Index

Adverse scenario, 11
Agencies, 27–28
American Express Bank, 103–104
American House Committee on Appropriations, 101–102
Annual, 3
Annual stress tests, 28–30
Arms trading, 15–16
Automate, 17–18
Automation, 37–38
Bank Holding Companies (BHCs), 3, 27–28
Bank of China (BOC), 103–104
Bank of Credit and Commerce International (BCCI), 60–64
Bank Runs, 52–53
Bank Secrecy Act (BSA) of 1970, 65–66, 100, 125–126
code of ethics, compliance practices, 140–141
compliance practices, 69–70
data source, compliance practices on, 138–139
governance practices, 68–69, 71–72, 130–131
internal control practices, 66–67, 131–135
internal practices on three line of defense, 136–137
reporting, compliance practices on, 139–140
risk and control assessment, compliance practices on, 135–136
Bank Secrecy Act/Anti-Money Laundering (BSA/AML), 3–4, 15–16
Bankers, 9–10, 16–17
Banking sector, 3
Basel Committee, 101
Basel Committee on Banking Supervision (BCBS), 19, 21, 125–126
Basel II, 28–30
Basel III, 75–76, 89
Beneficial Ownership Registry, 38–39
Beneficiary, 38
Bitcoins, 101–102
Blacklisted, 99
Blockchain, 45–46, 101–102
Board of Directors, 114, 133, 141
Board Oversight, 10–11
British Banking Association (BBA), 72–73
Broker dealer, 15–16
Call reports, 3–4
Capital, 3
Capital adequacy, 11
Capital Assistance Program (CAP), 51–52
Capital Conservation Buffer, 28–30
Capital inadequacy, 3
Capital projection, 51–52
Capital regulation, 11
Capital requirements, 75–76, 113
clear definition of data sources, compliance practices on, 116–117
Collateralized debt obligations (CDOs), 8–9, 40
Combating the financing of terrorism (CFT), 64, 102–103, 126
Commercial banks, 3, 15–16
Commercial real estate (CRE), 8–9
Commodity Futures Trading Commission (CFTC), 28
Common Equity Tier 1 (CET1), 75–76
Community Reinvestment Act (CRA) of 1977, 3–4, 24–25
Compliance, 11–12
Compliance costs, 27–28
Compliance program, 8
Compliance requirements, 27–28
forward looking science, compliance practices on, 31
long-term strategies, compliance practices on, 32
periodic assessment, compliance practices, 34
tests, compliance practices, 33
Compliance risks, 51–52
Compliance weakness, 51–52
compliance practices on test measurements, 56–57
governance practices, 55–56, 59–63
internal control practices, 54, 58–59
Comprehensive Capital Analysis and Review (CCAR), 28–30
Computer-based systems, 37–38
Concentration limits, 28–30
Congress, 28
Consensus, 11–12
Corporate Transparency Act (CTA), 15–16, 38–39
Correspondent Banking Services, 3–4
Cost–benefit analysis (CBA), 30–35
Countering terrorist funding (CFT), 19–21
Counterterrorism (CT), 104–105
Credit card (CC), 129
Credit exposure report, 28–30
Credit Lyonnais, 103–104
Crime, 5
Criminal fines, 38
Criminal liability, 38–39
Criminals, 19–21
Critical thinking, 67–72
Cross-border, 15–16
Cryptocurrency, 72–73
Cuban Assets Control Regulations (CACR), 109–111
Currency transaction reporting (CTR), 15–16, 65–66
Customer, 4–5
Customer Due Diligence (CDD), 16–17, 38, 53, 60, 100, 103–104, 142
Customer Identification Program (CIP), 38–39, 100
Customer risk, 7–8
Cyber criminals, 45
Cybercrimes, 39–40

Data, 15–16
De-risking, 5
Debt, 3
Delivery channels, 7–8
Democratic Republic of the Congo (DRC), 110–111
Department of justice (DOJ), 6–7, 38
Detection risk, 17–18
Dodd-Frank Act of 2010, 8–9
Dodd–Frank Asset Stress Tests (DFAST), 28–30
Dodd–Frank Bill 2010, 30
Dodd–Frank Wall Street Reform and Consumer Protection Act (DFA), 11, 75–76
Drug trade, 15–16
Drug trafficking, 99–100
Due diligence, 100

e-commerce, 37–38
e-Delphi study, 113
Effective risk culture, 114
Electronic Funds Transfer (EFT), 60–64
Enterprise-wide risk assessment (EWRA), 37–38, 99, 113–114, 126
methodology, 99
program, 37–38

False positives, 17–18
Fannie Mae, 9–10
Federal Deposit Insurance Corporation (FDIC), 3, 15–16, 27–28
Federal Reserve Banks, 15–16
CRA, 9–10
stress test, 52–53
Financial crisis, 9–10
Financial institutions (FIs), 3–4, 64
Financial Intelligence Unit (FIU), 60–64
Financial market, 51–52
Financial sector, 28
Financial Service Authority (FSA), 6–7
Financial stability, 11
Financial stress, 28–30
Fined, 5
FINRA, 15–16
First line of defense, 17–18
Flood Disaster Protection Act of 1973, 24–25
Foreign Account Holders, 38–39
Foreign correspondent, 6–7
Foreign Funds Control (FFC), 107
Fraud, 3
Fraudulent, 3
Freddie Mac, 9–10
Funding, 3
Funds, 4–5
Gate keepers, 7–8
General Assembly, 4–5
Geographic risk, 7–8
Global banks, 3, 15–16, 37–38, 113
compliance data source practices, 18–19
compliance policy practices, 22–23
compliance reporting practices, 20–21
compliance risk identification practices, 23–24
periodic assessment, compliance practices on, 43–44
responsibilities, compliance practices on, 42–43
risk identification, compliance practices on, 41–42
Government, 3–4
Guidelines, 6–7
High-quality liquid asset (HQLA), 28–30
Home Mortgage Disclosure Act (HMDA) of 1975, 8–9, 24–25
Hong Kong and Shanghai Banking Corporation (HSBC), 6–7, 16–17, 37–38, 53, 60
Human error, 5
Human resources (HR), 89
Human trafficking, 3
Humanitarian, 64
Identification, 37–38
Idiosyncratic, 3
Illegal drugs, 4–5
Illegal transaction, 45
Inadequacy, 3
Increased, 3
Information Management and Information Security, 15–16
ING Bank, 60, 64, 102–103
Insolvency, 28
International Holding Companies (IHCs), 3
International Monetary Fund (IMF), 101
Know Your Customer (KYC), 7–8, 15–16, 38, 65–66, 100
Know your data (KYD), 15–16
Laundering, 4–5
Laws, 3
Lebanese Canadian Bank, 103–104
Lending, 3
Leverage ratio, 28–30
Limited Liability Corporation (LLC), 102
Lines of defenses, 126
Liquidity Coverage Ratio (LCR), 28–30
Losses, 3
Low-risk weights, 9–10
Maduro Regime revenue streams, 108
Managerial slack, 8–9
Manual, 17–18
Margin, 28–30
Mergers, 10
Methodology, 40
Micro laundering, 45
Micro-payments, 45
Minimum capital ratios, 11
Mitigate, 4–5
Mitigating, 19–21
Mobile, 45
Monetary, 39–40
Money launderers, 45
Money laundering, 3–5, 15–16
Money Laundering Regulations (MLR) in 2017, 38
Money mules, 102–103
Money services, 4–5
Monitoring, 5
Monthly, 3
Mortgage, 3
Mortgage-backed securities (MBSs), 8–9, 40
Multiagency, 28
Multinationals, 28–30
Narcotic, 99
Narcotic traffickers, 6–7
NASD, 15–16
Nat West, 103–104
National Crime Agency (NCA), 16–17
National Criminal Intelligence Service (NCIS), 7–8
National Futures Association (NFA), 28
Net banking services, 45
Net Stable Funding Ratio (NSFR), 28–30
Non-Conviction Based Asset Forfeiture (NCB Asset Forfeiture), 8
Nonprofit organizations (NPOs), 64, 102, 110
Obligation, 3
Office of Foreign Assets Control (OFAC), 64, 99, 107, 110
Office of Thrift Supervision (OTS), 3, 27–28
Offloading, 64
Offshore trust account, 7–8
Omnibus accounts, 7–8
Onboarding, 5
Online payments, 45
Palermo and Anti-Terrorist Financing Conventions, 99
Penalties, 3–4
Petróleos de Venezuela, S. A. (PdVSA), 109
Politically exposed persons (PEPs), 38
Portfolio, 5
Power of Attorney (POA), 7–8
Predatory lending, 8–9
Preventative, 5
Proceeds of Crime Act 2002 (POCA 2002), 16
Product risk, 7–8
Programming logic, 17–18
Public sector banks (PSB), 39–40
Qualitative e-Delphi study, 11–12
Quantitative models, 27–28
Quarterly, 28–30
Recession, 3
Redlining, 3
RegTech, 127–129
Regulator, 3
Regulatory, 3
Regulatory arbitrage, 30–35
Regulatory capital, 9–10
Regulatory compliance laws, 3
Regulatory impact assessment (RIA), 30–35
Reputation risks, 5
Residential, 3
Resolution plan, 28–30
Respectable risk culture, 114
Risk, 3
Risk assessment, 7–8
Risk committee, 28–30
Risk rating, 37–38
Risk weighting system, 40
Risk-Based Approach (RBA), 7–8, 126–127
Risk-based capital (RBC), 9–10, 40, 75–76
Risk-weighted assets (RWAs), 75–76
Sanctions, 99
Sarbanes-Oxley Act 2002 (SOX), 24–25
Scorings, 126–127
Second line of defense, 126
Securities and Exchange Commission (SEC), 30
Securities Dealers, 4–5
Senior management, 114
September 11 attack, 100
Shadow banks, 30–35
Shell, 38–39