

DON'T WORRY, BE HAPPY*

Perspectives from "Donnie Brasco," improving AML in the islands, and a very special opportunity

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A Caribbean island working hard to change perceptions

Bobby McFerrin's late 80s call to calm down is often seen as music reflecting the way of life in Caribbean cultures. But that is too simplistic.

Having just returned from Antigua for an AML and financial crime conference, it is clear that both the private and public sectors there take very seriously the international community's assessment of their country as a "high risk" jurisdiction for money laundering and related crimes. The conference was begun with the singing of the Antigua/Barbuda National Anthem, a prayer, and opening comments from the Prime Minister.

With a clarion call to improve the country's reputation through improved AML programs and other necessary changes, the audience (mainly from the island but a solid number from neighboring countries) appeared focused, asked penetrating questions, and criticized what can best be described as the hypocrisy of other jurisdictions (with equal risks) not being assessed in the same manner as Antigua.

What stuck out to me was the acknowledgement by presenters of the challenge of changing long-held perceptions. For example, a Cayman Islands representative (and former law enforcement official) bemoaned the perception of her adopted home as not improving, even the slightest, since the 1990's movie, "The Firm," with Tom Cruise.

She accused the international AML community (and the press) of not updating their assessment, based on legal and regulatory improvements, of the financial community in Cayman and correctly pointed out, the lack of equally strong admonition to the United States for the lax state laws regarding due diligence with incorporation. (Note: As I mentioned in my previous posting, however, the FATF, US Treasury Department and members of Congress have issued a call for improvement in this area.)

For Antiguans, they understand that, as the former home of Allen Stanford (a Texan with dual citizenship in Antigua), they have had "a lot of explaining to do."

The good news is that in 2010, FATF indicated that "Antigua and Barbuda made a high-level political commitment to work with the FATF and CFATF to address its strategic AML/CFT deficiencies." Much work remains, but witnessing the efforts of the government's financial supervisory structure as well as their office of national drug control strategy, tells me that the commitment appears real.

While meeting with several ACAMS members from both the private and public sector, I was struck by the clear consensus for change. All agreed that it would be a lengthy process, but if the audience during the conference is any indication of the shared goals, we may see tangible improvements sooner than expected.

Undercover insight rarely seen at an AML conference

Another benefit of traveling to this program was an opportunity to hear from the former FBI undercover agent "Donnie Brasco."

He was not announced as a speaker until the conference began and offered rare insight into the mindset of a dedicated public servant (he rejected being called a "hero") who risked his life by infiltrating the Bonanno crime family in the 1970s.

Joe Pistone (his real name) said that the 1990s movie with Al Pacino and Johnny Depp was 85% accurate. Pistone offered simple but difficult traits that one needs to be successful at undercover work: patience, a need to stay focused, and a need to "know your enemy."

Pistone was undercover for 22 of his 27 years at the FBI. An amazing statistic.

ABA magazine marks 9/11

My good friend, John Atkinson of Protiviti, formerly of the Federal Reserve, has recently penned the cover story for ABA Compliance Magazine on the decade since 9/11. You will find it both instructive and an excellent training tool.

9/11/11: Time to reflect and learn

Bankers are well aware of the historic importance on our global community of September 11, 2001. All of us were changed forever that day, both professionally and personally. This is a reminder that we must learn from those tragedies, and that certainly has been the case in the financial industry and with our dedicated partners in the public sector.

ACAMS is commemorating the heroic response of law enforcement and bankers to terrorist financing challenges with a very special webinar: "9/11, Ten Years After: A Retrospective for the Financial Services Sector." Speakers are people played important roles during that time and still do today. The webinar will cover what we learned and what we are doing today on Friday, Sept. 9.

Proceeds for the program will go to the families of the 9/11 responders.

For more information, please [click here](#).

* For those of you who think McFerrin was a one-hit wonder, you would be wrong. He is a 10 time Grammy Award winner and has been a frequent guest conductor for various symphonies.

- About John Byrne, CAMS

- Byrne is Executive Vice-President of the Association of Certified Anti-Money Laundering Specialists (ACAMS). He has written extensively on AML issues for 25 years and has appeared on television and testified before many congressional committees on AML-related policy issues. Prior to joining ACAMS, John was the Global Regulatory Relations Executive at Bank of America. Previous to that, he worked for the American Bankers Association for 22 years and was responsible for ABA's lobbying, regulatory, and educational efforts on money laundering, and other compliance issues. He received the ABA's Distinguished Services Award and was also the first private sector recipient of the "Director's Medal for Exceptional Service" from the Treasury Department's Financial Crimes Enforcement Network (FinCEN). Byrne can be e-mailed at jbyrne@acams.org.