



## GLOBAL INVESTIGATIONS & COMPLIANCE

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### ELLEN ZIMILES

Managing Director and Head of Global Investigations & Compliance  
+1.646.227.4612  
ellen.zimiles@navigant.com

### SALVATORE LASCALA

Managing Director  
+1.212.554.2611  
salvatore.lascala@navigant.com

### ALMA ANGOTTI

Managing Director  
+1.202.481.8398  
alma.angotti@navigant.com

[navigant.com/gic](http://navigant.com/gic)

### About Navigant

Navigant, Inc. (NYSE: NCI) is a specialized, global professional services firm that helps clients take control of their future.

Navigant's professionals apply deep industry knowledge, substantive technical expertise, and an enterprising approach to help clients build, manage and/or protect their business interests. With a focus on markets and clients facing transformational change and significant regulatory or legal pressures, the Firm primarily serves clients in the healthcare, energy and financial services industries. Across a range of advisory, consulting, outsourcing, and technology/analytics services, Navigant's practitioners bring sharp insight that pinpoints opportunities and delivers powerful results. More information about Navigant can be found at [navigant.com](http://navigant.com).

## ANTI-MONEY LAUNDERING & SANCTIONS SERVICES

### COMPLIANCE, REMEDIATION, TECHNOLOGY AND INVESTIGATIVE SOLUTIONS

Heightened threats from global terrorist organizations and a surge of regulatory activity are resulting in record fines and increased scrutiny of organizational and personal accountability. These events have put financial institutions under more pressure than ever to prevent and detect money laundering and maintain robust sanctions compliance programs. As a result, many financial institutions are re-evaluating their anti-money laundering and global sanctions compliance programs and related technology.

Anti-money laundering ("AML") professionals in Navigant's Global Investigations & Compliance practice are Bank Secrecy Act ("BSA") and USA PATRIOT Act specialists who regularly assist financial institutions with enhancing their compliance programs and compliance related technology and helping them through regulatory actions. Our proactive and reactive offerings and monitorship services are highly regarded.

### HOW NAVIGANT CAN HELP

As an independent consulting firm, Navigant provides its clients with the objectivity and independence they require. Navigant has established a stellar reputation as a leader in the U.S. and global markets in developing, enhancing, implementing and assessing compliance and risk management programs for financial institutions.

Navigant's team is comprised of former regulators, compliance officers, bankers, prosecutors, law enforcement officials, software developers and IT specialists. Our years of experience, situational awareness and practical knowledge enable us to deliver sustainable AML and sanctions compliance solutions to the financial services industry worldwide.

We service a diverse client base including banks, broker dealers, investment advisors, hedge funds, casinos and money services businesses from all over the world. Our skills and experience, as well as our proprietary technologies, have been successfully applied to assist some of the largest financial institutions in the world, including Fortune 1000 and Global 500 companies as well as smaller niche financial services industry players.

## SERVICES

Our services range from pre-emptively or proactively assessing current programs and systems for compliance with legal and regulatory requirements to responding to large and small regulatory actions requiring the remediation of entire programs or specific program elements.

### PROGRAM REVIEWS

Development and Implementation of Action Plans Responsive to Regulatory Actions

Compliance Program and Policy and Procedure Reviews

Enterprise-wide AML/Sanctions Regulatory Compliance Gap Analyses

Enterprise-wide AML/Sanctions Risk Assessments

Financial Services Monitorships

Know Your Customer (“KYC”), Customer Identification Program (“CIP”), Enhanced Due Diligence (“EDD”)

Assessment of Financial Intelligence Unit (“FIU”) and Investigative Protocols

Conducting Corporate Governance Reviews

Independent Testing of AML Programs

### TRANSACTION REVIEWS

Historical Transaction Monitoring Look-backs

AML Transaction Monitoring Back-log Resolution

Transaction Monitoring Alert Reviews and Suspicious Activity Report (SAR) Filing

### CUSTOMER REVIEWS

KYC and EDD File Remediations

Embedded KYC Analyst Teams to Clear On-boarding or EDD Backlogs

Politically Exposed Persons (“PEP”) Customer Reviews

Customer Risk Ranking

### INVESTIGATIVE AND OPERATIONAL SERVICES

FIU Staff Augmentation

AML/Sanctions Investigations

Asset Tracing and Flow of Funds Analyses

## TECHNOLOGICAL SERVICES

Assessing AML/Sanctions Technology, Governance & Controls

Transaction Monitoring Detection Scenario Assessment and/or Optimization

Transaction Monitoring System Validation

Transaction Monitoring Rules and Data Analysis

AML Transaction Monitoring, Case Management and Sanctions Interdiction Software Vendor Selection

Sanctions Interdiction Assessments and Optimization

## TRAINING

Boards of Directors

Compliance Team and FIUs

Business Lines and Internal Audit

## NAVIGANT AT WORK

### THE CHALLENGE: AML COMPLIANCE GAP ANALYSIS

#### the solution

An international financial institution under regulatory scrutiny required assistance in managing risks associated with high risk products, clients and geographies. Navigant professionals performed a thorough AML compliance gap analysis to assist the financial institution in meeting regulatory requirements and expectations. Navigant was also asked to assess the AML audit program and, as a result, provided significant revisions and improvements, including redefining the laws, regulations, and applicable guidance and enhancing compliance controls and testing procedures. **The new AML compliance program and enhanced audit plan enabled the financial institution to self-identify and correct new AML issues in regulatory hot-button areas such as sanctions and trade finance.**

### THE CHALLENGE: TRANSACTION MONITORING LOOK-BACK

#### the solution

Navigant conducted a transaction look-back for a financial institution that encompassed billions of transactions occurring over a two year period. We collaborated with the financial institution and its regulators to identify, develop, and apply money laundering and risk assessments and develop investigative cases. These transactions were grouped into Navigant's

proprietary case management system, which provided a virtual and real time workspace for the look-back analysts and our client. Navigant also developed customized investigative protocols to expedite case review and quality assurance and prepared findings for cases requiring SARs filings. Navigant's team was able to resolve a two year look-back within six months with minimal disruption to business-as-usual compliance processes, related case dispositions and SAR filings. **Navigant's new processes and protocols were implemented in-house and utilized to enhance the AML transaction monitoring and case management systems.**

### THE CHALLENGE: KYC REVIEWS

#### the solution

A major U.S. Asset Manager engaged Navigant to provide assistance in performing a review of client and account KYC records. A team of AML professionals was deployed in the U.S. and five European countries to review and enhance the KYC files. Navigant established a project office across multiple time zones to monitor workflow across the teams, track file allocations, findings, remediation cases, and report by client, client type, relationship manager and risk level. The project office escalated process improvement suggestions and disseminated updates and efficiencies across all locations. Navigant enhanced the client procedures for verifying risk ratings, screening personnel and operationalizing the file review and assigning cases based on specialized skills or abilities identified within the analyst team. **Navigant's review sparked increased awareness of AML requirements, caused the adoption of more robust, efficient and consistent review processes and expedited the completion of this massive review.**

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## THE CHALLENGE: AML COMPLIANCE TECHNOLOGY MODEL VALIDATION

### the solution

A financial institution seeking to validate its AML and OFAC compliance technologies engaged Navigant to assess its systems. Navigant's team of AML and technology specialists reviewed the data sources and tracked the data through its extraction, transformation and loading to the AML and OFAC compliance systems. This work identified areas where data was missing or had been otherwise corrupted. Navigant also replicated AML transaction monitoring detection scenarios and OFAC filtering and reported on both over and under alerting caused by detection scenario logic issues and data issues. Other dependent systems and compliance processes, such as case management and reporting, respectively, were tested and validated as part of the analysis. **Navigant's work resulted in several material enhancements to data quality, detection scenario functionality and OFAC filtering logic and permitted the financial institution to proactively enhance its model and document the new model with far more transparency.**

## THE CHALLENGE: ASSESSING FINANCIAL ECONOMIC CRIME COMPLIANCE PROGRAM

### the solution

A top global financial institution engaged Navigant professionals to assess its global compliance program infrastructure and staffing and to test its effectiveness in multiple countries. In addition to reviewing policies, we tested investigative processes, transactions, client files, interdiction software and transaction monitoring systems. Our multi-jurisdiction, multi-business line review also focused on identifying accounts, transactions and products representing significant reputational, legal and regulatory risk for the involved entities. We also assessed and tested Internal Audit's AML program to ensure that it was appropriately risk-focused and addressed significant issues through resolution. **Our recommendations resulted in a more robust, risk responsive and sustainable AML and sanctions program for the client.**



## ABOUT NAVIGANT'S GLOBAL INVESTIGATIONS & COMPLIANCE PRACTICE

Navigant's Global Investigations & Compliance practice brings critical expertise and resources to clients to assist them with identifying, assessing and managing the compliance and business risks related to financial economic crimes, money laundering, sanctions, bribery and corruption matters, investigative due diligence, FATCA, monitoring and investigations related to fraud, waste and abuse.