


 ABA Professional Development

# ABA/ABA Money Laundering Enforcement Conference



November 13-15, 2011  
Washington, DC

 **CRIMINAL JUSTICE**  American Bar Association  
ABA Professional Development

 ABA Professional Development

# Coping with a Changing Regulatory Environment

November 14, 2011

 **CRIMINAL JUSTICE**  American Bar Association  
ABA Professional Development

## Speakers

- John Atkinson, Director, Regulatory Risk Consulting, Protiviti, Inc.
- John J. Byrne, Executive Vice President, Association of Certified Anti-Money Laundering Specialists
- Irwin Nack, General Manager, Chief Compliance Officer, Bank of Tokyo-Mitsubishi UFJ, Ltd.
- Amy G. Rudnick, Partner, Gibson, Dunn & Crutcher LLP
- Rick A. Small, Vice President, Enterprise Wide Anti-Money Laundering and Sanctions Risk Management, American Express



## The Existing Environment

- Increase in MRAs/MRIAs/Formal Criticisms
- Enforcement Action Themes
- The FFIEC Manual---good concept with some negative outcomes?
- Examiners and their decision making—understanding expectations during challenging times
- State/Federal Examiners---understanding differences and similarities





## What We Can Do

- Laying out regulatory expectations
- Improvements to communications
- Managing examinations
- Responding to regulatory criticisms
- Conditioning Management to MRAs
- Learning from Peer Financial Institutions

