

Board of Trustees

Executive Committee

**December 12, 2017**

**RESOLUTION TO APPROVE THE ADDITION OF OFF-CAMPUS LOCATIONS  
FOR THE MASTER OF ARTS IN FINANCIAL INTEGRITY**

WHEREAS, Article II, Section 1 of the Bylaws of the Board of Trustees for Case Western Reserve University (the “University”) states, in relevant part, that the Board of Trustees shall have the authority to establish policies to oversee the educational programs of the University; and

WHEREAS, Article V, Sec A, Par. 2 of the Constitution of the University Faculty authorizes the Faculty Senate to make recommendations to the President for consideration and transmittal to the Board of Trustees with respect to policies governing standards for curricula and content of all degree programs; and

WHEREAS, at its meeting on November 28, 2017, the Faculty Senate approved the addition of the following off-campus locations for the Master of Arts in Financial Integrity program in the following cities/countries: New York/New Jersey, Connecticut, D.C., Florida, London, Paris, Los Angeles/California, Las Vegas, and India (the “Additional Locations”).

NOW, THEREFORE, BE IT RESOLVED THAT:  
the Executive Committee of the Board of Trustees authorizes  
the University to take all necessary actions in order to offer  
the Master of Arts in Financial Integrity programs listed in  
the Additional Locations.

APPROVED by the  
EXECUTIVE COMMITTEE  
Case Western Reserve University  
BOARD OF TRUSTEES  
*Elizabeth J. Keefer*  
SECRETARY OF THE CORPORATION

## Executive Master of Arts Degree in Financial Integrity Case Western Reserve University School of Law

Starting in the fall of 2014, Case Western Reserve University School of Law's Program in Financial Regulation will be offering a new international Executive Master of Arts Degree in Financial Integrity [EMAFI]. The course of study is designed for experienced professionals in the policy and practice of anti-money laundering, counter-terrorism financing and proliferation finance, and related areas such as anti-corruption. Team-taught by top academics and practitioners from around the world, the EMAFI degree program will be the first of its kind ever offered by a major university.

Applicants must have a BA or equivalent degree and professional experience in financial integrity or a related field. To obtain the EMAFI degree, students must successfully complete 8 courses, each of which is 3 credits or 36 hours of instruction, for a total of 24 credits.

Students must choose between two tracks of study: (1) Regulatory Compliance and (2) Investigation and Prosecution. Because all financial integrity professionals should be well versed in the basics of both prevention and enforcement, students in both tracks will be required to complete the same 4 Foundation Courses that cover the key elements of both areas. Following completion of these courses, students will be required to take 2 Focus Courses that are specific to their track.

Following completion of the required courses, students must complete 2 Electives.

Courses are to be conducted through a combination of on-site and on-line instruction. Each course will be offered over 6 consecutive days, consisting of a total of 26 hours of classes. Each of these classes, which will include both lecture and discussion, will also be recorded and placed on-line. Each course will also consist of 8 hours of on-line instruction and 2 hours of on-line exams, for a combined total of 36 hours. Courses are to be taught in New York, London, Paris/Brussels, New Delhi, and Hong Kong.

*Because it is vitally important that students in an executive program have the opportunity to interact with faculty and each other in a way that only on-site learning can accomplish, students will be required to attend at least 4 courses in person.<sup>1</sup> However, since the commitment of time and financial resources is greater for in-person than on-line instruction, students may, if they so choose, take up to 4 courses on-line only.*

The School will begin accepting applications starting [     ].

The EMFI program is offered in cooperation with the Financial Action Task Force, the Egmont Group, International Governance and Risk Institute, and Northeastern University.

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<sup>1</sup> Plus 8 hours of on-line instruction and 2 hours of on-line exams.

**Course of Study for Executive Master of Arts Degree in Financial Integrity**  
**Case Western Reserve School of Law**  
*All courses are 3 credits/36 hours of instruction*

***Foundation Courses***

**Introduction to the criminology of money laundering and to international standards on combating money laundering and the financing of terrorism & proliferation**

This course will introduce students to the basics of money laundering and to the Financial Action Task Force's [FATF] Forty Recommendations on combating money laundering and the financing of terrorism and proliferation. The course will begin with an overview of the criminology of money laundering and to the origins of the FATF and the development of the Recommendations. It will examine how each recommendation functions in preventing, uncovering, and prosecuting money laundering, terrorism financing, and proliferation. The course will also introduce how the process of assessing compliance works.

**Preventive measures in depth: risk assessment, customer on boarding and acceptance, record keeping, customer activity monitoring, suspicious activity report preparation, internal controls, and regulation and supervision**

This course will examine in detail measures that banks and other financial institutions are required to implement to prevent and uncover money laundering/financing of terrorism and proliferation. It will focus on the key preventive measures of risk assessment, customer on boarding and acceptance, record keeping, customer activity monitoring, suspicious activity report preparation, internal controls, and the regulation and supervision of financial institutions with respect to preventive measures implementation. The course will focus on the preventive measures found in the Financial Action Task Force's [FATF] Forty Recommendations on combating money laundering and the financing of terrorism and proliferation and on a sampling of key national laws and regulations, including those of the United States.

**Operational and law enforcement in depth: the financial intelligence unit, investigation, and prosecution of money laundering/financing of terrorism and proliferation, and predicate crimes**

This course will examine in detail the operations of national financial intelligence units in analyzing suspicious activity reports and other data and information and in creating actionable intelligence from that information. It will then examine the investigation of the crimes of money laundering/financing of terrorism and proliferation, and a selection of key predicate crimes. The course will also review the operational and law enforcement elements found in the Financial Action Task Force's [FATF] Forty Recommendations on

combating money laundering and the financing of terrorism and proliferation and on a sampling of key national laws and regulations, including those of the United States.

### **International cooperation in civil and criminal matters in depth**

This course will examine in detail how financial intelligence units, investigators, prosecutors, and investigative judges/magistrates cooperate with officials of other jurisdictions in identifying possible money laundering/financing of terrorism and proliferation cases, investigating and prosecuting those cases, and recovering assets that are candidates for freezing or confiscation. The course will also review the international cooperation elements found in the Financial Action Task Force's [FATF] Forty Recommendations on combating money laundering and the financing of terrorism and proliferation, U.N. conventions, model laws and regulations, and on a sampling of key national laws and regulations, including those of the United States.

#### *Focus Courses*

##### *Track 1: Regulatory Compliance*

#### **Building and implementing an effective anti-money laundering/financing of terrorism and proliferation compliance program**

This course will continue the coverage of risk assessment, customer on boarding and acceptance, customer activity monitoring, and suspicious activity report preparation covered in Preventive Measures in Depth. The course will primarily involve the presentation and discussion of case studies in each critical area of an effective compliance program, with a focus on the banking sector.

#### **Anti-money laundering/financing of terrorism and proliferation audits, inspections, on-site examinations, and sanctions**

This course will continue the coverage of audits, inspections, on-site examinations, and sanctions covered in Preventive Measures in Depth. The course will primarily involve the presentation and discussion of case studies in each critical area of an effective compliance program.

##### *Track 2: Law Enforcement and Prosecution*

#### **Building and prosecuting an anti-money laundering/financing of terrorism and proliferation criminal case**

The course will continue the coverage of investigation and prosecution of money laundering/financing of terrorism and proliferation in operational and law enforcement in depth. The course will primarily involve the presentation and discussion of case studies in each critical area of investigation and prosecution.

## **Asset tracing and recovery**

The course will continue the coverage of asset tracing and recovery in operational and law enforcement in depth. The course will primarily involve the presentation and discussion of case studies in each critical area of asset tracing and recovery.

## ***Electives***

### **Selected topics in automated customer acceptance and transaction monitoring systems**

This course will consider the use of automated customer acceptance and transaction monitoring systems. It will examine key issues in data base formation, including web-based text recognition and analysis, link analysis, and different forms of statistical discriminant and regression analysis, and forms of data presentation. The course will examine current vendor products. The course will also make use of case studies.

### **Selected topics in automated financial intelligence unit systems: automated tools and transaction activity analysis**

This course will consider the use of automated systems for analyzing suspicious transaction reports and other data to develop actionable intelligence. It will examine key issues in data base formation, including web-based text recognition and analysis, link analysis, and different forms of statistical discriminant and regression analysis, and forms of intelligence presentation. The course will examine current vendor products. The course will also make use of case studies.

### **Selected preventive measures issues for insurance companies and agents/brokers, securities firms, broker-dealers, mutual funds/collective investment schemes, investment advisors, and money services businesses**

This course will examine in detail measures that for insurance companies and agents/brokers, securities firms, broker-dealers, mutual funds/collective investment schemes, investment advisors, and money services businesses are required to implement to prevent and uncover money laundering/financing of terrorism and proliferation. It will focus on the key preventive measures of risk assessment, customer on boarding and acceptance, customer activity monitoring, suspicious activity report preparation, and the regulation and supervision of non-bank financial institutions with respect to preventive measures implementation. The course will also review the use of automated systems and make use of case studies.

### **Selected preventive measures issues with respect to legal persons and arrangements, designated non-financial businesses and persons, trade-based laundering, narcotics, financial fraud, corruption, human trafficking, terrorism, and proliferation financing**

This course will continue the coverage of risk assessment, customer on boarding and acceptance, customer activity monitoring, and suspicious activity report preparation covered in Preventive Measures in Depth by examining the special circumstances of trade-based laundering, narcotics, financial fraud, corruption, human trafficking, terrorism, and proliferation financing. The principle focus will be on developing and implementing effective typologies. The course will primarily involve the presentation and discussion of case studies.

**Selected operational and law enforcement issues with respect to legal persons and arrangements, designated non-financial businesses and persons narcotics, financial fraud, corruption, human trafficking, terrorism, and proliferation financing**

The course will continue the coverage of investigation and prosecution of money laundering/financing of terrorism and proliferation in operational and law enforcement by examining narcotics, financial fraud, corruption, human trafficking, terrorism, and proliferation financing. The course will primarily involve the presentation and discussion of case studies in each critical area of investigation and prosecution.

**Mutual evaluations by the Financial Action Task Force and assessments by the IMF/World Bank: A practical approach for assessors and countries to be assessed using the Financial Action Task Force Methodology**

The course will cover the process of assessment compliance with the Financial Action Task Force's 40 Recommendations by use of the FATF's Methodology of Assessment. It will include all aspects of compliance assessment, from initial self-assessment questionnaire preparation to final discussion of the draft assessment at the FATF/FSRB Plenary.

**Philosophy of anti-money laundering and the financing of terrorism and proliferation: theories of global justice and philosophy of law as a normative basis for international standards**

The course will focus on practical and theoretical issues of global justice as they pertain to anti-money laundering and combating the financing of terrorism. What are our obligations to international justice? How do they influence AML/CFT law? The course will consider the normative basis of jurisprudence, comparing legal positivism to natural law theory. Next, the course will look at theories of global justice suitable to answer normative questions on what law should aim at. The remainder of the course will consider practical issues that come into play with AML/CFT law, such as corruption, poverty, distributive justice, human rights, violence, and war.

[Draft Application to Ohio Regents for approval of Degree Program]

**Executive Master of Arts in Financial Integrity**

**Case Western Reserve University School of Law**

**Program Development Plan**

**Preamble**

Since the attacks of September 11, 2001, experts in compliance with financial integrity standards, as well as investigation and prosecution of anti-money laundering and terrorism financing, have been in ever-increasing demand world wide. In particular, this year's unprecedented fines, levied by financial regulators on banks in the United States and the United Kingdom for breaching their integrity obligations, have resulted in a significant increase in the demand for experts by both financial institutions and governments. However, such demands have not been met, in part because only one university in the world (located in Sydney, Australia) offers an advanced degree in financial integrity.

Case Western Reserve University School of Law is planning to respond to that demand by offering an executive master or arts degree in financial integrity. Case is unusually well placed to offer such a degree because of its unique Program in Financial Integrity. Headed by Professor Richard Gordon, former Senior Counsel and Senior Financial Expert at the International Monetary Fund and a principal author of the Fund's and the World Bank's entry into the field of anti-money laundering, the Program has sponsored courses in the School's JD program (unique to American law schools), as well as conferences and symposia, attended by the most prominent experts in the field. The Program is in a unique position to leverage relations nurtured by these activities by successfully recruiting experts to teach in the program.

**1. Designation of the degree program, rational for that designation, definition of the focus of the program, and a brief description of its disciplinary purpose and significance.**

The new degree program is for an executive Master of Arts in Financial Integrity [MAFI] at Case Western Reserve University School of Law. Establishing an executive MAFI program would build on the law school's expertise in this area, its close relationships with the Financial Action Task Force (the international standard-setter for financial integrity), the International Monetary Fund and World Bank (who are assessors of compliance with those standards), and key practitioners throughout the world. It would further the School's exceptional international reputation in this critical field of financial regulation.

## 2. Description of the proposed curriculum.<sup>2</sup>

Designed and taught by the leading experts in the field, the executive MAFI program will provide experienced professionals with an in-depth knowledge of the policy and practice of anti-money laundering and counter-terrorism and proliferation finance. It will prepare students for leadership positions in financial integrity in financial institutions and in government.

Applicants must have a BA or equivalent degree and professional experience in financial integrity or a related field. The executive MAFI is a part-time program designed for professionals currently working in the field. As such, it is expected that students will complete the program in around 24 months, but in no case in fewer than 18 months or more than 30 months. To obtain the executive MAFI degree, students must successfully complete eight courses, each of which is three credits or 36 hours of instruction, for a total of 24 credits (see list of courses below).

Students will chose between two tracks of study: (1) Regulatory Compliance and (2) Investigation and Prosecution. Because all financial integrity professionals should be well versed in the basics of both prevention and enforcement, students in both tracks will be required to complete the same four Foundation Courses that cover the key elements of both areas. Following completion of these courses, students will be required to take two Focus Courses that are specific to their track. Following completion of the required courses, students must complete two Electives.

Courses are to be conducted through a combination of on-site and on-line instruction. Each course will be offered in one or more major financial centers around the world over six consecutive days, consisting of a total of 26 hours of classes. Each of these classes, which will include both lecture and discussion, will also be recorded and placed on-line. Each course will also consist of 10 hours of on-line instruction, for a combined total of 36 hours.

Because it is vitally important that students in an executive program have the opportunity to interact with faculty and each other in a way that only on-site learning can accomplish, students will be required to attend at least four courses in person.<sup>3</sup> However, because the commitment of time and financial resources is greater for in-person than on-line instruction, students may, if they so choose, take up to four courses on-line only.

### Foundation Courses

Introduction to the criminology of money laundering and to international standards on combating money laundering and the financing of terrorism & proliferation; Preventive measures in depth: risk assessment, customer on boarding and acceptance, customer activity monitoring, suspicious activity report preparation, and regulation and

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<sup>2</sup> See Appendix for descriptions for each course.

<sup>3</sup> Plus 10 hours of on-line instruction.

supervision; Operational and law enforcement in depth: the financial intelligence unit, investigation, and prosecution of money laundering/financing of terrorism and proliferation, and asset tracing and seizure; International cooperation in civil and criminal matters

### Focus Courses

#### *Track 1: Regulatory Compliance*

Building and implementing an effective anti-money laundering/financing of terrorism and proliferation compliance program; Anti-money laundering/financing of terrorism and proliferation audits, inspections, on-site examinations, and sanctions

#### *Track 2: Law Enforcement and Prosecution*

Building and prosecuting an anti-money laundering/financing of terrorism and proliferation criminal case; Asset tracing and recovery

### Elective Courses

Selected topics in automated customer acceptance and transaction monitoring systems; Selected topics in automated financial intelligence unit systems: automated tools and transaction activity analysis; Selected preventive measures issues for insurance companies and agents/brokers, securities firms, broker-dealers, mutual funds/collective investment schemes, investment advisors, and money services businesses; Selected preventive measures issues with respect to narcotics, financial fraud, corruption, human trafficking, terrorism, and proliferation financing; Selected operational and law enforcement issues with respect to narcotics, financial fraud, corruption, human trafficking, terrorism, and proliferation financing; Mutual evaluations by the Financial Action Task Force and assessments by the IMF/World Bank: A practical approach for assessors and countries to be assessed using the Financial Action Task Force Methodology; Philosophy of anti-money laundering and the financing of terrorism and proliferation: theories of global justice and philosophy of law as a normative basis for international standards

### **3. Administrative arrangements for the proposed program: department and school or college involved.**

The program is part of the Law School. Professor Richard Gordon, Associate Director of the School's Cox International Law Center and Director of the School's Program in Financial Law, will serve as chief administrator. Gordon will be assisted by his administrative assistant Deborah Turner, and by Nancy Pratt and Raymond Ultrup, who help manage the Law School's six Center's of Excellence. However, administration of program will require significant additional resources with respect to organizing the 15 week-long intensive sessions—to be held in Cleveland and in six other cities around the world—taught by 30 part-time adjuncts and two full-time faculty. These resources will

be provided by the International Governance and Risk Institute. The Institute, a UK-based consultancy, has over 10 years of experience in successfully planning and organizing conferences and classes around the globe, and has partnered with such organizations the International Monetary Fund, the World Bank, and the UK Foreign and Commonwealth Office. The Law School's partnership with the International Governance and Risk Institute will ensure the successful administration of each individual class as well as the Program as a whole.

**4. Evidence of need for the new degree program, including the opportunities for employment of graduates. This section should address other similar programs in the state addressing this need and potential duplication of programs in the state and the region.**

Since the attacks of September 11, 2001, experts in compliance with financial integrity standards, as well as investigation and prosecution of anti-money laundering and terrorism financing, have been in ever-increasing demand world wide. This year's unprecedented fines, levied by financial regulators on banks in the US and UK for breaching their integrity obligations, have resulted in a significant increase in demand for experts by both financial institutions and governments. In fact, it was Willie Maddox, Vice President and ERM Risk Assessment Manager at KeyBank in Cleveland, Phil DeLuca, Senior Vice President and Compliance Managing Director for JPMorgan Chase Bank in Columbus, and Rick McDonell, head of the Financial Action Task Force, who suggested that the Law School offer an executive MAFI. As students in this executive program would already be employed in the field, opportunities for graduates would lie in superior job performance and movement to more senior positions. There is currently no such program offered in the state or region; in fact, as far as we can determine, as of this writing the only similar program offered anywhere in the world is an on-line only course at Charles Sturt University in Sydney, Australia.

**5. Prospective enrollment.**

We anticipate that around 10 students will begin the program in the first year, will begin growing to about 30 entering in the third year.

**6. Special efforts to enroll and retain underrepresented groups in the given discipline.**

As with CWRU's policy, diversity will be an important factor to be considered in outreach to both potential students and adjuncts. We expect students to enroll from each inhabited continent and therefore to represent a significant diversity of ethnicity. A Steering Committee has been appointed to advise the program, with Willie Maddox, Vice President and ERM Risk Assessment Manager at KeyBank, an African-American woman with significant experience in promoting diversity in the financial sector, leading the Subcommittee on Inclusion.

**7. Availability and adequacy of the faculty and facilities available for the new degree program**

Because of the size and international reach of the program, we anticipate significant additional courses, faculty, and facilities. For this reason, we have already approved 15 new courses (listed above and described in detail in the Appendix), and received commitments from 30 top experts from around the world to serve as adjuncts—in most cases without any compensation—in addition to our current, full-time faculty. This should be more than adequate. Because the vast majority of courses will be taught in cities outside of Cleveland, it has been necessary to secure commitments to provide teaching space in those cities. So far, we have received commitments from donors for space in New York, London, Paris/Brussels, Geneva, New Delhi, and Hong Kong.

**8. Need for additional facilities and staff and the plans to meet this need.**

Please see answers to number 3 and number 7 above.

**9. Projected additional costs associated with the program and evidence of institutional commitment and capacity to meet these costs.**

With an estimated tuition of \$ 50,000, and with 10 students entering in the first year with an increase to 30 entering in the third, the executive MAFI should bring in an additional \$ 500,000 in tuition the first year, rising to \$1.5 million in the third. Because most adjuncts have agreed to serve *gratis* or for a nominal sum, and because teaching space outside Cleveland has been donated, the major additional expenses of the Program should be limited to compensating International Governance and Risk Institute for its work in administering the project, and reimbursing transportation and hotel costs to those faculty who must travel to cities where the courses are being offered (we plan to minimize these costs by ensuring, where possible, that adjunct faculty be assigned to teach courses where they are resident). We believe that the program should generate significant net proceeds. We also believe that by offering such a program we shall greatly increase the School's international reputation, which should have a positive effect on our fundraising efforts.

## Appendix

### **Course of Study for Executive Master of Arts Degree in Financial Integrity Case Western Reserve School of Law** *All courses are 3 credits/36 hours of instruction*

#### ***Foundation Courses***

##### **Introduction to the criminology of money laundering and to international standards on combating money laundering and the financing of terrorism & proliferation**

This course will introduce students to the basics of money laundering and to the Financial Action Task Force's [FATF] Forty Recommendations on combating money laundering and the financing of terrorism and proliferation. The course will begin with an overview of the criminology of money laundering and to the origins of the FATF and the development of the Recommendations. It will examine how each recommendation functions in preventing, uncovering, and prosecuting money laundering, terrorism financing, and proliferation. The course will also introduce how the process of assessing compliance works.

##### **Preventive measures in depth: risk assessment, customer on boarding and acceptance, record keeping, customer activity monitoring, suspicious activity report preparation, internal controls, and regulation and supervision**

This course will examine in detail measures that banks and other financial institutions are required to implement to prevent and uncover money laundering/financing of terrorism and proliferation. It will focus on the key preventive measures of risk assessment, customer on boarding and acceptance, record keeping, customer activity monitoring, suspicious activity report preparation, internal controls, and the regulation and supervision of financial institutions with respect to preventive measures implementation. The course will focus on the preventive measures found in the Financial Action Task Force's [FATF] Forty Recommendations on combating money laundering and the financing of terrorism and proliferation and on a sampling of key national laws and regulations, including those of the United States.

##### **Operational and law enforcement in depth: the financial intelligence unit, investigation, and prosecution of money laundering/financing of terrorism and proliferation, and predicate crimes**

This course will examine in detail the operations of national financial intelligence units in analyzing suspicious activity reports and other data and information and in creating actionable intelligence from that information. It will then examine the investigation of the crimes of money laundering/financing of terrorism and proliferation, and a selection of key predicate crimes. The course will also review the operational and law enforcement elements found in the Financial Action Task Force's [FATF] Forty Recommendations on

combating money laundering and the financing of terrorism and proliferation and on a sampling of key national laws and regulations, including those of the United States.

### **International cooperation in civil and criminal matters in depth**

This course will examine in detail how financial intelligence units, investigators, prosecutors, and investigative judges/magistrates cooperate with officials of other jurisdictions in identifying possible money laundering/financing of terrorism and proliferation cases, investigating and prosecuting those cases, and recovering assets that are candidates for freezing or confiscation. The course will also review the international cooperation elements found in the Financial Action Task Force's [FATF] Forty Recommendations on combating money laundering and the financing of terrorism and proliferation, U.N. conventions, model laws and regulations, and on a sampling of key national laws and regulations, including those of the United States.

#### *Focus Courses*

##### *Track 1: Regulatory Compliance*

#### **Building and implementing an effective anti-money laundering/financing of terrorism and proliferation compliance program**

This course will continue the coverage of risk assessment, customer on boarding and acceptance, customer activity monitoring, and suspicious activity report preparation covered in Preventive Measures in Depth. The course will primarily involve the presentation and discussion of case studies in each critical area of an effective compliance program, with a focus on the banking sector.

#### **Anti-money laundering/financing of terrorism and proliferation audits, inspections, on-site examinations, and sanctions**

This course will continue the coverage of audits, inspections, on-site examinations, and sanctions covered in Preventive Measures in Depth. The course will primarily involve the presentation and discussion of case studies in each critical area of an effective compliance program.

##### *Track 2: Law Enforcement and Prosecution*

#### **Building and prosecuting an anti-money laundering/financing of terrorism and proliferation criminal case**

The course will continue the coverage of investigation and prosecution of money laundering/financing of terrorism and proliferation in operational and law enforcement in depth. The course will primarily involve the presentation and discussion of case studies in each critical area of investigation and prosecution.

## **Asset tracing and recovery**

The course will continue the coverage of asset tracing and recovery in operational and law enforcement in depth. The course will primarily involve the presentation and discussion of case studies in each critical area of asset tracing and recovery.

## *Electives*

### **Selected topics in automated customer acceptance and transaction monitoring systems**

This course will consider the use of automated customer acceptance and transaction monitoring systems. It will examine key issues in data base formation, including web-based text recognition and analysis, link analysis, and different forms of statistical discriminant and regression analysis, and forms of data presentation. The course will examine current vendor products. The course will also make use of case studies.

### **Selected topics in automated financial intelligence unit systems: automated tools and transaction activity analysis**

This course will consider the use of automated systems for analyzing suspicious transaction reports and other data to develop actionable intelligence. It will examine key issues in data base formation, including web-based text recognition and analysis, link analysis, and different forms of statistical discriminant and regression analysis, and forms of intelligence presentation. The course will examine current vendor products. The course will also make use of case studies.

### **Selected preventive measures issues for insurance companies and agents/brokers, securities firms, broker-dealers, mutual funds/collective investment schemes, investment advisors, and money services businesses**

This course will examine in detail measures that for insurance companies and agents/brokers, securities firms, broker-dealers, mutual funds/collective investment schemes, investment advisors, and money services businesses are required to implement to prevent and uncover money laundering/financing of terrorism and proliferation. It will focus on the key preventive measures of risk assessment, customer on boarding and acceptance, customer activity monitoring, suspicious activity report preparation, and the regulation and supervision of non-bank financial institutions with respect to preventive measures implementation. The course will also review the use of automated systems and make use of case studies.

### **Selected preventive measures issues with respect to legal persons and arrangements, designated non-financial businesses and persons, trade-based laundering, narcotics, financial fraud, corruption, human trafficking, terrorism, and proliferation financing**

This course will continue the coverage of risk assessment, customer on boarding and acceptance, customer activity monitoring, and suspicious activity report preparation covered in Preventive Measures in Depth by examining the special circumstances of trade-based laundering, narcotics, financial fraud, corruption, human trafficking, terrorism, and proliferation financing. The principle focus will be on developing and implementing effective typologies. The course will primarily involve the presentation and discussion of case studies.

**Selected operational and law enforcement issues with respect to legal persons and arrangements, designated non-financial businesses and persons narcotics, financial fraud, corruption, human trafficking, terrorism, and proliferation financing**

The course will continue the coverage of investigation and prosecution of money laundering/financing of terrorism and proliferation in operational and law enforcement by examining narcotics, financial fraud, corruption, human trafficking, terrorism, and proliferation financing. The course will primarily involve the presentation and discussion of case studies in each critical area of investigation and prosecution.

**Mutual evaluations by the Financial Action Task Force and assessments by the IMF/World Bank: A practical approach for assessors and countries to be assessed using the Financial Action Task Force Methodology**

The course will cover the process of assessment compliance with the Financial Action Task Force's 40 Recommendations by use of the FATF's Methodology of Assessment. It will include all aspects of compliance assessment, from initial self-assessment questionnaire preparation to final discussion of the draft assessment at the FATF/FSRB Plenary.

**Philosophy of anti-money laundering and the financing of terrorism and proliferation: theories of global justice and philosophy of law as a normative basis for international standards**

The course will focus on practical and theoretical issues of global justice as they pertain to anti-money laundering and combating the financing of terrorism. What are our obligations to international justice? How do they influence AML/CFT law? The course will consider the normative basis of jurisprudence, comparing legal positivism to natural law theory. Next, the course will look at theories of global justice suitable to answer normative questions on what law should aim at. The remainder of the course will consider practical issues that come into play with AML/CFT law, such as corruption, poverty, distributive justice, human rights, violence, and war.

[Course Proposals]  
Procedures for Proposing New Courses or Seminars

The following form is to assist those proposing new courses or seminars. Proposal should be submitted to the Curriculum Committee. Proposals will be given a preliminary review by the Curriculum Committee, and then circulated to the faculty for comment. The Curriculum Committee will consider the proposals and any faculty comments and forward a recommendation to the faculty, which has the ultimate power of approval.

This form lists the information that the Curriculum Committee feels it needs to properly evaluate proposals. You may use this form or you may submit the information in your own format. In either event, please try to give all of the information requested. This form is available on a floppy in various word processor formats in case you find it more convenient to give the information on the form itself.

1. State name of proposed course or seminar:

Introduction to the criminology of money laundering and to international standards on combating money laundering and the financing of terrorism & proliferation

2. Indicate whether the proposal is for a "seminar" or a "course".

course

3. Describe the subject matter and coverage of proposed course or seminar:

The course will cover the basics of the criminology of money laundering and to international standards on combating money laundering and the financing of terrorism and proliferation, as well the methodology for assessing compliance with those standards, as promulgated by the Financial Action Task Force.

4. Attach copy of course description suitable for incorporation in the Student Handbook. If there is a syllabus, please attach.

Introduction to the criminology of money laundering and to international standards on combating money laundering and the financing of terrorism & proliferation: This course will introduce students to the basics of money laundering and to the Financial Action Task Force's [FATF] Forty Recommendations on combating money laundering and the financing of terrorism and proliferation. The course will begin with an overview of the criminology of money laundering and to the origins of the FATF and the development of the Recommendations. It will examine how each recommendation functions in preventing, uncovering, and prosecuting money laundering, terrorism financing, and

proliferation. The course will also introduce how the process of assessing compliance works.

5. State credit hours requested for the proposed course or seminar. Seminars suitable for satisfaction of the writing requirement can normally be for either three or two credit hours. The difference between the two and three credit hours seminar is described at the end of this form.

3 credit hours.

6. Indicate if you are requesting any size limitations for the proposed course or seminar. Writing seminars are normally limited in size, with 12 the norm if the seminar is suitable for satisfaction or writing requirement. If you wish to limit the enrollment in a course, please explain the reason for the limitation.

No limit.

7. Please list any prerequisites. If the course or seminar overlaps with existing courses or seminars, should students be permitted to take more than one of the overlapping courses or seminars?

No prerequisites.

8. Please explain why this course or seminar should be added to the curriculum. Does the proposed course or seminar overlap with any existing course or seminar? If so, please explain the extent of overlap and the reason why the overlap should not bar the approval of the new course or seminar. If there is an overlap, please discuss this with the faculty members teaching the overlapping courses or seminars.

This course is to be one of the four required Foundation courses in the Executive Master of Arts in Financial Integrity program.

9. Indicate if the proposed course or seminar is to replace an existing course or seminar.

No.

10. Indicate if the new course or seminar can be used to satisfy the upper-level writing requirement. How many students may use the proposed course or seminar to satisfy the writing requirement?

No.

11. Indicate the casebook or course materials that you recommend as most suitable for the proposed course or seminar, and attach a copy of the table of contents. If there are no published material suitable for the course or seminar, indicate who has or who will prepare unpublished course materials. If possible attach an outline, table of contents, or description of such unpublished materials.

Richard Gordon, Combating Money Laundering and the Financing of Terrorism & Proliferation: Theory and Practice (Oxford, 2014)

12. Most courses are graded by an examination, and most seminars by a paper. Indicate whether the students will be required to take an examination, write a paper or both. Is there an optional paper?

Exam.

13. Indicate the names of existing faculty willing and able to teach the proposed course or seminar. If the proposed course or seminar is expected to be taught by an adjunct, please attach the resume or some description of the background and qualifications of the proposed adjunct. If the course or seminar is to be taught by more than one person, please so indicate.

The course is to be taught by

Richard Gordon, Elizabeth Joyce, Eliot Kennedy, P.N. Krishnan, Nadim Kyriakos-Saad, Willie Maddox, Rick McDonell, Andre Montesdeoca--Broquetas, Nina Nichols, Nikos Passas, Moni SenGupta, Richard Small.

14. Indicate whether the expected need for the proposed course or seminar justifies that it be offered every year or only periodically, i.e. every other year.

The course will be offered on a periodic basis throughout the year as part of the Executive Master of Arts in Financial Integrity program.

Faculty Identification:

Elizabeth Joyce, Section Chief, Counter-Terrorism Committee, Executive Directorate, United Nations, New York

Eliot Kennedy, Executive Secretary, Asia Pacific Group on Money Laundering (the Asian FATF-Style Regional Body), Sydney

Nadim Kyriakos-Saad, Deputy Director, Financial Integrity Group, IMF, Washington, DC

Willie Maddox, CPA, CGMA, CAMS, Vice President, ERM Risk Assessment Manager, KeyBank, Cleveland, OH

Dr. Alejandro Montesdeoca--Broquetas, Former Executive Secretary, GAFISUD (the Latin American FATF-Style Regional Body), Montevideo, Uruguay

Nina Nichols, Deputy Director of the Division of Supervision Policy and Support, Federal Housing Finance Agency, formerly Senior Vice President, JP Morgan Chase and Special Counsel for Bank Secrecy Act and money laundering matters, The Board of Governors, Federal Reserve System, Washington, DC

Nikos Passas, Professor of Criminology, Northeastern University, Boston, MA

P. Moni SenGupta, Financial Sector Expert, the World Bank, formerly Senior Counsel, IMF, Washington DC.

Rick Small, CAMS, Vice President, Enterprise AML, Anti-Corruption and Sanctions, American Express, NYC, former managing director of global anti-money laundering at Citigroup, former Special Counsel for Bank Secrecy Act and money laundering matters, The Board of Governors, Federal Reserve System, Washington DC

Professor Dr. K.P. Krishnan, Principal Resident Commissioner and former Head of FATF Cell, Financial Action Task Force, New Delhi, India

## Procedures for Proposing New Courses or Seminars

The following form is to assist those proposing new courses or seminars. Proposal should be submitted to the Curriculum Committee. Proposals will be given a preliminary review by the Curriculum Committee, and then circulated to the faculty for comment. The Curriculum Committee will consider the proposals and any faculty comments and forward a recommendation to the faculty, which has the ultimate power of approval.

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2. State name of proposed course or seminar:

Preventive measures in depth: risk assessment, customer on boarding and acceptance, customer activity monitoring, suspicious activity report preparation, and regulation and supervision.

2. Indicate whether the proposal is for a "seminar" or a "course".

course

3. Describe the subject matter and coverage of proposed course or seminar:

The course will cover those measures designed to prevent financial institutions from being used by criminals to launder money, finance terrorism, and avoid proliferation sanctions.

4. Attach copy of course description suitable for incorporation in the Student Handbook. If there is a syllabus, please attach.

Preventive measures in depth: risk assessment, customer on boarding and acceptance, customer activity monitoring, suspicious activity report preparation, and regulation and supervision: This course will examine in detail measures that banks and other financial institutions are required to implement to prevent and uncover money laundering/financing of terrorism and proliferation. It will focus on the key preventive measures of risk assessment, customer on boarding and acceptance, customer activity monitoring, suspicious activity report preparation, and the regulation and supervision of financial institutions with respect to preventive measures implementation. The course will focus on the preventive measures found in the Financial Action Task Force's [FATF] Forty Recommendations on combating money laundering and the financing of terrorism

and proliferation and on a sampling of key national laws and regulations, including those of the United States.

5. State credit hours requested for the proposed course or seminar. Seminars suitable for satisfaction of the writing requirement can normally be for either three or two credit hours. The difference between the two and three credit hours seminar is described at the end of this form.

3 credit hours.

6. Indicate if you are requesting any size limitations for the proposed course or seminar. Writing seminars are normally limited in size, with 12 the norm if the seminar is suitable for satisfaction or writing requirement. If you wish to limit the enrollment in a course, please explain the reason for the limitation.

No limit.

7. Please list any prerequisites. If the course or seminar overlaps with existing courses or seminars, should students be permitted to take more than one of the overlapping courses or seminars?

Introduction to the criminology of money laundering and to international standards on combating money laundering and the financing of terrorism & proliferation

8. Please explain why this course or seminar should be added to the curriculum. Does the proposed course or seminar overlap with any existing course or seminar? If so, please explain the extent of overlap and the reason why the overlap should not bar the approval of the new course or seminar. If there is an overlap, please discuss this with the faculty members teaching the overlapping courses or seminars.

This course is to be one of the four required Foundation courses in the Executive Master of Arts in Financial Integrity program.

9. Indicate if the proposed course or seminar is to replace an existing course or seminar.

No.

10. Indicate if the new course or seminar can be used to satisfy the upper-level writing requirement. How many students may use the proposed course or seminar to satisfy the writing requirement?

No.

11. Indicate the casebook or course materials that you recommend as most suitable for the proposed course or seminar, and attach a copy of the table of contents. If there are no published material suitable for the course or seminar, indicate who has or who will prepare unpublished course materials. If possible attach an outline, table of contents, or description of such unpublished materials.

Emile van der Does de Willebois et alia, Preventing Money Laundering and Terrorism Financing A comprehensive Guide: A Comprehensive Guide for Bank Supervisors (2009)

Richard Gordon, Combating Money Laundering and the Financing of Terrorism & Proliferation: Theory and Practice (Oxford, 2014); The FATF Forty Recommendations; The FATF Methodology of Compliance Assessment; selected statutory and regulatory materials

12. Most courses are graded by an examination, and most seminars by a paper. Indicate whether the students will be required to take an examination, write a paper or both. Is there an optional paper?

Exam.

13. Indicate the names of existing faculty willing and able to teach the proposed course or seminar. If the proposed course or seminar is expected to be taught by an adjunct, please attach the resume or some description of the background and qualifications of the proposed adjunct. If the course or seminar is to be taught by more than one person, please so indicate.

The course is to be taught by

Ross Delston, Willie Maddox, Richard Small, Philip DeLuca, Karim Rajwani

14. Indicate whether the expected need for the proposed course or seminar justifies that it be offered every year or only periodically, i.e. every other year.

The course will be offered on a periodic basis throughout the year as part of the Executive Master of Arts in Financial Integrity program.

Faculty Identification:

Ross Delston, CAMS, Attorney and former Assistant General Counsel, FDIC, Washington, DC

Willie Maddox, CPA, CGMA, CAMS, Vice President, ERM Risk Assessment Manager, KeyBank, Cleveland, OH

Rick Small, CAMS, Vice President, Enterprise AML, Anti-Corruption and Sanctions, American Express, NYC, former managing director of global anti-money laundering at Citigroup, former Special Counsel for Bank Secrecy Act and money laundering matters, The Board of Governors, Federal Reserve System

Phil DeLuca, Senior Vice President and Compliance Managing Director, JPMorgan Chase Bank, Columbus, OH

Karim Rajwani Global Head, Anti-Money Laundering, *Royal Bank* of Canada, Toronto, Canada

## Procedures for Proposing New Courses or Seminars

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3. State name of proposed course or seminar:

Operational and law enforcement in depth: the financial intelligence unit, investigation, and prosecution of money laundering/financing of terrorism and proliferation, and predicate crimes

2. Indicate whether the proposal is for a "seminar" or a "course".

course

3. Describe the subject matter and coverage of proposed course or seminar:

The course will cover in depth key issues relating to the operation of financial intelligence units and the investigation and prosecution of money laundering/financing of terrorism and proliferation, and to a selection of key predicate crimes.

4. Attach copy of course description suitable for incorporation in the Student Handbook. If there is a syllabus, please attach.

Operational and law enforcement in depth: the financial intelligence unit, investigation, and prosecution of money laundering/financing of terrorism and proliferation, and predicate crimes: This course will examine in detail the operations of national financial intelligence units in analyzing suspicious activity reports and other data and information and in creating actionable intelligence from that information. It will then examine the investigation of the crimes of money laundering/financing of terrorism and proliferation, and a selection of key predicate crimes. The course will also review the operational and law enforcement elements found in the Financial Action Task Force's [FATF] Forty Recommendations on combating money laundering and the financing of terrorism and proliferation and on a sampling of key national laws and regulations, including those of the United States.

5. State credit hours requested for the proposed course or seminar. Seminars suitable for satisfaction of the writing requirement can normally be for either three or two credit hours. The difference between the two and three credit hours seminar is described at the end of this form.

3 credit hours.

6. Indicate if you are requesting any size limitations for the proposed course or seminar. Writing seminars are normally limited in size, with 12 the norm if the seminar is suitable for satisfaction or writing requirement. If you wish to limit the enrollment in a course, please explain the reason for the limitation.

No limit.

7. Please list any prerequisites. If the course or seminar overlaps with existing courses or seminars, should students be permitted to take more than one of the overlapping courses or seminars?

Introduction to the criminology of money laundering and to international standards on combating money laundering and the financing of terrorism & proliferation

8. Please explain why this course or seminar should be added to the curriculum. Does the proposed course or seminar overlap with any existing course or seminar? If so, please explain the extent of overlap and the reason why the overlap should not bar the approval of the new course or seminar. If there is an overlap, please discuss this with the faculty members teaching the overlapping courses or seminars.

This course is to be one of the four required Foundation courses in the Executive Master of Arts in Financial Integrity program.

9. Indicate if the proposed course or seminar is to replace an existing course or seminar.

No.

10. Indicate if the new course or seminar can be used to satisfy the upper-level writing requirement. How many students may use the proposed course or seminar to satisfy the writing requirement?

No.

11. Indicate the casebook or course materials that you recommend as most suitable for the proposed course or seminar, and attach a copy of the table of contents. If there are no published material suitable for the course or seminar, indicate who

has or who will prepare unpublished course materials. If possible attach an outline, table of contents, or description of such unpublished materials.

Richard Gordon, *Combating Money Laundering and the Financing of Terrorism & Proliferation: Theory and Practice* (Oxford, 2014); *The FATF Forty Recommendations*; *The FATF Methodology of Compliance Assessment*; selected statutory and regulatory materials; case studies

12. Most courses are graded by an examination, and most seminars by a paper. Indicate whether the students will be required to take an examination, write a paper or both. Is there an optional paper?

Exam.

13. Indicate the names of existing faculty willing and able to teach the proposed course or seminar. If the proposed course or seminar is expected to be taught by an adjunct, please attach the resume or some description of the background and qualifications of the proposed adjunct. If the course or seminar is to be taught by more than one person, please so indicate.

The course is to be taught by

Yves Aeschlimann, Richard Barrett, Jeff Breinhold, Jean Pierre Brun, Mark Butler, Sue Eckert, Patrick O'Sullivan, Nikos Passas, Susan Pond, Kevin Stephenson, Emile van der Does de Willebois, Boudewijn Verhelst

14. Indicate whether the expected need for the proposed course or seminar justifies that it be offered every year or only periodically, i.e. every other year.

The course will be offered on a periodic basis throughout the year as part of the Executive Master of Arts in Financial Integrity program.

Faculty Identification:

Yves Aeschlimann, Senior Vice President and AML Compliance Officer, UBS and former Financial Sector Expert, The World Bank, and Former Investigating Judge, Zurich, Switzerland

Richard Barrett, CMG, OBE, International Centre for Counter-Terrorism, The Hague and former Coordinator, Al-Qaida Taliban Monitoring Team, UN, NYC

Jeff Breinhold, founding Co-Director, Counterterrorism Task Force, United States Department of Justice.

Jean Pierre Brun, Financial Sector Specialist, World Bank, Washington; formerly Prosecutor and Investigative Judge, and Director for Forensic and Fraud investigations, Deloitte Finance, Paris.

Mark Butler, Financial Sector Expert, the World Bank, former Head of Financial Crime Unit, Hong Kong Police

Hon. Sue Eckert, Senior Fellow, the Watson Institute, Brown University, Providence, RI, former Assistant Secretary of Commerce, Washington, DC

Pat O'Sullivan, Manager, Financial Intelligence Unit, Wellington, New Zealand

Nikos Passas, Professor of Criminology, Northeastern University, Boston, MA

Susan Pond, Senior Officer, Political Affairs and Security Policy, NATO Headquarters, Brussels, Belgium

Kevin Stephenson, Executive Secretary, The Egmont Group of Financial Intelligence Units, Ottawa, Canada

Boudewijn Verhelst, Chairman, the Egmont Group and Co-Director, the Belgian Financial Intelligence Unit, Brussels, Belgium

Emile van der Does de Willebois, Senior Financial Sector Expert, Financial Market Integrity/ Stolen Asset Recovery Initiative (StAR), The World Bank, Washington DC

Procedures for Proposing New Courses or Seminars

The following form is to assist those proposing new courses or seminars. Proposal should be submitted to the Curriculum Committee. Proposals will be given a preliminary review by the Curriculum Committee, and then circulated to the faculty for comment. The Curriculum Committee will consider the proposals and any faculty comments and forward a recommendation to the faculty, which has the ultimate power of approval.

This form lists the information that the Curriculum Committee feels it needs to properly evaluate proposals. You may use this form or you may submit the information in your own format. In either event, please try to give all of the information requested. This form is available on a floppy in various word processor formats in case you find it more convenient to give the information on the form itself.

4. State name of proposed course or seminar:

International cooperation in civil and criminal matters in depth

2. Indicate whether the proposal is for a "seminar" or a "course".

course

3. Describe the subject matter and coverage of proposed course or seminar:

The course will cover in depth key issues relating to international cooperation in financial intelligence unit analysis, investigation, prosecution, and both criminal and civil asset recovery and asset sharing, in money laundering/financing of terrorism and proliferation cases.

4. Attach copy of course description suitable for incorporation in the Student Handbook. If there is a syllabus, please attach.

International cooperation in civil and criminal matters in depth: This course will examine in detail how financial intelligence units, investigators, prosecutors, and investigative judges/magistrates cooperate with officials of other jurisdictions in identifying possible money laundering/financing of terrorism and proliferation cases, investigating and prosecuting those cases, and recovering assets that are candidates for freezing or confiscation. The course will also review the international cooperation elements found in the Financial Action Task Force's [FATF] Forty Recommendations on combating money laundering and the financing of terrorism and proliferation and on a sampling of key national laws and regulations, including those of the United States.

5. State credit hours requested for the proposed course or seminar. Seminars suitable for satisfaction of the writing requirement can normally be for either three or two credit hours. The difference between the two and three credit hours seminar is described at the end of this form.

3 credit hours.

6. Indicate if you are requesting any size limitations for the proposed course or seminar. Writing seminars are normally limited in size, with 12 the norm if the seminar is suitable for satisfaction or writing requirement. If you wish to limit the enrollment in a course, please explain the reason for the limitation.

No limit.

7. Please list any prerequisites. If the course of seminar overlaps with existing courses or seminars, should students be permitted to take more than one of the overlapping courses or seminars?

Introduction to the criminology of money laundering and to international standards on combating money laundering and the financing of terrorism & proliferation

8. Please explain why this course or seminar should be added to the curriculum. Does the proposed course or seminar overlap with any existing course or seminar? If so, please explain the extent of overlap and the reason why the overlap should not bar the approval of the new course or seminar. If there is an overlap, please discuss this with the faculty members teaching the overlapping courses or seminars.

This course is to be one of the four required Foundation courses in the Executive Master of Arts in Financial Integrity program.

9. Indicate if the proposed course or seminar is to replace an existing course or seminar.

No.

10. Indicate if the new course or seminar can be used to satisfy the upper-level writing requirement. How many students may use the proposed course or seminar to satisfy the writing requirement?

No.

11. Indicate the casebook or course materials that you recommend as most suitable for the proposed course or seminar, and attach a copy of the table of contents. If there are no published material suitable for the course or seminar, indicate who has or who will prepare unpublished course materials. If possible attach an outline, table of contents, or description of such unpublished materials.

Richard Gordon, *Combating Money Laundering and the Financing of Terrorism & Proliferation: Theory and Practice* (Oxford, 2014); The FATF Forty Recommendations; The FATF Methodology of Compliance Assessment; selected statutory and regulatory materials; case studies

12. Most courses are graded by an examination, and most seminars by a paper. Indicate whether the students will be required to take an examination, write a paper or both. Is there an optional paper?

Exam.

13. Indicate the names of existing faculty willing and able to teach the proposed course or seminar. If the proposed course or seminar is expected to be taught by an adjunct, please attach the resume or some description of the background and qualifications of the proposed adjunct. If the course or seminar is to be taught by more than one person, please so indicate.

The course is to be taught by

Yves Aeschlimann, Jean Pierre Brun, Patrick O'Sullivan, Emile van der Does de Willebois, Boudewijn Verhelst

14. Indicate whether the expected need for the proposed course or seminar justifies that it be offered every year or only periodically, i.e. every other year.

The course will be offered on a periodic basis throughout the year as part of the Executive Master of Arts in Financial Integrity program.

Faculty Identification:

Yves Aeschlimann, Senior Vice President and AML Compliance Officer, UBS and former Financial Sector Expert, The World Bank, and Former Investigating Judge, Zurich, Switzerland

Jean Pierre Brun, Financial Sector Specialist, World Bank, Washington; formerly Prosecutor and Investigative Judge, and Director for Forensic and Fraud investigations, Deloitte Finance, Paris.

Pat O'Sullivan, Manager, Financial Intelligence Unit, Wellington, New Zealand

Boudewijn Verhelst, Chairman, the Egmont Group and Co-Director, the Belgian Financial Intelligence Unit, Brussels, Belgium

Emile van der Does de Willebois, Senior Financial Sector Expert, Financial Market Integrity/ Stolen Asset Recovery Initiative (StAR), The World Bank, Washington DC

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5. State name of proposed course or seminar:

Building and implementing an effective anti-money laundering/financing of terrorism and proliferation compliance program

2. Indicate whether the proposal is for a "seminar" or a "course".

course

3. Describe the subject matter and coverage of proposed course or seminar:

The course will continue the coverage of risk assessment, customer on boarding and acceptance, customer activity monitoring, and suspicious activity report preparation covered in Preventive Measures in Depth. The course will focus on case studies, primarily from the banking sector.

4. Attach copy of course description suitable for incorporation in the Student Handbook. If there is a syllabus, please attach.

Building and implementing an effective anti-money laundering/financing of terrorism and proliferation compliance program: This course will continue the coverage of risk assessment, customer on boarding and acceptance, customer activity monitoring, and suspicious activity report preparation covered in Preventive Measures in Depth. The course will primarily involve the presentation and discussion of case studies in each critical area of an effective compliance program, with a focus on the banking sector.

5. State credit hours requested for the proposed course or seminar. Seminars suitable for satisfaction of the writing requirement can normally be for either three

or two credit hours. The difference between the two and three credit hours seminar is described at the end of this form.

3 credit hours.

6. Indicate if you are requesting any size limitations for the proposed course or seminar. Writing seminars are normally limited in size, with 12 the norm if the seminar is suitable for satisfaction or writing requirement. If you wish to limit the enrollment in a course, please explain the reason for the limitation.

No limit.

7. Please list any prerequisites. If the course of seminar overlaps with existing courses or seminars, should students be permitted to take more than one of the overlapping courses or seminars?

Preventive Measures in Depth

8. Please explain why this course or seminar should be added to the curriculum. Does the proposed course or seminar overlap with any existing course or seminar? If so, please explain the extent of overlap and the reason why the overlap should not bar the approval of the new course or seminar. If there is an overlap, please discuss this with the faculty members teaching the overlapping courses or seminars.

This course is to be one of the two required Focus courses in the Regulatory Compliance Track of the Executive Master of Arts in Financial Integrity program.

9. Indicate if the proposed course or seminar is to replace an existing course or seminar.

No.

10. Indicate if the new course or seminar can be used to satisfy the upper-level writing requirement. How many students may use the proposed course or seminar to satisfy the writing requirement?

No.

11. Indicate the casebook or course materials that you recommend as most suitable for the proposed course or seminar, and attach a copy of the table of contents. If there are no published material suitable for the course or seminar, indicate who has or who will prepare unpublished course materials. If possible attach an outline, table of contents, or description of such unpublished materials.

Combatting Money Laundering and Terrorism Financing: A Comprehensive Training Guide (2009)

Delston, Willie Maddox, Richard Small, Philip DeLuca, Karim Rajwani,  
Materials on Financial Integrity Regulatory Compliance

12. Most courses are graded by an examination, and most seminars by a paper. Indicate whether the students will be required to take an examination, write a paper or both. Is there an optional paper?

Exam.

13. Indicate the names of existing faculty willing and able to teach the proposed course or seminar. If the proposed course or seminar is expected to be taught by an adjunct, please attach the resume or some description of the background and qualifications of the proposed adjunct. If the course or seminar is to be taught by more than one person, please so indicate.

The course is to be taught by

Ross Delston, Willie Maddox, Richard Small, Philip DeLuca, Karim Rajwani

14. Indicate whether the expected need for the proposed course or seminar justifies that it be offered every year or only periodically, i.e. every other year.

The course will be offered on a periodic basis throughout the year as part of the Executive Master of Arts in Financial Integrity program.

Faculty Identification:

Ross Delston, CAMS, Attorney and former Assistant General Counsel, FDIC, Washington, DC

Willie Maddox, CPA, CGMA, CAMS, Vice President, ERM Risk Assessment Manager, KeyBank, Cleveland, OH

Rick Small, CAMS, Vice President, Enterprise AML, Anti-Corruption and Sanctions, American Express, NYC, former managing director of global anti-money laundering at Citigroup, former Special Counsel for Bank Secrecy Act and money laundering matters, The Board of Governors, Federal Reserve System

Phil DeLuca, Senior Vice President and Compliance Managing Director, JPMorgan Chase Bank, Columbus, OH

Karim Rajwani Global Head, Anti-Money Laundering, *Royal Bank* of Canada, Toronto, Canada

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6. State name of proposed course or seminar:

Anti-money laundering/financing of terrorism and proliferation audits, inspections, on-site examinations, and sanctions

2. Indicate whether the proposal is for a "seminar" or a "course".

course

3. Describe the subject matter and coverage of proposed course or seminar:

The course will continue the coverage of audits, inspections, on-site examinations, and sanctions covered in Preventive Measures in Depth. The course will focus on case studies, primarily from the banking sector.

4. Attach copy of course description suitable for incorporation in the Student Handbook. If there is a syllabus, please attach.

Anti-money laundering/financing of terrorism and proliferation audits, inspections, on-site examinations, and sanctions: This course will continue the coverage of audits, inspections, on-site examinations, and sanctions covered in Preventive Measures in Depth. The course will primarily involve the presentation and discussion of case studies in each critical area of an effective compliance program.

5. State credit hours requested for the proposed course or seminar. Seminars suitable for satisfaction of the writing requirement can normally be for either three or two credit hours. The difference between the two and three credit hours seminar is described at the end of this form.

3 credit hours.

6. Indicate if you are requesting any size limitations for the proposed course or seminar. Writing seminars are normally limited in size, with 12 the norm if the seminar is suitable for satisfaction or writing requirement. If you wish to limit the enrollment in a course, please explain the reason for the limitation.

No limit.

7. Please list any prerequisites. If the course of seminar overlaps with existing courses or seminars, should students be permitted to take more than one of the overlapping courses or seminars?

Building and implementing an effective anti-money laundering/financing of terrorism and proliferation compliance program

8. Please explain why this course or seminar should be added to the curriculum. Does the proposed course or seminar overlap with any existing course or seminar? If so, please explain the extent of overlap and the reason why the overlap should not bar the approval of the new course or seminar. If there is an overlap, please discuss this with the faculty members teaching the overlapping courses or seminars.

This course is to be one of the two required Focus courses in the Regulatory Compliance Track of the Executive Master of Arts in Financial Integrity program.

9. Indicate if the proposed course or seminar is to replace an existing course or seminar.

No.

10. Indicate if the new course or seminar can be used to satisfy the upper-level writing requirement. How many students may use the proposed course or seminar to satisfy the writing requirement?

No.

11. Indicate the casebook or course materials that you recommend as most suitable for the proposed course or seminar, and attach a copy of the table of contents. If there are no published material suitable for the course or seminar, indicate who has or who will prepare unpublished course materials. If possible attach an outline, table of contents, or description of such unpublished materials.

Ross Delston, Willie Maddox, Richard Small, Philip DeLuca, Karim Rajwani,  
Materials on Financial Integrity Regulatory Compliance

12. Most courses are graded by an examination, and most seminars by a paper. Indicate whether the students will be required to take an examination, write a paper or both. Is there an optional paper?

Exam.

13. Indicate the names of existing faculty willing and able to teach the proposed course or seminar. If the proposed course or seminar is expected to be taught by an adjunct, please attach the resume or some description of the background and qualifications of the proposed adjunct. If the course or seminar is to be taught by more than one person, please so indicate.

The course is to be taught by

Ross Delston, Willie Maddox, Nina Nichols, Richard Small, Philip DeLuca,  
Karim Rajwani, Shaktikanta

14. Indicate whether the expected need for the proposed course or seminar justifies that it be offered every year or only periodically, i.e. every other year.

The course will be offered on a periodic basis throughout the year as part of the Executive Master of Arts in Financial Integrity program.

Faculty Identification:

Ross Delston, CAMS, Attorney and former Assistant General Counsel, FDIC, Washington, DC

Willie Maddox, CPA, CGMA, CAMS, Vice President, ERM Risk Assessment Manager, KeyBank, Cleveland, OH

Nina Nichols, Deputy Director of the Division of Supervision Policy and Support, Federal Housing Finance Agency, formerly Senior Vice President, JP Morgan Chase and Assistant General Counsel, the Board of Governors of the Federal Reserve System, Washington, DC

Rick Small, CAMS, Vice President, Enterprise AML, Anti-Corruption and Sanctions, American Express, NYC, former managing director of global anti-money laundering at Citigroup, former Special Counsel for Bank Secrecy Act and money laundering matters, The Board of Governors, Federal Reserve System

Phil DeLuca, Senior Vice President and Compliance Managing Director, JPMorgan Chase Bank, Columbus, OH

Karim Rajwani Global Head, Anti-Money Laundering, *Royal Bank of Canada*, Toronto, Canada

Shaktikanta DAS Additional Secretary, Ministry of Finance, Government of India, New Delhi, India

## Procedures for Proposing New Courses or Seminars

The following form is to assist those proposing new courses or seminars. Proposal should be submitted to the Curriculum Committee. Proposals will be given a preliminary review by the Curriculum Committee, and then circulated to the faculty for comment. The Curriculum Committee will consider the proposals and any faculty comments and forward a recommendation to the faculty, which has the ultimate power of approval.

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7. State name of proposed course or seminar:

Building and prosecuting an anti-money laundering/financing of terrorism and proliferation criminal case

2. Indicate whether the proposal is for a "seminar" or a "course".

course

3. Describe the subject matter and coverage of proposed course or seminar:

The course will continue the coverage of investigation and prosecution of money laundering/financing of terrorism and proliferation in operational and law enforcement in depth. The course will focus on case studies.

4. Attach copy of course description suitable for incorporation in the Student Handbook. If there is a syllabus, please attach.

Building and prosecuting an anti-money laundering/financing of terrorism and proliferation criminal case: The course will continue the coverage of investigation and prosecution of money laundering/financing of terrorism and proliferation in operational and law enforcement in depth. The course will primarily involve the presentation and discussion of case studies in each critical area of investigation and prosecution.

5. State credit hours requested for the proposed course or seminar. Seminars suitable for satisfaction of the writing requirement can normally be for either three or two credit hours. The difference between the two and three credit hours seminar is described at the end of this form.

3 credit hours.

6. Indicate if you are requesting any size limitations for the proposed course or seminar. Writing seminars are normally limited in size, with 12 the norm if the seminar is suitable for satisfaction or writing requirement. If you wish to limit the enrollment in a course, please explain the reason for the limitation.

No limit.

7. Please list any prerequisites. If the course or seminar overlaps with existing courses or seminars, should students be permitted to take more than one of the overlapping courses or seminars?

Operational and law enforcement in depth: the financial intelligence unit, investigation, and prosecution of money laundering/financing of terrorism and proliferation, and asset tracing and seizure

8. Please explain why this course or seminar should be added to the curriculum. Does the proposed course or seminar overlap with any existing course or seminar? If so, please explain the extent of overlap and the reason why the overlap should not bar the approval of the new course or seminar. If there is an overlap, please discuss this with the faculty members teaching the overlapping courses or seminars.

This course is to be one of the two required Focus courses in Law Enforcement and Prosecution Track of the Executive Master of Arts in Financial Integrity program.

9. Indicate if the proposed course or seminar is to replace an existing course or seminar.

No.

10. Indicate if the new course or seminar can be used to satisfy the upper-level writing requirement. How many students may use the proposed course or seminar to satisfy the writing requirement?

No.

11. Indicate the casebook or course materials that you recommend as most suitable for the proposed course or seminar, and attach a copy of the table of contents. If there are no published material suitable for the course or seminar, indicate who has or who will prepare unpublished course materials. If possible attach an outline, table of contents, or description of such unpublished materials.

Yves Aeschlimann, Richard Barrett, Jeff Breinhold, Jean Pierre Brun, Mark Butler, Sue Eckert, Rick McDonell, Patrick O'Sullivan, Nikos Passas, Susan

Pond, Kevin Stephenson, Emile van der Does de Willebois, Boudewijn Verhelst,  
Materials on Operational and Law Enforcement in Financial Integrity.

12. Most courses are graded by an examination, and most seminars by a paper. Indicate whether the students will be required to take an examination, write a paper or both. Is there an optional paper?

Exam.

13. Indicate the names of existing faculty willing and able to teach the proposed course or seminar. If the proposed course or seminar is expected to be taught by an adjunct, please attach the resume or some description of the background and qualifications of the proposed adjunct. If the course or seminar is to be taught by more than one person, please so indicate.

The course is to be taught by

Yves Aeschlimann, Richard Barrett, Jeff Breinhold, Jean Pierre Brun, Mark Butler, Sue Eckert, Rick McDonell, Patrick O'Sullivan, Nikos Passas, Susan Pond, Kevin Stephenson, Emile van der Does de Willebois, Boudewijn Verhelst,

14. Indicate whether the expected need for the proposed course or seminar justifies that it be offered every year or only periodically, i.e. every other year.

The course will be offered on a periodic basis throughout the year as part of the Executive Master of Arts in Financial Integrity program.

Faculty Identification:

Yves Aeschlimann, Senior Vice President and AML Compliance Officer, UBS and former Financial Sector Expert, The World Bank, and Former Investigating Judge, Zurich, Switzerland

Richard Barrett, CMG, OBE, International Centre for Counter-Terrorism, The Hague and former Coordinator, Al-Qaida Taliban Monitoring Team, UN, NYC

Jeff Breinhold, founding Co-Director, Counterterrorism Task Force, United States Department of Justice.

Jean Pierre Brun, Financial Sector Specialist, World Bank, Washington; formerly Prosecutor and Investigative Judge, and Director for Forensic and Fraud investigations, Deloitte Finance, Paris.

Mark Butler, Financial Sector Expert, the World Bank, former Head of Financial Crime Unit, Hong Kong Police

Hon. Sue Eckert, Senior Fellow, the Watson Institute, Brown University, Providence, RI, former Assistant Secretary of Commerce, Washington, DC

Rick McDonnell, Executive Secretary, Financial Action Task Force (FATF), Paris, France

Pat O'Sullivan, Manager, Financial Intelligence Unit, Wellington, New Zealand

Nikos Passas, Professor of Criminology, Northeastern University, Boston, MA

Susan Pond, Senior Officer, Political Affairs and Security Policy, NATO Headquarters, Brussels, Belgium

Kevin Stephenson, Executive Secretary, The Egmont Group of Financial Intelligence Units, Ottawa, Canada

Boudewijn Verhelst, Chairman, the Egmont Group and Co-Director, the Belgian Financial Intelligence Unit, Brussels, Belgium

Emile van der Does de Willebois, Senior Financial Sector Expert, Financial Market Integrity/ Stolen Asset Recovery Initiative (StAR), The World Bank, Washington DC

## Procedures for Proposing New Courses or Seminars

The following form is to assist those proposing new courses or seminars. Proposal should be submitted to the Curriculum Committee. Proposals will be given a preliminary review by the Curriculum Committee, and then circulated to the faculty for comment. The Curriculum Committee will consider the proposals and any faculty comments and forward a recommendation to the faculty, which has the ultimate power of approval.

This form lists the information that the Curriculum Committee feels it needs to properly evaluate proposals. You may use this form or you may submit the information in your own format. In either event, please try to give all of the information requested. This form is available on a floppy in various word processor formats in case you find it more convenient to give the information on the form itself.

8. State name of proposed course or seminar:

Asset tracing and recovery

2. Indicate whether the proposal is for a "seminar" or a "course".

course

3. Describe the subject matter and coverage of proposed course or seminar:

The course will continue the coverage of asset recover in operational and law enforcement in depth. The course will focus on case studies.

4. Attach copy of course description suitable for incorporation in the Student Handbook. If there is a syllabus, please attach.

Asset tracing and recovery: The course will continue the coverage of asset tracing and recovery in operational and law enforcement in depth. The course will primarily involve the presentation and discussion of case studies in each critical area of asset tracing and recovery.

5. State credit hours requested for the proposed course or seminar. Seminars suitable for satisfaction of the writing requirement can normally be for either three or two credit hours. The difference between the two and three credit hours seminar is described at the end of this form.

3 credit hours.

6. Indicate if you are requesting any size limitations for the proposed course or seminar. Writing seminars are normally limited in size, with 12 the norm if the

seminar is suitable for satisfaction or writing requirement. If you wish to limit the enrollment in a course, please explain the reason for the limitation.

No limit.

7. Please list any prerequisites. If the course of seminar overlaps with existing courses or seminars, should students be permitted to take more than one of the overlapping courses or seminars?

Operational and law enforcement in depth: the financial intelligence unit, investigation, and prosecution of money laundering/financing of terrorism and proliferation, and asset tracing and seizure

8. Please explain why this course or seminar should be added to the curriculum. Does the proposed course or seminar overlap with any existing course or seminar? If so, please explain the extent of overlap and the reason why the overlap should not bar the approval of the new course or seminar. If there is an overlap, please discuss this with the faculty members teaching the overlapping courses or seminars.

This course is to be one of the two required Focus courses in Law Enforcement and Prosecution Track of the Executive Master of Arts in Financial Integrity program.

9. Indicate if the proposed course or seminar is to replace an existing course or seminar.

No.

10. Indicate if the new course or seminar can be used to satisfy the upper-level writing requirement. How many students may use the proposed course or seminar to satisfy the writing requirement?

No.

11. Indicate the casebook or course materials that you recommend as most suitable for the proposed course or seminar, and attach a copy of the table of contents. If there are no published material suitable for the course or seminar, indicate who has or who will prepare unpublished course materials. If possible attach an outline, table of contents, or description of such unpublished materials.

Jean-Pierre Brun, et alia, Asset Recovery Handbook: A Guide for Practitioners (2011)

Ted Greenburg et alia, Stolen Asset Recover Guide: A good Practices guide for Non-Conviction based Asset Recovery (2010)

12. Most courses are graded by an examination, and most seminars by a paper. Indicate whether the students will be required to take an examination, write a paper or both. Is there an optional paper?

Exam.

13. Indicate the names of existing faculty willing and able to teach the proposed course or seminar. If the proposed course or seminar is expected to be taught by an adjunct, please attach the resume or some description of the background and qualifications of the proposed adjunct. If the course or seminar is to be taught by more than one person, please so indicate.

The course is to be taught by

Yves Aeschlimann, Jean Pierre Brun, Patrick O'Sullivan, Nikos Passas, Susan Pond, Kevin Stephenson, Emile van der Does de Willebois, Boudewijn Verhelst,

14. Indicate whether the expected need for the proposed course or seminar justifies that it be offered every year or only periodically, i.e. every other year.

The course will be offered on a periodic basis throughout the year as part of the Executive Master of Arts in Financial Integrity program.

Faculty Identification:

Yves Aeschlimann, Senior Vice President and AML Compliance Officer, UBS and former Financial Sector Expert, The World Bank, and Former Investigating Judge, Zurich, Switzerland

Jean Pierre Brun, Financial Sector Specialist, World Bank, Washington; formerly Prosecutor and Investigative Judge, and Director for Forensic and Fraud investigations, Deloitte Finance, Paris.

Pat O'Sullivan, Manager, Financial Intelligence Unit, Wellington, New Zealand

Nikos Passas, Professor of Criminology, Northeastern University, Boston, MA

Susan Pond, Senior Officer, Political Affairs and Security Policy, NATO Headquarters, Brussels, Belgium

Kevin Stephenson, Executive Secretary, The Egmont Group of Financial Intelligence Units, Ottawa, Canada

Emile van der Does de Willebois, Senior Financial Sector Expert, Financial Market Integrity/ Stolen Asset Recovery Initiative (StAR), The World Bank, Washington D  
Boudewijn Verhelst, Chairman, the Egmont Group and Co-Director, the Belgian Financial Intelligence Unit, Brussels, Belgium

## Procedures for Proposing New Courses or Seminars

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9. State name of proposed course or seminar:

Selected topics in automated customer acceptance and transaction monitoring systems

2. Indicate whether the proposal is for a "seminar" or a "course".

course

3. Describe the subject matter and coverage of proposed course or seminar:

The course will consider the use of automated customer acceptance and transaction monitoring systems. It will examine key issues in how such systems work, what systems are currently available, and how they can be improved.

4. Attach copy of course description suitable for incorporation in the Student Handbook. If there is a syllabus, please attach.

Selected topics in automated customer acceptance and transaction monitoring systems:

This course will consider the use of automated customer acceptance and transaction monitoring systems. It will examine key issues in data base formation, including web-based text recognition and analysis, link analysis, and different forms of statistical discriminant and regression analysis, and forms of data presentation. The course will examine current vendor products. The course will also make use of case studies.

5. State credit hours requested for the proposed course or seminar. Seminars suitable for satisfaction of the writing requirement can normally be for either three or two credit hours. The difference between the two and three credit hours seminar is described at the end of this form.

3 credit hours.

6. Indicate if you are requesting any size limitations for the proposed course or seminar. Writing seminars are normally limited in size, with 12 the norm if the seminar is suitable for satisfaction or writing requirement. If you wish to limit the enrollment in a course, please explain the reason for the limitation.

No limit.

7. Please list any prerequisites. If the course of seminar overlaps with existing courses or seminars, should students be permitted to take more than one of the overlapping courses or seminars?

Building and implementing an effective anti-money laundering/financing of terrorism and proliferation compliance program

8. Please explain why this course or seminar should be added to the curriculum. Does the proposed course or seminar overlap with any existing course or seminar? If so, please explain the extent of overlap and the reason why the overlap should not bar the approval of the new course or seminar. If there is an overlap, please discuss this with the faculty members teaching the overlapping courses or seminars.

This course is to be an Elective in the Executive Master of Arts in Financial Integrity program.

9. Indicate if the proposed course or seminar is to replace an existing course or seminar.

No.

10. Indicate if the new course or seminar can be used to satisfy the upper-level writing requirement. How many students may use the proposed course or seminar to satisfy the writing requirement?

No.

11. Indicate the casebook or course materials that you recommend as most suitable for the proposed course or seminar, and attach a copy of the table of contents. If there are no published material suitable for the course or seminar, indicate who has or who will prepare unpublished course materials. If possible attach an outline, table of contents, or description of such unpublished materials.

Combatting Money Laundering and Terrorism Financing: A Comprehensive Training Guide (2009)

Ross Delston, Willie Maddox, Richard Small, Philip DeLuca, Karim Rajwani,  
Materials on Financial Integrity Regulatory Compliance

Demonstrations of products offered by vendors

12. Most courses are graded by an examination, and most seminars by a paper. Indicate whether the students will be required to take an examination, write a paper or both. Is there an optional paper?

Exam.

13. Indicate the names of existing faculty willing and able to teach the proposed course or seminar. If the proposed course or seminar is expected to be taught by an adjunct, please attach the resume or some description of the background and qualifications of the proposed adjunct. If the course or seminar is to be taught by more than one person, please so indicate.

The course is to be taught by

Ross Delston, Willie Maddox, Richard Small, Philip DeLuca, Karim Rajwani

14. Indicate whether the expected need for the proposed course or seminar justifies that it be offered every year or only periodically, i.e. every other year.

The course will be offered on a periodic basis throughout the year as part of the Executive Master of Arts in Financial Integrity program.

Faculty Identification:

Ross Delston, CAMS, Attorney and former Assistant General Counsel, FDIC, Washington, DC

Phil DeLuca, Senior Vice President and Compliance Managing Director, JPMorgan Chase Bank, Columbus, OH

Willie Maddox, CPA, CGMA, CAMS, Vice President, ERM Risk Assessment Manager, KeyBank, Cleveland, OH

Karim Rajwani Global Head, Anti-Money Laundering, *Royal Bank of Canada*, Toronto, Canada

Rick Small, CAMS, Vice President, Enterprise AML, Anti-Corruption and Sanctions, American Express, NYC, former managing director of global anti-money laundering at Citigroup, former Special Counsel for Bank Secrecy Act and money laundering matters, The Board of Governors, Federal Reserve System

## Procedures for Proposing New Courses or Seminars

The following form is to assist those proposing new courses or seminars. Proposal should be submitted to the Curriculum Committee. Proposals will be given a preliminary review by the Curriculum Committee, and then circulated to the faculty for comment. The Curriculum Committee will consider the proposals and any faculty comments and forward a recommendation to the faculty, which has the ultimate power of approval.

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10. State name of proposed course or seminar:

Selected topics in automated financial intelligence unit systems: automated tools and transaction activity analysis

2. Indicate whether the proposal is for a "seminar" or a "course".

course

3. Describe the subject matter and coverage of proposed course or seminar:

The course will consider the use of automated systems for government financial intelligence units. It will examine key issues in how such systems work, what systems are currently available, and how they can be improved.

4. Attach copy of course description suitable for incorporation in the Student Handbook. If there is a syllabus, please attach.

Selected topics in automated financial intelligence unit systems: automated tools and transaction activity analysis: This course will consider the use of automated systems for analyzing suspicious transaction reports and other data to develop actionable intelligence. It will examine key issues in data base formation, including web-based text recognition and analysis, link analysis, and different forms of statistical discriminant and regression analysis, and forms of intelligence presentation. The course will examine current vendor products. The course will also make use of case studies.

5. State credit hours requested for the proposed course or seminar. Seminars suitable for satisfaction of the writing requirement can normally be for either three or two credit hours. The difference between the two and three credit hours seminar is described at the end of this form.

3 credit hours.

6. Indicate if you are requesting any size limitations for the proposed course or seminar. Writing seminars are normally limited in size, with 12 the norm if the seminar is suitable for satisfaction or writing requirement. If you wish to limit the enrollment in a course, please explain the reason for the limitation.

No limit.

7. Please list any prerequisites. If the course or seminar overlaps with existing courses or seminars, should students be permitted to take more than one of the overlapping courses or seminars?

Building and implementing an effective anti-money laundering/financing of terrorism and proliferation compliance program

8. Please explain why this course or seminar should be added to the curriculum. Does the proposed course or seminar overlap with any existing course or seminar? If so, please explain the extent of overlap and the reason why the overlap should not bar the approval of the new course or seminar. If there is an overlap, please discuss this with the faculty members teaching the overlapping courses or seminars.

This course is to be an Elective in the Executive Master of Arts in Financial Integrity program.

9. Indicate if the proposed course or seminar is to replace an existing course or seminar.

No.

10. Indicate if the new course or seminar can be used to satisfy the upper-level writing requirement. How many students may use the proposed course or seminar to satisfy the writing requirement?

No.

11. Indicate the casebook or course materials that you recommend as most suitable for the proposed course or seminar, and attach a copy of the table of contents. If there are no published material suitable for the course or seminar, indicate who has or who will prepare unpublished course materials. If possible attach an outline, table of contents, or description of such unpublished materials.

Combatting Money Laundering and Terrorism Financing: A Comprehensive Training Guide (2009)

Sean Mark, Patrick O'Sullivan, Boudewijn Verhelst, Materials on Financial Intelligence Unit Automation

Demonstrations of products offered by vendors

12. Most courses are graded by an examination, and most seminars by a paper. Indicate whether the students will be required to take an examination, write a paper or both. Is there an optional paper?

Exam.

13. Indicate the names of existing faculty willing and able to teach the proposed course or seminar. If the proposed course or seminar is expected to be taught by an adjunct, please attach the resume or some description of the background and qualifications of the proposed adjunct. If the course or seminar is to be taught by more than one person, please so indicate.

The course is to be taught by Sean Mark, Patrick O'Sullivan, and Boudewijn Verhelst

14. Indicate whether the expected need for the proposed course or seminar justifies that it be offered every year or only periodically, i.e. every other year.

The course will be offered on a periodic basis throughout the year as part of the Executive Master of Arts in Financial Integrity program.

Faculty Identification:

Sean Mark, Senior Analyst, AUSTRAC, Sydney and Sargent, Australian Federal Police

Pat O'Sullivan, Manager, Financial Intelligence Unit, Wellington, New Zealand

Boudewijn Verhelst, Chairman, the Egmont Group and Co-Director, the Belgian Financial Intelligence Unit, Brussels, Belgium

## Procedures for Proposing New Courses or Seminars

The following form is to assist those proposing new courses or seminars. Proposal should be submitted to the Curriculum Committee. Proposals will be given a preliminary review by the Curriculum Committee, and then circulated to the faculty for comment. The Curriculum Committee will consider the proposals and any faculty comments and forward a recommendation to the faculty, which has the ultimate power of approval.

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11. State name of proposed course or seminar:

Selected preventive measures issues for insurance companies and agents/brokers, securities firms, broker-dealers, mutual funds/collective investment schemes, investment advisors, and money services businesses

2. Indicate whether the proposal is for a "seminar" or a "course".

course

3. Describe the subject matter and coverage of proposed course or seminar:

The course will consider risk assessment, customer on boarding and acceptance, customer activity monitoring, suspicious activity report preparation, and regulation and supervision for the non-bank financial sector.

4. Attach copy of course description suitable for incorporation in the Student Handbook. If there is a syllabus, please attach.

Selected preventive measures issues for insurance companies and agents/brokers, securities firms, broker-dealers, mutual funds/collective investment schemes, investment advisors, and money services businesses: This course will examine in detail measures that for insurance companies and agents/brokers, securities firms, broker-dealers, mutual funds/collective investment schemes, investment advisors, and money services businesses are required to implement to prevent and uncover money laundering/financing of terrorism and proliferation. It will focus on the key preventive measures of risk assessment, customer on boarding and acceptance, customer activity monitoring, suspicious activity report preparation, and the regulation and supervision of non-bank financial institutions with respect to preventive measures implementation. The course will also review the use of automated systems and make use of case studies.

5. State credit hours requested for the proposed course or seminar. Seminars suitable for satisfaction of the writing requirement can normally be for either three or two credit hours. The difference between the two and three credit hours seminar is described at the end of this form.

3 credit hours.

6. Indicate if you are requesting any size limitations for the proposed course or seminar. Writing seminars are normally limited in size, with 12 the norm if the seminar is suitable for satisfaction or writing requirement. If you wish to limit the enrollment in a course, please explain the reason for the limitation.

No limit.

7. Please list any prerequisites. If the course of seminar overlaps with existing courses or seminars, should students be permitted to take more than one of the overlapping courses or seminars?

Building and implementing an effective anti-money laundering/financing of terrorism and proliferation compliance program

8. Please explain why this course or seminar should be added to the curriculum. Does the proposed course or seminar overlap with any existing course or seminar? If so, please explain the extent of overlap and the reason why the overlap should not bar the approval of the new course or seminar. If there is an overlap, please discuss this with the faculty members teaching the overlapping courses or seminars.

This course is to be an Elective in the Executive Master of Arts in Financial Integrity program.

9. Indicate if the proposed course or seminar is to replace an existing course or seminar.

No.

10. Indicate if the new course or seminar can be used to satisfy the upper-level writing requirement. How many students may use the proposed course or seminar to satisfy the writing requirement?

No.

11. Indicate the casebook or course materials that you recommend as most suitable for the proposed course or seminar, and attach a copy of the table of contents. If there are no published material suitable for the course or seminar, indicate who

has or who will prepare unpublished course materials. If possible attach an outline, table of contents, or description of such unpublished materials.

Ross Delston, Richard Gordon, and Sean Watterston, Materials on CDD, STR Reporting, and Compliance Supervision in the Non-Bank Sector

Demonstrations of products offered by vendors

12. Most courses are graded by an examination, and most seminars by a paper. Indicate whether the students will be required to take an examination, write a paper or both. Is there an optional paper?

Exam.

13. Indicate the names of existing faculty willing and able to teach the proposed course or seminar. If the proposed course or seminar is expected to be taught by an adjunct, please attach the resume or some description of the background and qualifications of the proposed adjunct. If the course or seminar is to be taught by more than one person, please so indicate.

The course is to be taught by

Ross Delston, Richard Gordon, and Sean Watterston

14. Indicate whether the expected need for the proposed course or seminar justifies that it be offered every year or only periodically, i.e. every other year.

The course will be offered on a periodic basis throughout the year as part of the Executive Master of Arts in Financial Integrity program.

Faculty Identification:

Ross Delston, CAMS, Attorney and former Assistant General Counsel, FDIC, Washington, DC

Sean Watterston, Senior Fellow, Case Program on Financial Regulation, and former Senior Vice President, Enterprise Policy & Regulatory Relations, Bank of America and former Senior Counsel, Securities & Exchange Commission, Office of International Affairs, Washington, DC

## Procedures for Proposing New Courses or Seminars

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12. State name of proposed course or seminar:

Selected preventive measures issues with respect to trade-based laundering, narcotics, financial fraud, corruption, human trafficking, terrorism, and proliferation financing

2. Indicate whether the proposal is for a "seminar" or a "course".

course

3. Describe the subject matter and coverage of proposed course or seminar:

The course will continue the coverage of risk assessment, customer on boarding and acceptance, customer activity monitoring, and suspicious activity report preparation with respect to selective predicate offenses to money laundering and terrorism and proliferation financing.

4. Attach copy of course description suitable for incorporation in the Student Handbook. If there is a syllabus, please attach.

Selected preventive measures issues with respect to trade-based laundering, narcotics, financial fraud, corruption, human trafficking, terrorism, and proliferation financing: This course will continue the coverage of risk assessment, customer on boarding and acceptance, customer activity monitoring, and suspicious activity report preparation covered in Preventive Measures in Depth by examining the special circumstances of trade-based laundering, narcotics, financial fraud, corruption, human trafficking, terrorism, and proliferation financing. The principle focus will be on developing and implementing effective typologies. The course will primarily involve the presentation and discussion of case studies.

5. State credit hours requested for the proposed course or seminar. Seminars suitable for satisfaction of the writing requirement can normally be for either three or two credit hours. The difference between the two and three credit hours seminar is described at the end of this form.

3 credit hours.

6. Indicate if you are requesting any size limitations for the proposed course or seminar. Writing seminars are normally limited in size, with 12 the norm if the seminar is suitable for satisfaction or writing requirement. If you wish to limit the enrollment in a course, please explain the reason for the limitation.

No limit.

7. Please list any prerequisites. If the course or seminar overlaps with existing courses or seminars, should students be permitted to take more than one of the overlapping courses or seminars?

Building and implementing an effective anti-money laundering/financing of terrorism and proliferation compliance program

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This course is to be an elective in the Executive Master of Arts in Financial Integrity program.

9. Indicate if the proposed course or seminar is to replace an existing course or seminar.

No.

10. Indicate if the new course or seminar can be used to satisfy the upper-level writing requirement. How many students may use the proposed course or seminar to satisfy the writing requirement?

No.

11. Indicate the casebook or course materials that you recommend as most suitable for the proposed course or seminar, and attach a copy of the table of contents. If there are no published material suitable for the course or seminar, indicate who

has or who will prepare unpublished course materials. If possible attach an outline, table of contents, or description of such unpublished materials.

Ross Delston, Philip DeLuca, Willie Maddox, Nikos Passas, Karim Rajwan, Richard Small, Materials on Detection of Predicate Offenses

12. Most courses are graded by an examination, and most seminars by a paper. Indicate whether the students will be required to take an examination, write a paper or both. Is there an optional paper?

Exam.

13. Indicate the names of existing faculty willing and able to teach the proposed course or seminar. If the proposed course or seminar is expected to be taught by an adjunct, please attach the resume or some description of the background and qualifications of the proposed adjunct. If the course or seminar is to be taught by more than one person, please so indicate.

The course is to be taught by

Ross Delston, Philip DeLuca, Willie Maddox, Nikos Passas, Karim Rajwan, Richard Small

14. Indicate whether the expected need for the proposed course or seminar justifies that it be offered every year or only periodically, i.e. every other year.

The course will be offered on a periodic basis throughout the year as part of the Executive Master of Arts in Financial Integrity program.

Faculty Identification:

Ross Delston, CAMS, Attorney and former Assistant General Counsel, FDIC, Washington, DC

Phil DeLuca, Senior Vice President and Compliance Managing Director, JPMorgan Chase Bank, Columbus, OH

Willie Maddox, CPA, CGMA, CAMS, Vice President, ERM Risk Assessment Manager, KeyBank, Cleveland, OH

Karim Rajwani Global Head, Anti-Money Laundering, *Royal Bank* of Canada, Toronto, Canada

Nikos Passas, Professor of Criminology, Northeastern University, Boston, MA

Rick Small, CAMS, Vice President, Enterprise AML, Anti-Corruption and Sanctions, American Express, NYC, former managing director of global anti-money laundering at Citigroup, former Special Counsel for Bank Secrecy Act and money laundering matters, The Board of Governors, Federal Reserve System

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13. State name of proposed course or seminar:

Selected operational and law enforcement issues with respect to narcotics, financial fraud, corruption, human trafficking, terrorism, and proliferation financing.

2. Indicate whether the proposal is for a "seminar" or a "course".

course

3. Describe the subject matter and coverage of proposed course or seminar:

The course will continue the coverage of investigation and prosecution of money laundering/financing of terrorism and proliferation in operational and law enforcement with respect to certain predicate offenses to money laundering and to terrorism and proliferation financing. The course will focus on case studies.

4. Attach copy of course description suitable for incorporation in the Student Handbook. If there is a syllabus, please attach.

Selected operational and law enforcement issues with respect to narcotics, financial fraud, corruption, human trafficking, terrorism, and proliferation financing: The course will continue the coverage of investigation and prosecution of money laundering/financing of terrorism and proliferation in operational and law enforcement by examining narcotics, financial fraud, corruption, human trafficking, terrorism, and proliferation financing. The course will primarily involve the presentation and discussion of case studies in each critical area of investigation and prosecution.

5. State credit hours requested for the proposed course or seminar. Seminars suitable for satisfaction of the writing requirement can normally be for either three

or two credit hours. The difference between the two and three credit hours seminar is described at the end of this form.

3 credit hours.

6. Indicate if you are requesting any size limitations for the proposed course or seminar. Writing seminars are normally limited in size, with 12 the norm if the seminar is suitable for satisfaction or writing requirement. If you wish to limit the enrollment in a course, please explain the reason for the limitation.

No limit.

7. Please list any prerequisites. If the course of seminar overlaps with existing courses or seminars, should students be permitted to take more than one of the overlapping courses or seminars?

Operational and law enforcement in depth: the financial intelligence unit, investigation, and prosecution of money laundering/financing of terrorism and proliferation, and asset tracing and seizure

8. Please explain why this course or seminar should be added to the curriculum. Does the proposed course or seminar overlap with any existing course or seminar? If so, please explain the extent of overlap and the reason why the overlap should not bar the approval of the new course or seminar. If there is an overlap, please discuss this with the faculty members teaching the overlapping courses or seminars.

This course is to be an Elective in the Executive Master of Arts in Financial Integrity program.

9. Indicate if the proposed course or seminar is to replace an existing course or seminar.

No.

10. Indicate if the new course or seminar can be used to satisfy the upper-level writing requirement. How many students may use the proposed course or seminar to satisfy the writing requirement?

No.

11. Indicate the casebook or course materials that you recommend as most suitable for the proposed course or seminar, and attach a copy of the table of contents. If there are no published material suitable for the course or seminar, indicate who has or who will prepare unpublished course materials. If possible attach an outline, table of contents, or description of such unpublished materials.

Yves Aeschlimann, Richard Barrett, Jeff Breinhold, Jean Pierre Brun, Mark Butler, Sue Eckert, Rick McDonell, Patrick O'Sullivan, Nikos Passas, Susan Pond, Kevin Stephenson, Emile van der Does de Willebois, Boudewijn Verhelst, Materials on Operational and Law Enforcement in Financial Integrity.

12. Most courses are graded by an examination, and most seminars by a paper. Indicate whether the students will be required to take an examination, write a paper or both. Is there an optional paper?

Exam.

13. Indicate the names of existing faculty willing and able to teach the proposed course or seminar. If the proposed course or seminar is expected to be taught by an adjunct, please attach the resume or some description of the background and qualifications of the proposed adjunct. If the course or seminar is to be taught by more than one person, please so indicate.

The course is to be taught by

Yves Aeschlimann Richard Barrett, Elizabeth Joyce, Jeff Breinhold, Jean Pierre Brun, Susan Pond, Patrick O'Sullivan, Nikos Passas

14. Indicate whether the expected need for the proposed course or seminar justifies that it be offered every year or only periodically, i.e. every other year.

The course will be offered on a periodic basis throughout the year as part of the Executive Master of Arts in Financial Integrity program.

Faculty Identification:

Yves Aeschlimann, Senior Vice President and AML Compliance Officer, UBS and former Financial Sector Expert, The World Bank, and Former Investigating Judge, Zurich, Switzerland

Elizabeth Joyce, Section Chief, Counter-Terrorism Committee, Executive Directorate, United Nations, New York

Richard Barrett, CMG, OBE, International Centre for Counter-Terrorism, The Hague and former Coordinator, Al-Qaida Taliban Monitoring Team, UN, NYC

Jeff Breinhold, founding Co-Director, Counterterrorism Task Force, United States Department of Justice.

Jean Pierre Brun, Financial Sector Specialist, World Bank, Washington; formerly Prosecutor and Investigative Judge, and Director for Forensic and Fraud investigations, Deloitte Finance, Paris.

Pat O'Sullivan, Manager, Financial Intelligence Unit, Wellington, New Zealand

Nikos Passas, Professor of Criminology, Northeastern University, Boston, MA

Susan Pond, Senior Officer, Political Affairs and Security Policy, NATO Headquarters, Brussels, Belgium

## Procedures for Proposing New Courses or Seminars

The following form is to assist those proposing new courses or seminars. Proposal should be submitted to the Curriculum Committee. Proposals will be given a preliminary review by the Curriculum Committee, and then circulated to the faculty for comment. The Curriculum Committee will consider the proposals and any faculty comments and forward a recommendation to the faculty, which has the ultimate power of approval.

This form lists the information that the Curriculum Committee feels it needs to properly evaluate proposals. You may use this form or you may submit the information in your own format. In either event, please try to give all of the information requested. This form is available on a floppy in various word processor formats in case you find it more convenient to give the information on the form itself.

14. State name of proposed course or seminar:

Mutual evaluations by the Financial Action Task Force and assessments by the IMF/World Bank: A practical approach for assessors and countries to be assessed using the Financial Action Task Force Methodology

2. Indicate whether the proposal is for a "seminar" or a "course".

course

3. Describe the subject matter and coverage of proposed course or seminar:

The course will cover the process of assessment compliance with the Financial Action Task Force's 40 Recommendations.

4. Attach copy of course description suitable for incorporation in the Student Handbook. If there is a syllabus, please attach.

Mutual evaluations by the Financial Action Task Force and assessments by the IMF/World Bank: A practical approach for assessors and countries to be assessed using the Financial Action Task Force Methodology: The course will cover the process of assessment compliance with the Financial Action Task Force's 40 Recommendations by use of the FATF's Methodology of Assessment. It will include all aspects of compliance assessment, from initial self-assessment questionnaire preparation to final discussion of the draft assessment at the FATF/FSRB Plenary.

5. State credit hours requested for the proposed course or seminar. Seminars suitable for satisfaction of the writing requirement can normally be for either three or two credit hours. The difference between the two and three credit hours seminar is described at the end of this form.

3 credit hours.

6. Indicate if you are requesting any size limitations for the proposed course or seminar. Writing seminars are normally limited in size, with 12 the norm if the seminar is suitable for satisfaction or writing requirement. If you wish to limit the enrollment in a course, please explain the reason for the limitation.

No limit.

7. Please list any prerequisites. If the course of seminar overlaps with existing courses or seminars, should students be permitted to take more than one of the overlapping courses or seminars?

Preventive measures in depth: risk assessment, customer on boarding and acceptance, customer activity monitoring, suspicious activity report preparation, and regulation and supervision

Operational and law enforcement in depth: the financial intelligence unit, investigation, and prosecution of money laundering/financing of terrorism and proliferation, and predicate crimes, and asset tracing and seizure

International cooperation in civil and criminal matters in depth

8. Please explain why this course or seminar should be added to the curriculum. Does the proposed course or seminar overlap with any existing course or seminar? If so, please explain the extent of overlap and the reason why the overlap should not bar the approval of the new course or seminar. If there is an overlap, please discuss this with the faculty members teaching the overlapping courses or seminars.

This course is to be an Elective in the Executive Master of Arts in Financial Integrity program.

9. Indicate if the proposed course or seminar is to replace an existing course or seminar.

No.

10. Indicate if the new course or seminar can be used to satisfy the upper-level writing requirement. How many students may use the proposed course or seminar to satisfy the writing requirement?

No.

11. Indicate the casebook or course materials that you recommend as most suitable for the proposed course or seminar, and attach a copy of the table of contents. If there are no published material suitable for the course or seminar, indicate who has or who will prepare unpublished course materials. If possible attach an outline, table of contents, or description of such unpublished materials.

FATF, 40 Recommendations (2012); FATF, Methodology (2013); Various country compliance reports

12. Most courses are graded by an examination, and most seminars by a paper. Indicate whether the students will be required to take an examination, write a paper or both. Is there an optional paper?

Exam.

13. Indicate the names of existing faculty willing and able to teach the proposed course or seminar. If the proposed course or seminar is expected to be taught by an adjunct, please attach the resume or some description of the background and qualifications of the proposed adjunct. If the course or seminar is to be taught by more than one person, please so indicate.

The course is to be taught by

Richard Gordon, Eliot Kennedy, Nadim Kyriakos-Saad, Richard McDonell, Alejandro Montesdeoca--Broquetas, Moni SenGupta, Emile van der Does de Willebois

14. Indicate whether the expected need for the proposed course or seminar justifies that it be offered every year or only periodically, i.e. every other year.

The course will be offered on a periodic basis throughout the year as part of the Executive Master of Arts in Financial Integrity program.

Faculty Identification:

Eliot Kennedy, Executive Secretary, Asia Pacific Group on Money Laundering, Sydney

Nadim Kyriakos-Saad, Deputy Director, Financial Integrity Group, IMF, Washington, DC

Rick McDonell, Executive Secretary, Financial Action Task Force (FATF), Paris, France

Dr. Alejandro Montesdeoca--Broquetas, former Executive Secretary, GAFISUD (the Latin American FATF-Style Regional Organization), Montevideo, Uruguay

P. Moni SenGupta, Financial Sector Expert, the World Bank, formerly Senior Counsel, IMF, Washington DC

Emile van der Does de Willebois, Senior Financial Sector Expert, Financial Market Integrity/ Stolen Asset Recovery Initiative (StAR), The World Bank, Washington DC

## Procedures for Proposing New Courses or Seminars

The following form is to assist those proposing new courses or seminars. Proposal should be submitted to the Curriculum Committee. Proposals will be given a preliminary review by the Curriculum Committee, and then circulated to the faculty for comment. The Curriculum Committee will consider the proposals and any faculty comments and forward a recommendation to the faculty, which has the ultimate power of approval.

This form lists the information that the Curriculum Committee feels it needs to properly evaluate proposals. You may use this form or you may submit the information in your own format. In either event, please try to give all of the information requested. This form is available on a floppy in various word processor formats in case you find it more convenient to give the information on the form itself.

15. State name of proposed course or seminar:

Philosophy of anti-money laundering and the financing of terrorism and proliferation: theories of global justice and philosophy of law as a normative basis for international standards

2. Indicate whether the proposal is for a "seminar" or a "course".

Course

3. Describe the subject matter and coverage of proposed course or seminar:

This course will provide a background on philosophy of law, and focus on global justice and applied ethics.

4. Attach copy of course description suitable for incorporation in the Student Handbook. If there is a syllabus, please attach.

Philosophy of anti-money laundering and the financing of terrorism and proliferation: theories of global justice and philosophy of law as a normative basis for international standards: The course will focus on practical and theoretical issues of global justice as they pertain to anti-money laundering and combating the financing of terrorism. What are our obligations to international justice? How do they influence AML/CFT law? The course will consider the normative basis of jurisprudence, comparing legal positivism to natural law theory. Next, the course will look at theories of global justice suitable to answer normative questions on what law should aim at. The remainder of the course will consider practical issues that come into play with AML/CFT law, such as corruption, poverty, distributive justice, human rights, violence, and war.

5. State credit hours requested for the proposed course or seminar. Seminars suitable for satisfaction of the writing requirement can normally be for either three or two credit hours. The difference between the two and three credit hours seminar is described at the end of this form.

3 credit hours.

6. Indicate if you are requesting any size limitations for the proposed course or seminar. Writing seminars are normally limited in size, with 12 the norm if the seminar is suitable for satisfaction or writing requirement. If you wish to limit the enrollment in a course, please explain the reason for the limitation.

none

7. Please list any prerequisites. If the course of seminar overlaps with existing courses or seminars, should students be permitted to take more than one of the overlapping courses or seminars?

Introduction to the criminology of money laundering and to international standards on combating money laundering and the financing of terrorism & proliferation

8. Please explain why this course or seminar should be added to the curriculum. Does the proposed course or seminar overlap with any existing course or seminar? If so, please explain the extent of overlap and the reason why the overlap should not bar the approval of the new course or seminar. If there is an overlap, please discuss this with the faculty members teaching the overlapping courses or seminars.

An elective in the Executive Master of Arts Degree in Financial Integrity, this course provides guidance in what the law should be as opposed to current law. It will help provide students tools to determine the value of existing laws as well as offer comprehensive theories providing answers on these issues.

9. Indicate if the proposed course or seminar is to replace an existing course or seminar.

No.

10. Indicate if the new course or seminar can be used to satisfy the upper-level writing requirement. How many students may use the proposed course or seminar to satisfy the writing requirement?

11. Indicate the casebook or course materials that you recommend as most suitable for the proposed course or seminar, and attach a copy of the table of contents. If there are no published material suitable for the course or seminar, indicate who has or who will prepare unpublished course materials. If possible attach an outline, table of contents, or description of such unpublished materials.

“Global Justice: Seminal Essays,” edited by Thomas Pogge and Darrel Moellendorf

This book will be supplemented by additional articles and book excerpts to be provided under fair use copyright laws on PDF.

12. Most courses are graded by an examination, and most seminars by a paper. Indicate whether the students will be required to take an examination, write a paper or both. Is there an optional paper?

exam

13. Indicate the names of existing faculty willing and able to teach the proposed course or seminar. If the proposed course or seminar is expected to be taught by an adjunct, please attach the resume or some description of the background and qualifications of the proposed adjunct. If the course or seminar is to be taught by more than one person, please so indicate.

Jill Delston, Sue Eckert, Nikos Passsas,

14. Indicate whether the expected need for the proposed course or seminar justifies that it be offered every year or only periodically, i.e. every other year.

The course need only be offered on a periodic basis as an elective

Attachment

Global Justice: Seminal Essays (Thomas Pogge and Darrel Moellendorf eds)

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Lifeboat Earth

2. Charles R. Beitz

Justice and International Relations

3. Thomas Nagel

Poverty and Food: Why Charity Is Not Enough

4. Amartya Sen

Equality of What?

5. Henry Shue

Chapters 1–2 of Basic Rights: Subsistence, Affluence, and U.S. Foreign Policy

6. Michael Walzer

The Distribution of Membership

7. Brian Barry

Humanity and Justice in Global Perspective

8. Joseph H. Carens

Aliens and Citizens: The Case for Open Borders

9. David Miller

The Ethical Significance of Nationality

10. Robert E. Goodin

What Is So Special about Our Fellow Countrymen?

11. Jürgen Habermas

Citizenship and National Identity: Some Reflections on the Future of Europe

12. David Held

Democracy: From City-States to a Cosmopolitan Order?

13. Thomas Pogge

Cosmopolitanism and Sovereignty

14. Jeremy Waldron

Special Ties and Natural Duties

15. John Rawls

The Law of Peoples

16. Thomas Pogge

An Egalitarian Law of Peoples

17. Martha C. Nussbaum

Human Capabilities, Female Human Beings

18. Darrel Moellendorf

Constructing the Law of Peoples

19. Allen Buchanan

Theories of Secession

- 20. Kok-Chor Tan  
Liberal Toleration in Rawls's Law of Peoples
  - 21. Hillel Steiner  
Just Taxation and International Redistribution
  - 22. Michael Blake  
Distributive Justice, State Coercion, and Autonomy
- Index

Faculty Identification:

Jill Baker Delston, Assistant Teaching Professor, Philosophy Department, University of Missouri, St. Louis, MO

Hon. Sue Eckert, Senior Fellow, the Watson Institute, Brown University, Providence, RI, former Assistant Secretary of Commerce, Washington, DC

Nikos Passas, Professor of Criminology, Northeastern University, Boston, MA

YVES AESCHLIMANN

4d chemin des Fraisiers  
1212 Grand-Lancy  
+41 173 60 11  
46, Swiss, married, two children

## PROFESSIONAL EXPERIENCE

Since January 2013: Senior Vice-President, Group Compliance Officer at Banque Privée Edmond de Rothschild SA, Geneva (“BPER”)

My duties include overseeing Compliance within the BPER Group; managing BPER’s Compliance Department; monitoring the operations of the Compliance Departments of the BPER Group entities; chairing or serving on various committees at the BPER, BPER Group and Edmond de Rothschild Group levels; acting as the main liaison officer with national authorities on matters relating to Compliance, particularly the prevention of money laundering and terrorist financing; helping to implement the government’s “clean money” strategy within the BPER Group.

January 2010 - December 2012: World Bank, Washington DC, Senior Financial Sector Specialist on integrity in financial markets

My duties included helping clients (sovereign States) to implement the Financial Action Task Force (FATF) recommendations in their countries; drawing up multidisciplinary action plans with the parties involved in combating money laundering and terrorist financing, particularly Ministries of Justice, Finance and the Interior, central banks, financial regulators, financial intelligence units and private-sector players, including banks.

I also developed practical training material on the prevention of money laundering and terrorist financing and provided it to prosecutors, judges, inspectors, financial intelligence units and private-sector players.

I represented the World Bank in its dealings with institutions such as FATF, regional FATF organisations, the UN, the OECD and Egmont and took part in their working groups.

I gave lectures on money laundering, corruption, international cooperation and the recovery of assets stolen by Politically Exposed Persons (PEPs) at numerous international conferences, on behalf of the public and private sector players, including banks.

On behalf of the Stolen Asset Recovery Initiative (StAR) I advised certain governments on moves to recover assets that had been stolen, laundered and invested in international financial centres; I also contributed to various StAR publications.

January 2001 - December 2009: Magistrate with the Geneva Judiciary

January 2001 - May 2002: As Deputy State Prosecutor of Geneva I headed multidisciplinary teams conducting preliminary enquiries; drafted Court documents (ordinances, opinions and appeals); assisted the prosecuting attorneys at hearings held by the Indictment Division, the Police Court, the Criminal Court and the Geneva Court of Appeals; served on various cantonal and national commissions.

June 2002 - December 2009: As an investigating magistrate in Geneva (from 2007 exclusively on cases involving financial crimes), I dealt with judicial information with international ramifications on money laundering, corruption and other related infractions; directed multidisciplinary teams conducting preparatory investigations; executed requests for international judicial assistance; participated in working groups with other judges in Switzerland and abroad; conducted adversary hearings; drafted Court orders; served on various cantonal and national commissions and took part in national and international conferences; had contact with the Federal Departments of Foreign Affairs, Justice, etc., on sensitive cases involving PEPs, and with FINMA on cases involving banks' governing bodies.

July 1999 - December 2000: Chief Clerk at the Geneva Court of First Instance

I directed a department with about 50 employees, which mainly involved managing human resources, organising the workflow, drawing up the budget and assisting the Chief Justice in administrative and judicial matters; helped to set up an in-service training programme for new and veteran staff; collaborated closely with external consultants who had been hired to study the processes and organisational structure of the various sections of the Clerk's Office and to propose ways to improve them.

June 1996 - June 1999: Attorney at the Geneva Bar

Working first as a self-employed barrister and subsequently for Collective Defence, I acted on behalf of clients; did legal consulting; took part in negotiations at the pre-litigation and litigation levels, at hearings and during pleas; drafted Court documents at the cantonal and federal levels in the areas of civil, criminal and administrative law.

## Education/training

1999 - 2000 Senior executive training with the Geneva Cantonal Government

1996 - 1999 Faculty of Law of the University of Geneva, research and teaching assistant to Jean-François Perrin, Professor of Civil Law (and an expert in matrimonial and inheritance law)

- 1994 - 1996 Admission to the Geneva Bar
- 1989 - 1993 Faculty of Law of the University of Geneva, Master's in Law completed in 1993
- 1987 - 1989 Centre national d'enseignement à distance (France), Bachelor's degree in Philosophy by correspondence, completed in 1989
- 1984 - 1987 Apprenticeship as an office employee in Geneva, Federal Certificate of Capacity completed in 1987
- 1983 - 1984 Senior high school in Sloan (Iowa), USA

### Languages

French: mother tongue

English: written and spoken fluently

German: good speaking skills, school-level writing ability

**Jean-Pierre BRUN**  
**Born: 09/24/1962**  
**Senior Financial Specialist**  
**Financial Market Integrity Unit**  
**World Bank (Washington DC)**  
[jeanpierre.brun@yahoo.fr](mailto:jeanpierre.brun@yahoo.fr)  
**1-202-297-7079**

### Professional experience

**2008-2013: World Bank, Senior Financial Specialist, Financial Market Integrity Unit (FPDFI), and World Bank-UNODC Stolen Asset Recovery Initiative (StAR), Washington DC.**

- Coordinating Anti-Money Laundering technical assistance provided by World Bank teams in the Middle East and North Africa Region. This technical assistance includes: assessing supervisory and investigative capacity of relevant authorities; providing recommendations for legislative or administrative reforms; and training compliance officers, supervisors from central banks, investigators, prosecutors and judges.
- Leading StAR teams providing strategic, legal, and operational assistance to develop and facilitate international investigations initiated by governments (including Tunisia, Senegal, Libya and Egypt) seeking to recover ill-gotten gains from former officials. Technical Assistance includes: designing investigative and legal strategies; recommendations to enhance domestic as well as international inter-agency coordination; and facilitating international cooperation in the context of mutual legal assistance.
- Successfully selected, managed and led a culturally and professionally diverse team composed of more than thirty five bank staff, consultants and external experts from various law enforcement agencies to draft and publish the "Asset Recovery Handbook". The book, which has become one of the Bank's best sellers, provides investigators and prosecutors in developing countries with a step-by-step, practical approach for investigating international corruption and recovering stolen assets located in foreign jurisdictions. It has been translated into French, Spanish, Arabic, Spanish, Korean and Thai languages.
- Developed partnerships and joint projects with various international organizations and represented the Bank at meetings with the OECD, UN, UNODC, IMF and national law enforcement agencies, including the US DOJ, the SEC, and the UK Serious Fraud Office. These joint projects included the drafting of a new OECD/StAR publication on the quantification of proceeds of bribery, and the creation of a StAR-Interpol network of asset recovery focal points.

**2008: Deloitte Finance, Director, Paris (France)**

- Successfully managed and supervised teams of investigators and auditors conducting international investigations into fraud and corruption allegations in the context of corporate activities. Drafted recommendations to support and implement preventive anti-corruption measures.

### **2004-2007: Tribunal of Paris, Deputy Chief Prosecutor**

- Successfully managed and supervised investigative teams and prosecuted approximately 65 money laundering and corruption cases, including by assessing allegations, formulating investigative strategies, analyzing financial and forensic evidence, preparing investigative reports, and presenting evidence to courts.
- Promoted innovative strategies to develop domestic and international interagency cooperation, including by establishing and managing joint teams of investigators with national as well as international law enforcement authorities.

### **2003-2004: Tribunal of Bordeaux (France), Vice President and Investigative Judge**

- Successfully managed and supervised teams of investigators and financial analysts conducting 55 simultaneous financial investigations. Ensured that legal and evidentiary requirements were met during the investigative process and referred investigative findings to competent courts. Presided adjudication hearings.

### **1997-2003: Cour des Comptes, Paris, Financial Investigator and Auditor**

- Conducted fraud and corruption investigations, as well as management and financial audits, of administrative bodies and state-owned companies with international operations.
- Prepared, presented, and defended reports, briefs or referrals to ensure that ministers and judicial authorities undertook appropriate judicial proceedings, and implemented preventive measures, as a result of key findings.

### **1994-1996: Ministry of Justice, Paris, Insolvency and Bankruptcy Specialist**

- Supervised the work of chief prosecutors and attorneys representing the Government in significant insolvency and bankruptcy proceedings involving financial institutions. Drafted legislation and participated in international negotiations regarding bankruptcy and insolvency.

### **1990-1994: Tribunal of Marseille (France), Prosecutor**

- Managed and supervised investigations of complex fraud and transnational corruption and directed investigative teams.

### **Publications**

**2011: Asset Recovery Handbook, a Guide for Practitioners**  
(Stolen Asset Recovery initiative, the World Bank-UNODC, 2011).

**2011: Barriers to Asset Recovery, an Analysis of the Key Barriers and Recommendations for Action** (Stolen Asset Recovery initiative, the World Bank-UNODC, 2011).

**2012: Joint StAR/OECD typology of quantification of proceeds of bribery.**

## **Education**

**1985:** Master's Degree, Political Science (Institute for Political Science, Paris)

**1986:** Master's Degree in Law (University of Aix-en-Provence)

**1990:** National School of the Magistrates (Certified to serve as a prosecutor and judge)

**1995:** Master's Degree in Criminal Law (University of Paris-Sorbonne)

**2008:** Trust Funds Accreditation Program (World Bank)

# JILL B. DELSTON, PH.D.

University of Missouri-St. Louis Department of Philosophy  
567 Lucas Hall  
1 University Blvd.  
St. Louis, MO 63121  
(314) 707-6039 • jdelston@wustl.edu

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## AREAS OF SPECIALIZATION

Social and Political Philosophy  
Ethics (Normative and Applied)

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## AREAS OF COMPETENCE

Ancient Philosophy  
History of Political Thought  
Philosophy of Law

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## EDUCATION

Ph.D. in Philosophy Washington University in St. Louis Dissertation: "A Hybrid Theory of Global Justice" Committee: Eric Brown (co-chair), Larry May (co-chair), Marilyn Friedman, Clarissa Hayward, Andrew Rehfeld, Christopher H. Wellman (Dissertation abstract available)	August 2011
M.A. in Philosophy Washington University in St. Louis	May 2007
B.A. in Liberal Arts (Great Books curriculum) St. John's College, Annapolis, Maryland	May 2004

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## AWARDS AND RECOGNITION

Missouri Learning Commons (National Center for Academic Transformation) Course Redesign for Business Ethics, May 2013. (\$5,000)

New Faculty Innovation Grant, University of Missouri-St. Louis, October 2012.

Teaching Citation, Washington University in St. Louis Teaching Center. (Awarded after completing an optional program for doctoral students.) September 2010.

Mellon Dissertation Fellowship Seminar, "The Shadow of the Law" with stipend, Summer 2010. (Declined)

First Place Ethics Contest Winner, "The Most Urgent and Neglected Ethical Issue of Our Time Is Environmentalism." The Washington University in St. Louis Center for the Study of Ethics & Human Values, 2009. (\$500)

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## PUBLICATIONS

*Applied Ethics: A Multicultural Approach*. Edited with Larry May and Kai Wong. 5th edition, 2010. Prentice Hall.

**CONFERENCE PRESENTATIONS AND COMMENTARY**

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- “The Criminalization of Money Laundering and Terrorism in Global Contexts: A Hybrid Solution” Spring 2013  
American Philosophical Association, Central Division
- “The Criminalization of Money Laundering and Terrorism in Global Contexts: A Hybrid Solution” Spring 2013  
Political Theory Workshop, Washington University
- “Why Virtue Ethicists Parent Poorly: The threat of developmental psychology for moral education and childrearing in virtue ethics” Summer 2012  
Research Symposium, Washington University
- “A Hybrid Theory of Global Justice” Fall 2011  
Colloquium, Washington University
- “Constructivist Theories of International Norms Complete Non-Constructivist Theories,” University of Georgia Graduate Student Conference, Athens Georgia Spring 2011
- “A Hybrid Theory of International Justice,” North American Society for Social Philosophy, Ryerson University Summer 2010
- “A Qualified Attack on Naturalism and Natural Law Theory,” Political Theory Workshop, Washington University Fall 2009
- Commented on “From Military Checkpoints to ‘Terminals’ in the Occupied Territories: The Dangers of Modernizing Power” by Daniela Mansbach, Political Theory Workshop, Washington University Spring 2009
- Commented on “Accountability Mechanisms and National Security Secrecy,” by Kathleen Clark, Political Theory Workshop, Washington University Fall 2008
- “The Limited Leviathan,” North American Society for Social Philosophy, University of Victoria, Canada Summer 2007
- “A Quota on Quotas,” Political Theory Workshop, Washington University Fall 2006
- “The Limited Leviathan,” Ethics Reading Group, Washington University Spring 2006

**TEACHING EXPERIENCE**

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Philosophy of Law (graduate level) Assistant Teaching Professor, UMSL	Fall 2013
Recent Ethical Theories (graduate level) Assistant Teaching Professor, UMSL	Fall 2013
Present Moral Problems Assistant Teaching Professor, UMSL	Fall 2013
Honors International Business Ethics Assistant Teaching Professor, UMSL	Spring 2013
Environmental Ethics Assistant Teaching Professor, UMSL	Spring 2013
Seminar in Ethical Theory (graduate level) Assistant Teaching Professor, UMSL	Fall 2012
Business Ethics Assistant Teaching Professor, UMSL	Fall 2012
Approaches to Ethics Assistant Teaching Professor, UMSL	Fall 2012
Ethics Visiting Assistant Professor, Mt. Holyoke College	Spring 2012
Foundations of Western Thought: History of Ancient Philosophy Visiting Assistant Professor, Mt. Holyoke College	Spring 2012
Social and Political Philosophy Visiting Assistant Professor, Mt. Holyoke College	Spring 2012
Advanced Social and Political Philosophy (Independent Study) Visiting Assistant Professor, Mt. Holyoke College	Spring 2012
International Justice: Possibilities and Limits Visiting Assistant Professor, Mt. Holyoke College	Fall 2011
First Year Seminar: What Is the Good Life? Visiting Assistant Professor, Mt. Holyoke College	Fall 2011
First Year Extended Seminar (Supplemental class for first year seminar)	Fall 2011

Biomedical Ethics Instructor, University College at Washington University	Summer 2010
Biomedical Ethics Instructor, University College at Washington University	Spring 2010
Present Moral Problems Instructor, University College at Washington University	Summer 2009
Environmental Ethics Instructor, University College at Washington University	Summer 2008
Great Philosophers Instructor, University College at Washington University	Summer 2007

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#### TEACHING ASSISTANT EXPERIENCE

All courses at Washington University in St. Louis

Classical Ethical Theories	Spring 2011
Present Moral Problems	Fall 2010, Spring 2010, Fall 2009, Fall 2006
Introduction to Environmental Ethics	Spring 2008
Great Philosophers	Spring 2007, Spring 2006
Biomedical Ethics	Fall 2007, Fall 2005

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#### WORKS IN PROGRESS

“Sovereignty, Absolutism, and Natural Law in Hobbes’ *Leviathan*” (Under Review)  
 “Weighing the Decision-Value Principle in the Prisoner’s Dilemma”  
 “The Criminalization of Money Laundering and Terrorism in Global Contexts: A Hybrid Solution”

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#### MEMBERSHIPS AND SERVICE

Member, Association of Certified Anti-Money Laundering Specialists, 2012 – present  
 Faculty Advisor, Mount Holyoke Debate Society, 2011 – 2012  
 Member, American Philosophical Association, 2010 – present  
 Member, Washington University Workshop on Politics, Ethics, and, Society 2004 – 2011, 2012 – present  
 Member, Washington University Ethics Reading Group, 2004 – 2011  
 Member, St. Louis Area Group Reading Ancient Philosophy (in Ancient Greek), 2005 – 2011  
 Peer Mentor, Washington University Graduate Philosophy Department 2007-8, 2009-11  
 Member, Washington University Meta-Ethics Reading Group, 2009 – 2011  
 Member, Campus Kitchens [delivers food to local shelters], 2009 – 2011  
 Research Assistant, Anne Margaret Baxley, “The Price of Virtue,” *Pacific Philosophical Quarterly*,” Vol. 88, Issue No. 4, pp. 403-423. 2007.  
 Coordinator, Washington University Prospective Student Weekend, 2007

**LANGUAGES**

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Ancient Greek

**REFERENCES**

---

Eric Brown, Washington University	eabrown@wustl.edu
Marilyn Friedman, Vanderbilt University	marilyn.friedman@vanderbilt.edu
Larry May, Vanderbilt University	larry.may@vanderbilt.edu
Christopher H. Wellman, Washington University	kwellman@artsci.wustl.edu
Lee Bowie, Mount Holyoke College (teaching letter)	lbowie@mtholyoke.edu

## Exhibit B: *Curriculum Vitae* of Ross Delston

ROSS S. DELSTON, CAMS  
ATTORNEY + EXPERT WITNESS  
WASHINGTON, DC

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**SUMMARY:** Attorney, Certified Anti-Money Laundering Specialist (CAMS), and former US banking regulator (FDIC) with substantial expertise in Bank Secrecy Act/Anti-Money Laundering (BSA/AML) compliance, including expert witness engagements in civil fraud cases; BSA/AML audits, reviews and testing; and international anti-money laundering and combating the financing of terrorism (AML/CFT) compliance projects.

### **LAW OFFICE OF ROSS S. DELSTON, WASHINGTON, DC** **2006 – PRESENT**

- Expert witness on BSA/AML compliance issues in three civil cases (including a FINRA arbitration and in state court) against major banks and broker-dealers.
- Completed three annual independent BSA/AML reviews of a public company; currently planning the fourth annual review. Also participated in the independent BSA/AML audit of a regional broker-dealer.
- Retained by financial regulator of major offshore financial center to conduct a review of its AML/CFT compliance activities and risk assessment as well as elements of the regulated sector in order to strengthen the island's supervisory framework.
- Assisted Bryan Cave law firm on 15-month project (April 2007 – July 2008) as part of AIG monitorship. Reviewed AIG's BSA/AML compliance functions including its insurance, broker-dealer, investment adviser, banking and real estate units worldwide; analyzed compliance policies; interviewed compliance officers; and drafted recommendations for effective implementation of US laws, regulations and guidance.
- Consultant to International Monetary Fund (IMF) since 1997, including nine AML/CFT assessments of offshore financial centers such as Saint Vincent (2010) and Bermuda (2008), drafting legislation for member countries, and training government officials.
- Consultant to World Bank since 1998 on banking regulation, enforcement, resolutions.

### **MANAGING DIRECTOR, KALORAMA PARTNERS, WASHINGTON, DC** **2005 – 2006**

- Advised financial services firms on compliance issues as a member of strategic consulting firm headed by former SEC Chairman Harvey Pitt.
- Consultant to Kalorama on review of compliance program for broker-dealer to ensure consistency with NYSE and NASD requirements, October 2005.

### **LEGAL DEPARTMENT, INTERNATIONAL MONETARY FUND, WASHINGTON, DC**

**Consulting Counsel (full-time) specializing in AML/CFT** **2000 – 2005**

**Legal Consultant (project basis) on banking laws** **1997 – 2000**

- **OFC Coordinator:** Designated by General Counsel to coordinate legal team during initial phase of offshore financial center assessment program, July – January 2000.
- **AML/CFT assessments:** Participated in assessments of seven offshore financial centers: Aruba, Curacao, Gibraltar, Guernsey, Isle of Man, Jersey, and Panama.
- **Legislative drafting:** Drafted laws on AML/CFT and banking for numerous countries in Africa, Asia, Eastern Europe, and the former Soviet Union.
- **Training:** Organized and/or participated in numerous training seminars on AML/CFT and banking issues in Asia, Europe and the former Soviet Union.

**LAW OFFICE OF ROSS S. DELSTON, WASHINGTON, DC** **1994 – 2000**

- Specialized in bank regulatory and transactional matters for clients such as a Fortune 50 industrial corporation, a major commercial bank, an S&L holding company, an industrial loan company, a high-tech bank services company and two national law firms.
- Reviewed US government agency proposal for compliance and OFAC program.
- World Bank consultant on banking issues; missions to Philippines and Turkey.

**OF COUNSEL, JONES DAY, WASHINGTON, DC** **1991 – 1994**

- Specialized in bank mergers and acquisitions and regulatory matters.
- Represented a money-center bank in successful bid on an insolvent bank controlled by the FDIC, and a consumer finance firm in chartering an industrial loan company.
- Testified on open bank assistance before RTC Oversight Board.

**COUNSEL AND ASSISTANT GENERAL COUNSEL – ASSISTED ACQUISITIONS,  
LEGAL DEPARTMENT, FEDERAL DEPOSIT INSURANCE CORP.,  
WASHINGTON, DC** **1986 – 1991**

- Created, organized and headed 20-attorney Assisted Acquisitions unit, advised FDIC Chairman and Board, led teams responsible for drafting and negotiating deal documents, hired and supervised outside counsel, and implemented training.
- Responsible for the legal work on resolutions of major insolvent banks during US banking crisis, including open bank assistance for First City and BancOklahoma as well as bridge bank transactions for Bank of New England, First Republic, and MCorp, virtually all of the largest bank failures during that period.

**COUNSEL, EXPORT-IMPORT BANK OF THE US, WASHINGTON, DC** **1976 – 1986**

- Drafted and negotiated numerous loan, guarantee, and insurance transactions.
- Lead attorney on a \$1.5 billion emergency trade credit facility for Brazil, at that time the largest commitment ever authorized by the Export-Import Bank.
- Traveled to Nigeria, Ivory Coast, Senegal, Ecuador, and Bolivia to assess projects.

**CERTIFICATIONS & MEMBERSHIPS**

- Certified Anti-Money Laundering Specialist (CAMS), 2007 – present.
- Certified CAMS Trainer, 2010 – present.
- Founding board member, US Capital Chapter of Association of Certified Anti-Money Laundering Specialists (ACAMS), 2009 – 2011; Advisor to Board, 2011 – present.
- Co-chaired American Bar Association International AML Committee, 2008 – 2011, then appointed Vice Chair, currently Senior Advisor.
- International Editorial Board, Journal of Banking Regulation (London) 2004 – present.
- Executive Council, Banking Law Committee, Federal Bar Association, 2012.
- District of Columbia Bar Association, 1976 – present. Served on Membership Benefits Committee, 1995 – 2001 (Best Bar Committee Award, 2000).
- AV rated by Martindale-Hubbell Law Directory (highest rating).

**EDUCATION**

The George Washington University Law School, J.D. with honors, 1976.  
The George Washington University, B.A. with Special Honors, 1973.

**PUBLICATIONS, PRESS CLIPPINGS AND SPEAKING ENGAGEMENTS, ATTACHED**

ROSS S. DELSTON, CAMS: PUBLICATIONS & PRESS CLIPPINGS, 1999 – PRESENT  
(AS OF AUGUST 14, 2013)

**PUBLICATIONS:**

“Insights: Did FinCEN Just Burst Bitcoin’s Bubble?” Moneylaundering.com News, May 31, 2013 (op-ed piece on FinCEN guidance issued in March 2013).

“Strengthening Our Security: A New International Standard on Trade-Based Money Laundering is Needed Now” (co-authored with Stephen Walls), 44 *Case Western Reserve Journal of International Law* 737 (2012). The article was reprinted in the *Annual Review of International Banking Law & Practice* (Institute of International Banking Law & Practice, 2013). An updated version will be reprinted in *ACAMS Today* (forthcoming 2013). For the original article, see: [http://law.case.edu/journals/JIL/Documents/\(10\)%20Delston%20&%20Walls%20Final.pdf](http://law.case.edu/journals/JIL/Documents/(10)%20Delston%20&%20Walls%20Final.pdf)

“St. Vincent and the Grenadines: Detailed Assessment Report on Anti-Money Laundering and Combating the Financing of Terrorism,” IMF Country Report No. 10/311 (2010), one of four co-authors as part of IMF team, available at: [www.imf.org/external/pubs/ft/scr/2010/cr10311.pdf](http://www.imf.org/external/pubs/ft/scr/2010/cr10311.pdf)

“Reaching Beyond Banks: How to Target Trade-based Money Laundering and Terrorist Financing Through Preventive Measures Outside the Financial Sector” (co-authored with Stephen Walls), 41 *Case Western Reserve Journal of International Law* 85 (2009). The article was reprinted in the *Annual Review of International Banking Law & Practice* at 11:81 (Institute of International Banking Law & Practice, 2011) and *Combating Money Laundering and Terrorism Finance: Past and Current Challenges*, at p. 737, N. Beekarry, ed. (Edward Elgar Publishing Ltd., 2013). Edited versions were published in *Money Laundering Bulletin* (London, July/August 2009); *NetPractice Exchange*, Vol. 3, No. 3, at p. 16 (November/December 2009); and the American Bar Association’s *International Trade Committee Newsletter*, Vol. IV, No. 1, at p. 12 (November 2009). For the original law review article, see [www.martindale.com/international-trade-law/article\\_Ross-S-Delston\\_738600.htm](http://www.martindale.com/international-trade-law/article_Ross-S-Delston_738600.htm)

“‘To Protect or Not to Protect, That is the Question’: Statutory Protections for Financial Supervisors – How to Promote Financial Stability by Enacting the Right Laws” (co-authored with Prof. Andrew Campbell, University of Leeds, UK), published in *Current Developments in Monetary and Financial Law*, Vol. 5 (IMF 2008), available at: [www.jdsupra.com/legalnews/to-protect-or-not-to-protect-that-is-t-72308/](http://www.jdsupra.com/legalnews/to-protect-or-not-to-protect-that-is-t-72308/)

“The 41<sup>st</sup> FATF Recommendation: Why preventive measures targeting trade-based money laundering should reach beyond banks,” *ACAMS Today* (July/August 2008), originally published in *Money Laundering Bulletin* (London, March 2008), available at: [www.jdsupra.com/legalnews/the-41st-fatf-recommendation-why-preven-24691/](http://www.jdsupra.com/legalnews/the-41st-fatf-recommendation-why-preven-24691/)

“Bermuda: Detailed Assessment Report on Anti-Money Laundering and Combating the Financing of Terrorism,” IMF Country Report No. 08/105 (2008), one of four co-authors as part of IMF team, available at: [www.imf.org/external/pubs/ft/scr/2008/cr08105.pdf](http://www.imf.org/external/pubs/ft/scr/2008/cr08105.pdf)

“Viewpoint: Regulatory Blitz for Subprime Players?” *American Banker* (November 9, 2007)(opinion piece about legal issues relating to bank closings).

## **Phillip A. DeLuca**

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Phil is a Senior Vice President and Compliance Managing Director for JPMorgan Chase, where he oversees AML / CTF investigations. He has over twenty-five years of security and investigations management experience. During that time, he has conducted and managed investigations involving financial fraud (including credit card and merchant fraud), internal fraud and embezzlements, and AML related crimes for major financial services providers. Through his expertise and leadership, he has closely partnered with various law enforcement agencies on innovative techniques to identify illicit activity through transaction analysis resulting in numerous successful prosecutions.

Most recently, he leads a team of diverse professionals who perform in-depth transactional analysis and background investigations to identify, prevent or respond to financial or reputational exposures. He is a member of an enterprise wide AML Oversight Committee made up of senior level business unit managers tasked to develop effective strategies for corporate-wide implementation in response to regulatory challenges.

He joined one of JP Morgan Chase's predecessor banks in 1996 as Regional Investigations manager in the Audit Department after holding a similar position for a Pennsylvania based financial institution for several years.

### **EDUCATION**

**Indiana University of Pennsylvania**

BA Criminology, 1978

**University of Virginia, Darden Graduate School of Business**

Diploma, Strategic Leadership, 1998

## **Nadim Kyriakos-Saad**

Nadim Kyriakos-Saad is Senior Counsel in the Legal Department of the International Monetary Fund. He joined the Fund in 1998.

Kyriakos-Saad also serves as Deputy Director of the Financial Integrity Group at the Fund and head of the Policy Surveillance and Programs Unit.

Kyriakos-Saad specializes in anti-money laundering and combating the financing of terrorism (AML/CFT) issues. He contributes to the design of the Fund's policy on AML/CFT and has carried out a number of country assessments as well as technical assistance missions in Asia, Africa, Europe, the Middle East, and the Western Hemisphere. He has also authored and co-authored a number of key IMF publications on AML/CFT matters.

Kyriakos-Saad received degrees in law and political science from Saint-Joseph University in Beirut, and received an LL.M. in international business law and corporate law from Columbia University in New York.

Before joining the Fund, he practiced law from 1988 to 1992 at Bahige Tabbarah Law Offices in Beirut, Lebanon and from 1993 to 1998 at Baker & McKenzie, in Riyadh, Saudi Arabia.

Kyriakos-Saad fluent in Arabaic (native), French (native), English, and Italian.

**SUE E. ECKERT**  
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Little Compton, Rhode Island 02837  
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Sue Eckert is an internationally-recognized expert and former senior government official with more than twenty-five years of policy, management, and research experience addressing issues at the intersection of international security and economic policies.

### **Key Professional Experience**

#### **Senior Fellow, Watson Institute for International Studies, Brown University (1998 – present)**

- Extensive work on proliferation, terrorism, human rights, and armed conflict issues with international organizations (United Nations Security Council, al-Qaida and Taliban sanctions committees, UN Counter-terrorism Implementation Task Force, OHCHR, European Union, IMF, World Bank, Roma/Lyon Group, FATF) and national governments;
- Direct research projects on terrorist financing and UN sanctions, including establishing and managing international consortium of policymakers and scholars conducting the first comprehensive assessment (quantitative and qualitative databases) of the impacts and effectiveness of UN targeted sanctions;
- Author of research reports, books and articles, as well as workshops and initiatives resulting in policy recommendations to strengthen instruments of international governance (sanctions, export controls, critical infrastructure protection and cybersecurity measures, and global norms);
- Developed and hosted training and simulation workshops for the Security Council, member states, NGOs;
- Member of advisory committees addressing security and technology issues, including the National Academy of Sciences (*Deterring Cyberattack: Informing Strategies and Developing Options for U.S. Policy*), the Resource Group advising the United Nations Secretary General's *High-Level Panel on Threats, Challenges, and Change*, International Peace Institute, and U.S. Naval War College

#### **Assistant Secretary for Export Administration, U.S. Department of Commerce (1993–1997)**

- Administered U.S. national security and foreign policy dual-use export control laws and programs. Designed and implemented Clinton Administration export reform agenda, including new nonproliferation initiatives and streamlining of high-tech (computers, encryption) controls;
- Supervised regulatory licensing and policy agency of more than 200 employees and \$20 million budget, developed and implemented agency reorganization, directed comprehensive regulatory rewrite, and managed reform of high-tech (computers, encryption) controls;
- Appointed by President Clinton, confirmed by the Senate. Senior political official for first year of Clinton Administration, reporting to Secretary of Commerce Ron Brown and leading agency transition team;

- Lead policy official at Assistant Secretary level on national security-related interagency deliberations on export control and defense industrial base policies, international negotiations for post-Cold War era multilateral regime (Wassenaar Arrangement), legislative proposals reforming the Export Administration Act and Arms Export Control Act, as well as outreach responsibilities with Congress, industry, media and other constituencies.

## **Related Experience**

### **Independent Consultant (1990– 1993, 1998 – present)**

- Consultant on security, sanctions, illicit finance, and technology policy matters to academic/law/consulting groups such as The Graduate Institute (Geneva), the International Peace Institute, Booz-Allen & Hamilton, Scientific Applications International Corporation, the National Academy of Sciences and other clients.

### **Visiting Fellow, Institute for International Economics (1998 – 1990)**

- Research focused on barriers to US exports and issues affecting high-tech industries, including electronic commerce (coauthor of *Global Electronic Commerce: A Policy Primer* (2000))

### **Professional Staff, Committee on Foreign Affairs, U.S. House of Representatives (1982 – 1989)**

- Lead majority staff of the Committee on Foreign Affairs specializing in economic and security issues (economic sanctions, terrorism and nonproliferation issues, export controls, and trade promotion and finance activities)
- Formulated and negotiated legislative proposals, advising Members of Congress on international trade issues, organizing and conducting oversight hearings and investigations, drafting statements and speeches, and acting as liaison with the Executive branch, industry and media for successive chairmen of the Subcommittee on International Economic Policy and Trade [Jonathan Bingham (D-NY), Don Bonker, (D-WA), and Sam Gejdenson (D-CT),] and Committee Chairman Lee H. Hamilton (D-IN)

### **Legislative Assistant, Congressman Bob Edgar (D-PA), U.S. House of Representatives (1981 – 1982)**

- Advisor to the Congressman on trade, economic and foreign policy issues; prepared speeches, floor statements and legislative proposals and served as liaison with constituent and interest groups

## **Education**

- The Fletcher School of Law and Diplomacy, MA (except formal language proficiency), 1990
- Pennsylvania State University, B.A. History/Political Science, magna cum laude, 1980

## Eckert Attachment – Publications

“Sanctions and the UN Security Council,” chapter in *The UN Security Council: From the Cold War to the 21<sup>st</sup> Century*, co-edited by Sebastian von Einsiedel, David M. Malone and Bruno Stagno Ugarte, forthcoming 2014

*The Effectiveness of UN Targeted Sanctions*, coedited with Thomas Biersteker presenting the research results of the Targeted Sanctions Consortium, forthcoming 2014

*UN Security Council, Sanctions and the Rule of Law*, chapter in book of the Australian Research Council project of ANU Centre for International Governance & Justice & the Australian Civil-Military Centre, forthcoming 2014

“The History of Congressional Naming and Shaming,” chapter in *Naming and Shaming Experiences*, Center for Transnational Justice, Marquette University, forthcoming 2013

*Due Process and Targeted Sanctions: An Update of the ‘Watson Report,’* December 2012, with Thomas Biersteker  
([http://www.watsoninstitute.org/pub/Watson%20Report%20Update%2012\\_12.pdf](http://www.watsoninstitute.org/pub/Watson%20Report%20Update%2012_12.pdf))

*Terrorist Financing Indicators*, Report for United Nations Counter-Terrorism Implementation Task Force, October 2012, with Richard Gordon and Nikos Passas

*Designing United Nations Targeted Sanctions: Initial Findings of the Targeted Sanctions Consortium (TSC) Evaluating the Impacts and Effectiveness of UN Targeted Sanctions*, August 2012, with Thomas Biersteker and Marcos Tourinho  
([http://www.watsoninstitute.org/pub/Designing\\_UN\\_Targeted\\_Sanctions\\_FINAL.pdf](http://www.watsoninstitute.org/pub/Designing_UN_Targeted_Sanctions_FINAL.pdf))

“UN Nonproliferation Sanctions,” *International Journal* (Special Issue on UN Sanctions, edited by Jane Boulden and Andrea Charron), Royal Military College of Canada, 2010

“The Politics of Numbers in the Financial ‘War’ on Terrorism,” in *Sex, Drugs and Body Counts: The Politics of Numbers in Global Crime and Conflict*, Peter Andreas and Kelly M. Greenhill, ed., Cornell University Press, 2010

*Addressing Challenges to Targeted Sanctions: An Update of the Watson Report*, Report for the United Nations sponsored by UNO Academia (Geneva, Switzerland), October 2009 co-authored with Thomas J. Biersteker

“The Use of Financial Measures to Promote Security,” *Columbia Journal of International Affairs*, Fall/Winter 2008

*Countering the Financing of Terrorism*, co-edited with Thomas Biersteker, London: Routledge, 2008

*Strengthening Targeted Sanctions Through Fair and Clear Procedures*, Report for the United Nations sponsored by the Governments of Switzerland, Germany, and Sweden, March 2006, co-

authored with Thomas J. Biersteker (Also made an official document of the UN General Assembly and UN Security Council - A/60/887-S/2006/331)

“Critical Infrastructure: The Role of the Private Sector in the New Security Environment,” in *Guns and Butter: The Political Economy of International Security*, Dombrowski, ed., Boulder: Lynne Rienner Publishers, July, 2005

“Lessons from the UN’s Counter-Terrorism Efforts,” in *Profiting from Peace: Managing the Resource Dimension of Civil War*, Ballentine and Nitzschke, ed., Boulder: Lynne Rienner Publishers, June 2005

“Targeted Sanctions and State Capacity: Towards a Framework for National Level Implementation,” and “Consensus from the Bottom Up? Assessing the Influence of the Sanctions Reform Processes,” co-authored with Thomas Biersteker, Peter Romaniuk, and Aaron Halegua, in *International Sanctions: Between Words and Wars in the Global System*, Wallenstein and Staibano, ed., New York: Frank Cass Publishers, February 2005

“Report on the Workshop on UN Sanctions Reform,” convened at the Watson Institute for members of the UN Security Council, July 16-17, 2004, co-authored by the Targeted Financial Sanctions Project, December 2004

“Appendix C,” *Update on the Global Campaign Against Terrorist Financing: Second Report of an Independent Task Force Sponsored by the Council on Foreign Relations*, co-authored by Targeted Financial Sanctions Project (analysis comparing the implementation of international terrorist financing measures in countries of the Islamic world), June 2004

“Report of the Workshop on UN Sanctions Reform,” convened at the Watson Institute for members of the UN Security Council, May 2-3, 2003, co-authored by the Targeted Financial Sanctions Project, November 2003

“Supporting Member State Capacity to Implement Targeted Sanctions,” Part III of *Making Targeted Sanctions Effective: Guidelines for the Implementation of UN Policy Options*, co-authored with Thomas Biersteker and Peter Romaniuk, in Wallenstein, Staibano, and Eriksson, ed., Department of Peace and Conflict Research, Uppsala University, February 2003

“Targeted Financial Sanctions: Harmonizing Legislation and Practices” co-authored with in *Smart Sanctions: Targeting Economic Statecraft*, Cortright and Lopez, ed., New York: Roman and Littlefield, January 2002

*Targeted Financial Sanctions: A Manual for Design and Implementation*, co-authored with Thomas Biersteker and Peter Romaniuk, Watson Institute for International Studies, October 2001

*Restructuring Sanctions Against Iraq*, Workshop Report, co-authored by Watson Institute for International Studies and Decision Strategies Department of the US Naval War College, April 2001. Policy memo also prepared and briefed to USG representatives summarizing the findings of workshop co-hosted by the Watson Institute and U.S. Naval War College, May 2001

A Report of the Proceedings of the Targeted Financial Sanctions Simulation, *co-authored*,  
*Winter 2000*

*Global Electronic Commerce: A Policy Primer*, co-authored with Catherine L. Mann and Sarah  
Cleeland Knight, Washington, DC: Institute for International Economics, July 2000

"Targeted Financial Sanctions: A Primer," Background paper for the Targeted Financial  
Sanctions Simulation Exercise, co-authored, Naval War College, May 2000

Author of numerous policy papers, memoranda, limited distribution documents, and other  
publications in the Executive Branch and Congress

## Eckert Attachment – Selected Presentations and Activities

UN Sanctions: Are Coercive Tools Effective? *Presentation of the Initial findings of the Targeted Sanctions Consortium Project*, “Evaluating the Impacts and Effectiveness of UN Targeted Sanctions,” Brown University, 29 January 2013

“*Targeted sanctions, Human Rights and Due Process – The future of the 1267/1989 Al-Qaida sanctions regime*,” United Nations Office of the High Commissioner for Human Rights (OHCHR) and the Permanent Mission of Germany, New York, 4 December 2013

International Crisis Group Policy and Training Workshop, *Do Sanctions Work?* Brussels, 4-5 September 2012

Testimony before the House of Representatives, Homeland Security Subcommittee on Counterterrorism and Intelligence, *Terrorist Financing Since 9/11: Assessing an Evolving al Qaeda and State Sponsors of Terrorism*, 18 May 2012

*Targeted Sanctions Consortium* briefings on interim research findings to USG interagency group, U.S. Department of State (May 2012) and UN Missions to the United Nations and UN Secretariat officials, Canadian Mission to the United Nations, April 2012

International Studies Association Annual Meeting, *Round Table on “Power in the Global Information Age,”* April 2012

Briefing of UN-EU Seminar on Targeted Sanctions, EU Mission to the United Nations, March 2012

Geneva Centre for Security Policy, United Nations Panel of Experts on Iran Sanctions, Geneva, 16 March 2012

Chair and Moderator of multiple workshops “Enhancing Skills for Sanctions Support and Implementation” for UN Secretariat, Agency officials, Member States, and representatives of regional organizations, hosted by The Permanent Mission of Canada to the United Nations, January and March 2012

Case Western Reserve Law School Symposium, *“Preventing the Financing of Terrorism,” Interim Findings of Terrorist Financing Indicators Project*, March 2012

Targeted Sanctions Consortium Workshop, *Assessing the Impact and Effectiveness of UN Sanctions*, hosted by the UK Foreign Office, London, 2-4 June 2011

Address to International Security Forum on *WMD Proliferation: North Korea and Iran*, Zurich, June 2011

Co-organizer with Naval War College, Strategic Research Department *Workshop on Cybered Conflict, Threat Perceptions, and Institutional Responses: A Comparative Analysis*, 25-26 May 2011

*Strengthening the UN Sanctions Tool*, UN Luncheon Address sponsored by the Friedrich Ebert Foundation, New York, May 2011

*UN Workshop for Enhancing Skills for Sanctions Support and Coordination*, Canadian Mission to the United Nations, April 2011

Great Decisions Lecture: *Sanctions and WMD Proliferation*, Pell Center for International Relations and Public Policy, April 2011

*Controlling Non-State Nuclear Proliferation*, Nautilus Institute for Security and Sustainability and the Carnegie Endowment for International Affairs, Washington, DC April 2011

Seminar for Canadian Foreign Ministry evaluating current policies focused on Iran and North Korea, with recommendations for enhancing the pressure (sanctions) track, Ottawa, Canada, 18 March 2011

International Studies Association: *Global Governance: Political Authority in Transition*, organizer/participant of roundtable on *Global Governance, Security, and Strategies for Cyberspace*, and chair of panels, *The Impact and Effectiveness of UN Targeted Sanctions: A Comparative Analysis*, Montreal, Canada, March 2011

Briefings at US Departments of State and Treasury on financial sanctions, as well as briefing the United Nations Panel of Experts on Iran Sanctions, 2 March 2011

Presentation to brainstorming session with UN Security Council Committee on al Qaeda/Taliban sanctions, reviewing the effectiveness of counterterrorism sanctions and proposing new policies and initiatives for the German chairmanship of the Security Council Committee, 24 February 2011

Member of National Academy of Sciences Committee, *Deterring Cyberattack: Informing Strategies and Developing Options for U.S. Policy* chaired by Dr. John Steinbruner, December 2009-2010

State Department Roundtable: *Enhancing the Effectiveness of Multilateral Sanctions* for officials of the Departments of State and Treasury and intelligence agencies (one of two academics asked to develop and lead session) 29 July 2010

“Watson Update” Briefing to selected group of United Nations policymakers hosted by the Mission of Canada to the United Nations, 26 March 2010.

Policy Briefing of G-8 Counterterrorism Advisors at the Roma/Lyon Group Meeting on ensuring respect for human rights and due process in terrorism designations, Montreal, Canada, (only non-governmental expert invited to brief and participate) 24-25 February 2010

International Studies Association: *Theory vs. Policy? Connecting Scholars and Practitioners*, organizer/participant of roundtable on *UN Sanctions: A Model of Scholar/Practitioner Collaboration*, and chair of panel, *New Perspectives on Targeted Sanctions*, New Orleans, LA, February 2010

Targeted Sanctions Research Consortium Workshop, The Graduate Institute, Geneva, October 2009

United States Institute of Peace, Member of *Financial Sanctions Study Group on North Korea*, Washington, DC, fall 2009

Mission of Switzerland to the United Nations, Presentation of *The Human Rights Challenge to Targeted Sanctions and Its Implications: An Update of the Watson Report*, New York, September 2009

Watson Institute Choices Program' National Security Institute (helped to organize and teach week-long course on national security issues for high school teachers) July 2007, 2008, 2010 and 2011, and Nuclear Issues Institute, July 2009

*Trends in International Terrorism* Workshop for Secretary of Defense, Office of Policy Planning, Reston, Virginia, July 2009

Rhode Island Capital Forum, Speaker and Facilitator, Providence, RI, March 2009

International Studies Association Convention: Roundtable Chair, *Economic Sanctions*, and Discussant, *Targeted Sanctions: A Critical Review*, New York, February 2009

Stimson Center Seminar: *Targeted Sanctions and Panels of Experts*, Washington, DC January 2009

Workshop sponsored by the Canadian Mission to the United Nations, *Increasing efficiency and accountability in the implementation of Security Council sanctions*, presentation on Due Process and Human Rights Concerns Associated with UN Sanctions, December 2008

*New Thinking on UN Sanctions: Objectives, Methods and Consequence*, Workshop at the Royal Military College, Kingston, Ontario November 2008

Meeting of Dubai financial community and hawaladars with the United Nations 1267 Committee Monitoring Team to explore challenges in the implementation of financial sanctions against Al Qaida and the Taliban, UAE, October 2008

Chair, Panel Discussion on the International Process on Global Counter-Terrorism Cooperation - *Enhancing Implementation of the UN Global Counter-Terrorism Strategy*, Center for Counterterrorism Cooperation, New York, July 2008

Brown University's Global Governance Conference, presentation, *Global Governance and Terrorism: The Role of the United Nations*, June 2008

Member, *Task Force on Transnational Security Challenges*, International Peace Institute Project on Strengthening Multilateral Security Capacity, April – June 2008

World Conference on Combating Terrorist Financing, Case Western Reserve Law School, April 9-10, 2008

Wake Forest Law Review symposium on Terrorism Finance, April 3-4, 2008

International Studies Association Convention, presentation: *The Politics of Numbers: Measuring Success in the Financial "War" on Terrorism*, March 2008

United States Institute of Peace (Washington, DC) and the International Peace Academy (New York, NY) symposia, *Countering the Financing of Terrorism*, September 2007

RAND conference "*Licit and Illicit Financial Transactions and Workarounds*," Washington, DC, June 2007

Wilton Park conference, *CBRN Terrorism: Mapping the Threat*, "The role of networks in contemporary terrorism: transnational financing and online networks," May, 2007

United Nations Symposium, *Enhancing the Implementation of United Nations Security Council Sanctions*, "The Nature and Scope of Targeting," April 2007

International Peace Academy and the Center on Global Counter-Terrorism Cooperation workshop: "Contributions of Security Council Committees and their Experts," April 2007

Organized Working Group on Improving Financial Sanctions Against Terrorists, with representatives of major U.S. financial institutions and officials of the UN Monitoring Team on for Al Qaida and the Taliban, New York, February 2, 2007

Council on Foreign Relations Podcast, *Time to Reevaluate Approach to Terrorist Finance*, January 31, 2007

Council on Foreign Relations Program, *The War on Terrorism: The Financial Front*, New York, January 10, 2007

Center for Strategic and International Studies, Study Group on Transatlantic Approaches to Sanctions, Report: *Transatlantic Approaches to Sanctions: Principles and Recommendations for Action*, December 2006

Developed and maintain the *Targeted Sanctions Toolkit* providing policymakers with key texts and up-to-date indices of UN sanctions, to assist in the drafting of UN resolutions imposing targeted sanctions.

Briefing at United Nations of the Report: "Strengthening Targeted Sanctions Through Fair and Clear Procedures," sponsored by the Swedish Foreign Ministry, March 30, 2006

Workshop organized by the UN Office of Legal Affairs on the human rights legal obligations of the UN Security Council, February 9, 2006

Expert Roundtable on "Strengthening UN Targeted Sanctions and Due Process," sponsored by the Government of Germany, January 24-25, 2006

Testimony before United Nations General Working Group on Sanctions on terrorism, November 22, 2005

Working Group on Economic Causes of Terrorism, *International Summit on Democracy, Terrorism, and Security*, Madrid (sponsored by the Club of Madrid), March 8-11, 2005

Geneva Centre for Security Policy, Homeland Security Forum, Geneva, October, 2004

Seminar on the Prevention of the Financing of Terrorism, sponsored by the EC and Dutch Presidency of the European Union, Brussels, September 22, 2004

Member of the Resource Group advising the United Nations' High-Level Panel on Threats, Challenges, and Change established by Secretary-General Kofi Annan November 2003-December 2004

Wilton Park Conference "Assessing Contemporary Security Threats," February 2004

"Targeted Financial Sanctions: Lessons from the Interlaken Process," International Peace Academy Conference on Policies and Practices for Regulating Resource Flows to Armed Conflict, May 2002

Working Group 2 (Measures to strengthen the capacity of members to implement sanctions), Swedish-sponsored Stockholm Process on the Implementation of Targeted Sanctions, 2001-2002

Swiss-sponsored panel of experts examining the UNITA financial sanctions and recommending steps to the Security Council to enhance sanctions' effectiveness, summer 2001

American Bar Association National Institute on Economic Sanctions, May 2001

*Study Group on Enhancing Multilateral Export Controls for U.S. National Security*, Henry L. Stimson Center, in cooperation with the Center for Strategic and International Studies (CSIS). Congressionally mandated report with findings and recommendations to the U.S. Government on the future of multilateral export controls, April 2001

Security Working Group of the *Technology and Security in the 21<sup>st</sup> Century: Study on Military Export Control Reform*, Center for Strategic and International Studies, 2000-2001

Testimony before the United Nations Security Council Working Group on General Issues on Sanctions, October 2000

*Committee on the Science, Technology, and Health Aspects of the Foreign Policy Agenda of the United States*, National Research Council of the National Academy of Sciences. Member of a panel of experts that developed recommendations for the Department of State to improve its scientific and technical expertise ("The Pervasive Role of Science, Technology and Health in Foreign Policy: Imperatives for the Department of State"), 1998-2000

Member of official U.S. Delegations and trade missions, including: Wassenaar Arrangement on Multilateral Export Controls, Secretarial Trade Missions, co-host of U.S. Delegation to EuroNaval, COCOM, OECD, the European Community, INTELSAT and others, 1985-1997

Participant, lecturer, and speaker in numerous conferences, including those sponsored by the United States Institute of Peace, the International Peace Academy, Swedish Foreign Ministry, Swiss Confederation, German Foreign Ministry, American Bar Association, Center for Strategic and International Studies, Henry L. Stimson Center, Sam Nunn Policy Forum, U.S. Naval War College, Stanford University's Center for International Security and Arms Control, National Academy of Sciences, National Association of Manufacturers, NATO, European Community, Forum for U.S.-Soviet Dialogue, Aspen Institute, Center for East-West Trade Policy, Federation of German Industry and others, 1985 – 2007

Commentator on issues of terrorism, terrorist financing, and sanctions, including the *New York Times*, National Public Radio (“One to One,” “Talk of the Nation”), Voice of America, Council on Foreign Relations Podcast

Recipient of numerous awards and scholarships, including from the European Community, the Mary Pillsbury Lord Fellowship at the Fletcher School of Law and Diplomacy, and the Women in Government Relations Scholarship

External research grants received from the United Nations Counter-Terrorism Implementation Task Force, United States Institute of Peace, the Governments of Canada, United Kingdom, Switzerland, Liechtenstein, Sweden, and Germany, UNO Academia, the Carnegie Corporation, and the International Studies Association

## ELIZABETH JOYCE

**Contact details.** Telephone: +1-347-738-5159 (home), +1-212-457-1747 (office), +1-646-645-5233 (mobile); e-mail: [joyce@un.org](mailto:joyce@un.org)

### Current position

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2012-present      Section Chief – Asia Pacific and Western Hemisphere, Counter-Terrorism Committee Executive Directorate (CTED), United Nations, New York

### Responsibilities:

- Supervise delivery of consistent and credible analysis and monitoring of implementation of resolution 1373 (2001) and resolution 1624 (2004) to the Counter-Terrorism Committee of the Security Council, including through the organization of official visits of the CTC to States
  - Supervise facilitation of technical assistance and follow-ups to Committee's visits
  - Coordination of outreach to Member States and IROs, including the FATF, IMF, and World Bank. Work with external partners to develop joint strategic and operational approaches on counter-terrorism
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### Education

1997      Oxford University  
Doctor of Philosophy in Politics (D.Phil.)

1993      Oxford University  
Master of Philosophy in Latin American Studies (M.Phil.)

1984      Manchester Metropolitan University  
Graduate Degree in Law (LL.B. equivalency):  
Common Professional Examination

1982      Bristol University  
B.A. Honours in English

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### Distinctions

Head of UN delegation to FATF, 2008-2013

Presiding Officer, Joint Appeals Board, United Nations at Vienna, 2001-2005. Elected to the Board in 2000 and to the position of Presiding Officer in 2001, I led the internal system of justice administration for the United Nations Office at Vienna

between 2001 and 2005, clearing 13 cases in 2003, the largest number of cases ever cleared for Vienna in a single year. I served the Board as a volunteer, in addition to full-time duties. Service in this position gave me an intimate understanding of staff rules and regulations, as well as of the institutional and personal challenges that the organization and its staff members face.

Fulbright EU-US Senior Scholar, 1996-98, Georgetown University, Washington D.C.

Editor-in-Chief, *The Oxford International Review*, 1991-92.

Reuters Fellow, Oxford University, 1991-92.

Economic and Social Research Council (ESRC) Scholarship, UK Government, 1991.

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### **Selected publications**

Elizabeth Joyce, "Expanding the International Regime on Money Laundering", in: Philip Reichel (ed.), *Sage Handbook of Transnational Crime and Justice*, London: Sage, (2004).

Elizabeth Joyce, "Transnational Criminal Enterprise: the European Perspective", in: Tom Farer (ed.), *Transnational Crime in the Americas*, New York: Routledge (1999), pp.99-116.

Elizabeth Joyce, "Packaging Drugs: Certification and the Acquisition of Leverage", in: Victor Bulmer-Thomas and James Dunkerley (eds.), *The United States and Latin America: The New Agenda*, Cambridge: Harvard University Press (1999), pp.207-217.

Elizabeth Joyce (ed.), *Latin America and the International Drug Trade*, London: Macmillan (1998).

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### **Selected presentations**

More than 40 presentations on substantive issues and representing the United Nations, including events organized by or at the Counter-Terrorism Committee (2008), the Center on Global Counter-Terrorism Cooperation, Washington DC (2008), Council of Europe, Strasbourg (2008), Wilton Park (2007), OSCE/USG, Vienna (2005), Security Council Informal Working Group on General Issues of Sanctions (2005), Asian Development Bank, Manila (2004), UNCITRAL, Vienna (2004), Iranian Government/UNODC, Tehran (2003), Kuwaiti Government (2004), Salzburg Seminar (keynote speaker, 2003), World Bank (2005, 2003).

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## Employment history

- 2008-2012 Section Chief – Europe and South Asia, CTED
- 2007-2008 Coordinator, Working Group on Terrorist Financing, CTED
- 2005-2008 Senior Legal Officer, Counter-Terrorism Committee Executive Directorate (CTED), United Nations, New York

### Responsibilities:

- Maintained relations on behalf of the Counter-Terrorism Committee of the Security Council and CTED with 14 States, including consultations with the Permanent Missions and government officials in capitals, where appropriate.
- Served as Coordinator of Working Group on Terrorist Financing, with responsibility for providing policy advice and recommendations to the Head of ATA0 and the Executive Director on substantive issues related to anti-money laundering and counter-financing of terrorism (AML/CFT).
- Drafted and reviewed substantive advice and guidance on issues and trends to the Committee; supervised preparation and drafting of reports.
- Analyzed Member States' legal, institutional and procedural compliance with counter-terrorism standards and drafted preliminary implementation assessments and reports for the Committee.
- Identified institutional and legal domains in which States require technical assistance, and developed projects to facilitate provision of technical assistance.
- Participated in missions to Member States to assess implementation of Security Council resolutions 1373 (2001) and 1624 (1999); drafted preliminary conclusions and reports.
- Maintained collaborative partnerships, with relevant stakeholders, including the Financial Action Task Force, the International Monetary Fund and the World Bank.
- Participated in meetings of the Committee and its Sub-Committees, making oral presentations, when required.
- Represented CTED in external fora and made substantive presentations.

1999-2005 *Money Laundering Officer, Global Programme against Money Laundering and Officer-in-Charge (2004-2005), Global Programme against Money Laundering, United Nations Office on Drugs and Crime (UNODC), Vienna*

### Responsibilities:

- Analyzed Member States' legal, institutional and procedural compliance with anti-money laundering and counter-financing of terrorism standards (AML/CFT); identify institutional and legal domains in which States require technical assistance; supervise preparation and draft reports on Member States' legal compliance with AML/CFT standards.
- Led missions to Member States to assess technical assistance needs.
- Designed, planned, implemented and, where required, directly delivered

specialized technical services to Governments in legal and law enforcement fields.

- Managed field advisor programme of long-term, field-based technical assistance for prosecutors, law enforcement officials and financial institution regulatory personnel. Selected and supervised specialist field-based staff, mentors.
- Led collaborative inter-agency partnerships, coordinating activities and implementing joint projects (active partners included the World Bank, the IMF, Commonwealth Secretariat, OAS-CICAD, Asian Development Bank, the US Department of Justice, and the Egmont Group).
- Led teams on substantive projects, managing, developing and training staff.
- Supervised preparation of benchmarks and best practice.
- Responded to technical questions and provide AML/CFT policy guidance, assistance and liaison to UN system, Member States, inter-governmental bodies and other organizations; supervise preparation and drafting of reports on AML/CFT trends to intergovernmental bodies, including CTC, Security Council and General Assembly, the Commission on Narcotic Drugs and the Crime Commission.
- Represented UNODC in external fora and made substantive presentations.
- Certifying Officer for GPML, responsible for the unit budget and all expenditures.
- As Officer-in-Charge, managed the Unit's operations, and ensured budgetary and administrative compliance of technical assistance, including budget preparation, critical indicators and resource allocation; certified unit expenditures and managed implementation/spending rate.

1998-1999 *Senior Research Associate, Institute for European-Latin American Relations (IRELA), Madrid, Spain*

**Responsibilities:**

- Support to European Commission, the European Parliament, and regional organizations in Latin America for high-level inter-governmental and bi-regional meetings, and other technical seminars and workshops (approximately 30 annually).
- Leadership of research teams, strategic planning and management of research to track and analyse trends in all aspects of European-Latin American relations, with special emphasis on security and transnational crime, drug policy and criminal legislation.
- Research, drafting and editing of books, reports, briefings, articles and other substantive documentation.
- Editing full-length books produced in partnership with the Inter-American Development Bank (one annually).
- Coordination of multi-disciplinary, multi-national research teams on research and analysis projects.
- Supervision of database on Latin American issues for EU institutions with four full-time substantive staff.
- Supervision of production of well-respected and well-known publications to technically challenging specifications.

- Fund-raising.

1996-1998 *Fulbright Senior Scholar, Georgetown University, Washington, D.C.*

**Responsibilities:**

- Research and lecture on transnational drugs and crime policy.
- Completed book on the illicit drug trade in Latin America, published by Macmillan.
- Published several chapters, articles, and newspaper op-eds.

1993-95 *Senior Editor, Oxford Analytica, Oxford, U.K.*

**Responsibilities:**

- Management of Latin America and Africa desks of a major international research consultancy, whose clients include the World Bank, the United Nations, the Inter-American Development Bank, and the European Commission.
- Writing and editing, to daily deadlines, reports on a wide range of issues for clients in the private sector, national governments and international organizations.
- Commissioning and editing political and economic research and analysis from specialist contributors, and senior academics to ensure excellent coverage of contemporary issues.
- Twice daily reporting to the managing editor with analysis of substantive issues and operational reports.

1990-91 *Writer/Editor, EFE News Agency (the Spanish national news agency), Madrid, Spain*

**Responsibilities:**

- Duty editor with responsibility for managing the work of the English Language Service, including choice of news output; the supervision of writers and their work; the assignment of tasks; desk editing; the monitoring of results; liaison with Spanish language services and senior management; and reporting to the editor-in-chief.
- Latin American Affairs editor of the English Language Service, with responsibility for output on Latin American affairs for the 24-hour news service, as well as related news services to specialist overseas clients.
- Writing, editing, and commissioning news stories.

1987-90 *Managing Editor, Institute for European-Latin American Relations (IRELA), Madrid, Spain*

**Responsibilities:**

- Research and analysis support to the European Commission and the European Parliament for approximately 30 inter-regional and inter-governmental meetings, workshops, and seminars a year.
- Ensuring that all outputs products were available simultaneously in English and Spanish at multiple locations to strict deadlines, and creating the in-house structures to enable this.

- Team member in group responsible for planning and supervision of research output.
  - Recruitment/supervision of a team of editors and translators.
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### Languages

English (mother tongue)  
Spanish (fluent)  
French (reasonable)  
German (modest)

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### References

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UK

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Rick McDonell  
Executive Secretary  
FATF

Kimberley Prost  
Ombudsman  
United Nations  
New York

**Name: Eliot Kennedy**  
Designation: Assistant Secretary  
Agency: APG Secretariat  
Email: [mail@apgml.org](mailto:mail@apgml.org), [eliot.kennedy@apgml.org](mailto:eliot.kennedy@apgml.org)  
Telephone: + 61 2 9277 0524  
Mobile: + 61 (0)409 015 386

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## **I. Professional Experience**

- Joined APG Secretariat in March 2001.
- Current position is “2IC” to Executive Secretary of APG Secretariat.
- Since joining the Secretariat, involved in all aspects of the APG’s work program, including strategic planning and management issues, liaison with FATF and attendance at FATF meetings, coordinating the APG's Mutual Evaluation program and conducting mutual evaluations of APG member countries to test their compliance with the international AML/CFT standards.
- Deputy Registrar, Refugee Review Tribunal (Australia), Sydney from 1993 to 2001
- Held various policy positions in the Australian National Crime Authority, 1985 to 1993.

## **II. Education**

- Bachelor of Arts (Honours), Sydney University, 1983
- Graduate Diploma in Communication Management, 1988
- Advanced Diploma of Management, 2012

## **III. Nationality**

- Australian

• **PROFESSIONAL PROFILE** •

Accomplished professional with proven ability to develop, implement, and execute management programs. Recognized as a trusted advisor and partner with senior management. Proven expertise in anti-money laundering, enterprise risk management, risk assessments, strategic planning, accounting, finance, and credit underwriting solidified by extensive training and certifications.

• **CORE COMPETENCIES** •

- Collaboration
- Visioning
- Managerial Courage
- Business Acumen
- Initiative
- Managing Risk
- Strategic Thinking & Planning
- Data Gathering & Analysis
- Emotional Intelligence

• **RECENT CAREER HIGHLIGHTS** •

- Significant contribution in creating KeyCorp's Enterprise Risk Management Program and Policy.
- Instituted and established program oversight and monitoring of KeyCorp's legal entities in the risk assessment process.
- Designed and executed an innovative employee offsite for the KNB RISC Office that incorporated relationship building, experiential learning and personal development; outcomes leveraged to plan annual employee and partners meeting.
- Developed a 10-week legal summer associate internship program for KeyBank.
- Created a volunteer management framework for NewBridge Cleveland.
- Demonstrated outstanding organizational skills resulting in increased attendance at PRMIA 2012 Global Conference; selected to serve as PRMIA's Speaker Coordinator for the Central and South America Regional Chapters.
- Lead initial succession planning efforts in search of Executive Director for Heights Arts.

• **EDUCATION AND TRAINING** •

- University of Chicago, Graduate School of Business, Chicago, Illinois, MBA, Concentration in Finance and Strategy, May 1998.
- Lakeland College, Sheboygan, Wisconsin, Bachelor of Arts, May 1983
- Global Association of Risk Professionals, International Certificate in Banking Risk and Regulation, 2012
- Weatherhead School of Management, Case Western Reserve University, Executive Leadership Certificates, June 2011:
  - Strategic Thinking
  - Designing Solutions for Innovation and Strategy
  - Operational Excellence
  - Project Management
  - Emotionally Intelligent Leader
  - Executive Management
  - Financial Decision Making
  - Communications and Professional Skills
  - Women in Leadership
- Cleveland Bridge Builders Flagship Leadership Program, 2005 - 2006
- American Bankers Association National Compliance School, April 2006
- American Banker Association Graduate School of Compliance School, April 2005

**- WILLIE ANN MADDOX -**

**• WORK EXPERIENCE •**

**KeyCorp, Cleveland, OH**

*Enterprise Risk Management*

*ERM Risk Assessment Manager*

June 2010 - Present

- Lead the oversight, management, and administration of lines of business quarterly risk profile process.
- Manage the production of KeyCorp's ERM risk profile, dashboard and related documents for the Board.
- Develop relationships across various stakeholders groups and partnered to ensure effective collaborations.
- Participate in the creation of the ERM Program and Policy, Framework and Procedures; ongoing contributor.

*Key National Banking RISC Office*

*Regulatory Compliance Manager*

December 2005 – June 2010

- Managed oversight of KNB Regulatory Compliance Programs providing day-to-day leadership achieving managed program status.
- Established KNB Clean Desk Program; enhanced program sustainability, achieving 107% of target.
- Streamlined number of line of business AML/BSA procedures that increased business writing efficiency and ensured consistency and sustainability.

*Key Corporate and Investment Banking*

*Compliance Analyst*

December 2003 – December 2005

- Managed KNB lines of business compliance and participated in firm-wide committees and initiatives.
- Partnered with stakeholders to maintain applicable procedures and management of AML program.
- Facilitated the development, implementation, and promotion of internal control and security awareness.

*Strategic Planning Group*

*Senior Associate Strategic Planning*

April 2001 – December 2003

- Participated in corporate-wide strategic planning efforts and projects.
- Created partnership assessment tool to assess LOB strategic needs and business intelligence requirements.
- Performed industry research and trend analysis to support strategic decision-making.

*Key Healthcare Finance*

*Senior Credit Associate Underwriting*

August 2000 – March 2001

- Led credit analysis and assessments of Healthcare Segment credit relationships ranging from \$1-\$200 million.
- Performed due diligence analysis of client's credit and assignment of risk rating.
- Monitored covenant compliance requirements of relationships.

**KeyCorp - Corporate Finance Management Associate Program**

*Investment Banking Rotation – McDonald Healthcare & Technology Group*

June 1999 – August 2000

- Performed industry and company research.
- Assisted in the creation of a medical device industry index.
- Performed financial analysis to support structuring of mergers and acquisition transactions.

*Credit Rotation –Key Healthcare Finance*

- Prepared credit write-ups by identifying, researching, evaluating, and incorporating relevant issues.
- Performed statement spreading and analysis of Healthcare Segment clients.
- Prepared appropriate financial models to assist in evaluating a client financial performance.

**- WILLIE ANN MADDOX -**

*Sales Rotation – Key Real Estate Capital Markets, Fannie Mae*

- Created collateral materials for the Brokers/Bankers Corner web site.
- Performed due diligence of the Master Forward Financing Agreement between Fannie Mae and Key.
- Created spreadsheet to perform cost/benefit analysis.

**Duchossois Industries, Elmhurst, IL**

Privately held \$1.2 billion diversified manufacturer engaged in the transportation, consumer products, and defense industries.

*Business Analyst Internship*

June 1998 - September 1998

- Managed successful system conversion of \$14 million split-dollar life insurance contracts.
- Analyzed existing portfolio investments and prepared performance reports.
- Researched venture capital indexes to identify benchmarks for investments.

**Strong Capital Management, Menomonee Falls, WI**

National investment management company with \$40 billion under management.

*Customer Service Support Representative*

October 1996 - June 1998

- Provided investment market activity and account information to shareholder base of 400,000.
- Processed 75-150 trades daily on accounts.
- Contributed to newly hired representatives training in service and call guide procedures.

**Firstar Trust Company, Milwaukee, WI**

Subsidiary of Firstar Corporation, a bank holding company with \$74.5 billion in assets and over 1,200 offices in 13 states.

*Senior Trust Officer & New Business Development Representative*

November 1992 - October 1996

- Established qualified retirement plans as a component of companies sponsored employee benefits.
- Recommended investments for portfolio selection aligned with company objectives.
- Delivered workshops for employees and obtained 90% participation.

**Elan Payroll Services, Milwaukee, WI, Subsidiary of Firstar Corporation**

*Sales Officer and Representative*

November 1989 - October 1992

- Recommended and analyzed prospective clients payroll processes for efficiency and effectiveness.
- Reduced client exposure to payroll tax liability.
- Developed sales plans for assigned territory to increase visibility of payroll service products.

**Elan Insurance Service, Milwaukee, WI, Subsidiary of Firstar Corporation**

*Accounting Manager and Officer*

December 1986 - October 1989

- Effectively managed \$3 million in assets and prepared \$2 million annual budget.
- Decreased processing time for regional sales representative commission payments by 60%.
- Established and grew department to a four-team member and executed training programs to cross-train staff.

*Staff Accountant*

November 1985 - December 1986

- Assisted in automating the financial institution division accounting reporting, which increased reporting efficiency 30%.
- Prepared monthly, quarterly, and year-end financial statements and tax returns.
- Established product line reporting for financial analysis.

## **- WILLIE ANN MADDOX -**

### **• ACHIEVEMENTS •**

- 1Key Chairman Achievement Award, 2010
- Best in Class Kick-Off Meeting, KeyBank United Way Campaign, 2009-2010
- Leadership Action Project (LAP) Team Leader, Cleveland Bridge Builders, 2005-2006
- Elsa Pavlik Member of the Year Award, Women's City Club, 2005
- New Member of Year, Women's City Club, 2003

### **• LICENSES / CERTIFICATIONS •**

- C.P.A., Ohio Society of CPAs, Member Since 2000
- CAMS, Association of Certified Anti-Money Laundering Specialists, Member Since 2008
- CGMA, Chartered Global Management Accountant, American Institute of CPAs, Member 2012
- Securities Series 7, 63, FINRA (Inactive)

### **• PROFESSIONAL AFFILIATIONS •**

- Professional Risk Managers' International Association (PRMIA), Speaker Coordinator 2013 - Present
- Case Western Reserve University School of Law, Guest Lecturer 2008 - Present
- Heights Arts Collaborative, Inc., Trustee and Past Treasurer 2008 - Present
- BSAAG SAR & NBF, ABA MLIG Open Compliance Committees 2008 - Present
- Minority MBA Student Case Competition, KeyBank & Fisher College of Business, Judge 2009 - Present
- Ohio Society of CPAs, International Tax & Accounting Conference Advisory Board 2009 - 2011
- Ursuline College, Arts and Science Department Advisory Board 2007 - 2009
- ABA Regulatory Compliance Conference Advisory Board 2006 - 2008
- Friends of the Cleveland Public Library, Past Trustee and Treasurer 2002 - 2008
- ABA National and Graduate Compliance School Advisory Board 2006 - 2007
- The Women's City Club, Past Board of Director 2003 - 2006

## Rick McDonell Career Summary

Qualifications: BA, LLB, Graduate Diploma in Commercial Law (Monash University, Australia).

- Three years as Sub-Dean university hall of residents: overseeing 180 undergraduate and post-graduate students in their academic and non-academic pursuits.
- Two years in private legal practice with a law firm in Australia. Wide variety of legal work including common law, criminal law, litigation, tax law and administrative law.
- Four years as an attorney with a Royal Commission (Special Prosecutor investigation) investigating large scale national and international white collar fraud and associated organized crime. Contributed to a report to government which led to a seminal realignment of Australia's approach to organized crime policies, laws and practices.
- Ten years as a legal adviser and National Coordinator of organised crime task forces for Australia's National Crime Authority (a federal and state specialised organised crime investigation agency). Providing legal advice on investigation powers and policies. Leading many police and multi-agency task forces on a wide variety of criminal investigations at a national and international level, including domestic and international money laundering, large scale commercial fraud, organized crime groups (mafia, Chinese triad and local groups). In this capacity, author of: "Taken to the Cleaners-Money Laundering in Australia" which set out the variety of money laundering methods and cases extant at the time, examined the relevant laws and proposed policy, legal and operational changes to the system in place at the federal and state level.
- Three years as a federal prosecutor with Australia's Director of Public Prosecutions. Wide variety of prosecutions at a federal level. Building briefs of evidence, advocacy in criminal and appeal courts, conducting mutual legal assistance and extradition cases, providing international cooperation including: under treaty, court-to-court and police-to police information and evidence exchange.
- Founder and First Executive Secretary of the Asia Pacific Group on Money Laundering (the Asia Pacific regional group of the FATF). Building the initial momentum with countries in the region, drafting the formal basis for the group, instituting and carrying out a country assessment program for money laundering and terrorist financing.
- Two years as Chief of the UN Global Programme against Money Laundering. Managing policy, legal and technical assistance program delivery to countries in Africa, South America, the Caribbean and south East Asia.
- Executive Secretary of the Financial Action Task Force since 2007.

# **Curriculum Vitae**

## **Patrick O'Sullivan**

**Manager : Financial Intelligence Unit  
New Zealand**

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Upper Hutt 5019  
New Zealand**

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## JOSÉE NADEAU

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*Phone: (819) 243-5851 (home); (613) 992-2394(work); (613) 796-9931 (cel.)*  
*josee.nadeau@fin.gc.ca*

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### PROFESSIONAL PROFILE

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A bilingual economist with excellent leadership and interpersonal skills and with extensive experience in the Canadian government advising Ministers and senior executives with respect to numerous public policy and economic issues. These include combating financial crimes, financial sector policy development and regulation, trade negotiations, tax policy development, macroeconomic policies, currency and counterfeiting, Aboriginal economic development and capacity building. Several years of management experience and in representing and negotiating for Canada internationally in various fora, in coordinating numerous federal organisations and in consulting with diverse key stakeholders, nationally, regionally and internationally. With integrity and respect, a dynamic team player, a strategic and analytical thinker and a results-driven executive.

### CAREER HIGHLIGHTS

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#### *2009 to date*

*Senior Chief (EX-2), Financial Crimes - International, Financial Sector Policy, Department of Finance Canada*

- Lead the Canadian delegation to the Financial Action Task Force (FATF) and to its regional bodies in the Caribbean, South America and the Asia Pacific region, including the coordination of up to twelve departments and agencies. In particular: led the review of the 2012 international standards for anti-money laundering and countering the financing of terrorism and proliferation as well as the development of the new assessment methodology; lead the on-going assessment of FATF countries and high-risk countries' compliance against the FATF standards; and lead the on-going policy development. Support Canada at the G7/8, G20, the United Nations and the Organization of American States with respect to financial crimes and financial integrity.
- Contribute to and lead various Canadian policy and legislative development and initiatives with respect to financial crimes, including preventive measures in the financial sector, targeted financial sanctions, national risk assessment, technical assistance and corporate transparency. Engage with other countries, the private sector, the International Financial Institutions, and other key stakeholders on relevant international and domestic issues.
- Manage 6 staff and oversee a travel budget of about \$150,000 as well as membership and capacity building contributions to relevant international organizations.

#### *2007 to 2009*

*Director (EX-1), Aboriginal Economic Development, Indian and Northern Affairs Canada*

- Provided leadership and coordination for Aboriginal economic development consultations within the Department and the Federal Government, with Aboriginal Governments and organizations, and Provincial and Territorial Governments (e.g., consultations on a new Aboriginal Economic Development Framework). Provided secretariat support to the National Aboriginal Economic Development Board appointed by Order in Council to advise federal Ministers on Aboriginal economic development.
- Led and coordinated strategic planning and performance management for the Economy Strategic Outcome and Logic Model of the Department, including: the Management Reporting

and Results Structure; the Departmental Performance Report; Report on Plans and Priorities; and internal annual planning and quarterly reporting on outcomes and activities.

- Manage a newly created unit of 10 staff with a budget of about \$2.7 million, and oversaw the development of another unit of 15 people, with concurrent management responsibility for 6 months.

#### *2002 to 2007*

##### *On Interchange Canada Program from the Federal Government to the Bank of Canada*

- As an Advisor to the Strategic Leadership Team, contributed to the management of the Bank of Canada department responsible for the currency function and for operations in financial system and funds management, including 300 employees and a \$90 million budget. For example, coordinated department-wide strategic activity such as: integrated medium-term and annual planning (including financial, human, physical and technological resources) as part of the Bank-wide planning exercise; and work environment and workforce planning using the business excellence framework of the National Quality Institute.
- Led the Bank's comprehensive program of currency counterfeiting situational analysis and interventions, in collaboration with a multidisciplinary team of Bank's currency experts, the Royal Canadian Mounted Police (RCMP) and the Department of Justice.
- As a Senior Regional Representative (Currency, Atlantic Provinces, and based in Halifax from 2002 to 2005), was responsible for currency communication and distribution system in the region. This included operations, research and analysis as well as consultations, representations and partnerships with senior representatives from the financial community, business sector, law enforcement, crown prosecutors and federal departments as well as liaison with the media.
- Managed the office of the Atlantic Provinces and shared leadership of the Bank's 5 regional offices for currency with 20 employees and a budget of a few \$ million.

#### *2000 to 2002*

##### *Director (Acting EX-1/EX-1), Economic Analysis and Statistics, Fisheries and Oceans Canada*

- Led economic research, analysis and policy development on wide-ranging fisheries and oceans issues, including: a comprehensive review of fishing licence fees; first ever costing of First Nations access to fisheries and the development of a licence buy-back program; economic impact of new species at risk legislation; and leading the Canadian delegation to the Organization for Economic Cooperation and Development (OECD) Committee on Fisheries.
- Responsible for trade policy, statistical analysis and surveys, data management and systems. Managed a division of 20 employees and a budget of a few \$ million.

#### *1999 to 2000*

##### *Project Leader (ES-6), Financial Sector Policy, Department of Finance Canada*

- Led and coordinated federal-provincial relations to address policy, legislative and regulatory gaps and overlaps in the banking, insurance and securities sectors in Canada. Coordinated international relations and conducted research in the financial sector.

#### *1996 to 1999*

##### *Economic Counsellor (ES-5/ES-6), Canadian Delegation to the OECD, France*

- Represented Canada at the Economic and Development Review Committee (EDRC) responsible for the OECD country economic studies and peer reviews; was also elected EDRC vice-chair. Monitored various OECD committees overseeing macroeconomic issues as well as taxation,

labour market, financial sector and investment with both a national and international focus, and advised the Canadian government.

*1988 to 1996*

*Analyst-Economist (ES-1 to ES5), Department of Finance Canada*

- In the Financial Sector Policy Branch of Finance Canada, participated in the General Agreement of Trade in Services (GATS) negotiations for the financial sector, including with regard to China and Taiwan's accessions to the World Trade Organization (WTO). Supported discussions under the North American Free Trade Agreement (NAFTA) and bilateral trade relations. Undertook consultations with executives from the Canadian financial sector and coordinated Canada's trade position. Developed policies and participated in legislative processes in relation to foreign financial institutions in Canada.
- In the International Trade and Finance Branch, conducted research and analysis of macroeconomic issues in Japan and other Asian countries in support of meetings of the Minister of Finance and senior management for the Group of 7/8, the Asia Pacific Economic Cooperation (APEC), the OECD and the International Financial Institutions. Coordinated Canadian positions with other departments and participated in relevant international meetings.
- In the Tax Policy Branch, participated in the development and design of policy and legislation to replace the federal manufacturers' sales tax with a new value-added tax, the Goods and Services Tax (GST), in particular for the financial sector. Then developed policies for a new tax relationship with First Nations in the context of self-government, including a discussion paper on an innovative tax framework. Also led an economic study in five First Nations communities to assess the potential tax base. Consulted with other federal departments and First Nations Governments and organizations.

*EDUCATION*

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*1987 to 1989* : M. Sc. Economics, Université de Montréal, Québec, Canada

*1984 to 1987* : B. Sc. Economics, Université de Montréal, Québec, Canada

*PROFESSIONAL DEVELOPMENT TRAINING*

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*2009*: FATF assessor training for country assessments against the FATF Standards.

*2007*: Leadership and Engagement of Citizens, Stakeholders and Partners, at Canada's School for Public Service.

*2006*: Coaching and Communication, at a Bank of Canada workshop for Leaders.

*2003 and 2004*: Media Spokesperson, offered by Professional Communication Firms.

*2001*: Coaching for Breakthroughs and Commitment, at the Canadian Center for Management Development.

*LANGUAGE AND SECURITY*

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Fully fluent in French and English (Second Language Proficiency at EEE (i.e., Exempt) as assessed by the Federal Government); Top Secret security clearance.

*REFERENCES*

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Available on request.

**Name:** Patrick John O'Sullivan

**Date of Birth:** 4 June 1951

**Nationality:** New Zealand

**Education:** Masters Degree: Master of Transnational Crime Prevention  
University of Wollongong, Australia.

**Profile:**

- 40 years of law enforcement and intelligence experience including 8 years as Officer-in-Charge/Manager of a Financial Intelligence Unit.
- 11 years in the international arena.
- An internationally recognized specialist in the establishment, operation and management of Financial Intelligence Units including FIU IT.
- Extensive experience of financial analysis, financial investigation, general criminal investigation and asset forfeiture and recovery.
- Highly experienced designer and deliverer of training in all these areas.
- Extensive experience of legislative drafting and drafting of implementing regulations and guidelines particularly in the area of anti-money laundering and countering the financing of terrorism (AML/CFT).
- Extensive experience of negotiating with and advising national governments on the implementation of AML/CFT legislative and enforcement regimes, the establishment and management of Financial Intelligence Units and the regulation of financial and non financial institutions and businesses in the area of AML/CFT.
- Extensive experience of advising private sector institutions on the implementation of AML/CFT legislation, regulations, guidelines and the requirements of various international standards and norms in AML/CFT.
- 17 years experience as a delegate to international organisations including the Egmont Group, The Financial Action Task Force (FATF), FATF Style Regional Bodies (FSRBs), Europol and Interpol.
- Intimate knowledge of and a strong advocate of the implementation and enforcement of UN Conventions, resolutions and other international standards in the areas of drugs, organized crime, anti money laundering and countering the financing of terrorism.

**Current:** Manager New Zealand Financial Intelligence Unit

**employment:**

The New Zealand Financial Intelligence Unit (FIU) is a semi autonomous government agency hosted and resourced by the New Zealand Police Department.

It currently has 21 staff principally made up of civilian personnel in the roles of Intelligence Analysts at various levels and Intelligence Support Officers and Intelligence Support Assistants. A small management team is comprised of The Manager, Operations Supervisor, Training and Compliance Manager, IT Systems Manager and Research and Policy Officer.

The FIU provides financial intelligence relating to suspicious transactions, money laundering, the financing of terrorism and other serious offences. Its services are a response to the functions and powers set out in the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 (AML/CFT Act). In this way the FIU helps the New Zealand Government fulfil its obligations to the Financial Action Task Force, the Government's organised crime strategy and the prevention and detection of serious crime.

The FIU collects and collates information provided by external parties and reporting entities, especially banks and other financial institutions. After the required analysis, intelligence products are sent to other investigative and intelligence units within Police, sector supervisors, domestic partner agencies and to relevant international agencies.

The Anti-Money Laundering and Countering the Financing of Terrorism Act 2009 (AML/CFT Act) comes fully into force on 30 June 2013. This places new obligations and extends the coverage of previous legislation and it will greatly increase the number of reports sent to the FIU.

In February 2012 I was employed by the New Zealand Government to help prepare the FIU, Sector Supervisors and reporting entities for the main implementation of the AML/CFT Act. To that end I am employing new staff in key roles, reassigning existing staff, have acquired and am in the process of implementing a new IT solution, am in the process of reorganising the operational structure of the FIU, implementing an entirely new internal training regime and supervising the preparation and publishing of best practice guidelines and reporting guidelines for reporting entities. I am also assisting New Zealand Police in the design and delivery of an anti-money laundering course for investigators which will be added to the curriculum of the Royal New Zealand Police College in 2013.

**Former  
Employment:**

I am a member of the New Zealand AML/CFT National Coordination Committee which is comprised of various government agencies and is charged with coordinating all AML/CFT activities across the government sector and with overseeing all policy matters and legal drafting and implementation issues related to AML/CFT.

**2008 - 2012 - Chief, Expert Services Unit and Senior Advisor – Intelligence**

and Law Enforcement Systems – Information Technology Service – United Nations Office on Drugs and Crime, Vienna, Austria.

**2006 – 2008** – Law Enforcement Advisor – Global Programme against Money Laundering – United Nations Office on Drugs and Crime.

**2001 – 2006** – Independent Consultant specializing in financial crime and Financial Intelligence Units. Worked as a consultant to the Legal Department of the International Monetary Fund, The Asia Development Bank, The World Bank, Deloitte Forensic, Asia/Pacific, ITC Australia and Control Risks Group, Philippines.

**1969 – 1978, 1982 - 2001.** New Zealand Police. 25 years in intelligence and criminal investigation. Coordinator, Money Laundering with the National Proceeds of Crime Bureau 1994 - 96 and Officer-in-Charge of New Zealand Police Financial Intelligence Unit 1996 – 2001 at rank of Detective Senior Sergeant.

**Countries of work experience:**

New Zealand, The Philippines, Indonesia, United States, Cook Islands, Samoa, Vanuatu, Fiji, Tonga, Niue, Mongolia, Singapore, Thailand, Malaysia, Palau, The Federated States of Micronesia, Nigeria, Zambia, Namibia, Kosovo, South Africa, Tanzania, Ethiopia, Kenya, The Maldives, The Netherlands, Montenegro, Azerbaijan, Finland and Denmark.

**Relevant work experience**

Expert advisor to the Information Technology Service of the United Nations Office on Drugs and Crime, Vienna. Provision of specialised advice in the development and deployment of software applications for financial intelligence units, law enforcement agencies, anti-corruption agencies, regulatory and intelligence agencies. Representative at various international and regional organisations such as the Egmont Group and FSRBs.

Law Enforcement Advisor to the United Nations Office on Drugs and Crime Global Programme against Money Laundering. Delivery of technical assistance and training to UN Member States in the area of financial analysis, financial investigation, establishment of Financial Intelligence Units and specialised investigative agencies. Development of training packages in the areas of financial analysis, financial investigation and FIU operations and management. Focal point for relevant International Organisations such as the International Monetary Fund, The World Bank, Egmont Group, FSRBs, Interpol, Europol, FATF etc.

Independent Consultant specializing in financial crime and Financial Intelligence Units. Worked as a consultant to the Legal Department of the International Monetary Fund, The Asia Development Bank, The World Bank, Deloitte Forensic, Asia/Pacific, ITC Australia and Control Risks

Group, Philippines with principal focus being the delivery of technical assistance to Financial Intelligence Units particularly in the developing world.

Development of New Zealand's Financial Intelligence Unit. Position Held: Officer-in-Charge. Duties: Planned, facilitated and implemented the formation of New Zealand's Financial Intelligence Unit involving establishment of an operational unit, IT support and financial intelligence/analysis methods. Researched similar units operating world-wide and developed the operational systems and procedures. Assisted with drafting of New Zealand's Financial Transactions Reporting Act 1996. Compiled a set of money laundering guidelines for financial institutions including banking, insurance, retail investment and wholesale banking industries and casinos. Completed draft guidelines for the legal profession. Duties also included managerial, administrative, public relations and human resources functions.

Management of staff encompassing supervision, training and evaluation.

Development of partnerships at the wider law enforcement level with other government agencies and departments involving training and education, information sharing and mutually beneficial interaction.

Provision of a financial intelligence support role to investigations particularly those concerned with money laundering offences and asset forfeiture actions. Liaison and contact with international organisations and enforcement agencies to facilitate co-operation and encourage mutual cooperation and assistance in development of financial intelligence and investigations

Member of New Zealand delegation to FATF, APG and Egmont Group 1996 – 2001.

FATF NCCT Asia Pacific Regional Review Group. Position held: Principal contact and Team Leader – Cook Islands. Duties: Collated and analysed on and offshore banking and financial services legislation, practices and regulation in the jurisdiction. Facilitated the establishment of a New Zealand Overseas Development Agency (NZODA) funded project to provide technical assistance to the Cook Islands Money Laundering Authority in establishing a Financial Intelligence Unit in the Cook Islands.

**Significant achievements:**

In 2008 the establishment and management of UNODC project GLOT29 – (Intelligence and Law Enforcement Systems) to design, develop, deploy and support software applications for intelligence and law enforcement agencies worldwide including Financial Intelligence Units. Two applications in particular, goAML and goCASE, are now recognised as industry leaders and standard setters in the areas of financial intelligence and case

management.

#### ADB TA Project – The Philippines

Member of Control Risks Group (Philippines) international consultant team contracted to ADB to establish an anti-money laundering legislative and institutional regime in the Philippines and to assist the Philippines in satisfying FATF requirements for removal from the FATF NCCT list.

This project included the drafting and passage of anti-money laundering laws and implementing rules and regulations, the establishment of a financial intelligence unit with full IT capacity, the establishment of money laundering investigative capacity within Philippines law enforcement agencies and the design and delivery of training for financial, legal and law enforcement agencies on the anti-money laundering regime.

Involvement in this project included:

- Assisting with the assessment of drafted laws, regulations and implementing rules and providing advice on required amendments to meet current international standards.
- Assisting with the drafting of guidelines to financial institutions to implement anti-money laundering laws and regulations.
- Assisting with the establishment of the Anti-money Laundering Council Secretariat (AMLC), which acts as the FIU, including the preparation of an organisation structure, standard operating procedures, position and person specifications, operational work methods and procedures, IT requirements and training needs.
- Assessment of institutional capacity of law enforcement agencies.
- Assessment of training needs of regulatory and law enforcement agencies.
- Design and delivery of training to regulatory and law enforcement agencies.

#### ADB TA Project – Indonesia

Member of Deloitte Touche (Australia) international consultant team contracted to ADB to establish an anti-money laundering legislative and institutional regime in Indonesia and to assist Indonesia in satisfying FATF

requirements for removal from the FATF NCCT list.

Project included the drafting and passage of anti-money laundering laws, decrees, regulations and guidelines, the establishment of a financial intelligence unit with full IT capacity (PPATK), the establishment of money laundering investigative capacity within Indonesian law enforcement agencies and the design and delivery of training for financial, legal and law enforcement agencies on the anti-money laundering regime.

Involvement in this project included:

- Implementation of anti-money laundering legislation;
- Preparing draft regulations for the anti-money laundering law;
- Assisting concerned agencies in developing a comprehensive program, strategy, and work plan based on the FATF 40 + 9 Recommendations;
- Identifying institutional reforms needed to comply with FATF requirements and other international initiatives;
- Implementation of anti-money laundering legislation;
- Assisting in the establishment of the PPATK. Assisting in elaborating the roles and functions of supporting institutions and interactions with other regulatory and law enforcement agencies in Indonesia;
- Providing capacity building and training, and necessary budget allocations to facilitate the prompt commencement of operations;
- Preparing a detailed training needs assessment and program for the staff of key institutions responsible for implementing the anti-money laundering regime;
- Developing appropriate governance structures for PPATK and other relevant institutions;
- Developing a program and conducting capacity-building training seminars for staff of key government institutions;
- Developing guidance notes for financial institutions in the reporting of suspicious transactions;

- Identifying and developing coordination mechanisms and procedures for mutual assistance programs;
- Developing an awareness program to educate regulated entities, the private sector, and the public on money laundering as a crime; the new anti-money laundering law and regulations; and their impact;
- Considering and designing plans within realistic timeframes that could be achievable and acceptable to the Government, ADB and APG;
- Recommending further TA needed to sustain efforts and to improve implementation capabilities and compliance, and providing a plan and timetable for such assistance.

**Employment  
Record**

**2012 - Present**

Manager, New Zealand Financial Intelligence Unit

**2008 - 2012**

Chief, Expert Services Unit and Senior Advisor to the Information Technology Service of the United Nations Office on Drugs and Crime, Vienna, Austria

**2006 - 2008**

Law Enforcement Advisor, the United Nations Office on Drugs and Crime Global Programme against Money Laundering

**2001 - 2006**

Consultant to Asia Development Bank (ADB) through Control Risks Group (Philippines);

Consultant to the ADB through Deloitte Touche, Asia/Pacific;

Consultant to the ADB through ITC, Australia;

Consultant to Legal Department, International Monetary Fund, Washington DC;

Consultant in IMF/APG/Forum Islands Secretariat project to strengthen anti-money laundering and financing of terrorism legislative regimes in Pacific Islands Forum member countries and to establish Financial Intelligence Units in each country. Participating countries included Fiji,

Samoa, Vanuatu, the Cook Islands, Niue, Tonga, Palau and the Federated States of Micronesia. Project also included studying the feasibility of establishing a regional support entity for the Financial Intelligence Units in the participating countries;

Consultant to the World Bank – Financial Integrity Unit.

**1996 - 2001**

Employer: New Zealand Police Department

Position held Detective Senior Sergeant, Officer-in-Charge of the Financial Intelligence Unit, Police National Headquarters (PNHQ).

**1995 - 1996**

Employer: New Zealand Police Department

Position held Detective Senior Sergeant, Coordinator Money Laundering – National Proceeds of Crime Bureau, PNHQ.

**1993 - 1996**

Employer: New Zealand Police Department

Position held Detective Sergeant / Analyst - Threat Assessment Unit, PHNQ.

**1990 - 1993**

Employer: New Zealand Police Department

Position held Detective Sergeant, Officer-In-Charge/Investigations/Intelligence, Interpol PNHQ.

**1982 - 1990**

Employer: New Zealand Police Department

Positions held      Detective/ UB Sergeant/Detective Sergeant/Prosecutions Officer/ Officer-in-Charge (Fraud)/ Officer-in-Charge (Sexual Abuse Team) – Wellington, Lower Hutt, Masterton. Officer-in-Charge CIB Upper Hutt (Relieving).

**To:1969 - 1978**

Employer:            New Zealand Police Department

Positions held      Cadet/Constable / Detective Constable/ Detective

**Referees:**

Mr Rick McDonell  
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## CURRICULUM VITAE

### SUSAN POND

#### Home

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1110 Brussels, Belgium  
32-2-707-3560

## CAREER PROFILE

I have more than thirty years experience working for the Canadian Government and NATO. My NATO career has been focused on developing partnership policies and mechanisms to strengthen peace and security. This includes working closely with nations, international organisations, in particular - EU, IOM, OECD, OSCE, UN and WB, as well as civil society. In practical terms these efforts have resulted in the establishment of ongoing NATO programmes for the destruction small arms and light weapons, munitions and land mines. More recently I have taken on responsibility for the design and conduct of the NATO Building Integrity Programme to reduce the risk of corruption and promote good practice in the defence and security sector. This includes working closely with nations to developed tailored action plans to strengthen governance the security sector as well as the development of education and training products.

Key areas of expertise: Strong analytical skills, ability to manage complex tasks and build effective partnerships with governments, other international organizations, business and civil society; Leading new initiatives and embedding them into policy and procedures, providing advice on future areas of cooperation and charting a way forward in a complex environment. Team leader, able to provide sound advice on implementation of priorities and monitoring of the results.

In addition to assignments with the Public Service of Canada, my NATO career has led me to Norfolk, Kyiv and Brussels. I have a reputation for team building, excellent networking with a wide civil-military community, a results-oriented manager with strong strategic skills, ability to work in a demanding multi-cultural environment, identifying solutions to overcome obstacles, and a track record of success.

In 2002, I was awarded the Queen Elizabeth II Golden Jubilee Medal for outstanding public service.

## EDUCATION

Graduate Diploma in Conflict Resolution, University of Lancaster, UK, 1980  
Pre-Masters Political Science, Carleton University, Ontario, Canada, 1979  
B.A. Major in Political Science, Collège Universitaire de Saint Boniface, Manitoba, Canada, 1978  
Pre-BA, History, Université Sainte-Anne, Nova Scotia, Canada, 1975

## CAREER PROFILE

Present	Senior Officer & Head Building Integrity Programme, Political Affairs and Security Policy, NATO Headquarters, Brussels
2003-2008	Head of Section, Partnership for Peace and Cooperation, NATO Headquarters, Brussels
2000-2003	Advisor on Ukraine, Defence Planning and Cooperation, NATO Headquarters, Brussels
1999-2000	Head, NATO Liaison Office Kyiv, Ukraine
1998-1999	Staff Officer, Defense Planning and Cooperation NATO Headquarters, Brussels
1990-1998	General Policy Officer, Civil Emergency Planning Directorate, NATO Headquarters Brussels
1989-1990	Senior Administrator Operational Analysis Division Supreme Allied Command Atlantic, Virginia, USA
1988-1989	Senior Liaison Officer Search and Rescue, Canadian Coast Guard, Ottawa
1984-1987	Emergency Planning Officer Transport Canada, Ottawa
1982-1984	Policy Analyst, Transport Canada, Ottawa
1981-1982	Information Officer Energy, Mines & Resources, Halifax

## Curriculum Vitae

Name: Nikos Passas  
Address: Northeastern University, School of Criminology and Criminal Justice, 400 Churchill Hall, Boston, MA 02115-5000.  
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### 1. EDUCATIONAL BACKGROUND and QUALIFICATIONS

1985-1988: University of Edinburgh, Law Faculty, Centre for Criminology and Social and Philosophical Study of Law; Ph.D. in Sociology of Deviance.  
1982-1983: Articled Clerk; qualified to the Bar (Athens, Greece) in June 1983.  
1981-1982: University of Paris - Paris II; Master's in Criminology and Penal Science; D.E.A. (Diplôme d' Etudes Approfondies).  
1976-1981: University of Athens, Law Faculty; LL.B.

### 2. EMPLOYMENT

2003- Professor, Northeastern University, School of Criminology and Criminal Justice  
2013 Visiting Professor, Qatar University Law College  
2013- Faculty, International Anti-Corruption Academy, Vienna, Austria  
2012- Adjunct Law Professor, Case Western Reserve University, Financial Integrity Program.  
2009-2010 Visiting Fellow, Max Planck Institute for Foreign and International Criminal Law, Freiburg, Germany.  
2003 Visiting Professor, Northeastern University, College of Criminal Justice.  
1995-2002 Associate Professor, Temple University.  
1995-1996 Visiting Professor, University of Wales College of Cardiff, School of Social and Administrative Studies.  
1989-95 Assistant Professor, Temple University.  
1989: Research Associate, Law Faculty of University College London.  
1989: Post-Doctoral Fellow, University of Edinburgh, Centre for Criminology (C.C.S.P.S.L.).

1984-85: Council of Europe Visiting Fellow, University of Edinburgh, Centre for Criminology (C.C.S.P.S.L.).

### 3. PUBLICATIONS

#### Books

- 2013 Financial Transnational Crimes. London: Ashgate.
- 2010 Essays in Honor of Prof. C.D. Spinellis: Interdisciplinary Criminological Pathways (co-edited with N. Courakis et al.). Athens: Sakkoulas.
- 2008 The Evolving Challenge of Identity-Related Crimes: Addressing Fraud and the Criminal Misuse and Falsification of Identity (with Christopher Ram and Demosthenis Chryssikos). Milan: International Scientific and Professional Advisory Council of the United Nations Crime Prevention and Criminal Justice Programme (ISPAC).
- 2007 The United Nations Convention against Corruption as a Way of Life. (with Dimitri Vlassis). Milan: International Scientific and Professional Advisory Council of the United Nations Crime Prevention and Criminal Justice Programme (ISPAC).
- 2006 Legislative Guide for the Implementation of the United Nations Convention Against Corruption. Vienna: UN Office of Drugs and Crime. Available at: [http://www.unodc.org/pdf/corruption/CoC\\_LegislativeGuide.pdf](http://www.unodc.org/pdf/corruption/CoC_LegislativeGuide.pdf)
- 2006 A Comparative Analysis of National Anti-Corruption Legislation and Programmes. (New York: UN Development Programme).
- 2005 Migrant Labor Remittances in South Asia (with S. Maimbo, R. Adams, R. Aggarwal). Washington, DC: The World Bank.
- 2005 Regulating Hawala and other Informal Funds Transfer Systems. (Ed.) Washington, DC: IMF.
- 2005 Informal Value Transfer Systems and Criminal Activities. Cahier 2005-1. Research and Documentation Centre. The Hague: Ministry of Justice, The Netherlands.
- 2004 It's Legal, but It Ain't Right: Harmful Social Consequences of Legal Industries (Ed. with Neva Goodwin). Ann Arbor: University of Michigan Press.
- 2003 International Crimes (Ed.). Aldershot: Dartmouth.
- 2003 Legislative Guide for the Implementation of the United Nations Convention Against Transnational Organized Crime. Vienna: UN Office of Drugs and Crime;

and Vancouver: International Centre for Criminal Law Reform and Criminal Justice Policy.

- 2002 Upperworld and Underworld in Cross-Border Crime (Ed. with Petrus van Dyune and Klaus von Lampe). Nijmegen: Wolf Legal Publishers.
- 1999 Informal Value Transfer Systems and Criminal Organizations: A Study into So-called Underground Banking Networks. The Hague: Ministry of Justice, The Netherlands.
- 1999 Transnational Crime (Ed.); Aldershot: Dartmouth.
- 1997 The Future of Anomie Theory (Ed. with Robert Agnew); Northeastern University Press.
- 1995 Organized Crime (Ed.); Aldershot: Dartmouth

#### Articles

- Forthcoming "Anti-Corruption Measures and their Effects on Procurement Processes in Four Countries (with Jorge Claro)
- Forthcoming "Unexplained Wealth Orders" (with D. DeVille, P. Kirkbride and J. White).
- Forthcoming "Global Anomie Theory and Terrorism" (with Anamika Twyman-Ghoshal)
- Forthcoming "Counter-terrorism, Remittances Regulation and Development"
- Forthcoming "Development and Anti-Corruption Agendas Aligned: the Contribution of the UNCAC".
- Forthcoming "Re-aligning the Legal and the Legitimate" in The International Spectator.
- In press "Transparency and Compliance Programs of Multinational Companies in Latin America" (with Matthias Kleinhempel) Organizational and Management Journal
- 2013 "Introduction to Transnational Financial Crime" In N. Passas (Ed.) Transnational Financial Crime. London: Ashgate
- 2013 "Public Sector Procurement and the effects of the anti-corruption agenda" (with J. Claro). In Red Interamericana de Compras Gubernamentales (RICG) Quarterly Newsletter.
- 2013 "Private-Public Sector Interactions: The Influence of Anti-Corruption on Procurement Regulation. Macao Anti-Corruption Commission.
- 2012 "Financial Controls and Counter-Proliferation of WMD". In Case Western Reserve Journal of International Law.

- 2012 “Development and Legitimacy of Chinese Informal Finance” (with S. Hsu and J. Li). In The Pacific Review.
- 2012 “Maritime Piracy and the UN conventions against transnational organized crime, corruption and terrorism finance” (with Anamika Twyman-Ghoshal) In R. C. Beckman & J. A. Roach (Eds.), Piracy and International Maritime Crimes in ASEAN: Prospects for Co-operation (pp. 62-94). Northampton, MA: Edward Elgar..
- 2011 “Terrorist Finance, Informal Markets, Trade and Regulation” In C. Lum and L. W. Kennedy (Eds.), Evidence-Based Counterterrorism Policy. New York, NY: Springer.
- 2011 “Lessons from the Countering of Terrorist Finance: The Need for Trade Transparency”. In A. Chalkia (Ed.) The Contemporary Criminality, its Confrontation and the Science of Criminology pp. 1497-1511. Athens: Sakkoulas.
- 2010 “Anomie and White-Collar Crime”. In F.T. Cullen and P. Willcox (Eds) Encyclopedia of Criminological Theory.
- 2010 “Functionalism, Functional Analysis And Functional Explanation”. Essays in Honour of Prof. C.D. Spinellis: Interdisciplinary Criminological Pathways (Ed. N. Kourakis et al.). Pp. 305-340. Athens: Sakkoulas.
- 2010 “Anti-corruption Agencies and the Need for Strategic Approaches”. In Crime, Law and Social Change, 53(1).
- 2010 “Overview Of Crimes Involving Art and Antiquities”. (with Blythe Bowman Proulx). In S. Manacorda (Ed) Crime in the Arts and Antiquities World. New York: Springer.
- 2010 Understanding Terrorism Financing. Paper published in Appendix of the Major Commission of Inquiry into the Investigation of the Bombing of Air India Flight 182 – available at [http://epe.lac-bac.gc.ca/100/206/301/pco-bcp/commissions/air\\_india/2010-07-23/www.majorcomm.ca/en/reports/finalreport/researchstudies/volume2/default.htm](http://epe.lac-bac.gc.ca/100/206/301/pco-bcp/commissions/air_india/2010-07-23/www.majorcomm.ca/en/reports/finalreport/researchstudies/volume2/default.htm)
- 2009 “Corruption, development and transnational crime: Challenges and Solutions” in book edited by Austrian Ministry of Internal Affairs – 2<sup>nd</sup> International Anti-Corruption Seminar.
- 2009 “The Financing of Terrorism: National and International Laws” in Revue Internationale de Droit Penal. 79: 326-43. Available in English, French and Spanish. Translated also in Turkish and published in Turkish National Report to the World Congress of the International Association of Penal Law.
- 2009 “Combatting Terrorist Financing” in Case Western Reserve Journal of International Law, 41(1).
- 2009 “Background to 3<sup>rd</sup> World Summit” (with D. Vlassis) in The Third World Summit of Prosecutors General, Attorneys General and Chief Prosecutors, Attorney General’s Office, Bucharest, Romania.

- 2008 “Formalizing The Informal While Neglecting Trade Transparency: Issues in the Regulation of Hawala and Financial Controls against Terrorism”. In From Early Warning to Early Action?, (407-413). Brussels, Commission of the European Union.
- 2008 “Dirty Money: Tracing the Misuse of Hawala Networks” in Jane’s Intelligence Review. Feb.
- 2008 “UNCAC, Technical Assistance and Development Efforts. In M. Pieth (Ed.), Recovering Stolen Assets (pp. 281-295). Bern: Peter Lang.
- 2008 “Identity-related Crimes: a Review of Research and Suggested Typologies”. In D. Chryssikos, N. Passas and C. Ram (Eds) The Evolving Challenge of Identity-Related Crimes: Addressing Fraud and the Criminal Misuse and Falsification of Identity. Milan: International Scientific and Professional Advisory Council of the United Nations Crime Prevention and Criminal Justice Programme (ISPAC).
- 2007 Introduction. In N. Passas and D. Vlassis (eds) Countering Corruption in Every Day Life: A Strategic Approach to Global and National Governance. Milan: ISPAC
- 2007 The UN Convention against Corruption: Opportunities and Risks for Global Governance. In Passas and Vlassis (eds) Countering Corruption in Every Day Life: A Strategic Approach to Global and National Governance. Milan: ISPAC
- 2007 Conclusions and Recommendations of the ISPAC conference on the UN Convention against Corruption as a Way of Life (with Eduardo Vettere). In Passas and Vlassis (eds) Countering Corruption in Every Day Life: A Strategic Approach to Global and National Governance. Milan: ISPAC
- 2007 “Informal Funds Transfer Systems and Terrorist Finance” (with S. Maimbo) in T. Bierstecker and S. Eckert (eds) Financing Global Terrorism. London: Routledge.
- 2007 “Measures and Mechanisms to Strengthen International Cooperation among Prosecution Services” (with Yvon Dandurand and Gherardo Colombo) in Crime, Law and Social Change.
- 2007 Terrorism Financing Mechanisms and Policy Dilemmas. In Harold Trinkunas and Jeanne Giraldo (Eds) The Political Economy of Terrorism Financing and State Responses: A Comparative Perspective. Stanford: Stanford University Press.
- 2007 “La Financiación del Terrorismo de Al Qaeda: Mitos y Realidades” in Revista de Derecho Penal y Criminología (with A. Giménez-Salinas Framis).
- 2007 “Money Laundering and Terrorist Finance”. Henry Stewart Talks. CD-Rom.
- 2007 “Interrogantes Acerca de la Financiación del Terrorismo de al Qaeda y su Control” (with Andrea Giménez-Salinas Framis) in Oscar Jaime Jiménez Reflexiones sobre el Terrorismo en España. Madrid: Fundación Policía Española, pp. 173-196.
- 2007 “The regulation of Non-vessel-operating common carriers (NVOCC) and Customs Brokers: Loopholes Big Enough to Fit Container Ships” Journal of Financial Crime.

- (with K.Jones) 14(1): 84 - 93. available at <http://www.emeraldinsight.com/Insight/viewContentItem.do?contentType=Article&contentId=1585488>
- 2006 “Demystifying Hawala: A Look into its Social Organisation and Mechanics” in Journal of Scandinavian Studies in Criminology and Crime Prevention 7(suppl. 1): 46-62. Available at <http://www.journalonline.tandf.co.uk/media/5hlvyjmytj9nc3k5yj2q/contributions/q/l/6/1/ql6150761640k084.pdf>.
- 2006 “Fighting Terror with Error: The Counter-productive Regulation of Informal Value Transfers” in Crime, Law and Social Change 45(4-5), 315-336. available at <http://www.springerlink.com/content/h0114048633q42nm/>
- 2006 “International Terrorism” in J.Greene (ed) Encyclopedia of Police Science. Pp. 1267-1274. London: Routledge.
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### Reports

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- 2010 Financial Vigilance and Sanctions against Proliferation of WMD. Report to the European Union Commission.
- 2010 Terrorism Finance Indicators. Report to the UN Security Council Monitoring Team (on al Qaeda and the Taliban sanctions).
- 2010 Assessment Method of Anti-Corruption Initiatives and Plans. Report to UN Office of Drugs and Crime and the Office of Comptroller General of Brazil.
- 2009 and 2008 Legal Library of Anti-corruption Laws and Cases, Reports to the UN Office of Drugs and Crime and to the International Association of Anti-corruption Authorities (IAACA).
- 2008 Understanding Terrorism Financing. Report prepared for the Major Commission of Inquiry into the Investigation of the Bombing of Air India Flight 182
- 2007 Procurement Fraud and Corruption. Report to the Institute for Fraud Prevention.
- 2006 Best Practices in Corruption Asset Recovery. Interim Report to NORAD
- 2006 Terrorist Finance, the Nexus with Transnational Organized Crime and the Trade in Diamonds, Gold and Tobacco. Report to the National Institute of Justice (NIJ).
- 2004 The Trade in Gold: Case Studies of Financial Misconduct. Report to FinCEN, US Treasury Department.

- 2004 Informal Value Transfer Systems and Criminal Activities in Holland, USA, and India. Report to WODC, Ministry of Justice of The Netherlands, The Hague.
- 2004 The Trade in Diamonds: Vulnerabilities for Financial Crime and Terrorist Finance. Report to FinCEN, US Treasury Department.
- 2003 Third-Party Checks, Indicators of Abuse and Money Laundering in the Middle East Expert Report to US District Court for the District of New Hampshire.
- 2003 Informal Value Transfer Systems, Money Laundering and Terrorism. Report to the National Institute of Justice (NIJ).
- 2002 Report to Congress in Accordance with Section 359 of the USA Patriot Act (with FinCEN's Non-traditional Methodologies Section).
- 2002 The Mechanics and Settlement Process in Hawala Networks. Report for the (UK) Crime Prosecution Service.
- 2002 Informal Value Transfer Systems, Money Laundering and Terrorism. Interim report to Financial Crimes Enforcement Network (FINCEN) and the National Institute of Justice (NIJ).
- 2002 US Law Enforcement Difficulties With Traditional IVTS: Focus on Hawala. Report to Financial Crimes Enforcement Network (FINCEN).
- 2002 Hawala Banking and Indications of Abuse. Report to the (UK) National Crime Squad.
- 2001 Illegal Transfer of Funds and Repatriation of Assets to Victim Countries to the Executive Director of the United Nations Office for Drug Control and Crime Prevention.
- 1999 Underground Banking Systems and Criminal Organizations to the Ministry of Justice of The Netherlands, The Hague.
- 1998 Handbook of Corruption (part 1 of 3) to the United Nations Centre for International Crime Prevention, Vienna.
- 1997 Economic, Transnational and Illegal Aspects of NRM (New Religious Movements) Activities, to the German Parliament (Bundestag), Enquête Kommission "Sekten und Psychogruppen", Bonn.
- 1997 Regional Initiatives Against International Corruption, to the United Nations Crime Prevention and Criminal Justice Program, Vienna.
- 1995 Report on Eurofraud: Greece, to European Commission/European Documentation and Research Network on Cross-Border Crime, The Hague (with C.D.Spinellis and D.D.Spinellis).
- 1990/1 Frauds Affecting the Budget of the European Communities Budget, interim and final reports to the Commission of the European Communities (Anti-Fraud Unit: UCLAF).

- 1989 Criminal Courts, Sentencing Powers and Trends in Sentencing in Scotland: 1945-1986, report to the Scottish Home and Health Department.
- 1985: Merton's Anomie Theory Revisited, report to the Council of Europe.
- 1985: Trends in Probation in Scotland, interim report to the Scottish Home and Health Department.

### **Conference Papers**

Presented papers, inter alia, at the Stockholm Criminology Prize, International Peace Academy, 11<sup>th</sup> and 12<sup>th</sup> United Nations Congress on Crime and Crime Prevention (Thailand and Brazil), 2<sup>nd</sup> World Summit of Prosecutors and Attorneys General (Qatar), Global Congress of the International Association of Penal Law (Turkey), Global Forum VI (Qatar), APEC Symposium on Alternative Remittance Systems (Japan), DFID/World Bank International Conference on Migrant Remittances: Development Impact, Opportunities for the Financial Sector and Future Prospects (England), Inter-American Development Bank International Forum on Remittances (Washington, DC), UNICRI conference on the UN Convention against Corruption (Italy), UN ISPAC Conferences on “Responding to Transnational Crime”, “Identity Crimes” and “Breathing Life into the UN Convention against Corruption” (Italy), the U.S. National Press Club, the 8th International Anti-Corruption Conference, the 4th Inter-American Tele-Conference (Respondacon) on Fraud and Corruption in Government (Peru), World Bank conference on Illicit Flows, three World Congresses of Sociology, the Oñati International Institute of the Sociology of Law (Spain), the National Strategy Information Center, and annual meetings of the American Sociological Association, the American Society of Criminology, the Law and Society Association, the European Society of Criminology, the British Sociological Association, the (US) Eastern Sociological Society, the Society for the Study of Social Problems, the Academy of Criminal Justice Sciences, the 10th International Congress of Criminology, the British Criminology Conferences, the 13th Cambridge Symposium on Economic Crime, the Liverpool bi-annual conferences on Business Crime and Corruption, and Bentley College conferences on Business Ethics.

### **Scholarly Seminars**

Invited to give seminars and lectures at the Tsinghua Law School of Beijing, Chongqing University of Post and Telecommunications, Southwest University of Political Science and Law (China), State University of Rio de Janeiro Law School, University of Campinas (Brazil), University of Qatar School of Law (Qatar), Free University of Brussels (Belgium), Free University of Amsterdam, University of Rotterdam, University of Maastricht, University of Leiden, the Transnational Institute (The Netherlands), Stockholm University (Sweden), University of Oslo (Norway), United Nations Interregional Crime and Justice Research Institute, University of Trento, Catholic University of Milan Sacro Cuore, University of Rome III (Italy), Charles University (Czech Republic), University of Edinburgh (Scotland), Cambridge University, Hull University, Oxford University, Sussex University (England), University of Lille (France), Cardiff University, University of Swansea (Wales), University of Granada Law School, Onati Institute (Spain), Max Planck Institute for Foreign and International Criminal Law, Freiburg, University of Würzburg Law School (Germany), Graduate Institute of International Studies (IUHEI), Geneva (Switzerland), Panteion University, University of Athens Law School (Greece), University of West Indies (Trinidad and Tobago), Austral University (Argentina), American University Law School, Harvard University (Kennedy School of Government), Brown University (Watson Institute), Boston University Law School, University of Texas – Austin (LBJ School of Public Affairs), Hampshire College, Kent State University, University of Oregon,

Northern Arizona University, Wharton School of Business (University of Pennsylvania), Detroit University Mercy Law School. Pennsylvania State University, Rutgers University, Tufts University, Villanova University Law School, University of Pittsburgh, University of Maryland, Case Western Reserve School of Law, University of Toledo (Ohio), University of Delaware, Naval Postgraduate School (Monterey, CA), RAND Corporation (Washington, DC).

### **Professional Seminars**

A series of presentations on money laundering, corruption, sanctions, informal value transfer systems, hawala, funding of terrorism, bank fraud and other transnational crimes to United Nations Canada Mission., New York; seminar on UN Security Council sanctions United Nations General Assembly, New York.

United Nations Office of Drugs and Crime High-Level Seminars on the UN Convention against Corruption in Sofia, Bulgaria; Cairo, Egypt; Pretoria, S. Africa.

United Nations Development Programme, New York.

International Association of Anti-Corruption Authorities (IAACA) seminar on corruption, Beijing, Chingqong and Shanghai, China.

Giessbach III International Seminar on Countering Terrorist Financing, Lucerne, Switzerland

Austrian government International Summer School of Anti-corruption, Vienna, Austria.

Caribbean FATF and GAFI SUD, Seminar on trade-based financial misconduct, Guatemala City, Guatemala.

IMF and Arab Monetary Fund, Abu Dhabi, UAE

International Association of Anti-Corruption Authorities (IAACA), Chongqing and Shanghai, China, and Marrakech, Morocco.

International Fund for Agricultural Development and Inter-American Development Bank meetings on the regulation of remittances

Commission of the European Union, Brussels, Belgium

SOCA training of expert witnesses, Cambridge, UK

Bank of Greece, Athens, Greece.

Swiss Federal Department of Foreign Affairs, Public-Private Cooperation in Combating the Financing of Terrorism, Zurich, Switzerland.

Republic of Ireland Department of Justice, Equality and Law Reform (DJELR) -

Senior Executive Programs in Justice Policy, Boston.

US Department of Defense seminar on the Underground Economies in Arab and Muslim Societies, Baltimore, DE.

FDIC and Dept. of Justice, Miami, FL.

FBI Financial Crimes Intelligence Unit, Washington, DC.

FBI/International Law Enforcement Academy, Budapest, Hungary.

FinCEN (Financial Crimes Enforcement Network) – various meetings and places,

Pacific Rim Int'l Conference on Money Laundering and Financial Crimes, Bangkok, Thailand (with Sam Maimbo – World Bank);

OCDETF (Organized Crime and Drug Enforcement Task Force) meetings in Idaho and Hawaii;

Boston Police Department Task Force on the Victims of Human Trafficking. Boston, MA.

United Arab Emirates Central Bank International Conferences on Hawala, key-note speaker, Abu Dhabi, UAE (1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup> International Conferences on Hawala);

Federal Reserve and High Intensity Financial Crimes Areas (HIFCA) Task Force New York meeting on financial crime;

Bundeskriminalamt (BKA – German Federal Police), Wiesbaden, Germany,

Bundesanstalt fuer Finanzdienstleistungsaufsicht, Bonn, Germany,  
Egmont Group, annual meeting in Oaxaca, Mexico;  
North Carolina Governor's Crime Commission – Safe Communities Conference in  
Charlotte, NC, USA  
Anti-Mafia task force (DIGA), Milan, Italy;  
Hellenic Financial Intelligence Unit (SDOE), Athens, Greece;  
FLETC (Federal Law Enforcement Training Center) advanced seminars on money  
laundering in Chicago and S. Francisco;  
International Institute for Strategic Studies (IISS) meeting on "Strategic Implications of  
Developments in Information Technology", Washington, DC;  
US Defense Science Board, Intelligence Support to Special Operations, Department of  
Defense, Virginia;  
US National Institute of Justice Research in Progress Program in Washington, DC.  
Ohio Bank Fraud Working Group meeting,  
National Academy of Sciences meeting on transnational organized crime, Washington,  
DC;  
Resolution Trust Corporation (RTC) annual meeting, Pennsylvania.

#### **4. WORK EXPERIENCE**

##### **Consultancies**

Since 1989, I have conducted research and carried out projects for several law firms, private security firms, as well as for the (US) National Academy of Science, the Commission of the European Union, the German Parliament, the United Nations Crime Prevention and Criminal Justice Programme and the International Crime Prevention Centre, the UN Development Programme, UN Office of Drugs and Crime, the UN Monitoring Group on al Qaeda and Taliban finances, the World Bank, the IMF, Inter-American Development Bank and a number of governments.

I have written reports and provided advice to both prosecution and defense teams in various cases involving informal money transfers, terrorism, and financial misconduct in the Americas, Europe, South Asia and the Middle East.

In the past years, I have advised FinCEN (US Treasury Department) on hawala and other informal value transfer systems, crime vulnerabilities in the online payment infrastructure and commodities trade, as well as the development of red flags and guidelines for the industry. On similar issues I advised prosecuting and defense teams in the UK, India and US (Michigan, California, Tennessee, New York, Virginia, Puerto Rico, New Hampshire).

I have drafted the Legislative Guide for the Implementation of the UN Convention on Transnational Organized Crime on behalf of the The International Centre for Criminal Law Reform and Criminal Justice Policy (ICCLR), Vancouver, and the United Nations Office on Drugs and Crime (UNODC).

I consulted with the World Bank on the regulation of remittances in South Asia with emphasis on Pakistan, India, Sri Lanka and Bangladesh, as well as with the IMF on a study concerning the regulation of Informal Fund Transfer Systems.

I conducted a comparative study of national anti-corruption programs on behalf of the United Nations Development Programme, another study on the effects of money transfer/remittance national and international regulation on behalf of the World Bank, and a study on illegal logging and money laundering in South East Asia.

I consult regularly with private financial institutions and government agencies on regulatory and AML/CFT, anti-corruption and security/terrorism issues. Recent projects include work with the Norwegian Ministry of Foreign Affairs, the Caribbean Financial Action Task Force, OECD, DfID and the Finnish Ministry of Foreign Affairs on corruption asset recovery,

free trade zones and financial crime, conflict reduction, anti-corruption and development policy and technical assistance issues respectively. Recent and current projects also include advice to the Commission of the European Union on organized crime and security policy issues, advice to the UN Monitoring Group on financial sanctions against al Qaeda and the Taliban, the monitoring of the implementation of the UN Convention against Corruption and the UN convention against transnational organized crime, “gap analysis” for the implementation of the UNCAC in Caribbean islands, testimony before the Canadian Commission of Inquiry into the bombing of Air India relative to terrorist finance, research into charities and the finances of al Qaeda, and regulation of the Netherland Antilles Free Trade Zone. The main current project focuses on national anti-corruption laws and practices for the benefit of UNODC and the International Cooperation Department of the Supreme People’s Procuratorate of P. R. China. Finally, participated in a project funded by the Organization for Security and Cooperation in Europe sought to construct a preventive strategy against human trafficking, by looking into relations between this illicit market, official corruption, money laundering and interfaces with legal social actors.

**Select recent activities:**

- Course Director, Ethics and Compliance Officer Association (ECO) for the development and delivery of online courses on corruption aimed at compliance officials globally.
- Consultant to the Centre for International Rule of Law and Anti-Corruption, Doha, Qatar for the development of its training and educational program.
- Consultant to the UN Development Programme on the development and delivery of anti-corruption courses in leading Arab Law Schools
- Consultant to the Controladoria Gerao da Uniao (CGU) Brazil for projects on anti-corruption self –assessment methods based on performance indicators and benchmarks and on research on anti-corruption authorities
- Programme Consortium Member for the development of a MA degree in anti-corruption, International Anti-Corruption Academy (IACA), Vienna, Austria - [http://www.iaca.int/index.php?option=com\\_content&view=article&id=142&Itemid=1](http://www.iaca.int/index.php?option=com_content&view=article&id=142&Itemid=1) .
- Advisory services and collaboration with the International Anti-Corruption Academy (IACA) on the development, planning and delivery of courses
- Team Leader for a European Union project looking into the control against proliferation/WMD finance;
- Serving on international organizing committees for the organization of the Global Forum and the Conference of States Parties to the UN convention against corruption in Doha, Qatar;
- Scientific advisor for the World Summit of Attorneys General and Ministers of Justice in Bucharest, Romania;
- Scientific committee of ISPAC annual conferences;
- Consultant to the World Bank on mapping the global architecture of asset recovery – StAR initiative
- Consultant to the World Bank on the regulation of remittances
- Consultant to the UNODC and World Bank for the creation of a Knowledge Management Consortium on Governance and Anti-Corruption issues (bringing Northeastern together with the UNODC, UN Development Programme, UNICRI, OECD, Council of Europe, the World Bank, Asian Development Bank, Basel University Institute of Governance, U4 Anti-Corruption Resource Center, Reuters Foundation and others).

- Member of Academic Advisory Board for the new UN/Interpol International Anti-Corruption Academy in Austria.

Chairman of QCo Holdings, a Washington, DC based consulting company in matters of governance, corruption, security, financial crime and regulation.

## **Research**

- 2013- Visiting Law Professor, Qatar University College of Law for lectures on corruption and financial crimes.
- 2012- Adjunct Law Professor, Case Western Reserve University, for the development a delivery of a MA degree on Financial Integrity for compliance officers and regulators globally (together with the heads of Egmont Group of FIUs and of the FATF).
- 2011- Co-ordinator of global academic initiative against corruption (ACAD) with the UN Office of Drugs and Crime and the support of the OECD, the Intl Bar Association, and dozens of universities and international organizations.
- 2012- Head of Faculty Development and Planning, International Governance and Risk Institute, London
- 2009-2010 Visiting Fellow, Max Planck Institute for Comparative and International Criminal Law, Freiburg, Germany
- 2008- Honorary Visiting Professor, Southwestern University of Political Science and Law, Chongqing, China.
- 2003- Full Professor at Northeastern University, College of Criminal Justice. Current research revolves around informal value transfer systems, funds transfer and funding of terrorism, trade diversion, crime relative to digital currency payments, the social organization and control of corruption, white-collar crime, organized crime, and transnational crime, as well as theories of crime.
- 2002-2003 Visiting Scholar at Northeastern University, College of Criminal Justice.
- 1995-2002 Associate Professor, Temple University.
- 1995-1996 Visiting Professor at University of Wales College of Cardiff, School of Social and Administrative Studies.
- 1989- Assistant Professor, Temple University. Comparative studies of theoretical, empirical and policy issues in economic crime and deviance. Main projects: 'frauds in the European Community'; the BCCI affair and international banking regulation; undercover operations; new religious movements and deviance.
- 1989: Research Associate (March-August) at the Law Faculty of University College London. Research into 'European Community Frauds'. A comparative study (United Kingdom, Germany, France and Italy) involving interviews of officials and experts in this field, as well as collection, analysis and synthesis of existing data.

1989: Post-Doctoral Fellow (January-April) at University of Edinburgh, Centre for Criminology (C.C.S.P.S.L.). Research on the Scottish criminal courts, their powers of sentencing and trends in sentencing in post-war Scotland.

1984-85: Council of Europe Visiting Fellow at University of Edinburgh, Centre for Criminology (C.C.S.P.S.L.). Study of British sub-cultural theories and Merton's anomie theory; authored report.

### **Teaching**

2003- Courses on terrorism, corruption, organized crime and white-collar crime at Northeastern University and lectures at universities around the world.

1995-2002 courses on criminological theory, organized crime, white-collar crime, transnational crimes, and comparative criminal justice.

1996 Visiting Professor, Temple Law School summer course on International Criminal Law at the University of Athens.

1996 Visiting Professor, Univ. of Cardiff post-graduate seminars on theories of crime and white-collar crime.

1989-96 Assistant Professor, courses on Theories of Crime, Organized Crime, White-Collar Crime, Regulation of Financial Institutions, Deviance and New Religious Movements, Comparative Criminal Justice.

1987-88: Tutor in Theoretical Criminology, Sociology of Punishment and Criminal Justice, at University of Edinburgh, Centre for Criminology (C.C.S.P.S.L.).

### **Service**

2012- Member of Global Task Force on Corruption sponsored by India's Central Vigilance Commission.

2011- American Society of Criminology (ASC) representative to the United Nations

2009-11 Chair, American Society of Criminology, Division of International Criminology

2011 Member Steering Committee and Adjudication Panel for International Anti-Corruption Public Announcement Video, sponsored by the Hong Kong Independent Commission Against Corruption.

2001- Expert reports, advice and consultation on several cases involving corruption, governance, regulatory compliance, money laundering, terrorism, hawala and other informal value transfer systems in all continents.

2008 Scientific adviser for the 3<sup>rd</sup> World Summit of Prosecutors, Attorneys General and Ministers of Justice held in Bucarest, Romania, December 2008.

2006-7 Expert Witness, Canadian Commission of Inquiry into Terrorism.

- 2007 Scientific Advisor/Coordinator for the ISPAC conference on Identify Theft and Fraud. Courmayeur, Italy.
- 2006-9 Member of Interpol Advisory Board, International Anti-Corruption Academy, Vienna, Austria
- 2006 Scientific Advisor/Coordinator for the ISPAC conference on Breathing Life into the UN Convention against Corruption. Courmayeur, Italy.
- 2006-09 Rapporteur General on Terrorist Finance for the International Association of Penal Law World Congress in Istanbul, Turkey.
- 2006 Participating Expert in AGIS/Europol/LKA (Landeskriminalamt) NRW/Ghent University project on “Money transfer methods, terrorist finance and criminal activities”.
- 2006- Expert/Member, Democratic Governance Practice Network (DGPNet) Advisory Group, UN Development Programme (UNDP).
- 2005 Scientific adviser for the 2<sup>nd</sup> World Summit of Prosecutors, Attorneys General and Ministers of Justice held in Doha, Qatar, November 2005.
- 2005- Board of Directors, International Society of Criminology.
- 2005-8 Member of Steering Committee (the the World Bank, IMF, DFID, S, Africa Ministry of Finance) on a comparative study on “Tools for Implementing FATF Recommendations”, conducted by Genesis/Finmark and sponsored by the UK DFID and FIRST.
- 1997 Expert Witness on Financial and Deviant Aspects of New Religious Movements before the German Parliament.
- 1994- Director; member of the board of directors of the Research Committee on Deviance and Social Control - International Society of Sociology.
- 1993 Co-organiser and moderator of a Symposium on "Cross-Border Banking Offenses and Regulation: Policy Lessons from the BCCI Affair" at Temple University.
- 1991-92 Chair, Local Organizing Committee for the 1992 Law and Society Association meeting in Philadelphia.
- 1989- Organizer and Chair of sessions at American Society of Criminology, British Sociological Association, and XII World Congress of Sociology meetings.
- Editorial**
- 2004- Editor-in Chief, Crime, Law and Social Change: An International Journal.
- 2013- Member of Editorial Board, International Anti-Corruption Journal
- 2011- Member of Editorial Board, Asian Journal of Criminology
- 2012- Member of Scientific Committee, Organizational and Management Journal

- 2007- Member of Editorial Advisory Board, Open Criminology Journal.
- 2006- Member of Scientific Board, Centre for Information and Research on Organised Crime (CIROC), Free University of Amsterdam and Erasmus University of Rotterdam.
- 2006-9 Member of Editorial Board (anti-money laundering issues), Complinet  
<http://www.complinet.com/home/>
- 2005- Associate Editor, International Journal of Comparative and Applied Criminal Justice.
- 2003- Associate Editor; European Journal on Criminal Policy and Research.
- 2003-04 Member, Program Committee of the 2004 Amer. Soc. of Criminology meeting.  
Responsible for the organization of all theory and research on violence and terrorism panels.
- 1997- Reviewer for manuscripts submitted for publication in American Journal of Sociology, Social Problems, Law & Society Review, Criminology, Theoretical Criminology, Journal of Research in Crime and Delinquency, Justice Quarterly, Sociological Inquiry, Crime, Law and Social Change, Rationality and Society, Social Justice, International Journal of Comparative and Applied Criminal Justice, Sociological Quarterly, International Journal of Offender Therapy and Comparative Criminology, Criminology and Public Policy, Security Journal, International Political Sociology, Open Criminology Journal and numerous university presses and other publishers of academic works.
- 1994-2004 Series Editor on "Transnational Crime"; Northeastern University Press.
- 1997-2004 Senior Editor, Crime, Law and Social Change.
- 1994-96 Associate Editor, Crime, Law and Social Change.
- 1993-97 Associate Editor, Justice Quarterly.
- 1999-00 Member, Program Committee of the 2000 Amer. Soc. of Criminology meeting.  
Responsible for the organization of all white-collar and corporate crime panels
- 1997-98 Member, Program Committee of the 1998 Amer. Soc. of Criminology meeting.  
Responsible for the organization of all white-collar and corporate crime panels.

## 5. GRANTS/SCHOLARSHIPS

- 2011-2012 Private sector sponsored project under the auspices of ISPAC-UNODC on comparative study into anti-corruption compliance programs in private sector with special emphasis on oil and gas sector.

- 2011-2012 Northeastern Center for Emerging Markets Small Grant (under Dept. of Education) for survey of compliance programs in private sector in the Caribbean and S. America (paper to be published with Matthias Kleinhempel, Austral University, Buenos Aires).
- 2011-2012 Northeastern University study with global financial institutions on compliance improvement approaches based on computer sciences and automated processes (jointly with College of Computer Sciences).
- 2011 Controladoria Gerao da Uniao (CGU – Auditor General’s Office) research on Anti-Corruption Authorities
- 2009-10 Commission of the European Union. Financial Vigilance and Counter-Proliferation Sanctions.
- 2008- United Nations Security Council 1267 Committee “Indicators of Terrorism Finance”.
- 2007-10 United Nations Office of Drugs and Crime and International Association of Anti-Corruption Authorities (IAACA) “Knowledge Base on Anti-Corruption”; collection and analysis of 191 countries’ corruption laws, cases, national anti-corruption plans/strategies and national anti-corruption bodies. In coordination with the UN Office of Drugs and Crime, UNICRI, World Bank StAR (Stolen Asset Recovery Initiative) Program.
- 2006 NORAD (Norwegian Agency for Development Cooperation) “Corruption Assets Tracing and Repatriation”.
- 2006 Institute for Fraud Prevention “Procurement Fraud and Corruption”.
- 2005-07 National Institute of Justice (NIJ) “Understanding and Improving Law Enforcement Responses to Human Trafficking” (with J. McDevitt and A. Farrell).
- 2003-05 National Institute of Justice (NIJ) “Terrorist Finance and the Nexus with Transnational Organized Crime: Commodities Trade and the Social Organization of al Qaeda Groups”.
- 2004 US Institute of Peace “The Financial Controls of Terrorism” (with T. Bierstecker and S. Eckert).
- 2002-03 National Institute of Justice (NIJ) “Informal Value Transfer Systems, Terrorism and Money Laundering”.
- 2002-03 “Paving the Ground for a Center for International Human Rights” at Temple University.
- 2002-03 Temple University Research Incentive Fund “Global Networks of Crime and Corruption”.
- 2001-03 Financial Crimes Enforcement Network (FinCEN) “Informal Value Transfer Systems”.

- 2002 "Trade Diversion, Money Laundering and Terrorism", CLA research incentive grant.
- 2002 "Transnational organized Criminals as Political Actors". CLA research incentive grant.
- 2001 Ministry of Justice, The Netherlands. Follow-up research into "Underground Banking Systems and Criminal Organizations". Ministry of Justice, The Netherlands.
- 2001 Temple University grant in aid of research for a project on international accounting frauds.
- 2001 Temple University summer scholarship for research on international accounting frauds.
- 1999 (Spring Semester) Sabbatical Leave for research on "Global Networks of Crime and Corruption: The Social Organization of Serious Misconduct".
- 1998-99 Ministry of Justice, The Netherlands. Research into "Underground Banking Systems and Criminal Organizations".
- 1994-95 European Documentation and Research Network on Cross-Border Crimes grant for research into European Union frauds.
- 1994-95 Lilly Foundation Fellowship for the preparation of a course on Transnational Crime.
- 1993 Temple University summer scholarship for research on BCCI.
- 1993 Temple University Grant-in-aid for research into the BCCI affair.
- 1991- I have received from Temple and Northeastern Universities salary increases for meritorious achievements in research and service in 12 different years.
- 1991-3 Fund for the Improvement of Post-Secondary Education (FIPSE) summer grants in-aid-of-teaching awards.
- 1989-90 Research award from the Commission of the European Community for a study into European Integration.
- 1989 Post-Doctoral Fellowship, Univ. of Edinburgh.
- 1985-88 University of Edinburgh Scholarship.
- 1984-85 Council of Europe Fellowship for research in criminological theory.
- 1980 Exhibition Scholar; National Foundation for Research (Greece).
- 1979: Universidad Menendez Pelayo Scholarship for a month's course on "History of Spanish Art and Literature" in Santander, Spain.

1978 Study scholarship from the French Ministry of Culture for a course on "Modern and Contemporary Theatre" in Paris, France.

#### **6. LANGUAGE SKILLS**

- English (native speaker competence)
- Greek (native speaker)
- French, Spanish and German (fluent)
- Italian (very good)
- Portuguese, Danish and Swedish (working knowledge).

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## Background

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An astute, results-oriented leader with proven success in implementing strategic, enterprise-wide initiatives. A strategic and creative thinker that can adapt to new situations quickly and effectively. Exceptional technology, program management skills.

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## Professional Expertise

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- Demonstrated ability to resolve challenges and achieve results in a complex organization structure
- Highly motivated and innovative with excellent organization, presentation and communication skills
- Flexible and articulate individual with excellent analytical and business analysis skills.
- Well-developed program management skills with proven success implementing cross-enterprise initiatives and systems
- Over thirty years of experience in finance, accounting, risk management, compliance and strategic initiatives
- Extensive negotiations and consensus build skills.
- Experienced international speaker on AML and risk related matters

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## Accomplishments

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- Provided strategic leadership for RBC's Anti Money Laundering (AML) and Anti-Terrorism Program since its inception
- Successfully implemented RBC's (AML) & Anti-Terrorism Compliance Regime and created an AML Professional Centre
- Led the implementation of major cross-enterprise systems including (over \$100mm): AML Training, Suspicious Transactions Reporting, Large Cash Reporting, Control List Filter and AML Detection Systems
- Navigated RBC through challenging regulatory issues and developed AML Compliance programs to meet US AML requirements
- Managed a global team of over 250 AML Professionals
- Transformed the AML Operations centre into a financial intelligence unit, recognized as an industry leader
- Transformed the approach to AML monitoring resulting in significant reduction in false positives and improvement in suspicious activity reporting
- Member of the Advisory Council for National Security for the Prime Ministry of Canada (2009 -2012)
- Participated on various international AML forums and operational risk including, the Institute of International Finance and the Risk Management Group of the Basel Committee on Banking Supervision, Wolfsberg and United Nations
- Working with the centre for the protection of children to identify and stop commercial child pornography
- Successfully negotiated regulatory issues and impacted new regulations
- Participated in a number of new acquisitions, new product developments and remediations to ensure AML Controls are built into the process
- Led major client investigations
- Opined on high risk client approvals, demarkets and advised the Reputational Risk Oversight Committee with respect to high risk client cases submitted for approval to the committee
- Led the development of a number of AML risk management tools including, Inherent Risk Assessment, Program Assessment and Client Risk Scoring
- Achieved cost savings of several million dollars
- Led the development of leading edge dashboards and metrics
- Set-up and led the Association of Anti-Money Laundering Specialists in Canada
- Led the development of RBC's Anti-Bribery/Anti Corruption Program
- Worked with various agencies including RCMP, CSIS and the Centre for the Protection of Children on various cases
- Developed and implemented RBC's Risk and Control Self-Assessment and OpRisk capital allocation methodology
- Restructured and redesigned CIBC's Technology Asset Management Group
- Participated in the restructuring of the Workers' Compensation Board (WCB)
- Redesigned control process that saved millions of dollars in fraud

- Participated in the design, development and implementation of major systems
- Led and successfully facilitated process re-engineering efforts
- Managed multiple project teams as part of a systems implementation, including data conversion and data clean up and risk and controls team as part of consulting engagements.
- Led and coordinated budgeting, financial and operational planning
- Developed and implemented integrated planning and reporting models for operating revenues, investment returns and consolidated balance sheet
- Identified, analyzed and evaluated critical weaknesses of systems as part of systems development
- Created activity based costing systems that resulted significant cost savings for organizational units as well as improving the management reporting systems
- Led various audits, tax reviews and consulting engagements

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### **Employment History**

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RBC Financial Group, VP and Global Head Anti-Money Laundering	Oct 2001 – Current
RBC Financial Group, Director, Operational Risk	Oct 1998 – Oct 2001
CIBC, Director, Technology Risk Management	Feb 1998 – Oct 1998
Workplace Safety and Insurance Board - Senior Manager, Risk Management & Controls	Nov 1990 – Feb 1998
Senior Audit Manager/Senior Consultant – Various CA/Consulting Firms	Sept 1982 – Oct 1990

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### **Other Skills/Accomplishments**

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- Co-Chair of the Canadian Chapter of Association of Anti Money Laundering Specialists (ACAMS)
- Member of the Advisor Board of ACAMS
- Member of the Canadian Financial Coalition against Child Pornography
- Very high level of proficiency in software packages, including, spreadsheets, databases, word processors, graphic packages and other software packages such as Microsoft Access and Developers Toolkit
- Developed various user applications on Microsoft Access and Lotus Approach
- Developed and delivered financial and computer training
- Lectured at Richview Collegiate on Small Business Management and various PC software products
- Presented various conferences for Operational Risk and Anti-Money Laundering, including for the US Treasury/Middle Eastern and North Africa (MENA) organization
- Developed the loss classification categories for the Basel Committee as part of the operational risk quantification project
- Personal performance consistently rated as exceeds expectations. Rated as tier one employee and nominated to participate in the RBC Mentorship Program for the past 3 years
- Continually enhancing/developing skill sets through conferences and training programs
- Selected to attend the Governor General's Canadian Leadership Conference in May 2004,

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### **Education and Professional Training**

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- Double honors in Accounting and Finance from Bristol, England
- Fellow of the Institute of Chartered Accountants in England and Wales (FCA)
- Associate of the Canadian Institute of Chartered Accountants (ACA)
- Certified Anti Money Laundering Specialist

Moni SenGupta joined the FIRST Initiative in 2011. She spent 9 years with the IMF Legal Department, advising on legal and financial sector issues, including FSAPs, G-20 and Financial Stability Board policies, provided direct technical assistance, and designed of trust funds and other financial arrangements for IMF TA. She also supported IMF lending and surveillance. Previously, she was a banking lawyer in Washington D.C., first with the Office of the Comptroller of the Currency, U.S. Department of Treasury and later in private practice with Arnold & Porter, LLC. Her practice focused on multilateral financial institutions regulatory compliance and enforcement, including problem banks, fraud, and money laundering.

Moni holds LL.M in Banking Law from Boston University School of Law Morin School of Banking Law Studies, a Juris Doctor from the Ohio State University College of Law and a Bachelors degree in Economics and Spanish from Carnegie Mellon University.

## RICHARD A. SMALL

(212) 640-3075  
[rick.small@aexp.com](mailto:rick.small@aexp.com)

### Experience:

May 2008  
to Present

**SENIOR VICE PRESIDENT, ENTERPRISE WIDE ANTI-MONEY LAUNDERING,  
ANTI-CORRUPTION, AND INTERNATIONAL REGULATORY COMPLIANCE  
AMERICAN EXPRESS**  
New York, New York

Responsible for the development and implementation of the global anti-money laundering program, global sanctions program and global anti-corruption program. Also responsible for all Compliance activities outside of the United States. Member of the American Express Compliance Senior Leadership Team. Manage a global team of approximately 400 Compliance professionals.

June 2006  
to May 2008

**GLOBAL ANTI-MONEY LAUNDERING LEADER, GE MONEY  
GENERAL ELECTRIC COMPANY**  
Stamford, Connecticut

Responsible for the development and implementation of GE Money's global anti-money laundering program, which included policy formulation, strategic planning, ongoing compliance and self-assessment and measurement tools. In addition, responsible for the selection and implementation of global anti-money laundering and due diligence technology solutions and the development and deployment of anti-money laundering training programs. Managed relationships with bank supervisors and regulators globally. Also had oversight responsibility for OFAC and FCPA. Developed a global anti-money laundering infrastructure with appropriate resourcing and tools.

July 2001  
to June 2006

**MANAGING DIRECTOR, GLOBAL ANTI-MONEY LAUNDERING  
CITIGROUP, INC.**  
New York, New York

Responsible for overseeing Citigroup's global anti-money laundering program, including strategic planning and development, ongoing anti-money laundering compliance, development and oversight of anti-money laundering technology initiatives, management of money laundering and terrorist financing related investigations, identification and resolution of significant and sensitive matters related to potential money laundering issues and development and deployment of anti-money laundering training. Additionally, responsible for managing terrorist financing issues throughout Citigroup. Managed local staff of twenty-five and, through matrix management, responsible for staff of 500 globally.

September 1997  
to July 2001

**DEPUTY ASSOCIATE DIRECTOR  
DIVISION OF BANKING SUPERVISION AND REGULATION  
BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM**

**ASSISTANT DIRECTOR  
ENFORCEMENT AND SPECIAL INVESTIGATIONS  
DIVISION OF BANKING SUPERVISION AND REGULATION  
BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM  
Washington, D.C.**

Appointed as an officer to the official staff of the Board of Governors in September 1997. Responsible for the Enforcement and Special Investigations sections of the Board of Governors.

Managed staff of attorneys responsible for determining, preparing and implementing appropriate enforcement actions against domestic and foreign financial institutions and related parties for violations of criminal and civil laws and regulations that adversely affect the safe and sound operations of financial institutions.

Responsible for the development and implementation of significant regulations in the areas of money laundering, the Bank Secrecy Act and matters regarding safety and soundness of financial institutions.

Managed staff of investigators and examiners responsible for investigations and examinations of potential criminal and civil violations, including fraud, money laundering and insider abuse, with regard to foreign and domestic financial institutions operating within the United States.

Additional responsibilities included representing the Federal Reserve System in international initiatives such as the Financial Action Task Force, G-7 and other multi-national programs and coordinating and providing specialized assistance and training to domestic and international law enforcement agencies, foreign governments, domestic and foreign bank supervisory agencies and domestic and foreign financial organizations.

Promoted to the position of Deputy Associate Director in December 2000.

December 1989  
to  
September 1997

**SPECIAL COUNSEL and MANAGER  
SPECIAL INVESTIGATIONS AND EXAMINATIONS  
BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM  
Washington, D.C.**

Directed and actively participated in litigation efforts of various enforcement matters, including motion practice, trial preparation and trial litigation. Responsible for setting policy with regard to the Bank Secrecy Act and money laundering matters within the Federal Reserve System. Also responsible for developing and reviewing financial institution compliance programs for compliance with all appropriate laws and regulations, as well as developing examination methods and practices to ensure compliance.

Initiated corrective enforcement actions against financial institutions for noncompliance with Bank Secrecy Act and related regulations. Coordinated various enforcement initiatives within and outside the Federal Reserve System and established a System-wide task force on money laundering.

January 1988  
to  
December 1989

**SENIOR COUNSEL FOR LAW ENFORCEMENT  
OFFICE OF THE GENERAL COUNSEL**

**ACTING DEPUTY ASSISTANT SECRETARY FOR  
LAW ENFORCEMENT**

**DEPARTMENT OF THE TREASURY**  
Washington, D.C.

As Senior Counsel for Law Enforcement, provided legal analysis, opinion and support on a variety of subject matters including operational and proposed programs, legislative and regulatory initiatives, ongoing and proposed litigation and personnel matters related to the enforcement functions of the Department of the Treasury.

As Acting Deputy Assistant Secretary, was responsible for departmental oversight of the law enforcement bureaus of the Department of the Treasury, including U.S. Customs Service, U.S. Secret Service, Bureau of Alcohol, Tobacco and Firearms and Federal Law Enforcement Training Center, as well as administration of the Bank Secrecy Act.

1984 to 1988

**ACTING ATTORNEY IN CHARGE - DEPUTY ATTORNEY IN CHARGE  
ORGANIZED CRIME AND RACKETEERING SECTION,  
CRIMINAL DIVISION, UNITED STATES DEPARTMENT OF JUSTICE**  
Los Angeles, California

Responsible for the operation of the Los Angeles Strike Force of the Organized Crime and Racketeering Section. Duties included supervision of staff of thirty individuals consisting of trial attorneys, law enforcement personnel and support staff, overall case management, and day-to-day operations. Reviewed and provided direction with regard to initiating prosecutions, investigative and trial strategies, as well as maintaining individual caseload consisting of variety of matters related to traditional and nontraditional organized crime, including extortion, fraud, narcotics, tax evasion and money laundering.

1980 to 1984

**TRIAL ATTORNEY, ANTITRUST DIVISION  
UNITED STATES DEPARTMENT OF JUSTICE**  
Philadelphia, Pennsylvania

Investigated and prosecuted criminal and civil antitrust violations. Participated in complex litigation related to price fixing and price maintenance, bid rigging and mergers and acquisitions.

**Professional  
Associations**

**ASSOCIATION OF CERTIFIED ANTI-MONEY LAUNDERING SPECIALTIST (ACAMS)**  
Certified Anti-Money Laundering Specialist  
Chairman, Advisory Board, ACAMS

**AMERICAN BANKERS ASSOCIATION / AMERICAN BAR ASSOCIATION**  
Co-Chairman, Annual Anti-Money Laundering Conference

**Education:**

**SCHOOL OF LAW, HOFSTRA UNIVERSITY**  
Hempstead, New York  
Juris Doctor, 1980

**RIDER COLLEGE**  
Lawrenceville, New Jersey  
Bachelor of Science in Commerce, Cum Laude, 1977

# Kevin Mark Stephenson

## Curriculum Vitae

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A uniquely qualified manager with an international profile in law enforcement, financial intelligence, asset recovery, policy and operational matters. Extensive international experience on a wide range of topics, published author, and involved in high profile and politically sensitive matters. A highly accomplished criminal investigator and liaison officer, manager of a Financial Intelligence Unit, program manager, policy and training course developer.

### Professional Experience

- 2012-present:           **Executive Secretary Egmont Group - Toronto, Ontario, Canada**
- Manage the Secretariat of the Egmont Group of Financial Intelligence Units
  - Provide strategic, business and financial planning advice and in carrying out business plans on time and within budget
- 2008 to 2012:           **Senior Financial Sector Specialist – World Bank, Washington, DC.**
- Financial Market Integrity – Project Manager of several projects – developing training needs – Tactical Analysis Course, Strategic Analysis Course, National AML/CFT Collaboration and Cooperation Course; technical Assistance; Capacity Building
  - AML/CFT Matters – Global – Policy Work with Clients
  - Asset Recovery
  - FATF Policy Work - Operational Working Group – Co-Chair
  - Egmont Group – Training Working Group
  - StAR – Stolen Asset Recovery Initiative – Transaction assistance; develop and publish knowledge products.
  - MER – Mutual Evaluation Reports (FATF) of countries
- 2008 to 2008:           **Anti-corruption Advisor to Prime Minister, East Timor, United Nations**
- Advisor to the government of Timor-Leste on developing good governance in the fields of Anti-Corruption, Transparency and Accountability. Assist the government of Timor-Leste develop the appropriate institutions to combat corruption; assist in developing the necessary legal frameworks; and capacity building.
- 2005 to 2008:           **Director, Financial Intelligence Centre, Kosovo, United Nations**
- Execute the overall management of the Centre; the strategic and operational planning and decision-making within the FIC; implementing personnel regulations and policies; preparation and management of the budget of the FIC; supervising the activities of the internal departments; deciding on the temporary suspension of a transaction; dissemination of financial intelligence reports to the competent authorities; reviewing and when required drafting opinions to draft legislation; providing training for persons under reporting obligation and other authorities and institutions

## Kevin Mark Stephenson

### Curriculum Vitae

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involved in the prevention of money laundering and the financing of terrorist activities; representing the FIC when interacting with international institutions; representing the FIC abroad and in relation to relevant international institutions; develop policy and procedure manuals for the FIC Staff.

2002 – 2005:

**Deputy Attaché, Department of Homeland Security, American Embassy, New Delhi, India**

Supervise day to day operations of the office; develop the operational plan; coordinate budgetary matters; represent the Department of Homeland Security/ICE in several matters of International interest, CSI, C-TPAT, CMAA, etc.; supervise and coordinate all investigative matters; generate complex reports, threat analysis, etc.; conduct Criminal Investigations within Area of Responsibility - Bhutan, India, Nepal, Maldives, and Sri Lanka that have a nexus to the USA in the areas of Money Laundering, Terrorism Financing, Trade Fraud, Sex Tourism, Child Pornography, Illegal Exports (Weapons), Alien Smuggling, Security - Counter Terrorism.

2000 to 2002:

**Assistant Customs Attaché, Department of Treasury, American Embassy, Berlin**

Law enforcement liaison officer with twenty nations - including Germany, Holland, Sweden, Norway, Denmark, Finland, Poland, and all of the former Soviet Union excluding Russia; coordinated mainly financial investigations with the aforementioned nations' police and customs authorities; post 9/11, coordinated "Operation Greenquest (OGQ)" terrorism financing investigations in the aforementioned nations – at that time OGQ was the most successful anti-terrorism financing operation ever conducted by international law enforcement; conducted investigative liaison work with police and customs authorities in fraud, money laundering, weapons smuggling, strategic investigations, child pornography and other violations of US law; provided financial and investigative training in several nations to include Armenia, Kazakhstan, Norway, Finland, Latvia, Lithuania, Estonia, and Sweden.

1997 – 2000:

**Senior Special Agent, United States Customs Service, Department of Treasury, New York, New York**

Senior Special Agent - worked undercover against Russian organized crime operating in the New York metropolitan area; worked undercover against Palestinians and others involved in stealing luxury autos in the USA and illegally exporting them out of the USA; conducted criminal investigations, executed search warrants, testified in federal court, conducted surveillance, etc.



**Kevin Mark Stephenson**  
**Curriculum Vitae**

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kvolberlin@hotmail.com

# EMILE VAN DER DOES DE WILLEBOIS

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## EXPERIENCE

### **The World Bank**

**2004-Present**

Washington, D.C., USA

- Financial Market Integrity Unit (FPDFI) at the World Bank with expertise on Anti-Money Laundering (AML) and Countering the Financing of Terrorism (CFT). Main responsibilities include drafting and reviewing primary and secondary AML and CFT legislation and criminal policy, conducting country AML/CFT assessments and training country officials on AML/CFT systems and domestic cooperation. Deputy Manager since 2011.
- Part of the World Bank/ UNODC Stolen Asset Recovery Initiative (StAR) since inception (2007) – offering both direct country assistance (helping countries establish contact with financial centers, conducting mutual legal assistance, developing an asset recovery strategy) and conducting policy work. Leading country work in Egypt
- Work spans countries in: Eastern Europe, Central Asia, Middle East, Sub Saharan Africa, South Asia and East Asia and Pacific. Led AML/CFT country assessments of Rwanda, Niger, The Philippines and Papua New Guinea.

### **Ministry of Finance**

**2002-2004**

The Hague, The Netherlands

Responsible for the implementation of the international standard on AML/CFT (the 40 Recommendations of the Financial Action Task Force against money laundering–FATF) in Dutch legislation and financial regulation.

### **De Brauw, Blackstone, Westbroek, Lawyers and Notaries**

**1998-2002**

Amsterdam, The Netherlands

- Attorney (*advocaat*) specialized in banking and capital markets regulatory affairs.
- Admitted to the Dutch Bar.

### **The International Criminal Tribunal for the former Yugoslavia (ICTY)**

**1996-1998**

The Hague, The Netherlands

- Lawyer in the Office for the Prosecutor on the case of the Prosecutor v General Blaskic
- Assistant to Professor Micha Wladimiroff, defense counsel in the first case before the ICTY, the case of the Prosecutor v Dusko Tadic, drafted motion disputing ICTY jurisdiction

## EDUCATION

Master of laws (“*meester in de rechten*”) and graduate degree in Philosophy (“*doctorandus in de filosofie*”), from Leiden University, The Netherlands

## PUBLICATIONS (all available on-line)

- “The Puppet Masters”, a StAR report on the use of legal entities for in corruption cases - concealing beneficial ownership, protecting assets. (lead author) (2011)
- Nonprofit Organizations and the Combatting of Terrorism Financing, a proportionate response (World Bank working paper) (2010)
- Preventing Money Laundering and Terrorist Financing: A Practical Guide for Bank Supervisors (co-author)(2009)
- Forthcoming: “Civil remedies against corruption” (planned first half 2013)

## LANGUAGES

- Dutch (native) English (native) French (excellent) German (excellent) Spanish (fluent) Russian (basic)

Personal résumé:

Boudewijn VERHELST  
° 2 November 1947, Brugge (B)

Business address : Gulden Vlieslaan 55, bus 1, 1060 BRUSSELS, Belgium  
Tel. : 00 32 (0)2 5337211  
Fax : 00 32 (0)2 5337200  
E-mail : [boudewijn.verhelst@ctif-cfi.be](mailto:boudewijn.verhelst@ctif-cfi.be) or [info@ctif-cfi.be](mailto:info@ctif-cfi.be)

Doctor Juris, graduated University Leuven (B), 1971.

King's Attorney (Public Prosecutor) in Brugge (B) from 1975 to 1994, in charge of the financial fraud section.

Deputy Attorney General at the Court of Appeal in Gent (B) since 1994.

Seconded as deputy director of the Belgian Financial Intelligence Processing Unit CTIF/CFI since 1 July 1993.

Chairman of the Egmont Group of Financial Intelligence Units from July 2010 to July 2013.

Law enforcement expert to the Moneyval Committee (Council of Europe)

Evaluator (legal / law enforcement) in FATF, Council of Europe, CFATF, WB and IMF AML/CFT assessments

**SEAN ANTHONY WATTERSON**

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Lakewood, OH 44107  
(347) 415-0288  
[seanwatterson@gmail.com](mailto:seanwatterson@gmail.com)

**RELEVANT WORK EXPERIENCE**

**Program Committee Member and Advisor, Program on Financial Integrity, Case Western Reserve School of Law.** Participate in all activities of the Program, 2011-present.

**Bank Of America, Enterprise Policy & Regulatory Relations, Cleveland, Ohio**  
*Senior Vice President, 2009 – 2010*

Developed systems to track all regulatory requirements under the US Government's TARP and TALF programs and map those requirements to applicable departments within the bank. Developed and implemented a system for collecting, consolidating and reporting regulatory information from the bank's non-US operations to the Federal Reserve. Directed the firm's Emerging Regulatory Risk Group and coordinated the firm's Emerging Regulatory Risk Forum.

**Merrill Lynch, Global Monetary & Financial Control Group** New York, New York  
*Director, 2007 – 2008*

Managed Global Coordination team, and developed and maintained the firm's anti-money laundering and economic sanctions risk assessment, policies and procedures, quality assurance program, and training programs. Coordinated and managed audit and exam of and coordinated anti-money laundering and economic sanctions compliance by Merrill's non-U.S. operations (37 countries).

**Citigroup Inc., Global Anti-Money Laundering** New York, New York  
*Associate Director, 2005- 2007*

Developed policies and procedures to aid in implementing Citigroup's anti-money laundering program across Citigroup business lines, including the Corporate Investment Bank, Global Wealth Management, the Global Consumer Group, and Citigroup Alternative Investments, and in over 100 jurisdictions where Citigroup has a presence. Performed onsite quality assurance assessments of anti-money laundering compliance programs in various businesses and in countries, including Pakistan, Malaysia, Hong Kong, Chile, Ireland, Canada and India.

**Securities & Exchange Commission, Office of International Affairs, Washington, DC**  
*Senior Counsel, 2001-2005, Program Manager, 2004-2005, Acting Assistant Director for Technical Assistance 2005- 2005*

Worked extensively on international enforcement cases, negotiated cross-border information sharing arrangements with Bermuda, the Bahamas, and the Cayman

Islands and represented the Commission in international forums, including the Financial Action Task Force, the Council of Securities Regulators of the Americas and the International Organization of Securities Commission's Task Force on Client Identification and Beneficial Ownership. Organized and delivered training programs in the U.S. and abroad, on topics including enforcement, market oversight and anti-money laundering.

**SG Cowen Securities Corporation, Cleveland, Ohio**

*Vice-President Municipal Bond Trading, 1994-2000*

Involved in all aspects of the operation and management of a municipal bond trading desk. Maintained \$3 million inventory, supplying over 30 retail and institutional salespersons with product and knowledge to assist their clients.

**Baker & Co., Inc., Cleveland Ohio**

*Account Executive, 1991-1994*

Earned Series 7 & 63 licenses and worked as a retail account executive, advising and executing transactions on behalf of retail brokerage clients.

## EDUCATION

**Case Western Reserve University School of Law, Cleveland, Ohio, J.D. 2001**

G.P.A. 3.71/4.00, Dean's honor list, Class rank 12 of 177, Order of the Coif

Articles Editor, Case Western Reserve University Law Review

Awarded Frederick I. Cox International Law Award, June 2001

Awarded the C.A.L.I. Excellence Award for the study of property law, June 1999

**St. Petersburg Summer Law Institute, St. Petersburg, Russia, August 1999**

G.P.A. 4.00/4.00

**Williams College, Williamstown Massachusetts, B.A. American Studies, 1991**

Four-year member of the varsity swimming and water polo teams.

## PROFESSIONAL ORGANIZATIONS & QUALIFICATIONS

**Ohio State Bar, Admitted to practice law 2001**

**Depository Trust & Clearing Corporation (DTCC) AML Advisory Committee,**

Member 2008 – 2009

**Securities Industry & Financial Markets Association (SIMFA) AML Committee,**

Member 2006 – 2009

**Financial Action Task Force, Member of the United States delegation to FATF, representing the US Securities & Exchange Commission, 2002-2005, Represented the International Organization of Securities Commissions, 2003-2005**

**Ohio Municipal Advisory Council, Trustee and Secretary-Treasurer 1996-1998**

**Cleveland Bond Club, Member, Board of Governors 1992-1997**

## **SELECTED SPEAKING ENGAGEMENTS**

**Association of Certified Anti-Money Laundering Specialists - 2008 Annual International Money Laundering Conference & Exhibition**

**Institutional Investor – 2007 & 2008 Anti-Money Laundering & Counter-Terrorist Financing Forums**

**U.S. Securities & Exchange Commission – International Institute for Securities Market Development (2004 – 2006); International Enforcement Institute (2004 & 2005); Regional Enforcement and Market Oversight Training Programs with US AID – Rio de Janeiro, Brazil (2004), Bucharest, Romania (2004), Abuja Nigeria (2005), Santo Domingo, Dominican Republic (2007); Regional Enforcement and Market Oversight Training Program with the Financial Services Volunteer Corps – Dubai, United Arab Emirates (2004)**



SCHOOL OF LAW

CASE WESTERN RESERVE  
UNIVERSITY

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Tom J.E. and Bette Lou Walker  
Professor of Law

Michael P. Scharf, Dean  
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October 26, 2017

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Dear Members of the Faculty Senate,

We are pleased to submit this letter in support of the CWRU School of Law's Master of Arts in Financial Integrity (MAFI) program. Designed and taught by experts from diverse financial regulatory bodies, top financial sector compliance officials, law enforcement, and leading academics, MAFI provides a unique academic approach, combining theory and practice. The program will educate professionals who seek insight into cutting edge issues in financial integrity, and is the only academically based program of its kind offered by a major research institution.

The degree was initially approved by the Law School Faculty and the Faculty Senate in 2012. As explained in the initial proposal, it is designed to be taught in financial centers throughout the country and the world. There are likely to be overlapping cohorts (usually no more than two running in any given semester in different cities). The classes are taught on an intensive basis over a Friday-Sunday weekend, and we have an extensive faculty upon whom we draw, ensuring adequate resources.

We are now seeking specific approval to offer MAFI cohorts in the following cities/countries within the span of the next 3-5 years (state level accreditation approvals pending):

*New York/New Jersey, Connecticut, D.C., Florida, London, Paris, Los Angeles/California, Las Vegas, India.*

This is one of our most exciting and innovative programs, and we look forward to seeing it expand to reach its full potential!

Sincerely,

A handwritten signature in cursive script, appearing to read "Jessica Berg and Michael Scharf".

Jessica Berg and Michael Scharf

Co-Deans, School of Law