

Financial Crimes Compliance Experience:

During my time with **SunPower**, I was responsible for Financial Crimes Compliance with SunPower Financial. This role involved the creation of testing methodologies and quantitative rules for pulling data sets along with working closely with our Banking-as-a-Service (BaaS) partner to align our policies and procedures with their requirements and drafting new ones where we did not have existing policies & procedures.

- Created all testing methodology for Financial Crimes Compliance requirements set on a monthly and quarterly basis and obtained the data-sets from the relevant business areas to review, including working to clean up the data prior to first use.
- Wrote and developed all FCC policies for our lease and loan lines of business covering AML, KYC, KYB, Sanctions/314(a), OFAC, reputational risks and Fraud.
- Developed the first comprehensive fraud program and policy for SunPower including setting investigation timelines, requirements for investigation, minimum triggers for fraud investigations and how to manage, mitigate and remediate fraud cases and presented this to the Compliance Committee for review.
- Performed a Compliance Risk Assessment on our existing policies and procedures around the onboarding of Dealer Partners who would be licensed to sell and install our products where I discovered that we were not properly completing both our KYC checks but also our KYB checks where we were not properly fully understanding who the UBO or the actual owners of the business were and permitting anyone from the business to sign legally binding documents.
 - Fully developed new training documents and procedures
 - Identified areas needing remediation re-documentation
 - Provided comprehensive plans to the Compliance Director for next steps including discussions needed with the Chief Legal Officer due to the regulatory implications of our failures.
- Researched and identified Dealers who were engaged in fraudulent activity and performed full investigations into their activities including data history, activity, fake email addresses and fraudulent signatures on Loan and Lease documents.
 - In one investigation I identified 40 contracts that were fraudulent and were ultimately canceled after contacting customers via phone and physical mail which resulted in the savings of over \$250,000 in prevented payments for these contracts.
 - Dealer was removed from our network and company was pursuing legal action to reclaim other payments and physical good deliveries

At **Structure Financial**, I was responsible for all Financial Crimes Compliance activity on our platform, by our employees and for engaging with all vendors and third parties with regards to anything FCC related. As a Series A startup, we had limited budget and access however I used our internal team to leverage existing information and dashboards to create a fully functioning system.

- Created the KYC onboarding flow for our app to prevent exploitation of our system and keep individuals who are citizens or residents of restricted jurisdictions from using our platform.
 - This included capturing US geo-locations to prevent US residents with non-US identification from bypassing our onboarding restrictions.
- Wrote all policies and procedures for Complaints, Compliance Monitoring, Advertising, Financial regulations and ensuring compliance with our regulators requirements (Financial Services Commission of the British Virgin Islands).
- Performed KYC investigations for OFAC and Sanctions potential matches, investigated using our KYC platform and OSINT.
- Performed transaction analysis and monitoring of all incoming and outgoing funds on the platform using internal monitoring dashboards and TRM's KYT software for blockchain investigations.
- Wrote and presented our annual Compliance training which included FCC items.
- Detected, investigated and blocked users who were attempting to use our platform to pass-through funds to a known investment scam.
 - A user was collecting money locally in Columbia, aggregating and sending it to a third party that promised very high investment returns (20%+/month)
 - Placed a hold on the user's funds, contacted user, discussed the specifics of the transactions and that they would not be permitted. Whitelisted the one withdrawal address and added user info to our blacklist to prevent them re-onboarding.
- Served as the BSA Officer, accepted by the Financial Services Commission of the British Virgin Islands responsible for filing SAR's and other monthly reports with our regulator.

With **Goldman Sachs**, I was responsible for training and local branch office investigations. This included working closely with our colleagues in the Financial Crimes Compliance specialization area when additional information was needed.

- Performed monthly and annual training regards financial crimes compliance for new hires and current employees
- KYC and KYB review for all new clients looking to be brought into the Private Wealth Management business.
- Worked with FCC team on an investigation of an individual previously under sanctions due to their involvement with potential criminal activity during the fall of the Soviet Union and obtaining ownership of certain businesses.
 - Criminal cases were eventually cleared and sanctions removed, however the client was still deemed to be beyond our risk profile to accept, despite the potential value of the client.
- Performed an investigation into the Source of Wealth for a potential customer who had accumulated their wealth through cryptocurrencies and their employment with Binance
 - Due to the difficulties in proving the SOW and the legal issues Binance was facing, we elected not to accept them as a client as the reputational and regulatory risk was too high.
- Review of cashiering activity including deposits, checks issued and securities deposited to ensure compliance with regulatory requirements and firm policies.
- Review of transactional activity (wires, journals, ACH) for potential FCC issues as needed, including review of letters of authorization, payee and payment details.

At **Merrill Lynch / Bank of America**, I held multiple roles before becoming a Market Supervision Manager, as a Senior Registered Client Associate and a Cashier.

- Experienced with handling deposits of checks, money orders, securities and bonds.
 - Check scanning via Check21 and other systems.
 - Packaging cashiering documents for retention and review, and subsequent shredding and destruction of cashiering packages after the hold times had expired.
- Review of cashiering activity at non-supervisory offices to ensure compliance with regulatory requirements and firm policies on a quarterly basis.
- Review and approval of transactional activity (wire, journal, ACH) for potential FCC issues as needed including discussing with the customer, reviewing documentation and rationale for the transaction.
- Identified and remediated a “romance scam” that a customer was involved in.
 - Customer had provided conflicting information as to the purpose of a wire transfer, which was supposedly for the purchase of an RV in Texas but was instead being sent to his “Girlfriend” who he had never met and was only talking to online.
 - Prevented the following wire transfer from being sent as the customer was providing falsified information about the reason for the transfer.
 - Reviewed the scam with the customer who refused to believe it was true but was able to prevent him sending further assets, losses were just over 100k USD.
- Performed KYC and KYB due diligence on accounts being opened for venture capital and private equity firms and their investors via WorldCheck for any potential reputational, criminal or legal issues that needed to be reviewed and remediated if possible prior to proceeding with account opening.