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. Teamtaught 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 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 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. 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.

¹ 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 webbased 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.²

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.³ 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

² See Appendix for descriptions for each course.

³ 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

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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 of 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, Uruguy

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.

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.

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 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.

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 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, 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.

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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, onsite 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.

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

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 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.

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.

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 McDonell, 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

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.

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

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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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 webbased 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.

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

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 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)

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.

Sean Mark, Senor 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

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.

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

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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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 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

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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.

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?

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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?

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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.

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

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.

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, Uruguy

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

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 Maser 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 excerptsm 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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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



Jessica W. Berg, Dean Tom J.E. and Bette Lou Walker Professor of Law

Michael P. Scharf, Dean Joseph C. Hostetler - BakerHostetler Professor of Law

> 11075 East Boulevard Cleveland, Ohio 44106-7148

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> > > law.case.edu

October 26, 2017

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!

hml

Sincerely,

Jessica Berg and Michael Scharf

Co-Deans, School of Law