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*15 June 2014*

New and noteworthy developments in the regulatory landscape …

* **The Ongoing Year**

The ante for BNP Paribas climbed from $10 billion to $16 billion plus criminal charges. The Board with others seeks comment on reducing the regulatory burden. Every time they try to reduce the burden, it seems to grow heavier. A colleague reported that in a seminar he heard the second in command of the NYS Department of Financial Services state that almost 75% of FBOs in New York face enforcement actions.

Avoid clashed with regulators … visit the *Consulting for Compliance* website and …

*Call Consulting for Compliance for assistance.*

* **OFAC**

I never thought I would write this … OFAC made NO changes during the first half of June. None. OFAC did announce an upgrade to its search tool and an FAQ related to South Sudan, and an enforcement action against Fokker Services for $21 million.

<http://www.treas.gov/offices/enforcement/ofac/actions/index.shtml>

Remember to make sure that your interdiction lists are up-to-date, checked, and tested.

* **Board of Governors**

The Board released enforcement action and terminations of written agreements with US banks and bank holding companies for failures in capital adequacy and control and credit management. The Board announced a new schedule of margins applicable for collateral pledged by depository institutions to secure discount window loans and for payment system risk purposes. The Board with other federal regulatory agencies published the first of a series of requests for comments to identify outdated, unnecessary, or unduly burdensome regulations imposed on insured depository institutions. The Board published an FAQ on the Volcker Rule. The Board again with others issued final supplemental guidance on income tax allocation agreements involving holding companies and insured depository institutions. An aim of the guidance is to reduce confusion regarding ownership of tax refunds.

<http://www.federalreserve.gov/whatsnew.htm>

<http://www.federalreserve.gov/newsevents/press/monetary/20140603a.htm>

<http://www.federalreserve.gov/newsevents/press/bcreg/20140604a.htm>

<http://www.federalreserve.gov/bankinforeg/volcker-rule/faq.htm>

<http://www.federalreserve.gov/newsevents/press/bcreg/20140613a.htm>

* **Financial Crimes Enforcement Network (FinCEN)**

FinCEN published the remarks of its Director to the Casino industry and the application of the BSA.

<http://www.fincen.gov/news_room/speech/html/20140612.html>

* **Financial Action Task Force (FATF)**

FATF related an advisory of the MONEYVAL (Council of Europe) concerning the lack of progress made by one of its member states, Bosnia and Herzegovina.

<http://www.fatf-gafi.org/documents/news/moneyval-ps-bosnia-and-herzegovina-jun-2014.html>

 **Department of Treasury**

Treasury issued part 2 of its primer on sanctions from Adam Szubin, Director of OFAC.

<http://www.treasury.gov/connect/blog/Pages/Sanctions-101-Pt-2-.aspx>

* **Miscellaneous**

The NY Fed announced a FR 2900 Reporting Seminar for June 24 at the Liberty Street complex.

<http://www.newyorkfed.org/newsevents/events/banking/2014/0624_2014.html>

The Egmont Group (international association of national Financial Intelligence Units) held its Plenary Session and announced the results.

<http://www.egmontgroup.org/news-and-events/news/2014/06/06/co-chairs-statement-22nd-egmont-group-plenary-2014>

The OCC announced it is seeking comment on a notice of proposed rulemaking amending the OCC’s Annual Stress Test rule. The OCC also issued interim procedures for examiners to assess banks’ progress in developing a framework to comply with requirements of section 619 of Dodd-Frank aka Volcker Rule.

<http://www.occ.gov/news-issuances/news-releases/2014/nr-occ-2014-86.html>

<http://www.occ.gov/news-issuances/bulletins/2014/bulletin-2014-27.html>

The FCPA Blog (Foreign Corrupt Practices Act) published an article on the most and least corrupt states in the US. Fun reading.

<http://www.fcpablog.com/blog/2014/6/12/ranking-americas-ten-most-and-least-corrupt-states.html>

* **Training Opportunities**

The Institute of International Bankers will host several events of interest to the international banking community; of particular interest may be the annual Tax Seminar on May 24-25. Two days of taxes. That’s a hardy bunch of people. As always, as coming from the IIB, it will be top notch.

[www.iib.org](http://www.iib.org)

The Securities Industry and Financial Markets Association (SIFMA) will hold AML-related and Dodd-Frank conferences.

[www.sifma.org](http://www.sifma.org)

The American Bankers Association will sponsor AML related seminars and webinars.

[www.aba.com](http://www.aba.com)

The Association of Certified Anti-Money Laundering Specialists (ACAMS) and Money Laundering.com will also sponsor several AML conferences of varying degrees of interest

[www.ACAMS.org](http://www.ACAMS.org/)

[www.moneylaundering.com](http://www.moneylaundering.com)

If you have any questions, or require more details on any of the above items, please call or email at your convenience.

Bill Schlameuss