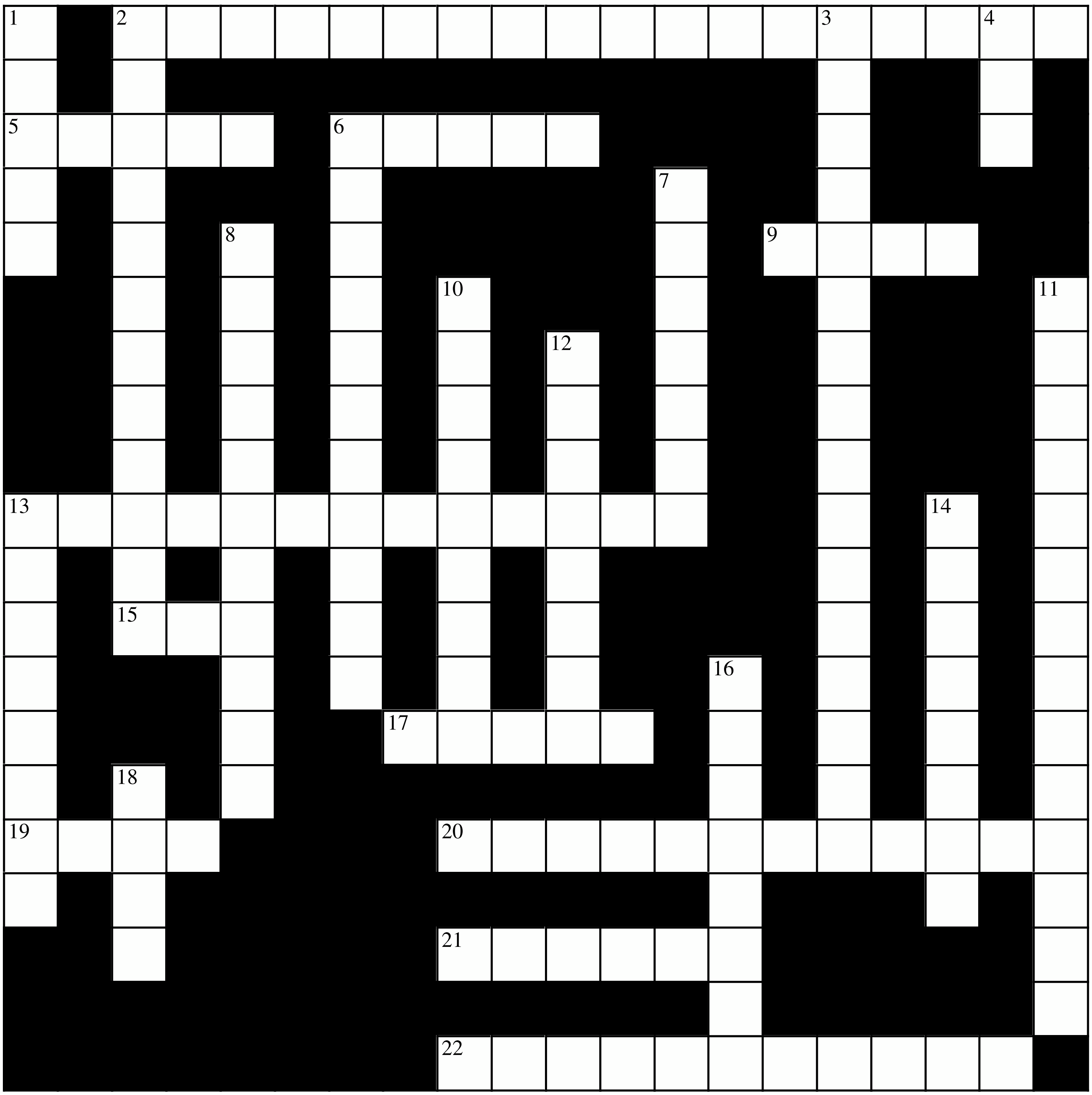
ABA BJ Puzzle of the Week: 10/13/10

Eclectic Enforcement: The Puzzle



Banks' central role in our economic lives ensures lots of legal attention and regulation. Besides actual regulation and enforcement, there are many steps banks take internally to deal with a myriad of challenges. The list of terms constantly expands. This week, we bring you a puzzle comprising a variety of special words, entities, and more in the area of enforcement and controls. *Fax completed puzzle, with name, bank, title, and e-mail, by 5 PM, Oct. 19, to 212-633-1165, to participate in a drawing for a $25 Amazon e-gift card. (Please allow four weeks for delivery.) Good luck!* ***scocheo@sbpub.com***

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Eclectic Enforcement: The Clues

ACROSS

2. When a decisionmaker is faced with a choice where they aren't a neutral party, they have one or more of these.

5. One means of detecting untoward, incorrect, or illegal behavior in bank business transactions.

6. Officially blue-colored gnome of years-ago kiddie programming, it's also an oldish term for someone who, often a dupe or lowly paid accomplice, moves money for a moneylaunderer.

9. While its namesake bears a gray color, being one of these for a moneylaunderer is plain wrong—not a gray area.

13. Employees or similar players whose inside knowledge brings them to attention of enforcers or regulators. Some are protected by federal statutes now.

15. Reports filed with the government for many types of potential suspected wrongdoing, including that possibly done by insiders.

17. In the original "Wall Street" movie, he declared that, "Greed is good."

19. Abbreviation for Treasury agency in charge of keeping and enforcing compliance with federal sanctions.

20. "Civil" may precede this term, but its a costly way of learning a lesson at regulators' determination.

21. When a banker or board member voluntarily takes themselves out of the decisionmaking process, they are said to ________ themselves.

22. The classic bank insider lending rule, promulgated by the Federal Reserve Board.

DOWN

1. Activity that more and more banks have opted to combine monitoring and screening for with other efforts, such as anti-money-laundering activities.

2. A statement or enumeration of a bank's policy on what is and isn't acceptable for employees in various aspects of business transactions and conduct on the job.

3. A special meeting of the board of directors where management members who usually attend meetings leave the room for discussion of topics involving themselves.

4. Enron, Worldcom, and other corporate debacles helped give birth to this legislation, for which banks also have to "foot" the bill.

6. A new means of remote personal communication that in some cases has become troublesome enough that a growing number of banks are adopting special policies governing employee behavior in this sphere.

7. Flighty messages of 140 characters or less can get banks and bankers into trouble requiring millions of characters to resolve.

8. Setting up cash transactions in order to evade federal reporting thresholds.

10. Though his name wound up as a nickname for an early bank ethics law, this former Director of the federal Office of Management and Budget actually was acquitted of all charges when he went to trial.

11. Statute that spells out the line between business courtesies and gifts and related transactions that could be seen as corrupting.

12. When compensation already paid to an executive is pursued because the money was earned on the basis of erroneous financial reports, among other reasons.

13. Canine function performed by some federal agencies.

14. Internal measures banks take to ensure that employees behave and to track transactions that need to be monitored out of legal requirement or good practice.

16. A legal order to appear or to produce evidence, from the Latin, "under penalty."

18. Abbreviation for international inter-governmental body whose purpose is to develop and promote policies to combat money laundering and terrorist financing.