

# Anti-Money Laundering (AML) Compliance Services for Investment Advisers



## Ensuring AML Compliance with FinCEN's Final Rule

### For Investment Advisers, what used to be recommended is now required

FinCEN's Final Rule stipulates that Registered Investment Advisers must adopt anti-money laundering (AML) compliance programs similar to those of broker-dealers. Even with AML procedures already in place, building and testing an AML program may be uncharted territory for Investment Advisers – and outsourcing that task to DFP Partners may be the right solution.

# ANTI-MONEY LAUNDERING (AML) COMPLIANCE SERVICES FOR INVESTMENT ADVISERS

## Optimize Your AML Compliance with Experienced Certified AML Specialists (CAMS) You Can Trust

The Final Rule, which defines Registered Investment Advisers and Exempt Reporting Advisers (ERAs) as “financial institutions,” represents a major change in regulatory expectations. We are uniquely positioned to provide both the AML and Investment Adviser consulting expertise needed to ensure Final Rule compliance.

### DFP Partners can help build and test your AML program, as we have been doing for broker-dealers for 20+ years.

Whether you need advice or someone to shoulder the full compliance responsibility, our expert Certified AML Specialists (CAMS) work directly with your firm to meet all Final Rule requirements, which entail:

» **The development of internal policies, procedures, and controls**

We can help you develop and implement a detailed internal risk-based AML/Combating the Financing of Terrorism (CFT) compliance program that includes a comprehensive system of reasonably designed policies, procedures and controls, including procedures for ongoing customer due diligence.

» **The designation of a compliance officer**

Advice and support in appointing one or more dedicated individuals who are knowledgeable of AML requirements, to oversee the operations and internal controls of your AML/CFT program.

» **Establishing an employee training program**

Implementation of an ongoing training and onboarding program for your compliance officer(s) to ensure they understand their responsibilities under the Final Rule, and to maintain a high level of vigilance.

» **Periodic independent AML testing**

S.D. Daniels & Co., LLC (“SDDco-LLC”), a subsidiary of DFP Partners, provides independent testing of the AML programs of FINRA member broker-dealers and other financial institutions. All SDDco-LLC testing professionals are certified CAMS who can provide independent testing of your AML/CFT program that is tailored to the aspects of AML requirements most relevant to your firm. Once the review is completed, we will produce a written report with findings and recommendations (if applicable).

## Customized, Efficient Service with Deep Expertise

As consultants with decades of AML experience, we understand the importance of achieving compliance in a cost-effective manner for our entrepreneur clients. We will customize our services to your firm’s business model to maximize efficiency, charting your pathway to better compliance.