

OVERVIEW

Evaluate the adequacy of the residential mortgage lender and originator to manage FinCEN's nonbank anti-money laundering program and its ability to file Suspicious Activity Reports (SARs).

Review management's commitment to implement effective monitoring and reporting systems.



LENDERS COMPLIANCE GROUP is the first and only full-service mortgage risk management firm in the United States.



Lenders Compliance Group

167 West Hudson Street  
Suite 200  
Long Beach, NY 11561  
Phone: (516) 442-3456  
Fax: (516) 706-7070  
lenderscompliancegroup.com

# Anti-Money Laundering

## FinCEN's AML Program for Nonbanks

### SCOPE OF ENGAGEMENT - PROGRAM

Lenders Compliance Group, Inc. provides a comprehensive Policy and Procedures for Anti-Money Laundering Program, consisting of:

1. RISK ASSESSMENT
2. THE MONEY LAUNDERING PROCESS
3. POTENTIAL INDICATORS OF MONEY LAUNDERING
4. OVERSIGHT COMMITTEE
5. TRAINING
6. AUDIT PROCEDURES/INDEPENDENT TESTING
7. ANTI-MONEY LAUNDERING DETECTION AND PREVENTION PROCEDURES
  - Monitoring for Suspicious Activity
  - Suspicious Activity Reporting
  - Supporting Documentation for the SAR
  - Bank Secrecy Act Officer
  - Access to SAR Records
  - Maintaining Accounts after a SAR Has Been Filed
  - Confidentiality
  - Regulators and Government Sponsored Entities

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