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Business Information in a Global Context

This year marks 30 years since the inception of C5 Group.
It is time to match our brand with the dynamic strides we have made.
See inside for details...

EARN CLE/ETHICS/CPE CREDITS

January 19–20, 2017 | Benchmarking Workshop – January 20, 2017
Intercontinental New York Times Square | New York City

7th Annual Forum on

AML & OFAC Compliance for the INSURANCE INDUSTRY

*Avoiding Costly Sanctions and Ensuring Compliance in an Era
of Heightened Scrutiny and an Uncertain and Shifting Regulatory
and Enforcement Landscape*

Inquire about
in-house,
government,
and group rates

Obtain valuable compliance strategies and best practices from:

Leonard Frady
OFAC

Marsha Hunt
FinCEN

Stuart Huffman
U.S. Department of State

Andrew Keller
U.S. Department of State

Alexander Wilson
U.S. Attorney's Office,
Southern District of NY

David Brummond
Former Senior
Sanctions Advisor –
Insurance for OFAC

Eric Dinallo
Former New York State
Superintendent of
Insurance

Christopher Conroy
NY County District
Attorney's Office

Catherine Christian
NY County District
Attorney's Office

Robert Walsh
AXA Group

Richard Kinville
Prudential

Damian Sepanik
Zurich North America

Scott Horton
AIG

Chris Po-Ba
Lloyd's

Chad Eslinger
Voya Financial

Brent Kessler
SCOR

Inna Tsimerman
Marsh & McLennan

Mónica Aguilar
Allianz SE

Lisa Tate
American Council
of Life Insurers (ACLI)

Kevin Askew
Manulife/John Hancock

Stephen Shine
Prudential

Ben Omorogbe
Travelers

Gina Jones
AXA US

Henry French
XL Group

Gina Byrne Miller
National Western Life

Charles Smith
Prudential

Sessions include:

REGULATORY AND ENFORCEMENT ROUNDTABLE: Perspectives from OFAC, FinCEN, the DOJ, the Department of State, and Other Federal and State Agencies that Govern the Insurance and Reinsurance Industries

FOCUS ON IRAN: Ensuring Compliance and Avoiding Sanctions in an Uncertain and Shifting Landscape — General License H, Section 219 (Iran Notice filing requirements), Evaluating the Opportunities and Risks Provided by Iran, and More

CUBA, CRIMEA/RUSSIA, AND OTHER KNOWN AND POTENTIAL SANCTIONS HOTSPOTS: Critical Strategies and Best Practices for Insurance and Reinsurance Companies

OFAC ENFORCEMENT CASE STUDIES: Recent Trends and Lessons Learned, Including Working with Third Party Administrators (TPAs), Responding to Subpoenas, Developing and Implementing Best Practices in Order to Avoid Engaging in Sanctionable Activity, Meeting the Heightened Expectations for Sanctions Compliance Programs, and Working with OFAC in the Wake of Staff Reductions

EXAMINING CRITICAL ANTI-MONEY LAUNDERING HURDLES FACING THE INSURANCE INDUSTRY: Assessing the Impact of Recent High-Profile AML Enforcement Actions and New and Emerging Money Laundering Trends, Ensuring that Your AML Program is in Compliance with the Evolving Regulatory Paradigm, and Creating and Fostering a Culture of Compliance by Setting the "Tone at the Top"

SUSPICIOUS ACTIVITY REPORTING, "KNOW YOUR CUSTOMER" PROTOCOLS, AND INFORMATION SHARING: Detecting and Reporting on Potential Laundering or Fraudulent Activities and Overcoming the Challenges of Identification, Including Cases Involving Elder Exploitation

BEST PRACTICES FOR INTERNAL INVESTIGATIONS: Conducting Effective Investigations into Potential Money Laundering Activity, Fraud, Sanctions Violations, or FCPA Violations

AUDITING, MONITORING, EXAMINATIONS, AND MORE: Implementing Effective Internal and External Auditing and Monitoring Procedures, Preparing for an Examination, and Determining Next Steps

Sponsored by:



Enhance your attendance by registering for the post-conference Benchmarking Working Group:

Benchmarking Your AML and OFAC Compliance Initiatives — Identifying Industry Best Practices and Incorporating Them Into Your Compliance Programs

Register Now | 888 224 2480 | AmericanConference.com/AMLOFAC

a C5 Group Company
Business Information in a Global Context

This is the event that insurance and reinsurance legal and compliance professionals look forward to every year and that they will be talking about for months afterward — make sure that you are not left out of the conversation!

Be a part of the nation's premier forum devoted entirely to AML and OFAC compliance for the insurance and reinsurance industries and obtain the key insights and strategic knowledge that are needed to avoid costly sanctions and to ensure compliance with the evolving regulatory and enforcement paradigm.

The insurance and reinsurance industries are facing heightened regulatory and enforcement scrutiny at both the state and federal levels. Nowhere is this more evident than in the areas of AML and OFAC compliance. It is absolutely essential that those responsible for developing, implementing, and monitoring AML and OFAC compliance programs for insurance and reinsurance companies **keep abreast of industry best practices as well as new and emerging state and federal regulatory requirements.** However, while insurance and reinsurance companies must remain compliant or risk severe sanctions and penalties, they have not received much guidance with respect to how best to achieve compliance.

Building on the incredible success of our prior events and in response to demand from the market, **American Conference Institute** has developed the **7th Annual Forum on AML and OFAC Compliance for the Insurance Industry** specifically to address the unique challenges facing insurance and reinsurance companies. Our unparalleled faculty of high-level state and federal regulatory and enforcement officials, AML/OFAC compliance experts from industry leaders, and experienced outside counsel will provide you with best practices and proven strategies for:

- Overcoming the compliance challenges and exploring new opportunities arising from the rapidly evolving regulatory and enforcement regimes, with particular focus on Iran, Cuba, and Crimea/Russia
- Evaluating and testing your current AML and OFAC programs and identifying potential pitfalls, areas of concern, and compliance gaps
- Striking the appropriate balance between increasing efficiency while maintaining the integrity of your compliance programs
- Conducting accurate and effective AML risk assessments and implementing appropriate controls in response to an AML risk assessment

PLUS, add value to your attendance by also registering for the post-conference **Benchmarking Working Group:**

Benchmarking Your AML and OFAC Compliance Initiatives — Identifying Industry Best Practices and Incorporating Them Into Your Compliance Programs

January 20 | 1:00 p.m. – 3:00 p.m.

Space is limited and this event will fill up quickly!

Register now by calling **888-224-2480** or faxing your registration form to **877-927-1563**. You can also register online at www.AmericanConference.com/AMLOFAC



The **C5 Group**, comprising American Conference Institute, The Canadian Institute and C5 in Europe, is a leading global events and business intelligence company.

For over 30 years, **C5 Group** has provided the opportunities that bring together business leaders, professionals and international experts from around the world to learn, meet, network and make the contacts that create the opportunities.

Our conferences and related products connect the power of people with the power of information, a powerful combination for business growth and success.

WHO YOU WILL MEET

Regulatory and enforcement officials

In-house counsel and compliance professionals at insurance and reinsurance companies, with responsibility for:

- AML compliance
- OFAC compliance
- FCPA compliance
- Global sanctions
- Fraud prevention
- Internal audits
- Regulatory matters

Private practice attorneys specializing in:

- Insurance and reinsurance
- AML
- OFAC
- FCPA
- Compliance and regulation



CONTINUING LEGAL EDUCATION CREDITS

Accreditation will be sought in those jurisdictions requested by the registrants which have continuing education requirements. This course is identified as nontransitional for the purposes of CLE accreditation.

ACI certifies that the activity has been approved for CLE credit by the New York State Continuing Legal Education Board, including 1.0 hours of ethics credit.

ACI certifies that this activity has been approved for CLE credit by the State Bar of California, including 1.0 hours of ethics credit.

You are required to bring your state bar number to complete the appropriate state forms during the conference. CLE credits are processed in 4-8 weeks after a conference is held.

ACI has a dedicated team which processes requests for state approval. Please note that event accreditation varies by state and **ACI** will make every effort to process your request.

Questions about CLE credits for your state? Visit our online CLE Help Center at www.AmericanConference.com/CLE



CONTINUING PROFESSIONAL EDUCATION CREDITS

American Conference Institute (ACI) will apply for Continuing Professional Education credits for all conference attendees who request credit. There are no pre-requisites and advance preparation is not required to attend this conference.

Course objective: To provide key insights and best practices to insurance and reinsurance professionals in order to assist them in their efforts to maintain compliant AML, OFAC, and FCPA programs. Prerequisite: None. Level of knowledge: Beginner/Intermediate. Teaching Method: Group-Live. Advanced Preparation: None. Delivery method: Group Live. Please refer to the information in this brochure for outline, course content and objectives. Final approval of a course for CPE credits belongs with each state's regulatory board. Recommended CPE Credit: 12.5 hours for the main conference and an additional 2.0 hours for the workshop.

ACI is registered with the National Association of State Boards of Accountancy (NASBA) as a sponsor of continuing professional education on the National Registry of CPE Sponsors. State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be addressed to the National Registry of CPE Sponsors, 150 Fourth Avenue North, Suite 700, Nashville, TN, 37219-2417 or by visiting the web site: www.nasba.org

To request credit, please check the appropriate box on the Registration form.

DAY ONE: THURSDAY, JANUARY 19, 2017

7:30 Registration and Continental Breakfast

8:00 Co-Chairs' Opening Remarks

Robert P. Walsh
Global Financial Crime Officer
AXA Group

Richard W. Kinville II, CAMS
Vice President, Enterprise Anti-Money
Laundering Compliance
Prudential

8:05 KEYNOTE ADDRESS: Sanctions – Update and Perspectives from the U.S. Department of State

Andrew N. Keller
Deputy Assistant Secretary for Counter Threat Finance and Sanctions
Bureau of Economic and Business Affairs
U.S. Department of State

8:30 Regulatory and Enforcement Roundtable: Perspectives from Federal and State Agencies that Govern the Insurance and Reinsurance Industries

Leonard Frady
Sanctions Compliance Officer
U.S. Treasury Department
Office of Foreign Assets Control
(OFAC)

Marsha E. Hunt
Senior Liaison Officer
Financial Crimes Enforcement
Network (FinCEN)

W. Stuart Huffman
Head of Iran Sanctions Team
Office of Economic Sanctions Policy
and Implementation
U.S. Department of State

Alexander Wilson
Deputy Chief, Money Laundering
and Asset Forfeiture Unit
U.S. Attorney's Office,
Southern District of New York

Eric R. Dinallo
Debevoise & Plimpton LLP
Former New York State
Superintendent of Insurance

Christopher Conroy
Chief, Major Economic Crimes Bureau
New York County District
Attorney's Office

Catherine A. Christian
Chief, Elder Abuse Unit
New York County District
Attorney's Office

Moderators:

Stephen J. Shine
Chief Regulatory Counsel
Prudential

Betty Santangelo
Schulte Roth & Zabel LLP

In this moderated panel session, you will have the opportunity to participate in a Q&A session with regulatory and enforcement officials from the key federal and state agencies that oversee the insurance and reinsurance industries. You will not want to miss this unprecedented opportunity to have your most pressing regulatory and compliance questions answered by our panel of experts as they weigh in on the changing regulatory and enforcement landscape, new and emerging enforcement trends, how state and federal agencies are working together, how they use the information provided to them by insurance and reinsurance companies, new and emerging "red flags", examinations, their expectations of the insurance and reinsurance industries, and AML, OFAC, and FCPA issues that are specific to insurance.

10:00 Networking and Refreshment Break

10:05 Focus on Iran: Ensuring Compliance and Avoiding Sanctions in an Uncertain and Shifting Landscape – General License H, Section 219 (Iran Notice Filing Requirements), Evaluating the Opportunities and Risks Provided by Iran, and More

Robert P. Walsh
Global Financial Crime Officer
AXA Group

Mónica Aguilar
Head of the Financial Crime Unit
Allianz SE

Kathy S. Strom
Cahill Gordon & Reindel LLP
Greta Lichtenbaum
O'Melveny & Myers LLP

- Assessing the current state of U.S. Iranian sanctions
 - What is allowed now, what is still prohibited, and what are the gray areas?
- How much parity is there between the U.S. approach and the EU approach to Iran?

- Impact of the disparity in sanctions regimes on U.S. insurance and reinsurance companies
- What is actually happening in practice for the insurance and reinsurance industries as they grapple with the new Iran sanctions regime?
- How are insurance and reinsurance companies managing the evolving Iran situation?
 - What has changed? What has not changed?
 - What has worked and what has not worked?
 - Lessons learned and pitfalls to avoid
- General License H
 - OFAC guidance
 - Implications for the insurance and reinsurance industries
 - Assessing how the insurance and reinsurance industries are responding
- Section 219 issues (Iran Notice filing requirements)
 - Required self-reporting
 - When do you need to include a disclosure and what exactly needs to be disclosed?
 - What activities qualify?
- Evaluating opportunities versus risk relating to Iran
 - Determining if the opportunities outweigh the potential risks
 - Determining which risks can be insured and which cannot
 - Best practices for handling business and claims (on both the insurance and reinsurance sides)
- Best practices when advising on a business transaction that falls in the gray area created by the uncertain and rapidly changing sanctions landscape
 - Maintaining compliance vigilance in the face of increasing business pressures
- Avoiding facilitation

11:25 Critical Strategies and Best Practices for Insurance and Reinsurance Companies Regarding Cuba, Crimea/Russia, and Other Known and Potential Sanctions Hotspots

Chris Po-Ba
Policy Manager
Lloyd's International Regulatory Affairs
Lloyd's

Inna Tsimerman
Chief Privacy &
International Trade Counsel
Marsh & McLennan Companies, Inc.

Jim Slear
Thompson Coburn LLP

Mark D. Herlach
Sutherland Asbill & Brennan LLP

The Evolving Cuba Sanctions Regime

- New opportunities in the wake of lifted sanctions
- What is now allowed in Cuba, what is still prohibited, and what are they gray areas?
 - Determining which risks can be insured and which cannot
- Best practices for exploring and engaging in new business opportunities while ensuring compliance with any outstanding sanctions issues
 - What has worked and what has not worked?
 - Lessons learned and pitfalls to avoid
- How level is the playing field now between U.S. insurance companies and non-U.S. insurance companies as relates to Cuba?
- Reinsurance and Cuba
 - Impact of eased sanctions on reinsurers
- Cuba and global travel insurance
 - What travel has been authorized?
 - Best practices for insuring travel
 - Ensuring proper record-keeping
- Avoiding facilitation

Crimea/Russia, Sudan, and Other Potential Hotspots

- Assessing the current state of U.S. sanctions relating to Crimea/Russia
- New and emerging sanctions issues related to Crimea/Russia
 - Evaluating the possibility for escalation of sanctions relating to Crimea/Russia in the coming months and their potential impact on the insurance and reinsurance industries
- Conducting sufficient due diligence on Russian entities

- How are insurance and reinsurance companies managing the evolving situation?
 - What has changed and what has not changed?
 - What has worked and what has not worked?
 - Lessons learned and pitfalls to avoid
- Sudan
 - Sanctions issues related to agriculture
- Key sanctions issues for the insurance and reinsurance industries arising from other know and potential hotspots

12:40 Networking Luncheon for Speakers and Attendees

1:40 OFAC Enforcement Case Studies: Recent Trends and Lessons Learned, Including Working with Third Party Administrators (TPAs), Responding to Subpoenas, Developing and Implementing Best Practices in Order to Avoid Engaging in Sanctionable Activity, Meeting the Heightened Expectations for Sanctions Compliance Programs, and Working with OFAC in the Wake of Staff Reductions

Damian V. Sepanik
Chief Compliance Officer
Zurich North America

Ben I. Omorogbe
Vice President and Assoc. Group General Counsel
Travelers

David J. Brummond
DLA Piper LLP (US)
Former Senior Sanctions Advisor – Insurance for OFAC

L. Brent Kessler
Vice President, Associate General Counsel & Compliance Manager
SCOR Reinsurance Company

Judith Alison Lee
Gibson, Dunn & Crutcher LLP

- New and emerging trends in OFAC enforcement and penalties
- Working with Third Party Administrators (TPAs)
 - Lessons learned from recent OFAC enforcement actions
- Reinsurers' reliance on brokers/cedents
- Conducting sufficient due diligence on third parties regarding their OFAC processes and procedures
 - How comprehensive should your oversight/due diligence be?
- Findings of Violations (FOVs)
- Impact on voluntary disclosures
- OFAC subpoenas
 - What to expect and how to respond
- Evaluating your current OFAC compliance procedures
 - Identifying potential pitfalls, areas of concern, and compliance gaps
- Adapting your compliance programs to the new sanctions landscape
- Building a sanctions risk assessment program
 - Risk-based sanctions programs
- Ownership, control, and relational concerns
- Identifying and understanding facilitation risks
 - How and when do these risks occur?
 - Best practices for reducing your exposure to facilitation risks
- Assessing blocking versus rejecting for insurance and reinsurance companies
- How OFAC procedures differ based on company size and product offerings
- Staying current with new laws and sanctions
 - Determining what you need to do to ensure compliance and avoid sanctions in the absence of official guidance
 - Benchmarking against other companies
- OFAC licensing hurdles
- OFAC screening
 - Challenges and risks
 - Evaluating your setup — are you screening properly?
 - Best practices for screening
 - New procedures and processes

- Making use of screening software
- Politically exposed foreign persons and politically exposed domestic persons
- Impact of recent staff reductions and employee turnover at OFAC
 - How are companies dealing with issues arising from turnover and staff reductions?
 - OFAC response times
 - Ensuring that you provide OFAC with everything that it needs in order to provide a faster turnaround — what does this entail and will it speed up the process?
 - What happens to potential business transactions that raise possible sanctions issues but that must be made in a shorter timeframe than OFAC's response timeframe?
 - Risks of a slowdown or decrease in communications between the insurance industry and OFAC
- OFAC considerations specific to reinsurers
 - Communicating with cedents to ensure mutual understanding of your OFAC obligations
 - Facultative reinsurance: Assessing the potential for an individual policy to result in an OFAC violation
 - Reinsurance treaties: Ensuring that the necessary exclusions and protections are included so as to minimize the risks of OFAC violations
- Managing OFAC compliance challenges that are unique to the group insurance business
- Considerations and best practices when selecting vendors
 - Conducting due diligence on vendors
 - Key criteria; pitfalls and red flags; how much due diligence is enough?
 - Considerations when deciding whether or not to continue with a specific vendor
- Conflict of law hurdles and best practices for overcoming them
 - Foreign anti-discrimination and privacy laws and their potential for conflict with U.S. laws
- OFAC hurdles arising from foreign holding companies with U.S. employees
 - Ensuring effective screening

3:05 Networking and Refreshment Break

3:10 Examining Critical Anti-Money Laundering Hurdles Facing the Insurance Industry: Assessing the Impact of Recent High-Profile AML Enforcement Actions and New and Emerging Money Laundering Trends, Ensuring that Your AML Program is in Compliance with the Evolving Regulatory Paradigm, and Creating and Fostering a Culture of Compliance by Setting the "Tone at the Top"

Anders A. L. Rodenberg
Director
Bureau van Dijk

Richard W. Kinville II, CAMS
Vice President, Enterprise Anti-Money Laundering Compliance
Prudential

Chad M. Eslinger
CCO, Insurance Solutions
Voya Financial, Inc.

Charles Smith
Vice President – Anti-Money Laundering and OFAC Compliance
Prudential

Sharon Cohen Levin
Wilmer Cutler Pickering Hale and Dorr LLP
Former Chief of the Money Laundering and Asset Forfeiture Unit in the U.S. Attorney's Office for the Southern District of New York

- Assessing the recent high-profile AML enforcement actions against large banks, MSBs, and securities firms, and their implications for the insurance industry
 - How have these companies revamped their compliance programs and what are they focusing on moving forward?
 - How should insurance companies adapt their AML processes and procedures, if at all, to minimize the risks of non-compliance?
 - Lessons learned from recent enforcement actions, whether in the insurance industry or otherwise
- Are regulators becoming more stringent with AML enforcement across the board?
 - Ensuring that you are prepared for enhanced enforcement initiatives

- Evaluating FinCEN's new CDD rule and assessing whether it has any implications for the insurance industry
 - Considerations for life insurance companies involved in cross-border deals
 - Considerations for insurance companies with broker/dealer arms that sell variable insurance products
 - Should these insurance companies set their AML standards based solely on the requirements for insurance companies or should they incorporate the requirements that their broker/dealer arms have to meet?
 - How are regulators treating the AML requirements associated with variable insurance products?
- Overcoming the challenges of doing due diligence on beneficial owners
- What are regulators looking for and expecting when conducting an examination?
- Evaluating your current AML program
 - Identifying potential pitfalls, areas of concern, and compliance gaps
- Conducting an effective and accurate AML risk assessment
 - Geographic risks; product- and service-specific risks; client-specific risks
- Best practices for creating and fostering a culture of compliance; setting the "tone at the top"; getting buy-in from senior management
- Implementing appropriate controls in response to your risk assessment
- Incorporating advanced analytics into your AML program
 - More effective than rule-based transaction monitoring?
 - Potential impact on client risk-based approaches
- Incorporating data-driven risk assessments into your risk assessment methodology
- Conducting periodic tests of your AML program to ensure that it is current and fully compliant
 - What to look for when testing your AML program; when and how often to test
- How AML considerations and programs differ based on company size and product offerings
- Establishing a global AML policy
 - U.S.-owned companies
 - Foreign-owned companies
- Accounting for AML risk in non-life policies
- Identifying the discrete functions in which employees may encounter money laundering "red flags"
- Assessing the overlap amongst AML regulations, FATCA requirements, and the universal reporting standards that some countries are adopting
- Assessing FinCEN's proposed rule relating to AML requirements for registered investment advisors and how it might impact the insurance industry
- How the U.S. AML regulatory examination and enforcement regime for insurance and reinsurance companies compares to those in other countries
- Impact of international AML standards for insurance
 - How relevant are international AML guidelines (e.g. FATF and the IAIS) to your U.S. operations?
 - How relevant are they to your international operations?

4:35 Suspicious Activity Reporting, "Know Your Customer" Protocols, and Information Sharing: Detecting and Reporting on Potential Laundering or Fraudulent Activities and Overcoming the Challenges of Identification, Including Cases Involving Elder Exploitation

Scott Horton
Associate General Counsel
AIG

Cari N. Stinebower
Crowell & Moring LLP

Gina Jones
Lead Director, Chief Financial Crime Officer/AML
AXA US

- Assessing recent and emerging trends and categories relating to suspicious activities and SARs
 - What suspicious activities are triggering filings and is this changing over time?
 - Common SAR typologies for insurance

- Are companies screening for and filing negative media?
- Expanded expectations on reporting on fraud and cyber security
 - Are companies reporting on claims fraud?
- Assessing the effectiveness of suspicious activity automated monitoring
 - How much does automated monitoring actually add to the process of identifying suspicious activity?
 - How many regulatory filings are the result of suspicious activity identified by automated surveillance?
 - Best practices for conducting model validation of your monitoring system
 - Determining what thresholds and red flag triggers to use in order to make automated surveillance a valuable and effective tool
 - Clearing out false positives
- How do old legacy systems impact AML monitoring capabilities?
 - What are companies doing to overcome these challenges?
- If you opt to forego automated monitoring, what should you use instead?
- The increasing number of AML cases involving elder exploitation and the complications that often arise in these cases
 - SAR issues; individual state reporting requirements; what information states require; variations amongst states regarding how elder abuse reports are handled; elder abuse investigations
- Assessing the larger trend of theft committed by someone who knows the victim
- Recognizing and responding to e-fraud and hacked customer email accounts
 - Determining whether to file a SAR
- Determining whether an agent, rather than a client, is the entity involved with suspicious activity and best practices for handling this situation
- Identifying "red flags" accurately and efficiently
- Considerations for internal reporting
- Making the decision to file a SAR and determining when to file
 - Best practices regarding who makes the decision as to whether and when to file a SAR
- Filing SARs and cash transaction reports
- Implementing appropriate mechanisms for reporting of sensitive information
- Specific transactions vs. patterns
- Reporting considerations
 - What data should be captured; unusual activity vs. suspicious transactions; evaluating and assessing operations; accepting cash-like payments; third party transactions; recording/monitoring types of deposits
- Ensuring that you have appropriate KYC protocols in place
 - Obtaining sufficient information about your customers
 - Customer risk ranking
 - Best practices for maintaining up-to-date customer information, especially for high-risk customers
 - Striking the right balance between being customer-friendly and complying with KYC requirements
- Have insurance companies developed high-risk customer policies by which certain high-risk customers are denied?
- Implementing customer identification programs (CIPs)
 - How and when to verify identities; developing an effective record-keeping system; taking action when an unauthorized person has been identified
 - Trends relating to voluntary CIP on the various entities associated with insurance products
- OFAC list compliance and its relationship to the CIP process
- What to do when an OFAC name is detected
 - Closing policy; navigating the appeals process; liability issues
- Customer identification issues relating to beneficial ownership
 - Overcoming the challenges of doing due diligence on beneficial owners
- Information sharing under 314(b)
 - When to make use of this safe harbor; ensuring that you receive the safe harbor protections; acquiring information from other insurance companies and financial institutions; what has and has not worked

- Best practices for handling conflict of law hurdles that can arise when complying with U.S. AML requirements
 - Foreign anti-discrimination and privacy laws and their potential for conflict with U.S. laws

5:50 Conference Adjourns

DAY TWO: FRIDAY, JANUARY 20, 2017

7:30 Continental Breakfast

8:00 Implementing Effective Monitoring and Independent Auditing Procedures, Preparing for an Examination, and Determining Next Steps

Kevin Askew
VP, Chief AML Officer and Chief Anti-Fraud Officer
[Manulife/John Hancock](#)

Gina Byrne Miller
Vice President – Corporate Counsel
Anti-Money Laundering Compliance Officer
[National Western Life Insurance Company](#)

Vicki Landon, CAMS-Audit, FLMI, CFCS
President
[Landon Associates, Inc.](#)

- How to prepare for and what to expect from an AML examination
 - Understanding what the exam process is like, what examiners are looking for, and what they expect
 - Types of data requests that you should expect to receive
- What steps should a company take in the wake of being charged with a violation?
- Assessing recent coordination efforts between FinCEN and the states
 - How do federal and state AML initiatives overlap and intersect?
 - How do exams by state agencies differ from those by federal agencies?
 - Which states are already conducting exams and what has the industry experience been like thus far?
- Joint examinations by regulators
- Identifying causes of concern that have arisen in examinations of other companies
- Conducting ongoing self-auditing to ensure continuing compliance
- Internal versus external audits
 - Who should conduct an internal audit?
 - External audits
 - The role of independent, external auditors in your program
 - Using both internal and external audits
- Assessing who and what should be reviewed during an audit
- Determining when and how often to conduct audits
- Board reports and committee reporting
 - Best practices for conveying useful information to an audit committee
 - Structuring reports so as to communicate that information which is important, but without overwhelming the Board/committee members with too much detail — striking the right balance
- Corrective actions to take in the wake of an audit
- Overcoming the unique challenges faced when auditing international divisions
 - Privacy issues; access to information; conflict of laws

9:20 Networking and Refreshment Break

9:35 Conducting Effective Internal Investigations into Potential Money Laundering Activity, Fraud, Sanctions Violations, or FCPA Violations

Henry T. French Jr.
Corporate Compliance Director
Chair, Operational Risk Committee
[XL Group](#)

Robert Clifton Burns
[Bryan Cave LLP](#)

Lisa Tate
Vice President &
Associate General Counsel
[American Council of Life Insurers \(ACLI\)](#)

William M. McGlone
[Latham & Watkins LLP](#)

- Assessing when an investigation is necessary
 - When internal investigations are not warranted or appropriate
- Determining who should conduct the investigation
 - In-house versus outside counsel
- Evaluating the type of investigation that meets your needs
- Conducting an internal investigation
 - Document trail
 - Effective employee interviews
 - Engaging with employees who are not part of the legal/compliance team
 - Expediting the process
 - Preserving confidentiality and privacy
- Evaluating and assessing the overlaps between fraud investigations and money laundering investigations
 - Best practices for tying fraud and AML investigations together
- Minimizing risks to the company when conducting an investigation
- Preserving documentary and computer evidence
- How attorney-client privilege and the work product doctrine apply to internal investigations
- Implementing changes based on investigation findings
- Best practices for dealing with potential violations
- Preparing for government investigations of suspected laundering activity, sanctions violations, or FCPA violations
 - Proactive measures to protect the company
 - Providing relevant documentary evidence
 - The importance of full cooperation — and what it entails
 - What should and should not be disclosed
- Who to notify about findings and when to notify them

11:00 Ethical Issues that Arise from AML and Sanctions Compliance Challenges and Best Practices for Resolving Them



Jim Slear
[Thompson Coburn LLP](#)

Robert Clifton Burns
[Bryan Cave LLP](#)

- Maintaining compliance vigilance in the face of increasing business pressures
- Establishing and implementing ethics hotlines
- Assessing the most common ethical dilemmas that arise in relation to AML and OFAC compliance
- Grey areas in which interesting ethical issues can arise
 - Determining what you should and should not do in these situations
- Best practices for providing sound legal advice that avoids prohibited topics
- Issues involving recusal
- Determining if and when to go to OFAC and ethical issues that arise from this decision

12:00 Conference Ends — Lunch for Working Group Participants

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POST-CONFERENCE WORKING GROUP | FRIDAY, JANUARY 20, 2017

1:00 p.m. – 3:00 p.m. (registration begins at 12:30 p.m.)

SEPARATE REGISTRATION
REQUIRED

Benchmarking Your AML and OFAC Compliance Initiatives — Identifying Industry Best Practices and Incorporating Them Into Your Compliance Programs

Richard W. Kinville II, CAMS
Vice President, Enterprise Anti-Money
Laundering Compliance
Prudential

Ben I. Omorogbe
Vice President and Assoc. Group General Counsel
Travelers

Chad M. Eslinger
CCO, Insurance Solutions
Voya Financial, Inc.

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