

EXCHANGE ANALYTICS INC.

2021 Anti-Money Laundering Awareness Training Course Outline

- I.** What is Money Laundering?
- II.** AML Regulatory Background
- III.** AML Regulatory Landmarks
 - a. Bank Secrecy Act (1970)
 - b. Money Laundering Control Act (1986)
 - c. FinCEN (1990)
 - d. USA PATRIOT Act (2001)
- IV.** OFAC Sanction Compliance
- V.** Digital Assets
- VI.** Elements of an AML Compliance Program
 - a. Written Policies
 - i. Policy Statement
 - ii. Implementation of a Customer Identification Program
 - iii. Suspicious Activities Procedures
 - iv. Due Diligence and Monitoring
 - v. Know Your Customer
 - b. Annual Training
 - c. Designation of a Compliance Officer
 - d. Independent Testing of the AML Compliance Program
 - e. Customer Due Diligence
- VII.** Stages of Money Laundering
 - a. Placement
 - b. Layering
 - c. Integration
- VIII.** Recognizing Money Laundering - Red Flags
 - a. Nonsensical Trades or Transfers
 - b. Frequent Wire Transfers
 - c. Unusual or Excessive Questions
 - d. Unwillingness to Disclose Information
 - e. Change in Trading Activity
 - f. Foreign Origin of Money
 - g. Unusual Account Funding
 - h. Unusual Transaction Type
 - i. Cash-Intensive Business
 - j. Disregard for Costs and Risk
 - k. Acting as an Agent
 - l. Lack of Knowledge
- IX.** Suspicious Activity
 - a. Cyber-enabled activity
 - b. Cryptocurrency
 - c. Email Account Compromise
 - d. FBI Financial Fraud Kill Chain
 - e. Reporting Suspicious Activity
 - f. Individual Liability
 - g. Financial Fraud Kill Chain
 - h. Willful Blindness

- X. Individual Liability
- XI. Recent Noteworthy Money Laundering Cases
- XII. Case Study: Know Your Customer
- XIII. Quiz

About the Course Authors

Marc Nagel serves as an advisor to Exchange Analytics and was the main course author. Mr. Nagel recently retired as Chief Operating Officer and Chief Compliance Officer of a clearing Futures Commission Merchant. He serves on the Futures Commission Merchant Advisory Committee of the National Futures Association and on the Advisory Board of the IIT- Chicago Kent College of Law Futures and Derivatives Conference. Mr. Nagel is employed as a futures industry compliance consultant and expert witness. He is a licensed CPA and attorney, admitted to the State of Illinois Supreme Court, the U.S. District Court for the Northern District of Illinois, and the U.S. Tax Court. Mr. Nagel is a registered Floor Broker and has held various Exchange memberships since 1979. Mr. Nagel received his BS in Accountancy and CPA from the University of Illinois and his JD from IIT/Chicago Kent College of Law.

Lawrence D. Israel served as co-author. He has been continuously registered with the National Futures Association from March 11, 1981 through the present, and is a 30 year member of the Chicago Board of Trade. During that time Mr. Israel has been extensively involved in the futures and securities industry, serving on a variety of committees at the CBOT, including Arbitration and Education. In 2008 Mr. Israel was appointed to both the Business Conduct Committee and Probable Cause Committee of the Chicago Board of Trade/CME Group. Mr. Israel was Chairman of the Associate Members Committee (financial traders), and serves as an Arbitrator for the National Futures Association. He has served as an expert witness in both Federal Court and arbitrations in disputes involving futures trading, as well as testifying in criminal proceedings for the United States Department of Justice. Mr. Israel served as an adjunct lecturer at Northwestern University where he taught courses about the futures, securities and options markets. Mr. Israel earned his BS in Economics from the University of Illinois Champaign-Urbana and his MBA from the University of Chicago. He is a Certified Anti-Money Laundering Specialist.