# ABA Risk and CONTENTS

NOV | DEC 2025 | VOL. 46 | NO. 6

## 4 Fighting organized retail crime: Lessons for banks and investigators

Insights from Raul Aquilar, former deputy assistant director for the Countering Transnational Organized Crime, Financial and Fraud Division of Homeland Security BY SEPIDEH ROWLAND, CAFP, CCBCO

A former Homeland Security leader, Raul Aguilar, explains how organized retail crime operates as a structured, lucrative enterprise — and why it's far more than "petty shoplifting." He outlines the red flags banks should monitor and shows how tighter publicprivate collaboration can turn intelligence into disruption.

#### **14** Location, location, location: Risk management and geospatial data BY LYNN WOOSLEY, CRCM

Banks are finding new ways to apply geolocation data to fraud detection, compliance, and customer engagement. This article explores both the benefits and the regulatory risks of this fast-evolving tool.

# **73** Exploring the fraud-complaint connection: Insights from Rich Vitale, CFE, SVP, head of investigations at Valley Bank

BY LAINE CROSBY

Rich Vitale of Valley Bank shares how customer complaints can reveal critical fraud red flags and why distinguishing between disputes, service issues, and true fraud is essential. He highlights the value of centralized reporting, real-time response, and cross-department collaboration in strengthening fraud prevention.

## **32** Navigating the Convergence of **Sanctions and AML Regimes: Key Insights and Best Practices**

BY DANNY MCGLYNN and CATHERINE M. WOODS

Illicit finance rarely fits neatly into categories such as money laundering, sanctions evasion, or export control evasion. This article explores how these activities intersect — and how financial institutions can adapt with unified controls to better detect, disrupt, and defend against hybrid threats.









#### **COLUMNS**

10 HMDA **COMPLIANCE** 

> Navigating the "Not Applicable" maze with confidence

BY REBECCA ESCARIO, CAMS

**20** RISK

Redefining success in anti-money laundering: Aligning artificial intelligence and model risk management in transaction monitoring BY DEBRA GEISTER

**28** PERSONAL RISK Mitigating personal liability risk for

> compliance and risk professionals BY JEREMY HOCHBERG and PATRICIA HARTSFIELD-DAVIS

#### **DEPARTMENTS**

**3** LETTER FROM THE **EDITOR** BY LAINE CROSBY

**38** FROM THE HOTLINE BY LESLIE CALLAWAY, CRCM, CAMS, CAFP and TERRY L. HOLLINGER, CRCM

**40** REGULATORY **DEVELOPMENTS TABLE** 

**44** CONTINUING **EDUCATION QUIZ**