

OVERVIEW

Evaluate the adequacy of the residential mortgage lender and originator to manage FinCEN's anti-money laundering program and its ability to file Suspicious Activity Reports (SARs).

Review management's commitment to implement effective monitoring and reporting systems.

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LENDERS COMPLIANCE GROUP is the first and only full-service mortgage risk management firm in the United States.



Lenders Compliance Group

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Anti-Money Laundering

AML Program for Nonbanks and Bank Mortgage Divisions

SCOPE OF ENGAGEMENT - PROGRAM

Lenders Compliance Group, Inc. provides a comprehensive Policy and Procedures for Anti-Money Laundering Program, consisting of:

1. RISK ASSESSMENT
2. THE MONEY LAUNDERING PROCESS
3. POTENTIAL INDICATORS OF MONEY LAUNDERING
4. OVERSIGHT COMMITTEE
5. TRAINING
6. AUDIT PROCEDURES/INDEPENDENT TESTING
7. ANTI-MONEY LAUNDERING DETECTION AND PREVENTION PROCEDURES
 - Monitoring for Suspicious Activity
 - Suspicious Activity Reporting
 - Supporting Documentation for the SAR
 - Bank Secrecy Act Officer
 - Access to SAR Records
 - Maintaining Accounts after a SAR Has Been Filed
 - Confidentiality
 - Regulators and Government Sponsored Entities

APPENDICES

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- APPENDIX J: PROHIBITION OF SAR DISCLOSURE
- APPENDIX K: SAR DECISION MAKING
- APPENDIX L: IDENTIFYING THE UNDERLYING CRIME
- APPENDIX M: SAFE HARBOR FROM LIABILITY
- APPENDIX N: IDENTIFY, RESEARCH, REPORT
- APPENDIX O: MANAGING ALERTS
- APPENDIX P: COMMON FILING ERRORS
- APPENDIX Q: SAR NARRATIVE
- APPENDIX R: ORGANIZING THE SAR NARRATIVE
- APPENDIX S: CUSTOMER DUE DILIGENCE
- APPENDIX T: TIMING OF A SAR FILING
- APPENDIX U: RESPONDING TO LAW ENFORCEMENT REQUESTS
- APPENDIX V: SAR AUDIT – SCOPE AND TESTING

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