The ACAMS Greater Omaha Chapter seeks to advance the knowledge, skills and experience of local AML professionals dedicated to the prevention, detection and reporting of money laundering and other financial crimes within the region, and to educate and promote positive communication between regulators, law enforcement and local financial services professionals.

The chapter is dedicated to providing a forum for the professional development and networking opportunities of its members, and will host similar events throughout the coming year. Future learning events will provide CAMS and CPE credits, where available.

On behalf of the executive board, we would like to thank our attendees for taking Omaha by storm and making the launch event a stellar success!

On April 27, 2016, the ACAMS Greater Omaha Chapter held its inaugural meeting, marking a continued drive toward the national expansion of ACAMS’ activities to meet the needs of members and the markets in which they serve. It would not have been a true Midwestern event without some prospective tornado activity. However, a little inclement weather only delayed the launch. Over 50 of the anticipated 125 AML professionals attended the event held at Brix Midtown Crossing.

Crowe Horwath, LLP the chapter’s gold level sponsor, hosted the event and featured partner and ACAMS faculty member, Paul Osborne. Osborne has over 30 years of experience in the banking industry and is a faculty member for the CAMS-audit Advanced Certification. Osborne provided attendees with an insider perspective of the CAMS exam, reigniting even the most tenured ACAMS members’ desire to pursue additional training and certifications.

On April 27th - Chapter Launch Event proceeds despite severe weather.

June 1st - Chapter Executive Board Meeting.

June 23rd - Learning Event with John Byrne, ACAMS executive Vice President.

Insider This Issue:
Human Trafficking—Everyone’s Problem 2
Coalition on Human Trafficking—A Resource 2
Launch Event: Photos 3
SAR—Black Hole or Not? 4
Executive Board 6
Membership & Events 6

The Greater Omaha Chapter of ACAMS graciously invites all AML professionals to attend its first learning event—A Conversation with John Byrne, Executive Vice President of ACAMS—on Thursday, June 23rd from 3 to 5 p.m. Byrne will be discussing his insights around the topic of de-risking, including his experiences from a recently attended World Bank Group conference on this topic. Recent enforcement actions and other AML news will also be discussed. A networking reception will follow from 5 to 6 p.m. The event is free to all GOACAMS members, $25 for non-members. Two CAMS credits anticipated. Parking available at Hilton Omaha (10th and Cass St). More details are available, including RSVP on the chapter homepage.
Human Trafficking: Everyone’s Problem

- Emily J. Sherwin, CRCM, CAMS—Greater Omaha ACAMS Chapter, Co-Communications Director

Executive board members attended the Omaha Press Club’s May noon forum, exploring human trafficking in the Omaha area. Panelists and local activists against human trafficking shared their involvement in a problem that plagues every city, particularly Omaha. The panelists on the forum comprised of:

- Sister Rosalee Burke, a Notre Dame Nun, serves as the coordinator of the order’s Social Justice Committee. She is chair of the Coalition on Sex Trafficking, which was started by the Leadership Conference for Women Religious.

- Stephen O’Meara J.D., currently serves as an assistant Nebraska attorney general, and coordinator for both the Nebraska Human Trafficking Task Force (NHTFF) and Child Protection Training.

The forum provided additional first-hand viewpoints, those outside of the often associated red flags identified from within a financial institution. Human trafficking exists and is growing. It is problem that is often not fully measured; but happens in our own backyards. O’Meara provided that trafficking has now become the second largest criminal enterprise; only following illicit drug trafficking. Part of the rise in human trafficking has come from drug traffickers migrating into human trafficking due to the reduced sentencing standards currently in place for human trafficking crimes.

Panelists shared surprising statistics, “there are currently more people in slavery today than at any point in history.” Could it really be that human trafficking is such an issue we have more people in slavery today than we did during the Civil War era? Given Omaha’s location along I-80 and I-29 and its regular hosting of major sporting events, thousands of these individuals move through or into the metro. With the College World Series right around the corner, it is important to have a current awareness of the impact of Human Trafficking in Omaha.

As AML professionals, we follow the money trail, but what should lead us to believe that transactions may be associated with human trafficking? Monitoring for structuring and changes against expected profiles are commonly in place. Additional red flags include night drop and ATM activity consistent with human trafficking patterns. Credit card payments to areas of suspicion are also triggers for review. Another possible indicator of human trafficking is ongoing ATM/credit card transactions in even amounts between 10 p.m. and 6 a.m.

These red flags on their own are not conclusive, but money laundering indicators have never been straight forward. We must each utilize the tools at our disposal, put critical thinking skills to the test, and not be afraid to think outside the box. Having awareness is the first step to make a difference. Identifying suspicious activity is everybody’s responsibility, so if you see something, say something.

The forum will be broadcast in its entirety on Omaha Public Radio—KIOS 91.5 FM on June 13th at noon.

Coalition on Human Trafficking: A Resource

As part of the Human Trafficking forum, materials from the Coalition on Human Trafficking were provided to attendees.

Sex trafficking is not a problem of the past—it is an epidemic in the here and now. Join the local fight to bring freedom to those who are trapped, and serve justice on the perpetrators.

Realize—Over 250,000 people are trafficked in the U.S. every year.

Recognize—You cannot stop what you do not see, but the signs that someone is being trafficked are not hard to spot when you know what to look for.

Respond—We are not powerless. To report suspected trafficking, call 911 or the National Trafficking Hotline at 888.373.7888.

More information is available at www.notrafficking.org.
Launch Event: Attendee Gallery

Door Prize Winners
- Naheed Karamali, COR Clearing
- Eloiza D’Lima, COR Clearing
- Jessica Kowalsky, PayPal

Distance Travelers
- Jeff Ketelhut & Stephanie Schumacher, Metabank—Sioux Falls, SD
- Sean Brough, Protiviti—Liberty, MO
- David Stevens, US Marshals Service—Wichita, KS

April 27, 2016—Greater Omaha ACAMS chapter launch event, Sponsored by Crowe Horwath—held at Brix-Midtown Crossing, Omaha, NE
Something Ain’t Right: Black hole or not?
- James P. Cummings, Jr, CCBCO—Guest Law Enforcement Contributor

Bankers always have doubts whether SARs are ingested (read and trigger investigations) or digested (deleted and filed in a bottomless black hole). During my short career as a banker, this thought crossed my mind regularly. Were my SARs sent to a black hole never to be seen or heard from again? During my federal law enforcement career, I learned firsthand that SARs are one of the most valuable forms of intelligence available. Information contained within SARs prompted many criminal cases and resulted in several arrests.

As a U.S. Special Agent assigned to the Department of Treasury and then later to the Department of Homeland Security, SARs resulted in criminal cases with significant arrests and seizures related to: Fraud—bankruptcy, income tax, investment or embezzlement; cash structuring for criminal purposes; narcotics or weapons trafficking and prostitution/human smuggling; identity theft organizations and terrorism.

In the majority of these cases, the

Seized cash—Results of a successful sting, triggered by a SAR.

criminals and their organizations went undetected by all levels of law enforcement. It was only through systematic reviews of the generated SARs where law enforcement was able to detect criminal activities. But this was the easy part! I just read and responded to what a financial institution had already started. The bank had done all of the hard work by understanding and documenting that “Something Ain’t Right” (SAR).

It is important to remember that these particular criminals were deliberately choosing to target smaller financial institutions located in smaller communities. They counted on not being scrutinized as closely at a smaller community bank located in a small town as they would be at a large national bank located in a larger metropolitan area.

For example, a bank located in a town with a population under 5,000 filed a SAR detailing the following:

- A commercial customer opened several accounts to deposit rental property checks on a monthly basis. He informed the bank that he managed rental properties throughout the area for investors located in another part of the U.S.
- Over the course of three years, the customer deposited more than $25,000 monthly, primarily composed of different money orders purchased from various chain stores around the area.
- A teller noticed an address that was written on the money order, for a deposit left at the night drop. It was an empty lot—next door to her home!
- Based on this revelation the bank reviewed all of the addresses on the money orders and discovered not only were all of the addresses bogus, but that all of the money orders had been filled out by two or three people.

Law enforcement identified that the customer/criminal was laundering drug proceeds for a large Mexican-based narcotics trafficking organization through these accounts. Millions of dollars of cash was laundered. It was only through due diligence by the bank that this criminal was caught and sentenced to a significant amount of jail time.

He had several young females that worked for him that he gave large amounts of cash to convert to money orders, bought from retail convenience stores to deposit at various financial institutions.

Law enforcement discovered four other banks located in other small towns where the same operation was conducted.

Banks continue to be on the front lines in the war against criminal activities. While serving customers, they must incorporate a little “professional skepticism.” Criminals act illegally to either make money or access their money to operate. At some point criminals deal with a bank, conducting financial transactions, both legal and illegal, in some manner.

About the author

Paul Cummings is a retired Special Agent who was assigned to the United States Department of Treasury and Department of Homeland Security. He now works for Oliver Garrison, LLC, an accounting firm based in San Angelo, Texas, specializing in regulatory compliance.
Something Ain’t Right (continued from page 4)

Now in the 21st century, complete and accurate information provided by financial institutions is critical to fight the War on Terror. Former FinCEN, Jennifer Shasky Calvery, stated the following in a speech in November 2012:

“For example, after bin Laden was taken care of, we searched all SARs referencing Abbottabad, Pakistan. If the institution had written a SAR concerning something in Abbottabad, but had only stated Pakistan, then we would have missed it, and that SAR would not have been reviewed.

As a matter of fact, our search did have one SAR referencing Abbottabad [that] also contained a telephone number with that individual. Our check of the SAR and telephone number determined the subject had called a telephone number in Abbottabad that had also been called by a telephone recovered from bin Laden’s compound. That is worth us looking at. If the financial institution had not included the phone number, we would not have made a connection and no further review would have been done.

Let us analyze that for a minute. A SAR filed inside the U.S. included a domestic telephone number that called a phone connected to Osama bin Laden, the most wanted terrorist in the world and that called phone was located by U.S. Navy SEALs in the terrorist’s compound. This particular SAR was important on so many different levels.

Having had the opportunity to see how SARs work from both bank and law enforcement perspectives, it is readily apparent the importance SARs play. Banks should know that SARs are received, reviewed and acted upon by law enforcement at all levels.

While assigned to the Treasury Department’s Financial Intelligence Unit, we had an interesting unofficial motto: “IN GOD WE TRUST, ALL OTHERS WE MONITOR.” Perhaps “professional skepticism” is a more politically correct term these days, but whichever term is used, now more than ever it is needed by financial institutions to help combat the growing trend of criminal organizations all over the world. Drafting complete and accurate SARs is a huge factor in this battle.

More about Paul

Prior to joining Oliver Garrison, Paul was a Senior Special Agent with the United States Department of Homeland Security stationed in the San Angelo, Texas area. His experience covers a wide array of complex criminal investigations involving terrorist financing, narcotics/weapons smuggling, and other high risk violent criminal organizations. Paul specialized in using BSA/AML material gathered by financial institutions to detect, disrupt and deter these types of criminal organizations. Paul has conducted hundreds of Federal investigations resulting in the arrest of over 750 individuals and the seizure of millions of dollars of assets, cash and contraband. Using his law enforcement background, Paul reinforces the importance of BSA training and its effects on actual criminal investigations.

Paul.Cummings@olivergarrison.com

As an ACAMS member, you will receive exclusive access to a wealth of AML/CTF and financial-crime related information, training plus an international network of thousands of like-minded professionals to turn to for guidance and support. The ACAMS Greater Omaha Chapter fosters professional relationships and provides local forums for discussion around region-specific issues.
The Greater Omaha Chapter of ACAMS seeks to advance the knowledge, skills and experience of local AML professionals dedicated to the prevention, detection and reporting of money laundering and other financial crimes within the region, and to educate and promote positive communication between regulators, law enforcement and local financial services professionals.

The Chapter graciously invites participation of AML professionals from all facets of financial services and related industries, law enforcement and regulatory officials. While headquartered in Omaha, the Greater Omaha chapter hopes to benefit all ACAMS members in Iowa, Kansas, northwest Missouri, South Dakota and Nebraska.

**Membership Update**

**Paid Memberships**
41 members from 13 organizations

**Potential Memberships**
312 ACAMS national members from over 100 organizations

**Annual Rates**
$50 / $40 (Groups of 10+)
Pro-rated based on ACAMS member date

**Upcoming Events**

Newsletters: May, July/Aug, Oct 2016; Jan, Mar 2017
Learning Events: Jun, Sep, Nov 2016, Feb 2017
Social/Networking: Dec 2016, Apr 2017

---

**Executive Board**

**Co-Chairs**
- Jason Cadek, Bank of the West
- Amy Bracht, PayPal

**Secretary**
- Brandon Seim, Bank of the West

**Treasurer**
- Leesa Wees, First Data

**Membership**
- Shelley Vandenberg, Security National Bank

**Programming**
- Logan Anderson, TD Ameritrade
- Amy Wheeler, First National Bank of Omaha

**Communications**
- Sara Rose Ahonen, Mutual of Omaha Bank
- Emily Sherwin, First National Bank of Omaha

---

GreaterOmahaChapter@ACAMS.org