AME RIGHTSOURCE

FIGHTING FINANCIAL CRIMES FOR OUR CLIENTS AND THE WORLD

WWW.AMLRIGHTSOURCE.COM

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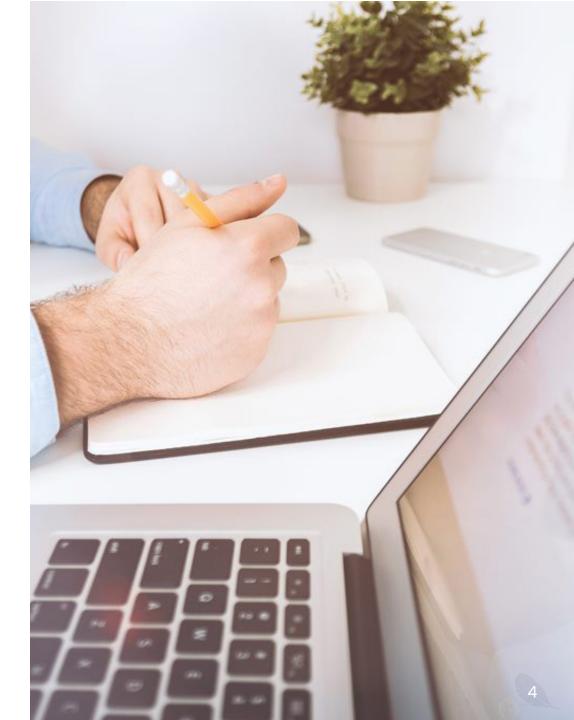
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OUR VALUE PROPOSITION

AML RightSource is the leading provider of AML, KYC and financial crimes co-sourcing solutions. AML RightSource was founded in 2004 with the following value proposition in mind.

- We will focus only on financial crimes;
- We will only use full time employees instead of contractors;
- We will use our own secured facilities and management teams to execute engagements;
- We seek to build long term partnerships with our clients through successfully managing client engagements; and
- We will be a flexible partner and held accountable for the outcomes we seek to produce.





WHO WE ARE TODAY

With a growing team of more than 2,000 professionals globally, AML RightSource provides highly trained AML/BSA/Fraud professionals and subject matter experts to assist financial institutions with day-to-day compliance tasks and regulatory matters. We provide access to the latest AML technology to automate and accelerate processes, reduce onboarding and investigation times, and eliminate excessive costs.

AML RightSource partners with a diverse client base comprised of global financial institutions, Cryptocurrency Exchanges, FinTechs, Payment Exchanges, and Money Service Businesses. Services include fraud investigations, transaction monitoring & reporting, OFAC/sanctions screening, enhanced due diligence/customer due diligence reviews, KYC reviews, Suspicious Activity Report (SAR) preparation and financial crimes advisory. AML RightSource typically provides services using our secure facilities in the North America, EMEA and APAC regions. AML RightSource's trained team can be on the job immediately, without disrupting your business and without reinventing your process.

OUR VISION - FIGHTING FINANCIAL CRIMES FOR OUR CLIENTS AND THE WORLD

THE LEADING AML MANAGED SERVICES, ADVISORY AND TECHNOLOGY FIRM

AML RightSource provides financial institutions with a fully integrated solution of highly-trained financial crimes professionals, advisory services and cutting-edge AML and KYC technology.

Our workforce of analysts and subject matter experts includes the industry's largest team of full-time professionals who can seamlessly

SERVICING

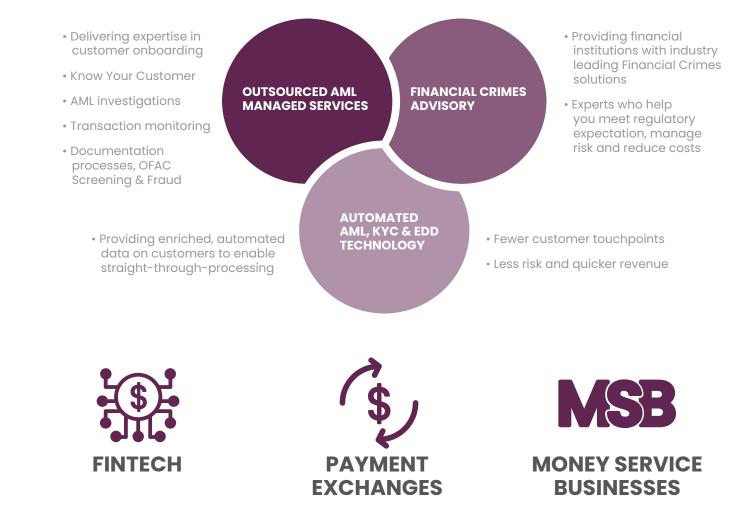
100+

GLOBAL CLIENTS

join your organization to mitigate financial crimes risk, regulatory scrutiny, and potential financial loss.

We provide access to the latest AML technology to automate and accelerate processes, reduce onboarding and investigation times, and eliminate excessive costs.

BANKS



AMLRS serves 100+ discrete clients that include global financial and non-bank financial institutions of all sizes, with a focus on US, Europe, and Asia based operations.

AML RIGHTSOURCE FULL SUITE OF OUTSOURCED MANAGED SERVICES

We provide you with a wide range of operational services irrespective of time and location.



TRANSACTION MONITORING

Provide Level 1 and Level 2 alert clearing & escalation to Level 3 or investigations – as a project or business as usual; adverse media screening; sanctions screening

KYC OPERATIONS & AFC

Look Back & remediation, staff augmentation; fraud investigations, alert/case backlogs; "Business as Usual" staff augmentation; Suspicious Activity Report ("SAR") preparation;, Currency Transaction Report ("CTR") filing & documentation; End-to-end KYC solutions; Regular Reviews, Event Driven Reviews



IT SERVICES & SOLUTIONS

Automated processes from strategy to Implementation; enriched, automated data on customers; straight-throughprocessing; adverse media screening





The Arachnys platform helps accelerate entity resolution; automate population of entity and risk profiles; UBO identification; modular platform integration; search process automation via RPA; structured audit reporting; entity profile enrichment and validation, and enhanced productivity in KYC operational and compliance file review processes



FINANCIAL CRIMES ADVISORY

Compliance program design and support; risk assessments; model validation; system optimization & tuning; system implementation vendor selection

WE SUPPORT YOU AROUND THE GLOBE

AML RightSource can ramp up resources across various jurisdictions to meet your needs.

35+ LANGUAGES

15+ OFFICES
 2000+ EMPLOYEES



NON-BANK FI CLIENTS

\$36 Billion Global NBFI
\$616 Billion Global NBFI
\$46 Billion Payment Processor
\$36 Billion Payment Processor
\$18 Billion NBFI
\$30 Billion NBFI
\$1 Billion NBFI

GLOBAL BANK CLIENTS

\$625 Billion Global Bank
\$1.6 Trillion Global Bank
\$1 Trillion Global Bank
\$42 Billion International Bank
\$10 Billion International Bank

ONLINE BANK CLIENTS

\$170 Billion Online Bank\$6 Billion Online Bank\$1 Billion Online Bank

UNITED STATES BASED BANK CLIENTS

\$125 Billion New England Bank
\$7 Billion New England Bank
\$495 Billion Mid-Atlantic Bank
\$375 Billion Mid-Atlantic Bank
\$160 Billion Midwestern Bank
\$115 Billion Midwestern Bank

\$170 Billion West Coast Bank
\$130 Billion West Coast Bank
\$125 Billion West Coast Bank
\$75 Billion West Coast Bank
\$30 Billion Texas Bank
\$15 Billion Northwestern Bank



TRANSACTION MONITORING SUPPORT FOR US REGIONAL BANK

SCOPE OF WORK

A large regional U.S. bank with holdings of \$220 billion and branches in North Carolina, South Carolina, Virginia, Maryland, West Virginia, Kentucky, Tennessee, Georgia, Florida, Alabama, California, Indiana, Texas, New Jersey, Ohio, Pennsylvania, and Washington, D.C. contracted with AMLRS in 2017 to engage a team of 10 analysts to assist with a population of 90 day reviews.

Based on AMLRS' ability to meet production and quality goals ahead of schedule, the bank asked AMLRS to expand the team beyond the initial scope of the engagement. AMLRS was engaged to assist with the reduction of a significant (10,000+) backlog of transaction monitoring alerts and fraud-related cases over a three-month period. During this time, AMLRS developed a team of about 75 analysts to adjudicate the alerts and cases, identify suspicious activity, and file SARs as necessary. The initial backlog project was completed on time and met all quality standards.

CLIENT REGIONAL BANK

DELIVERY & OUTCOME

Throughout the engagement, AMLRS has continued to assist in a BAU environment performing 90-day reviews, alerts, case investigations, SAR filings, and EDD reviews, but has also ramped the team upwards and downwards on multiple occasions to assist with fraud case backlogs, alert backlogs, and 90-day review projects. AMLRS has cross-trained core team members on multiple bank workflows so that resources can be shifted as quickly as business needs demand.

Most recently, the team ramped up to 220 FTE to assist with parallel processing while the bank transitioned to a new system. Half of the team adjudicated alerts, identified, and escalated potentially suspicious activity in an older system and half of the team worked in the new system. The team has continued to assist the bank with various workflows while it underwent a merger growing to \$495 billion in assets.

ONGOING ADVERSE MEDIA MONITORING

SCOPE OF WORK

A digital platform required assistance with completing a backlog of 12,000 fraud cases, as well as overall fraud operations support. Specifically, the client required 40 FTE to perform fraud investigation services in several languages including English, German, Polish, Spanish, Russian, Chinese, Turkish, Hindi, Danish and Bulgarian.

CLIENT ONLINE INVESTMENT PLATFORM

DELIVERY & OUTCOME

To complete the fraud backlog, resources were deployed across various locations in the US, Europe and Asia to provide coverage in various time zones. The team ramped up to 40 FTE in three waves over a six week time period, deploying a train-the-trainer model, in which the first training was conducted by the client and the following were led by the team with minimal client support.

The team was responsible for reviewing cases to determine if activity presented fraudulent risks and performing investigation as required. The team provided their findings and the appropriate documentation, including decisions back to the client.

The backlog was completed in advance of the deadline and the client found no deficiencies in the work performed. The client also found that the team was able to complete end to end processing 50% faster than its internal employees. The team was also able to stabilize new FTE within three weeks from onboarding, compared with 6 weeks for internal employees.

KYC OPERATIONS

CLIENT GLOBAL INVESTMENT FINANCIAL INSTITUTION

DELIVERY & OUTCOME

In the US, the team was contracted to assist with US new client adoptions including creating and developing customer onboarding files, as well as the quality control function for this business line. After demonstrating success on this workflow, the team also prepared and trained internal client analysts on this workflow. Over the last year, the team has flexed in size depending on the client's volumes.

At the start of US team's project, the client had an internal quality control pass rate of 38%. The client closed the project with an internal quality control pass rate of 77%.

AMLRS's US analysts – responsible for 60% of all US new client adoptions – had a quality control pass rate of 85%. AMLRS analysts had a quality control pass rate of 55% higher than their internal client counterparts and exceeded the client case per day mandate by over 5%. The customer onboarding file creation team averaged 95% or better on QC checks of completed files.

The EMEA team supported the client with an initial backlog of 11,000 KYC related cases. To complete this task, the team ramped up in three waves, with training conducted by internal training team members which lasted approximately three weeks. The team was able to complete the backlog of 11,000 cases in 8 months, which was in advance of the client's deadline. KPIs and reporting showed that the team processed cases on average 50% faster than the client's internal team. Furthermore, the team was able to stabilize new resources within 3 weeks from onboarding compared with 6 weeks for client's internal team.

Our EMEA and US teams continue to assist this client with various KYC workflows.

SCOPE OF WORK A large multinational investment

A large multinational investment bank required global KYC support with several projects. The client required approximately 250 FTE in various EMEA and US locations to perform work in English, German, Polish, Spanish, Italian, Russian, Chinese, Turkish, Danish and Bulgarian.

SANCTIONS SCREENING

SCOPE OF WORK

A global financial technology company required AMLRS's assistance to help develop workflow documents and procedures for sanctions screenings (including OFAC screening and other product sanctions screenings), as well as the adjudication of sanctions alerts.

CLIENT GLOBAL FINTECH

DELIVERY & OUTCOME

Working remotely, AMLRS currently staffs 7–10 analysts for sanctions alerts and conducts quality assurance oversight on an established percent of completed reviews. AMLRS is responsible for adjudicating all sanctions alerts within a 12-hour SLA from generation, including weekends and holidays. Sanctions alerts consist of OFAC sanctions screening and sanctioned country keyword investigations. On average, AMLRS adjudicates 30,000 sanctions alerts each month. AMLRS has also assisted with sanctions lookback assignments and sanctions rescreening projects while maintaining daily generated volumes.

For OFAC sanction screening, AMLRS analyzes each sanctions alert to determine if it is a true match or not. If enough mitigating factors are present to conclude that it is not a true match, AMLRS will clear the alert. If there are not enough mitigating factors, AMLRS will either outreach for updated identification information or escalate it to a separate team. If AMLRS ever believes the

alert is a true match to a sanctioned individual, AMLRS will not only escalate the alert, but also notify a designated team of individuals to take the appropriate steps.

For sanctioned countries keyword investigations, AMLRS analyzes each sanctions alert to determine if the triggering keyword match poses an elevated risk or nexus with a sanctioned country. Keywords include sanctioned geographic countries and regions, common products originating from sanctioned countries, as well as industries and attractions found in sanctioned countries. If no clear or potential nexus to a sanctioned country is found, AMLRS will clear the alert. If a potential nexus is found or the account details are unclear, AMLRS will either outreach for additional information or escalate to a separate team. If a confirmed sanctions nexus is identified, AMLRS will close the account and send communications to the account owner regarding the account closure.

MARKET DIFFERENTIATION & VALUE CREATION

MANAGED SERVICES TRAINING OVERVIEW

In-depth Internal Training Curriculum and Content



DEFINED FRAMEWORK

• AML AND KYC University provides the framework for our New Hire Onboarding and Continuing Education programs

Utilizes proprietary training materials as well as external sources

• Tailored curriculum by job level designed to keep professionals at the forefront of industry trends



THOUGHT LEADERSHIP

• John Byrne, AML RightSource EVP, Chairman of AMLRS Advisory Board, and ACAMS Advisory Board Member, oversees training content

• Maria Filipakis (former DFS), Tim White and Chuck Taylor develop content and participate in educating our training staff



FIRST-IN-CLASS TRAINERS

• Former practitioners with over 20 years of experience

CAMS certified

INDUSTRY INSIGHTS AND TRENDS

Direct channel to lawmakers



• Access to large data sets

• Host monthly podcast with industry experts on current events and relevant challenges in AML

Highly Effective Virtual Training Model



INITIAL PREPARATION

• Pre-process training including an initial assessment to understand each individual analysts knowledge and writing abilities.

Test IT setup including system access and training platform



COMPREHENSIVE PROCESS AND SYSTEMS TRAINING

- Intensive, virtually-lead classroom style training
- Daily tollgates / assessments covering key concepts



LIVE CASE WORK WITH 100% AND REAL TIME FEEDBACK

• Individual work with real time feedback

• Final assessment

Customized Client Training



INITIAL PREPARATION

• AMLRS works with clients to develop customized training sessions with topics specific to the engagement

• AMLRS Senior Advisors are available throughout this process

AUTOMATED AML TECHNOLOGY

AML RightSource acquired Arachnys and Passcon in 2021, further strengthening our service offerings available to our clients. The Navigator and GoKYC platforms provide enriched AML and KYC data, and software solutions to accelerate KYC onboarding and AML monitoring for financial institutions and other high-risk industries. Our plat-forms and suite of APIs support AML investigations, KYC and customer onboarding, EDD reviews, adverse media monitoring, Third-Party Due Diligence (3PDD), and other critical Anti-Financial Crime (AFC) processes.



GLOBAL AML DATA

Access 23,000+ sources spanning 220 jurisdictions, searchable in 98 languages, as well as 1 billion cached articles with 250,000+ new articles added each day.



INTELLIGENT AUTOMATION

Automate laborious tasks leveraging deep web search technology to extract data wherever it is buried and, remove 80% of the noise associated with manual searches.



I FULL AUDIT CONTROL

Validate findings through a consolidated, auto-generated report containing risk heat maps, summaries, a full evidence log, and crucial audit support details.



E2E KYC SOLUTION

GoKYC and our production control approach increases productivity threefold, reduces the cost of KYC case processing and is 100% compliant with existing regulatory requirements.

Client policies can be codified to drive AML investigation, augment investigators' capabilities at all levels, and capture every aspect of the investigation to support QA reviews, periodic reviews, audits, and previous investigations to be leveraged.

TRANSACTION MONITORING USE CASE

Clients apply their alert handling policies and workflow within Arachnys Navigator to increase productivity of Level 1, 2 and investigations alert clearings. Navigator utilizes a library of over 23,000 open sources to assist the analyst and investigator to disposition the alerts more effectively.



L1 ALERT TRIAGE

Captured and presents for decisioning open-source information to L1 Analysts e.g nature of business, adverse media, PEP/Sanctions

Workflows (source collection) can be configured in line with customers Policies/Alert type/customer segmentation etc.

BENEFITS:

• Increases the consistency of the L1 review process to ensure conformance with the policy guided investigation

• All aspects of the L1 is captured (investigation process, sources searched, results and the analyst dispositions (disposition categories and free form analyst comments)

• L1 triage assessment is captured and clearly referenceable to QA, L2, L3 and FIU Analysts through to supporting SAR filing



L2 REVIEW

L2 Workflow(s) will capture additional curated data sources to supplement a L2 assessment (e.g. corporate registry confirmation, stock exchange listing, regulatory status, adverse media searches for related parties - as per customer policies)

BENEFITS:

• Many of our customers have realized up to 40% reduction in working L2 alerts



L3 ESCALATION

All searches, findings, dispositioning work (L1 and L2) are captured

Enable 'freestyle' investigation, e.g. provide access to Google or Bing – capturing the results and enabling analyst dispositions to support decisioning and potential exiting or SAR filing.

BENEFITS:

• Navigator will provide the L3 analyst with a structured workflow as well as deep dive and capture every aspect of their structured and 'free style' investigation.

ACCESS TO OVER 23,000 CURATED RISK DATA SOURCESUSE CASE

 Corporate Reg 	istries	Social and Cit	tizen Media	 Watchlists 			• PEPs		
Corporate Date	a	• Directories		• Regulatory Bo	dies		• NGOs and ir	nt. organizations	
• News Media		Litigation		Official Sanctions Lists			Maritime and trade data		
	EMIUM DATA SC			-rde	nanii		Kualan		
	EMIUM DATA SO		Trans Union. TLOxp.	The Diligence Technology Company	panji	va	Kyckr	world compliance	

+ SEARCH ENGINE INTERACTION WITHIN WORKFLOWS & RESULT INTEGRATION

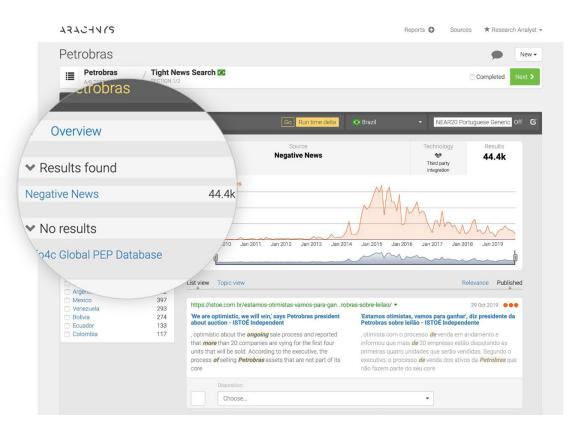
Google Bing

NAVIGATOR – DRIVING EFFICIENCIES FOR YOU

Arachnys Navigator is designed to make identifying relevant information for AML investigations far easier than conventional manual OSINT research, while still providing real-time access to a broad range of risk-relevant data which structured data vendors may lack.

BENEFITS:

- SEARCH A COMPREHENSIVE GLOBAL COLLECTION of over 23,000 sources in 98 languages, covering 220 jurisdictions, including over 16,000 news sources and 1 billion+ cached articles dating back over 10 years.
- ACCELERATE SCREENING PROCESSES with automated data collection from carefully curated sources. The configurable platform allows organizations to select the most relevant data sources for their use cases, reducing noise and increasing confidence in the reliability of results.
- **REDUCE TIME** spent validating results with innovative refinement options, including the application of the risk relevance algorithm to news searches, which works in conjunction with keywords lists to reduce the time needed to review results by calculating the relevance score of each article based on the frequency, density, and proximity of keywords in relation to the focal entity name
- **IDENTIFY AND CATEGORIZE RISKS** in a standardized way, leveraging configurable disposition options to assign risk types to each result.
- AUTOMATICALLY CAPTURE an audit trail of all actions and store evidence, further eliminating manual effort and increasing efficiency.
- EASILY SHARE INFORMATION across teams with a single working environment and intuitive escalation processes to reduce effort duplication.



GoKYC – FOUR SIMPLE MODULES TO MANAGE YOUR WHOLE KYC PROCESS



BOOK OF WORK

- Can be uploaded by the bank (excel export)
- Contains all KYC profiles which have to be produced incl. static data
- Automated quality checks for data consistency
- Easy prioritization of cases
- One-Click allocation of profiles to teams and analysts



KYC PRODUCTION

- Predefined End-to-End workflow involving all required parties
- Segregation of duties between 2-eyes and 4-eyes
- Defined Escalation process
- Overview of missing documents
- Clear work baskets and actions owner



MI REPORTING

- Real time reporting on Key risk indicators and production performance
- Transparency on backlogs
- Work in progress reportings to steer the pipeline
- Escalation reports for management attention
- Dashboard for production steering (esp. for teamleader)



KPI STEERING

- Production and capacity forecasting
- Analysis of turnaround times
- Actionable KPIs

ENGAGEMENT TEAMS & TALENT

MANAGED SERVICES ENGAGEMENT LEADERSHIP TEAM



FRANK H. EWING, ESQ. CHIEF EXECUTIVE OFFICER fewing@amlrightsource.com

Mr. Ewing serves as Chief Executive Officer of AML RightSource. He is a licensed attorney & an anti-money laundering expert with over 15 years of combined professional experience in global consulting, banking, & law. Mr. Ewing has extensive hands-on experience in the areas of anti-money laundering compliance, regulatory enforcement actions, regulatory affairs, internal audit, commercial litigation, corporate investigations, fraud, & risk management. Mr. Ewing earned his undergraduate degree at LeMoyne College in Syracuse, New York & his juris doctor at the University of Buffalo Law School.



CORINNA REIBCHEN GLOBAL HEAD OF EMEA/APAC corinna.reibchen@amlrightsource.com

Ms. Reibchen serves as Global Head of EMEA/APAC at AML RightSource. She has over 20 years of work experience in the financial service sector (Commerzbank, Sparkassengruppe) and in consulting (PwC, Capgemini Consulting). Her main areas are regulatory and compliance – in particular FATCA/CRS, BCBS 239, AML – as well as risk management, distribution, cost-saving programs, strategy development and project management. Ms. Reibchen has successfully managed national and international banking projects for many years and in recent years, she has been engaged in cross-functional IT projects. Various publications in banking magazines round off her profile.



JEFFREY HEHR, CPA SENIOR VICE PRESIDENT, CLIENT ACQUISITION & RETENTION ihehr@amlrightsource.com

Mr. Hehr is Senior Vice President, Acquisition & Retention for AML RightSource. Mr. Hehr has extensive experience in professional services managing and leading teams. Mr. Hehr has expertise in process optimization, internal control testing andengagement management. Mr. Hehr has previous experience as a member of the external audit practice team at Deloitte. Mr. Hehr earned his bachelor of accountancy from Eastern Michigan University, his masters of accounting from The Ohio State University, and is a Certified Public Accountant.



ARUN BANERJEE CHIEF REVENUE OFFICER Arun.banerjee@amlrightsource.com

Mr. Banerjee serves as Chief Revenue Officer for AML RightSource. Mr. Banerjee has worked in the AML compliance space for more than 15 years in various roles including COO, CRO, and CEO during his tenure at Goldman Sachs, Dow Jones Risk and Compliance, Kroll and Exiger. He has led the growth and acquisition strategies for several leading Governance, Risk, and Compliance businesses. Mr. Banerjee attained his bachelor's degree in History from Vassar College, and his Doctorate of Law from the Benjamin N. Cardozo School of Law, at Yeshiva University.

FINANCIAL CRIMES ADVISORY LEADERSHIP TEAM



CHUCK TAYLOR EXECUTIVE VP, HEAD OF FINANCIAL CRIMES ADVISORY

Mr. Taylor serves as Executive VP, Head of Financial Crimes Advisory at AML RightSource. He has amassed years of regulatory compliance experience with multiple financial institutions. Mr. Taylor is an expert in Bank Secrecy Act (BSA)/Anti-Money Laundering (AML) and Sanctions compliance. He regularly speaks at local and national conferences, is a founding member and former Co-Chair of the ACAMS SoCal Chapter, and serves as Board Chair of the West Coast Anti-Money Laundering Forum. Mr. Taylor obtained his bachelor's degree in communication from University of California, Santa Barbara, earned his juris doctorate at Santa Barbara College of Law and attended Pacific Coast Banking School. Mr. Taylor is a Certified Anti-Money Laundering Specialist (CAMS) and a Certified AML and Fraud Professional (CAFP). In 2014 Mr. Taylor was recognized as the ACAMS AML Professional of the Year.



VESNA MCCREERY MANAGING DIRECTOR, EMEA vesna.mccreery@amlrightsource.com

Ms. McCreery serves as Managing Director for AML RIghtSource. She has over 20 years of experience in designing and making financial crime and related operational controls in banks. She served as the group head of financial crime at several top banks such as Barclays and RBS. She was the Financial Crime Advisor to the Monitor of HSBC has considerable experience in working positively with C-Suite, Boards and regulatory and enforcement authorities. Her active participation in the regulatory technology space allows her to bring to her engagements cutting edge innovation.



MATT MICHAUD SENIOR VICE PRESIDENT, FINANCIAL CRIMES ADVISORY <u>matt.michaud@amlrightsource.com</u>

Mr. Michaud serves as Senior Vice President of Financial Crimes Advisory at AML RightSource. Mr. Michaud has extensive experience in BSA/AML and Sanctions risk management, including Suspicious Activity Monitoring, High Risk Customer Management, Screening, KYC, Fraud, and Regulatory Enforcement Actions. With a wide breadth of experience in analytics, technology, machine learning, and model and data management, Mr. Michaud helps institutions transform their Financial Crimes programs to be strategically risk-based, proactive in identifying and managing risks, trusted by examiners and auditors, and increasingly cost-effective. Mr. Michaud received his Bachelor's degree from Boston College, and his Masters of Business Administration from Duke University.



JON MCISAAC SENIOR DIRECTOR

Jonathan McIsaac specializes in developing, managing, implementing BSA/AML and OFAC risk assessments, model validations, system tuning and calibrations, data validations and transaction lookback reviews for financial institutions, the U.S. branches/agencies of foreign banks, and money services businesses. He manages extensive data and risk analysis, and provides project support in the areas of data management, extraction, normalization, database construction, risk rule generation and reporting. A Certified Anti-Money Laundering Specialist, Mr. McIsaac works closely with our clients and our team to develop analytics and data mining support. Mr. McIsaac has over 15 years of experience in project management, data analytics, risk analysis, requirement analysis, workflow design/ development, testing/quality assurance, and full life-cycle project management.

AML RIGHTSOURCE ADVISORY BOARD



JOHN BYRNE

Mr. Byrne serves as Executive Vice President, and Chairman of the AML RightSource Advisory Board. He is an internationally known regulatory and legislative attorney with wide-ranging experience in banking and financial crimes. Mr. Byrne has particular expertise in all aspects of regulatory management, anti-money laundering (AML) issues and has served in leadership positions at trade associations, financial services industry groups, and government working groups. Mr. Byrne earned his undergraduate degree at Marquette University and his juris doctor at George Mason University School of Law. He currently serves as a special advisor to the ACAMS Advisory board and on Marquette University's Commercial Banking Board.



MELISSA STRAIT

Ms. Strait is an expert in AML compliance in the fintech context, having served in senior roles at leading payments firms, Stripe, Inc., Square, Inc., and Coinbase all headquartered in San Francisco. Currently at Coinbase, Ms. Strait serves as the Chief Compliance Officer where she is responsible for Coinbase global compliance programs, including their know-your-customer (KYC) and anti-money-laundering (AML) initiatives, as well as managing work with law enforcement agencies around the world.

Prior to joining the fintech industry, Ms. Strait served as a director in the Due Diligence practice of Kroll, Inc. In that capacity, she managed teams producing indepth due diligence research reports for banking and corporate clients, focused mainly in Asia and the Americas.

Ms. Strait speaks frequently on topics related to fintech compliance. She is a co-chair of the West Coast AML Forum and a regular panelist at ACAMS events and other industry forums.



TERRY PESCE

Teresa Pesce is an industry leader and Subject Matter Expert in Financial Crimes regulatory enforcement and compliance. She has a demonstrated history of working in and with the financial services industry, including in government, industry, and consulting. She has led large teams and managed significant projects, and she has designed and implemented financial crimes compliance programs and organizational structures.

She has spearheaded engagements for financial institutions in addressing numerous financial crimes and sanctions issues, including assisting clients facing regulatory enforcement actions, both private and public. She has often been called upon to report directly to law enforcement agents and prosecutors, regulatory agencies and Boards of Directors.

Ms. Pesce was an Assistant United States Attorney in the Southern District of New York, serving as Chief of the Major Crimes Unit, and Deputy Chief of the Criminal Division. She was responsible for supervision and oversight of all money-laundering and tax prosecutions and worked closely with law enforcement and the financial regulatory agencies responsible for oversight of AML enforcement.

AML RIGHTSOURCE ADVISORY BOARD



RICK SMALL

Mr. Small possesses leading insights on the challenges, strategies, regulatory expectations and future focus areas for AML and financial crimes at a global level. Currently serving as Executive Vice President, Director Financial Crimes, at Truist Bank, Mr. Small oversees all of the bank's financial crimes compliance programs.

Previously, Mr. Small held positions as: Senior Advisor Anti-Money Laundering and Financial Crimes for Ernst & Young; Senior Vice President, Enterprise Wide Anti-Money Laundering, Anti-Corruption and International Regulatory Compliance for American Express; Global Anti-Money Laundering Leader for GE Money, a division of General Electric; and Managing Director, Global Anti-Money Laundering for Citigroup.

Mr. Small gained extensive knowledge and expertise with positions within the U.S. Government, first as a Federal Prosecutor with the United States Department of Justice in the Antitrust Division and then the Organized Crime Strike Force, followed by Senior Counsel for Law Enforcement at the United States Department of the Treasury. His most recent government position was on the staff of the Board of Governors of the Federal Reserve System as Deputy Associate Director in the Division of Banking Supervision and Regulation. Mr. Small is currently Chairman of the Advisory Board of ACAMS.



DON FORT

Mr. Fort is the former Chief of the Internal Revenue Service's Criminal Investigation (CI) Division and is now the Director of Investigations at Kostelanetz & Fink, LLP. In this role, he assists clients facing governmental investigations involving all manner of alleged financial and economic crimes, including tax controversies or suspected tax crimes, money laundering, and Bank Secrecy Act violations. Mr. Fort also is involved in conducting internal investigations and advising clients on compliance regimes.

Mr. Fort's time in law enforcement included overseeing investigations of some of the most significant financial crimes involving tax evasion, sanctions evasion, money laundering, bribery, international corruption, bank malfeasance, cyber and cryptocurrency crimes, and terrorist financing.

Mr. Fort began his IRS career in 1991 as a Special Agent in Baltimore, Maryland, and later served as Supervisory Special Agent in Orlando, Florida; Senior Analyst and Acting Director, Office of Special Investigative Techniques; Assistant Special Agent in Charge of the Baltimore and Washington, D.C. Field Offices; Special Agent in Charge of the Philadelphia, Pennsylvania, Field Office; and Deputy Director of Strategy, IRS-CI Headquarters. Mr. Fort entered the Senior Executive Service in January 2011, when he was appointed to serve as a Director of Field Operations – the position he held until his appointment as Deputy Chief, IRS-CI. In 2020, Mr. Fort was the recipient of the ACAMS Public-Private Partnership Award.

AML RIGHTSOURCE ADVISORY BOARD



MARILÚ JIMÉNEZ

Marilú Jiménez is a compliance and legal professional with over 25 years of financial institution experience. With specific expertise in all aspects of regulatory oversight, AML, consumer and financial compliance, she currently serves as Founder and Principal of Financial Intelligence Network & Compliance Advisors (FINCAdvisors).

Ms. Jiménez is an active participant in the compliance industry, holding several board positions, is a frequent speaker both nationally and internationally, and has been part of the US Treasury Department's public-private sector dialogues with the Latin American AML financial community.

She has participated with the American Bankers Association (ABA) in various capacities, as co-chair and currently member of the Advisory Board on Financial Crimes and previously as Chairwoman of the ABA Compliance Administrative Committee. She is also a member of the Association of Certified Anti-Money Laundering Specialists (ACAMS) Advisory Board.

Additionally, Ms. Jimenez led the Puerto Rico Bankers Association Anti-Money Laundering Committee for more than 14 years and still spearheads the leading educational Financial Crimes Symposium in Puerto Rico.

Fully bilingual; Ms. Jiménez is a frequent public speaker both nationally and internationally. She has cooperated with the US Treasury Department in the public and private sector dialogues with the Latin American financial community and in 2017 was the recipient of the Professional of the Year Award by ACAMS.



NICOLAS CHOULES-BURBIDGE

Nicolas Choules-Burbidge, a financial expert in the fields of compliance, AML,CFT and sanctions currently provides consulting services to public and privatesector organizations in Canada and internationally. He was previously a senior executive at the Office of the Superintendent of Financial Institutions (OSFI) in Canada, where he started and boversaw the AML/CFT and Compliance Division (AMLC) for 15 years.

After retiring from OSFI in 2017, Mr. Choules-Burbidge was appointed by the International Monetary Fund and the Council of Europe as a financial assessor of the FATF mutual evaluations of China and Latvia, respectively. He currently serves as team lead advisor to the Office of Technical Assistance (OTA) in the US Department of the Treasury; Director of Shinhan Bank Canada; and is a consultant to the Monetary Authority of Brunei Darussalam.



WILLIAM (BILL) MAGGIO

William ("Bill") is an experienced, accomplished executive. Bill has spent his life building and growing companies, both organically and through strategic acquisitions. Over the past 10 years, Bill has acquired, operated and exited a number of life science-based companies, including Immco Diagnostics, Nova Century Scientific, Inc., Oma Pathology Labs, LLC, and Unilab, Inc.

Bill has also held senior level business development and operational positions at Boehringer Mannheim, Roche, and Bureau Veritas. Bill is committed to Western New York and is engaged in a number of social, charitable and community organizations, including as Vice Chairman of the Kaleida Health Board of Trustees, Chairman of 43North, Trustee at Buffalo Philharmonic Orchestra, Trustee at Burchfield Penney, Senior Advisor to Convergent Health Care Partners, Trustee at University at Buffalo Foundation, Advisor to Roswell Park GBCT, Trustee at the West Side Rowing Club, and CEO of the Jacobs Institute.

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