



BSA ACADEMY

APRIL 7-11, 2025

Sandestin Golf and Beach Resort • 9300 Emerald Coast Pkwy W • Miramar Beach • FL 32550

Registration April 7 at 8:30 a.m.
Adjourn April 11 at 12 p.m.

This week long school provides an up-to-date overview covering a wide range of top industry concerns to ensure your knowledge and understanding of BSA/AML Requirements. In the age of deregulation, BSA/AML is here to stay, with its ever-increasing compliance expectations. Our faculty is highly experienced and knowledgeable. You won't want to miss this opportunity to dive in deep and bring back helpful knowledge and resources for your bank. We will also have fun!

WHO SHOULD ATTEND?

The school is designed for BSA professionals with a working knowledge of all aspects of the BSA compliance management including BSA, AML, compliance, risk management, auditors, and fraud. Individuals with accountability for BSA compliance will also benefit from this program, such as: retail management, risk management, operations, and employee development.



EDUCATIONAL SESSIONS

BSA Updates

In this session we will recap recent FinCEN advisories, guidance, and hot topics. We will also cover recent enforcement actions to analyze what went wrong and where we can expect examiners to focus during the upcoming exam cycle. This will be a great opportunity to catch up on what you should be considering in your program and how AML/CFT continues to evolve.

Corporate Transparency Act Update

Three weeks prior to the mandatory compliance date for reporting entities to submit their beneficial ownership information to FinCEN, the U.S. District Court of Eastern Texas issued a ruling declaring the law unconstitutional and issued an injunction blocking the enforcement of the law. Meanwhile financial institutions have been waiting for revised customer due diligence rules. We'll discuss the implications of this ruling and the status of FinCEN's appeal while determining what this means for an AML program.

Quantifying AML/CFT Priorities Risk

FinCEN's proposed rulemaking for incorporating AML/CFT priorities into the AML risk assessment leaves many bankers questioning how to comply with the requirements. Obtaining quantitative data for the number of customers or volume of transactions is relatively straightforward, but quantifying a type of financial crime is not so easy. In this session we will consider FinCEN advisories and guidance that relates to the AML/CFT priorities and how to leverage data already collected to better quantify risk to satisfy the new FinCEN requirements.

AML Risk Assessment methodology

Once we quantify the AML/CFT priorities, we're still faced with the task of integrating new risk factors into our existing risk assessment methodology. We will consider various methods for how this might look, and how the math works for incorporating new risk factors including the AML/CFT priorities, distribution channels, and intermediaries. In addition, we will consider internal controls that mitigate the risks associated with the priorities.

Suspicious Activity Referrals

One of the challenges many AML professionals face is the difficulty in obtaining suspicious activity referrals from business lines. Monitoring reports and software are great methods for identifying suspicious activity, but no one knows your customers better than the front-line staff who works with them on a regular basis. Since the AML officer can't be everywhere, quality referrals are a critical component to a strong AML program and organizational compliance culture. In this session we will discuss strategies for encouraging referrals and how to communicate with staff in a constructive way to solicit and encourage referrals.

Third Party Risk Management for AML Risk Management

The regulators issued joint interagency guidance for third party risk management. While it may seem that this primarily focuses on vendor management, recent consent orders and enforcement actions have shown that AML exams are focusing on third parties that partner with the bank to provide products and services. The AML officer should be involved in the third party risk management process to ensure that we consider the AML risks associated with the products, services, and customers involved in banking as a service products regardless of whether we provide a settlement account to the BaaS or their customers

are also bank customers and there will be examiner scrutiny on how the AML risks are managed.

Elder Financial Abuse

Elder Financial Abuse continues to be on the rise. It can be challenging to protect our most vulnerable customers from fraud or exploitation. Concerns about the customer's privacy and the limits of what we can and can't say to family members or law enforcement can be challenging. FinCEN has published several advisories on this topic to help us with identifying red flags, and the steps to take to satisfy AML requirements and also help customers.

Breaking down the TD Bank Penalty

A total of \$3 billion is a large enough to get anybody's attention. There were significant breakdowns in the compliance culture of this organization that resulted in millions of dollars in drug money being laundered through the institution. What are the lessons that can be learned from these failures? How do we keep this from happening at our own institutions? We will review the civil and criminal complaints involved in the TD Bank case and evaluate the internal control issues and culture issues that plagued the organization.

OFAC Sanctions Program: The Hidden Risks

Most financial institutions have written OFAC Programs and feel confident that they are adequately protected from non-compliance penalties. However, we've seen several private companies, and some financial institutions receive OFAC penalties in the last year. Many of these entities had processes for scanning transactions. So, what went wrong? We'll evaluate these penalties and what key risks were overlooked in their program and how gaps in monitoring led to OFAC violations.

Breakout Sessions: Suspicious Activity Monitoring

One of the benefits of an in-person conference is the opportunity to network. In this interactive session, we will divide into groups based on the monitoring software we use (or manual reports for those institutions who do not have manual software) so that we can discuss software and model risk management processes and learn about the various challenges each software presents. As someone who has validated the majority of the software available, the facilitator will visit each group to provide feedback and help spur the conversation.

To the Moon with BitCoin

The price of virtual currency skyrocketed following the presidential election results and providers and traders anticipate relaxation of regulations of the virtual currency industry proposed by FinCEN and the Securities and Exchange Commission. However, this also makes virtual currency more attractive for money laundering and terrorist financing. This session will provide an update on the status of regulations and the potential impact this could have on our responsibilities and how it could influence customer behavior.

AI: The Good, the Bad, and the Ugly

AI is here to stay. The question is how will it be used as improvements to its capabilities continue. It can assist an AML professional in increasing efficiency as a strong tool can assist monitoring and research, but AI could also be a source of suspicious activity if nefarious actors attempt to use it to circumvent security processes. In this session we will consider the uses of AI, policies and procedures to consider whether or not we choose to use AI, and the latest in technological advances.

The Integration between BSA and Fraud

For some institutions, BSA and fraud may work hand in hand, and even be

EDUCATIONAL SESSIONS

managed by the same person, but in more complex institutions these could be separate departments. Even in small banks, it's possible that fraud could occur separately from the BSA function. Like any financial crime, identifying fraud, whether the institution or its customer is the target, requires a SAR filing if thresholds are met. Based on fraud trends FinCEN identifies in its recent advisories, we'll consider some of the common red flags that could be indicative of reportable fraud, and the best way to make sure the AML officer isn't the last person to know that fraud occurred.

Pillars of the BSA Compliance Program, plus Updates

BSA requirements are essentially divided into two distinct sets: the "day-to-day" rules of completing CTRs, SARs, and so forth, but don't overlook the overall program requirement. If you read enforcement actions, there is almost always a criticism of the bank's BSA program, the thinking being if you had a handle on things, you wouldn't need the regulator (or DOJ) to enact enforcement. We'll ensure your program is up to date with all the necessary requirements ("pillars") to ensure your rules of the road are set.

BSA Risk Assessment – Foundation to Understanding What You Have to Do

Your risk assessment directs your bank to know where to devote its precious and scarce resources, including personnel, software, and, frankly, time. This is a foundational requirement of BSA compliance, and if your risk assessment is incomplete or inadequate, everything else will be suspect in the eyes of the examiner. We'll talk in-depth about the process and content, including annual reviews, to ensure your resources are properly allocated.

CTR Reporting – Where are the Traps?

This is the part of BSA most people think about when you mention "Bank Secrecy Act." It should be straightforward, right? If that is the case, why are there so many violations and issues with it? Part of the answer is the complexity of the rules, and another part of it is the proper staff not understanding what the requirements are. It can't all be automated, unfortunately, so we'll discuss some of those gray areas to ensure you report when you should, and not when you don't have to.

Customer Identification Program (CIP) – Validating Identity in a Digital Age

Your bank's CIP program is the basis for establishing the profile of your customer, so you can determine whether and when to file a SAR. But in an age when you may never see your customer, how can you be sure you're dealing with who someone claims to be? We'll review the requirements of this part of the BSA, and discuss the risks, and solutions, of proper customer identification.

Beneficial Ownership – What Are Our Responsibilities?

There has been so much uncertainty around what specifically banks have to do when it comes to the BOI rules, really since 2018 when they first came out. How will they intersect with due diligence? How far do we have to go? Will things change when the courts finally figure out the CTA? We'll answer these questions and more to ensure you're up to speed on your bank's responsibilities.

Due Diligence – CDD and EDD Tips and Tricks

After you've properly identified your customer, how do you "profile" them? That sounds like a dirty word, but in the end, you must establish baseline to evaluate whether or not a customer's activities go outside the lines and may be worthy of a SAR. Further, how do we determine what customers are high risk, and then assign proper enhanced due diligence against them? We'll go through these issues and provide many ideas on how to fulfill this important requirement.

Special Relationships – MSBs and Others

There are many aspects of various customer relationships that mean "special treatment." Money services businesses are just one, but there are others. How about gambling outfits? Other cash-intensive businesses? We'll call out these special cases and discuss how to best deal with them

SAR Issues – Particular Issues to Look For

What are some of the chief indicators of "suspicious activity?" When do we know when to file a SAR, or when not to? What types of documentation do we need to retain, and for how long? Who might want access to that information later? And what can we share with who? We'll address these issues and more when talking about your bank's suspicious activity process.

The "Other" BSA Reporting Requirements

There are many other corners of BSA that we must comply with, including rules around monetary instrument record, record of loans, the funds transfer rule, and others. Many times, these seemingly minor parts of BSA are the parts that trip banks up. Treat this as a review of all these other requirements of the rule to make sure you're not missing anything in your program.

Information Sharing – when and what should we do?

There are many aspects of sharing information with other parties, whether it be your regulator or even other banks. We'll go over the requirements of USA Patriot Act Section 314 and also talk about the procedural aspects of these rules. Do you have to do it? If so, what do we have to do? There are some competing interests here we'll go over so you can make the proper decisions for your bank.

The State of Cannabis Banking and BSA

Where do we stand in 2025 on this longstanding issue? Of course, there's more to cannabis banking issues than just BSA, but how does it fit into the larger picture? We'll go over where we are as a nation on this ever evolving topic, and prepare your bank for the important decisions ahead when the time comes.

The Regulatory Approach to BSA Enforcement

What are the standards we are evaluated under? It's not all about the BSA/AML Exam Manual, although that's always a great place to start. Fortunately, over the years the agencies have issued guidance that explains what they look for during an exam, and what may be problematic. We'll make sure your bank is not the next one targeted for enforcement.

OFAC Essentials and Understanding

OFAC compliance is sometimes overlooked when it comes to financial crimes compliance. Understanding that OFAC is a zero-tolerance set of rules, which means that one slipup could be very expensive for your bank. This means a thorough understanding of the basics of OFAC compliance is essential. We'll review what it's all about and provide some great resources for ensuring your bank never gets itself into trouble here.

CONFERENCE INCLUDES:

- Case Studies
- Interactive Breakout Sessions
- Networking Opportunities
- Interactive Reg Panel

SPEAKERS



Brian Crow's passion for and skill in protecting bank assets from fraud and compliance losses have earned him the nickname "Security Evangelist." In addition to developing and guiding the strategic vision for TCA, Brian delivers focused educational support to clients and helps them manage TCA's suite of consulting, audit, and training services. He's a nationally recognized expert on BSA/AML and deposit compliance and is a regular speaker at the annual BSA/AML Top Gun Conference. As an education consultant for the Glia Group BOL Learning Connect program, Brian conducts webinars on topics like VISA/MasterCard chargebacks, debit card compliance, and fraud prevention. For this work, he was recognized as a Bankers Online Guru in 2011.



Carl Pry, CRCM, CRP Senior Advisor, Asurity Advisors is a seasoned executive with banking law, corporate finance, and regulatory compliance experience in Fortune 500 institutions, regional banks and industry consulting firms. Carl advises clients on commercial compliance, fair lending, corporate treasury and risk management. Over the last 30-plus years, Carl has held senior leadership positions including Managing Director at Trelia LLC, Senior Vice President and Compliance Manager for the Compliance and Control Division at KeyBank, Manager of Finance and Performance Management Service Line at Accenture, and Vice President of Regulatory Services at Kirchman Corporation. With strong knowledge and experience as a banking attorney and officer, Carl is a frequent contributor to and currently serves as Co-Chair of the Editorial Advisory Board for the ABA Bank Compliance magazine. As a featured speaker for numerous banking, compliance, and state bar associations, he has led training sessions across the country. Carl has served as an instructor at FDIC examiner school and back-up instructor for NCUA examiner school. He has authored training programs covering consumer and commercial compliance, audit, quality control, tax, privacy and risk management.

AGENDA

Times are listed in CST. Registration will begin at 8:30am Monday.

Meals include:

*5 breakfasts, 3 lunches,
and breaks*

MONDAY - 8:30 a.m. - 5 p.m.

TUESDAY - 8:30 a.m. - 4 p.m.

WEDNESDAY - 8:30 a.m. - 12 p.m.

THURSDAY - 8:30 a.m. - 4 p.m.

FRIDAY - 8:30 a.m. - 12 p.m.

In order to make necessary arrangements, we request that you please indicate **NO LATER** than **15 business days** from events if you require any special accommodations, such as handicap accessibility, or if you have special dietary needs, i.e. food allergies, dietary request, etc. If you have special request please email them

to Elizabeth Bailey at ebailey@alabama.bank.

ACCOMMODATIONS

Sandestin Golf and Beach Resort • 9300 Emerald Coast Pkwy W • Miramar Beach • FL 32550



There are several special room rates for you to select from!

Room rates range from \$145 - \$400.

To book your stay at Sandestin Golf and Beach Resort please visit <https://bit.ly/4gVzu6j>

Group code: 2509E2

If you wish to call to make your reservation please call 800-320-8115.

Room block expires March 21, 2025.

REGISTRATION for BSA Academy

Please return this form and appropriate fees to: ABA, 445 Dexter Ave., Suite 10025, AL 36104

EARLY BIRD MEMBER RATE*: \$1,695 - Register before 3/7/2025 and save \$200!

**To qualify for early bird rate all fees must be paid by 3/7/2025.*

REGULAR MEMBER RATE: \$1,895

NON-MEMBER RATE: \$2,975 (Prepayment is required for all non-members.)

All rates are for ONE attendee. Daily substitutions are not permitted.

Name _____ Bank _____

Title/Dept. _____ Email _____

Mailing Address _____ City, State & Zip _____

Direct Line _____ Cell _____

Additional Attendees: 1. _____

2. _____

PAYMENT METHOD: Total fees due: \$ _____ (Payment due prior to event.)

Check enclosed

Please send me an invoice

Please bill the following credit card: Visa MasterCard Discover Amex

Credit Card No. _____ Exp. date _____

To register, you may email this form to ebailey@alabama.bank. Or, you may mail this form and appropriate fees to:

ABA, 445 Dexter Avenue, STE 10025, Montgomery, AL 36104.

For more information, contact Elizabeth Bailey, vice president of professional development, at (251) 510-3593 or email ebailey@alabama.bank.

For information on important policies please visit our website at <https://www.alabama.bank/policies>.

Registration
gift
included!



ALABAMA BANKERS ASSOCIATION

445 Dexter Ave., Suite 10025

Montgomery, AL 36104



ABA

BSA ACADEMY

APRIL 7-11, 2025



Sandestin Golf and Beach Resort • 9300 Emerald Coast Pkwy W • Miramar Beach • FL 32550