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# Video #1: Introduction to Money Laundering: Client’s Name’s Anti-Money-Laundering Program

Word Count = 950. Duration = 6:30 mins. approx.

**[ Opening screen 1-1: ]** [Screen Title ] Introduction to Money-Laundering: Client’s Name’s Anti-Money-Laundering Program [ Screen Subtitle ] Client’s Name’s Payment Compliance Program [Audio: Intro music 3-5 seconds. Bg Image: Full screen of Client’s Name exterior office building]

**[ Screen 1-2 ]** [ VO script: ] Hello! Welcome to Client’s Name’s Anti-Money-Laundering introductory training. My name is Nxxxx, and I’m a Customer Success supervisor. I’m also your guide through this training to help you answer a question you might be asking yourself. Client’s Name is a technology company. Why do I need to learn about money laundering? [ Images: Client’s Name office interior/full screen; img of supervisor in foreground.. M or F based on avail images. ]

**[ Screen 1-3 ]** [ VO script: ] Good question and here’s the answer. In this training, you will learn about the dangers of money laundering and how you can help protect Client’s Name from people who might put our company at great risk through criminal or terrorist activities. Let’s get started on the topic by following Annie/Andrew, a new employee on Client’s Name’s Customer Success team and a her/his very scary day. [ Images: Supv in Fg; Bg full screen image of Customer Success area/team working. ]

**[ Screen 1-4 ]** [ Employee at break with coworker. A/A = Annie/Andrew. CW = coworker ] [ Media/Images: Imgs: Two Ees sitting at a table talking, (M/M or M/F or F/F). w/ transp Bg. Img: of Client’s Name break/lunch room for full screen Bg. CW = coworker; never named. A/A = Annie or Andrew for CSR. Below, CW and A/A VO script. ]

CW: Annie/Andrew, what’s wrong? You look worried.

A/A: I haven’t even been here for 30 days, and I’m worried I might lose my job.

CW: What? How?

A/A: I had a meeting with my boss early this morning. I almost did something wrong on the first call I took, and she scheduled a meeting with me in about an hour.

CW: What did you do?

A/A: I’m not sure. We have a meeting this afternoon with some group in the company. Something about money laundering and the company facing huge fines.

CW: Oh, that doesn’t sound good.

A/A: I know. She/He said it’s OK, but I feel sick to my stomach. Please pray for me.

**[ Screen 1-5 ]** [ VO Script ] I forgot to introduce myself. I’m Annie’s/Andrew’s supervisor, and she’s/he’s not going to lose her/his job. Annie’s/Andrew’s customer was a **potential** money launderer, pretending to be a church. Good thing I was listening in on the call and examined the account. I made notes and scheduled a meeting with Annie/Andrew in an hour because the caller may have been trying to use Client’s Name to launder money gained from illegal means. [ same as Scrn 1-2 Images: Supv in Fg; Bg full screen image of Customer Success area/team working. ]

**[ Screen 1-6 ]** [ VO Script ] What’s next is a wonderful training moment for Annie/Andrew and for you. We’re going to talk about what money laundering is, how it can put Client’s Name at great risk, causing the company to face stiff fines and penalties, and you, and Annie/Andrew, can prevent this from happening. [ Similar to Scrn 1-5. Img: would like a different pose of the supervisor, for variety. Media: VO audio file. White box as Bg for 3 bullets: “What Is Money Laundering?” “How Does It Put Client’s Name at Risk?” “How Can You Help Prevent Money Laundering?”]

**[ Screen 1-7 ]** [ VO Script ] Are you wondering why you’re required to participate in this training? Maybe you work in Marketing or in Software Development and not in Customer Success. Maybe you’re wondering why Client’s Name is concerned about money laundering. The bottom line is if we do not actively support an anti-money-laundering program, either a criminal element, or terrorist organization, could potentially use our company to “launder” ill-gotten funds. If Client’s Name was found to be complicit in assisting these efforts, Client’s Name staff could be imprisoned, and the company could suffer financially from paying millions of dollars in penalties. As a result, Client’s Name could go out of business, and that would negatively impact not only our employees but hundreds of thousands of believers worldwide who depend on us. [ Media/Images: Screen Bg: Client’s Name branded white, no full scrn photo. Img of criminals/drug dealer. Img of s/o behind prison bars. Img of churches, a seminary, Client’s Name images of ppl using digital media, Img of a church service and/or Bible study group. Img of iceberg + ship sinking. Have images fade In/Out as Supv talks. ]

**[ Screen 1-8 ]** [Same scrn L&F as 1-7. Incl branded white box for bulleted list] [ VO Script ] We can prevent that from happening by working together to learn about money laundering and reporting it immediately. How? By participating in this required training program. Your new knowledge can help keep the risk of money laundering at bay. How? Well, after you complete this training program, you will be able to:

* Define money laundering
* Describe Client’s Name’s role as a Payment Facilitator
* Identify regulations that govern anti-money-laundering programs
* Explain why it’s important to “Know Your Customer”
* Report unusual activity

**[ Screen 1-9 ]** [ VO Script ] To understand, you will watch a TED-Ed video on the basics of money laundering. You’ll find the link to the video on the wiki page for the Anti-Money Laundering Program videos. [ Segue to the external link to the TED-Ed YouTube video. If a separate, stand-alone video, then we’ll need a screen shot of the wiki page. ]

[ VO Script ] The Compliance Team has “chunked” the training program into easily digestible video “bites”. You will watch a series of videos: [ Onscreen Text: List each video title and maybe a screen shot of each. Or use a screen grab of the video list on the wiki page. ] [ Talk about the wiki page for this training program and get screen shots from Marynifer. ]

[ VO Script ] Oh, and there will be a test for you to take after you have watched all of the videos. You’ll find the test under Course Resources. That’s it for this video. Thank you for watching. If you have any questions, please contact your supervisor or the Compliance Team.

**[ Screen 1-10 ]** [ Create a standard conclusion screen for each video with outro music. ]

# Video #2 TED-Ed Money Laundering YT Video

Duration = 4:46

TED-Ed YT video on the basics of Money Laundering

# Video #3: LO = Introduction to Money Laundering: Why It Matters at Client’s Name

Word Count = 1,369. Duration = 9:12 minutes, approx..

**[ Opening Screen 3-1 ]** [Title ] Introduction to Anti-Money-Laundering: What It Is and Why It Matters [ Subtitle ] Client’s Name’s Payment Compliance Program [Audio: Intro music 3-5 seconds. Image: Full screen of Client’s Name exterior office building]

**[ Screen 3-2 ]** [ VO Script ] Your awareness of money laundering’s illegal activities matters at Client’s Name. Why? It’s a common, and frequently used, criminal activity that could affect our business. Let’s recap the TED-Ed video that you watched. Money laundering is any process that “cleans” illegally obtained funds of their dirty, criminal origins allowing them to be used within the legal economy. Money laundering is very old, as old as money itself. Merchants hid their riches from tax collectors and pirates sought to sell their bounty without drawing attention to how they got it. All forms of money laundering use [ Header ] Three Basic Steps: [ Numbered list: ] (1) Placement. Is “where illegally obtained money is converted into assets that seem legitimate. Funds are deposited into a bank account registered to an anonymous corporation or a professional middleman.” Vulnerability for the criminals is introducing massive wealth into the financial system seemingly from nowhere. This can be solved by Layering. (2) Layering. Using multiple transactions to further distance the funds from their origin. This can take the form of transfers between multiple bank accounts or the purchase of tradable property like real estate. Casinos, where large sums of money exchanges hands frequently, are also popular venues for layering. (3) Integration. Allows cleaned money to re-enter the mainstream economy and to benefit the original criminal. They might invest it into a legal business, claim payment by producing fake invoices, or even start a bogus charity placing themselves on the board of directors, paying themselves an exorbitant salary. [ L&G TBD ]

**[ Screen 3-3 ]** [ VO Script ] You might remember I was monitoring a call that our new employee Annie/Andrew had with a customer. While Annie/Andrew chatted with the customer, I pulled up the customer’s account like I always do when training a new representative. When I took a look, I realized that it’s time for Annie/Andrew to learn about our anti-money laundering program, and transaction laundering in particular. Why? I suspected that the activity I saw on the account was unusual. Any unusual activity could indicate that people might be using the business’s account to launder money gained from illegal means. Let’s take a moment and read about Client’s Name’s role in the payment processing world. [ Images/Media: Img of Supv, diff poses. Bg img of Cust Support area. ]

**[ Screen 3-4 ]** [ No Audio/VO. ] [Header:] Client’s Name Is a Payment Facilitator. [Text;] Money laundering could happen at Client’s Name because of our unique role with our customers. Although Client’s Name is known for the digital ministry and discipleship tools we offer, we also provide an online donation platform to our customers. In the payments ecosystem, the world of processing payments, Client’s Name’s role is called a Payment Facilitator. We “move money” for our customers by processing their payments through our online donation platform. The criminal element could take advantage of our online donation platform to launder funds. How? [ Img of Client’s Name office exterior-can use same img as prev. White box with text under header. Create a graphic with arrows showing money going from an individual through Client’s Name and to the entity/business/church’s bank or credit union. Img: of Supv. Different poses. Scrn Bg is CLIENT’S NAME branded white Bg. “Nice to Have” Img: a screen shot of any screen -w/ no data or w/ “dummy” data- from the online donation platform. ]

**[ Screen 3-5 ]** [ VO Script ] The criminal and terrorist element launders funds through transaction laundering. Transaction laundering is a new and sophisticated form of money laundering and terrorism financing. Criminals take advantage of the electronic payments processing ecosystem to process payments for criminal enterprises that sell firearms, illicit drugs, child pornography, or other illegal goods or services. The illicit transactions are laundered through legitimate websites that act as electronic storefronts, replacing Al Capone’s brick-and-mortar laundromats. That’s how transaction laundering processes the criminals’ payments. [ Images/Media: Img of Supv, diff poses. Bg img of Cust Support area. ]

**[ Screen 3-6 ]** [ VO Script ] Let’s say an individual wants to launder funds from or for drug deals by way of donations made to our online donation platform. The drug dealer will set up a charitable organization and its bank or credit union account by using fake or stolen identification. [ Screen w/ Client’s Name branded white Bg. Media/Images: img of a criminal/drug dealer. Img of a social security card. Img of a cash gift card(s). Img of a person on a laptop of computer-to make an online donation. Can’t use a scrn grab of video as it’s licensed content. ]

**[ Screen 3-7 ]** [ VO Script ] Once the charity and its financial institution are set up to receive donations on our platform, the money laundering happens when individuals who intend to buy or distribute drugs go online and donate funds to the charity by using debit cards, eChecks, or pre-paid cash gift cards. [ Screen w/ Client’s Name branded white Bg. Media/Images: img of a criminal/drug dealer. Img of a social security card. Img of a cash gift card(s). Img of a person on a laptop of computer-to make an online donation. Can’t use a scrn grab of video as it’s licensed content. ]

**[ Screen 3-8 ]** [ VO Script ] For example, the money from a pre-loaded cash gift card will go to the drug dealer’s fake charity’s bank or credit union through Client’s Name’s online donation platform. The online transmission, or the journey, of these electronic funds is the digital way criminals launder money instead of using a brick-and-mortar laundromat like Al Capone did in the TED-Ed video you watched. [ Screen w/ Client’s Name branded white Bg. Media/Images: img of a criminal/drug dealer. Img of a social security card. Img of a cash gift card(s). Img of a person on a laptop of computer-to make an online donation. Can’t use a scrn grab of video as it’s licensed content. ]

**[ Screen 3-9 ]** [ No Audio/VO. ] Making illegally-gained proceeds appear legal through the use of a storefront is money laundering by definition. Transaction laundering works based on the same principle. By processing illegal transactions through a storefront merchant account, criminals kill two birds with one stone: They remove the money from its source, while at the same time they place the previously laundered money back into circulation, making such monies appear to be normal business earnings. [ Images/Media: Scr L&F of A/A and CW sitting in break/lunch room. See Video #1, Screen 1-4. Speech bubbles for A/A and CW introduce text. Client’s Name branded white box to side with text online. ]

**[ Screen 3-10 ]** [ VO Script ] However, your awareness and knowledge of our anti-money laundering program, and how to report unusual activity, will help Client’s Name’s Compliance Team to investigate reported activity. Together, we hope to keep Client’s Name’s role as a Payment Facilitator safe from transaction laundering. [ Images/Media: Img of Supv, diff poses. Bg img of Cust Support area. Optional: Branded Client’s Name white box with some text TBD. ]

**[ Screen 3-11 ]** [ Employee at break with coworker. A/A = Annie/Andrew. CW = coworker ] [ Media/Images: Imgs: Two Ees sitting at a table talking, (M/M or M/F or F/F). w/ transp Bg. Img: of Client’s Name break/lunch room for full screen Bg. CW = coworker; never named. A/A = Annie or Andrew for CSR. Below, CW and A/A VO script. ]

CW: I’ve been praying for you, A/A.

A/A: Thanks. My supervisor says we’re going to visit the Compliance Team this afternoon.

CW: Really? That sounds serious.

A/A: I know. Something about reporting unusual activity. Oh, and money laundering.

CW: Well, now I can pray specifically for your meeting.

A/A: Thank you. My supervisor’s not mad. S/He’s been smiling since s/he got off the phone with the Compliance Director. S/He said I’m going to learn how to launder money.

CW: What?? Are you sure about that??

A/A: No. I’m so nervous. I just want to keep my job. I love it here.

**[ Screen 3-12 ]** [ same screen img as scr #1-3 fm Video #1 ] [ VO Script ] By the end of today, Annie/Andrew will understand what’s going on, and no, s/he isn’t going to learn how to launder money. Instead, the Compliance Team and I are going to introduce her/him to Client’s Name’s Anti-Money Laundering Program and how to report unusual activity. I’m glad you’re joining us on this journey. It’s important for all Client’s Name employees to be aware of what transaction laundering is and to understand the company’s role as a Payment Facilitator. We have a video dedicated to this vital role, so make sure you take time to watch it. [ Note: In the future, if the series changes, Client’s Nameag this for content to be updated. ]

**[ Screen 3-13 ]** [ Create a standard conclusion screen for each video with outro music. ]

[ **Question** - Marynifer to put these links into the Course Resources wiki page and Jane on the Compliance wiki page? They’re really great articles and perhaps a nice Resource for Client’s Name employees. ~JLC ]

http://www.elenavandesande.com/2017/08/04/transaction-laundering-the-digital-evolution-of-money-laundering/

http://evercompliant.com/transaction-laundering-new-advanced-form-money-laundering/

# Video #4: LO = Introduction to Money Laundering: What Is a Payment Facilitator?

Word Count = 900. Duration = 6:00 minutes, approx.. [ Jane, see changes in blue font. ]

**[ Opening Screen 4-1 ]** [Title ] Introduction to Anti-Money-Laundering: What Is a Payment Facilitator? [ Subtitle ] Client’s Name’s Payment Compliance Program [Audio: Intro music 3-5 seconds. Image: Full screen of Client’s Name exterior office building]

**[ Screen 4-2 ]** [ Employee at break with coworker. A/A = Annie/Andrew. CW = coworker ] [ Media/Images: Imgs: Two Ees sitting at a table talking, (M/M or M/F or F/F). w/ transp Bg. Img: of Client’s Name break/lunch room for full screen Bg. CW = coworker; never named. A/A = Annie or Andrew for CSR. Below, CW and A/A VO script. ]

CW: Sounds like your supervisor is very supportive.

A/A: Oh, yes. S/He spent a lot of time with me today.

CW: Excellent! What did you learn?

A/A: That I now know something you don’t know.

CW: Oh, I’m sure you know a lot of things I don’t.

A/A: Yea, but you’ve been a Client’s Name employee for ….

CW: Don’t say it.

A/A: OK, I won’t. Bet you don’t know what a Payment Facilitator is. I do now.

**[ Screen 4-3 ]** [ VO Script ] As we mentioned in an earlier video, Client’s Name has a unique role in the electronic processing of customer payments, also called the payment ecosystem. Our role is called a Payment Facilitator, and as the name implies, we facilitate payments. We provide an online donation platform to our customers, such as churches, parachurches, and ministries. Through this platform, we facilitate the collection of funds from donors who wish to donate funds electronically to a church or ministry using a debit or credit card or other account. We facilitate donations by collecting these electronic funds and pushing those funds to a customer’s account at a bank or a credit union. [ Notes for L&F Define payment ecosystem, use graphic from Jane’s PPT. Use images of church to define customer and img of person w/ CC to show donor. ]

**[ Screen 4-4 ]** [ VO Script ] The payments ecosystem calls our customers, the churches or ministries, merchants or sub-merchants. To help you remember these financial terms, think of a store-front church in a strip mall with other merchants, like a convenience store or a beauty salon.

**[ Screen 4-5 ]** [ VO Script ] How does all of this relate to money laundering? As a Payment Facilitator, we are responsible for moving money electronically for our customers, the merchants or sub-merchants. As a money mover, we assume one-hundred percent of the risk and liability for our merchant’s or sub-merchant’s activities. So, if a criminal element, or terrorist organization, were to use our online donation platform to launder money, Client’s Name would suffer the full financial hit through stiff, onerous penalties and, in some cases, Client’s Name employees could also face fines and/or imprisonment. [ Images: Show def of sub-merchant. ]

**[ Screen 4-6 ]** [ VO Script ] That’s why Client’s Name cares about money laundering, and preventing it through our Anti-Money-Laundering Program. For over twenty years, we have served people in over 180 countries and over 800 seminaries and colleges. By educating you and all Client’s Name employees on how to prevent money laundering, we can continue our mission to serve to hundreds of thousands of believers worldwide for many years to come. [ Images TBD. ]

**[ Screen 4-7 ]** [ VO Script ] Now that you know what money laundering is and why Client’s Name’s concern has established our Anti-Money-Laundering Program, let’s talk about prevention. How do we prevent money laundering? Client’s Name has set up systems and reviews that constantly monitor for money laundering, terrorist financing, and other illegal activity associated with customers and their transactions. We call these activities “Red Client’s Nameags”. Some examples of our prevention methods include monitoring for transactions that are: [ L&F: Bulleted list in white branded box ] \*Composed of unusually high dollar amounts; \*Part of an unusual pattern of transactions; and/or,\* Appear to have no apparent economic or visible, lawful purpose. [L&F TBD ]

**[ Screen 4-8 ]** [ VO Script ] For Annie/Andrew working as a Customer Support Representative, s/he might see on a customer’s account either a spike in transaction volume or a high number of chargeback or returns. In addition, if s/he tries to reach the customer about the unusual activity, Annie/Andrew may be unable to reach customer, either by phone, email, or through the organization’s website. Maybe the website remains “under construction”.

**[ Screen 4-9 ]** [ VO Script ] Or, Annie/Andrew get calls with strange customer inquiries. How strange? For example: ”Can you tell me about your anti-money laundering policies?” I’d say that’s a “red Client’s Nameag”, wouldn’t you? Or, how about this customer question: “Do you have to report donations over a certain dollar amount, and how quickly can I access the donations?” A customer asking how quickly funds are deposited is a big “red Client’s Nameag” as well. [ L&F TBD. ]

**[ Screen 4-10 ]** [ VO Script ] I’m guessing that this video may feel like a big information “dump”, and your brain might hurt like Annie’s/Andrew’s. The good news is I cannot list for you every possible variation of unusual activity in this Anti-Money-Laundering course. Know this: There is no substitute for personal judgment. As we all often say around Client’s Name, Use Your Best Judgment. If you have any doubts about any customer transactions, talk with your supervisor, the Compliance Officer, or a member of the Compliance Team immediately. The company you may save from fraudulent activities and stiff fines and penalties may be your own. [ L&F TBD, but add screen shot of Client’s Name’s mission statement and a Bible study group. ]

**[ Screen 4-11 ]** [ Create a standard conclusion screen for each video with outro music. ]

# Video #5: LO = Introduction to Money Laundering: What Are the Regulations?

Word Count = 1,012. Duration = 7:15 minutes, approx.. Jane, this is extensively rewritten, so no blue font. ☺

**[ Opening Screen 5-1 ]** [Title ] Introduction to Anti-Money-Laundering: What Are the Regulations? [ Subtitle ] Client’s Name’s Payment Compliance Program [Audio: Intro music 3-5 seconds. Image: Full screen of Client’s Name exterior office building]

**[ Screen 5-2 ]** [ Employee at break with coworker. A/A = Annie/Andrew. CW = coworker ] [ Media/Images: Imgs: Two Ees sitting at a table talking, (M/M or M/F or F/F). w/ transp Bg. Img: of Client’s Name break/lunch room for full screen Bg. CW = coworker; never named. A/A = Annie or Andrew for CSR. Below, CW and A/A VO script. ]

CW: You’re looking less nervous, A/A.

A/A: Good. Thank you for your prayers.

CW: Anytime. So, what else are you learning from your boss?

A/A: That my brain hurts a bit more, but it’s all good.

CW: Your boss didn’t tell you that, did s/he?

A/A: No. But learning about financial regulations hurts my brain.

CW: What does that have to do with Client’s Name?

A/A: A lot. It all plays a part in preventing money laundering. Want me to teach you?

**[ Screen 5-3 ]** [ VO Script ] A/A’s beginning to understand why our Anti-Money Laundering Program is important to our company and to our customers. We’re a technology company committed to equipping the church to grow in the light of the Bible. That’s a pretty high spiritual standard, and we also have a high view our financial commitment to our customers and the service our online donations platform provides to them. [ Images: Client’s Name office interior/full screen; img of supervisor in foreground.. M or F based on avail images. ]

**[Screen 5-4 ]** [ VO Script ] Our commitment to this high standard reClient’s Nameects not only our commitment to the discipleship of believers around the world; it also reClient’s Nameects our understanding of the regulations that guide the world of payment processing. The payments ecosystem is a highly regulated industry overseen by several regulatory bodies including the U.S. Department of Treasury, the Financial Crimes Enforcement Network,and the Office of Foreign Assets Control, [ L&F bulleted list of each entity. ]

**[ Screen 5-5 ]** [ VO Script ] In this video, we’ll give you a brief overview of the Office of Foreign Assets Control as well as the Bank Secrecy Act and Anti-Money Laundering laws.

**[ Screen 5-6 ]** [ Header: History of the Office of Foreign Assets Control ].[ me to TBD onscreen TXT and VO. ] An enforcement agency, the Office of Foreign Assets Control publishes a list of individuals and companies owned or controlled by, or acting for or on behalf of, targeted countries. The agency also lists individuals, groups, and entities, such as terrorists and narcotics traffickers designated under programs that are not country-specific. Collectively, such individuals and companies are called "Specially Designated Nationals" or "SDNs." Their assets are blocked and U.S. persons are generally prohibited from dealing with them. [09-10-2002] [ Mary/Jane, Can we add their website to the wiki pages, esp to Course Resources? For the SDNs: https://sanctionssearch.ofac.treas.gov/ ]

**[ Screen 5-7 ]** [ Header: History of the Office of Foreign Assets Control ] “Terrorist Financing”: May not involve the proceeds of criminal conduct, but rather an attempt to conceal either the origin of the funds or their intended use, which could be for criminal purposes. Although the motivation differs between traditional money launderers and terrorist financiers, the actual methods used to fund terrorist operations can be the same as, or similar to, methods used by other criminals to launder funds. (from Jane)

**[ Screen 5-8 ]** [ Header: History of the Bank Secrecy Act ]. The Bank Secrecy Act, established in 1970 and administered, by the Financial Crimes Enforcement Network ( [www.fincen.gov/history-anti-money-laundering-laws](http://www.fincen.gov/history-anti-money-laundering-laws) ), is one of the most important tools in the fight against money laundering. Since 1970, numerous other laws have enhanced and amended the Bank Secrecy Act to provide law enforcement and regulatory agencies with the most effective tools to combat money laundering. Some of these Anti-Money Laundering Laws include: [ Bulleted list: ] \*Money Laundering Control Act (1986) \* Annunzio-Wylie Anti-Money Laundering Act (1992) \*Money Laundering Suppression Act (1994) \*Money Laundering and Financial Crimes Strategy Act (1998). You can learn more about the Bank Secrecy Act by visiting their website. [ Provide link on wiki pages, and put a screen shot of the Course Resources here. ]

**[ Screen 5-9 ]** [ Header: History of the Bank Secrecy Act ] After 9-11, The USA PATRIOT Act criminalized the financing of terrorism, strengthened the existing framework of the Bank Secrecy Act, and required all financial institutions to adopt formal Anti-Money Laundering programs. The list is long, so take a look at this graphic from the website. [ Insert screen cap of the long list of prohibitions so learners can read through the list in the image. Better to have them pause and read. ] You can learn more about the Bank Secrecy Act by visiting their website. [ Provide link on wiki pages, and put a screen shot of the Course Resources here. ]

**[ Screen 5-10 ]** [ Header: History of the Bank Secrecy Act ] Anti-Money Laundering legislation seeks to combat illegal activity such as the illicit child and adult sex trades. Client’s Name’s commitment to Anti-Money Laundering laws, and requiring employees to learn about our Anti-Money Laundering policy, helps enforcement agencies to fight against illegal proceeds from criminal activity. Our involvement is not only a regulatory obligation, it’s also a moral obligation we have as a company and as employees of Client’s Name. [ L&F TBD. ]

**[ Screen 5-11 ]** [ VO Script ] Anti-Money Laundering legislation combats illegal activities through many compliance processes, including Know Your Customer. We cover this topic in a separate video, but it’s important for you to know that Anti-Money Laundering law require businesses to identify their clients, and to verify the customer is who they say they are, before processing transactions. Another compliance process includes reporting suspicious transactions. We also cover how to report unusual customer activity in a separate video. Individuals and businesses failing to comply with Anti-Money Laundering legislation, failure to report suspicious activity, or even tipping off the suspicious customer can face severe penalties or even imprisonment.

**[ Screen 5-11 ]** [ VO Script ] Client’s Name, having a unique role within the payments ecosystem as a Payment Facilitator, is committed to upholding the highest standards of compliance and security in its best practices. This commitment is why we have established our Anti-Money Laundering Program. We are committed to help prevent and/or reduce the financial impact of financial crime such as sex trafficking by following the laws established following the laws established within the Bank Secrecy Act. [ L&F TBD - Supv and C.S. interior as Bg. ]

**[ Screen 5-12 ]** [ Create a standard conclusion screen for each video with outro music. ]

# Video #6: LO = Introduction to Money Laundering: Why You Need to Know Your Customer

Word Count = 1,218. Duration = 8:12 minutes, approx..

**[ Opening Screen 6-1 ]** [Title ] Introduction to Anti-Money-Laundering: Why You Need to Know Your Customer [ Subtitle ] Client’s Name’s Payment Compliance Program [Audio: Intro music 3-5 seconds. Image: Full screen of Client’s Name exterior office building]

**[ Screen 6-2 ]** [ VO Script ] You know our business, what we do for a living, and our mission to use technology to equip the church to grow in the light of the Bible. But, do you really know our customers? How can your knowledge of our customers help prevent money laundering through our online donation platform? Yes, as you’ve learned by now, I have answers to those questions for you. But, first, let’s go spy on Annie/Andrew. I think something’s going on. [ Images: Client’s Name office interior/full screen; img of supervisor in foreground.. M or F based on avail images. ]

**[ Screen 6-3 ]** [ Employee at break with coworker. A/A = Annie/Andrew. CW = coworker ] [ Media/Images: Imgs: Two Ees sitting at a table talking, (M/M or M/F or F/F). w/ transp Bg. Img: of Client’s Name break/lunch room for full screen Bg. CW = coworker; never named. A/A = Annie or Andrew for CSR. Below, CW and A/A VO script. ]

CW: Annie/Andrew, I’ve been praying for you. How did your meeting with your boss go?

A/A: OK. We talked about transaction laundering. It was a good meeting.

CW: That’s a relief. How was it good?

A/A: Well, my boss told me that every new representative has a lot to learn. And, that’s why she/he listens in on the calls.

CW: That’s true. You’ve only been here two weeks.

A/A: I know. But, I still feel nervous. And, learning about transaction laundering makes my brain hurt.

CW: I bet. But, your boss believes in you. S/He wouldn’t have hired you unless you were right for the job.

A/A: Were you eavesdropping? That’s what s/he said in our meeting. We talked about how I need to know my customers.

**[ Screen 6-4 ]** [ VO Script ] Annie’s/Andrew’s right. We all need to know our customers. Both Anti-Money Laundering and the Office of Foreign Assets Control have fundamental requirements that financial institutions and payment processors know their customers. This is commonly referred to as Know Your Customer, and Client’s Name believes in this primary method in which we can protect ourselves from becoming the victim of financial crimes.

**[ Screen 6-5 ]** [ VO Script ] As a Payment Facilitator, our number one exposure to risk happens when we send money to customers through our online donation platform. When I say “the customer’s money”, the key word here is “customer”. We must know our customers to prevent fraud. And, that’s why it’s everyone’s responsibility to be on guard to properly identify our customers consistently throughout the account’s lifecycle. We all need to practice Know Your Customer techniques to best protect us against losses due to fraudulent and criminal activity. What are these techniques? Let’s see what the Compliance Team looks for during their initial account set up and investigations to give you an idea. [ Images: blank T-shirt and add KYC on it in Client’s Name green w/ Client’s Name logo. ]

**[ Screen 6-6 ]** [ VO limited. ] Here are key customer-focused questions that the Compliance Team asks when they set up a customer’s account. These questions may also help you to keep in mind anytime you interact with a customer: [ No VO, text on screen: ] [ Header: Know Your Customer ] [Text, in bulleted list; ] Is the customer who they say they are? Is the business a valid and verifiable non-profit as recognized by the Internal Revenue Service? Does the banking information the customer provided belong to that business? Do the funds that are deposited and debited belong to the business? Is the person requesting services listed on any Office of Foreign Assets Control sanctions lists? [ Begin VO here: ] In summary: Is the customer and the business who they say they are? Learn to Know Your Customer and you will help Client’s Name avoid stiff fines and penalties. [ Images/Media: static screen with branded white box and bulleted list of the questions. Bg image of Cust. Support area with img of Supvs. Header: Know Your Customer. ]

**[Screen 6-7 ]** [ VO Script ] If at any point during your interaction with a customer you think that the answer to any of these questions cannot be answered satisfactorily, contact the Compliance Team immediately so they can investigate. For example, let’s say a conversation you had with a customer left you wondering if they really know their business. Or, the customer became defensive when you asked them to provide information, or to provide proper and official supporting identification. When you immediately contact the Compliance Team about any unusual behavior from the customer, or to express your doubts, you will help the team to launch a timely investigation.

**[ Screen 6-8 ]** [ VO limited. ] Penalties can be assessed based on your knowing something, and not reporting it, or you choosing to ignore it. You may hear the Compliance Team use these terms: Knowledge and Willful Blindness. Let’s read up on them. [ No VO. ] [Header] Knowledge [Text] An employee who knows or should have known that conducting a transaction will or might promote unlawful activity. [Header] Willful Blindness [Text] An employee intentionally fails to inquire about a transaction they consider suspicious, or an employee chooses to ignore the circumstances surrounding a suspicious transaction. [ Image: blindfolded person. White branded box with 2 headers w/ corresp Text. May make this a “Tab” interaction. ]

**[ Screen 6-9 ]** [ VO Script ] This is serious business, folks. Failure to report unusual activity, or turning a blind eye and ignoring it, carries steep penalties imposed by the regulatory agencies. Violations based on an employee’s Knowledge or Willful Blindness carry high criminal and civil penalties. How high? [ Images/L&F: carry over fm prev slide. Imgs of jail, prison bars, federal bldgs. ]

**[ Screen 6-10 ]** [ VO Script ] Civil penalties range from $500-$10,000 per occurrence. And, criminal penalties range from $10,000 plus five years imprisonment, or $500,000 and 10 years imprisonment, or up to one million dollars and 30 years imprisonment. [ I’ll make a chart of these 3 criminal penalties. ]

**[Screen 6-11 ]** [ VO Script ] Remember, civil and criminal penalties may be based on an employee’s: [Header] Knowledge [Text] Knew or should have known or [Header] Willful Blindness [Text] Intentionally fails to act or ignores suspicious activity. Why did I repeat this? So that you won’t feel silly reporting suspected money laundering activity to a supervisor or to the Compliance Team. No one’s going to laugh at you, or get irritated, if you report unusual activity and Compliance’s investigation determines that there’s no fraud. An obvious, and additional, penalty is that an employee’s who failure to report could also result in disciplinary action up to, and including, termination from Client’s Name. [ Images: carry over L&F from prev screen, incl chart. ]

**[ Screen 6-12 ]** [ VO Script ] Please. Know your customer so you can recognize and then report unusual activity. Together, we can prevent money laundering at Client’s Name, and keep our company moving forward in supporting the worldwide church. [ Images: Img of planet Earth. Imgs of churches, ppl in Bible studies, etc. ]

**[ Screen 6-13 ]** [ Create a standard conclusion screen for each video with outro music. ]

# Video #7: LO = Introduction to Money Laundering: Why You Must Report Unusual Activity

Word Count = 698 approx. Duration = 4:65 minutes, approx.

**[ Opening Screen 7-1 ]** [Title ] Introduction to Anti-Money-Laundering: Why You Must Report Unusual Activity [ Subtitle ] Client’s Name’s Payment Compliance Program [ Audio: Intro music 3-5 seconds. Image: Full screen of Client’s Name exterior office building]

**[ Screen 7-2 ]** [ VO Script ] All Client’s Name employees can play a role in helping to prevent money laundering and help prevent the company facing stiff fines and penalties. How? Even if you do not work directly on customer accounts, your awareness could help a coworker who does. You can encourage your colleague to talk with a Supervisor or a member of the Compliance Team. Or, if you work in Customer Success, you may play a key role in prevention. The bottom line is: Any Client’s Name employee who suspects unusual activity on any customer’s accounts must report the activity immediately. Annie/Andrew has learned that today. [ Media/Images: Images: Client’s Name office interior/full screen; img of supervisor in foreground.. M or F based on avail images. White branded box with Img of Stop sign w/ transp Bg, and Text: “Report Unusual Activity Immediately” ]

**[ Screen 7-3 ]** [ Employee at break with coworker. A/A = Annie/Andrew. CW = coworker ] [ Media/Images: Imgs: Two Ees sitting at a table talking, (M/M or M/F or F/F). w/ transp Bg. Img: of Client’s Name break/lunch room for full screen Bg. CW = coworker; never named. A/A = Annie or Andrew for CSR. Below, CW and A/A VO script. ]

CW: What else did you learn from your boss today?

A/A: Lots of stuff. And, our meeting ended well. I got to meet some really great people.

CW: You did? Who?

A/A: And, my boss told me all about money laundering and what to look for on my customer’s accounts.

CW: Hmm. That’s interesting, Annie/Andrew. But, what about the “really great” people you met?

A/A: Oh, yea. My boss and I walked over to meet the team in Compliance. I had a blast.

CW: What? You had fun with the Compliance people?

A/A: I did. They told me what to look for and how to report suspicious activity. I’m glad this day ended well.

**[ Screen 7-4 ]** [ VO Script ] Who ya gonna call? The Compliance Team. And, did I mention that you must report the unusual activity to them immediately? Why? The team members need time to investigate the unusual activity and then determine if they need to formally file a report. They’ll do their “research magic” to find out if the activity is unusual or part of a normal payment transaction. If employees do not report the unusual activity right away, the Compliance Team may not meet regulatory reporting deadlines. And then Client’s Name could face stiff fines and penalties. Let’s read how to report unusual activity. It’s very easy to do. [ Img: can’t use the Ghost Busters logo, but find an image that’s similar and royalty free. Img: of Compliance team area, or a door/wall with “Compliance” sign and the backs of 2-3 people’s heads holding “ghost buster” type tools. <Best not to have front-facing, close-up imgs of staff>. ]

**[ Screen 7-5]** [ VO Script ] What’s the process for reporting unusual activity? Let’s say a customer-facing representative suspects unusual activity on a customer’s account. The representative would: (1) Make note of the transaction. (2) Verbally notify a supervisor, a Compliance Officer, or a member of the Compliance Team. And finally (3) Complete an Unusual Activity Report. The Compliance Officer or a member of the Compliance Team will immediately investigate. [ Images/Media: static screen with branded white box and bulleted list of the questions. Bg image of Cust. Support area with img of Supvs. Header: Reporting Unusual Activity. ]

**[ Screen 7-6 ]** [ VO Script ] You can find the Unusual Activity Report on the Compliance Team’s wiki. The link goes to a Google Form [ and more details to come from Jane once the report is set up on the team’s wiki page. Screens shots of the link and of the form would be nice. Jane/Mary: “Client’s Nameagged for updating this once the wiki pages are both revised. ]

**[ Screen 7-7 ]** [ Create a standard conclusion screen for each video with outro music. ]

# Assessments (to be developed)

* + *[ Marynifer to create a Google quiz form. ]* Typically, it takes about 1-2 minutes for the learner/participant to read a test question and respond, on average. Can calculate and say 1.5 minutes per questions. That will help determine how long it might take a learner to complete this assessment. ~JLC.

## Define money laundering

* + 1. (M/C Placement definition) Money launderers may use this step to convert illegally obtained money into assets that seem legitimate. Examples include depositing funds into a bank account registered to an anonymous corporation. [ 29 words ]
    - Layering
    - Integration
    - **Placement (correct)**
  + 2. (T/F) Money laundering was officially recognized in the United States as a federal crime in 1986.
    - **True (correct)**
    - False
  + 3. (M/C Integration Definition) Money launderers may use this step to allow “cleaned” money to re-enter the mainstream economy. Examples include investing in a legal business and claiming payment by producing fake invoices, or founding a bogus charity and seating themselves on the board of directors and drawing an exorbitant salary. [ 47 words ]
    - Layering
    - **Integration (correct)**
    - Placement
  + 4. (M/C Layering Definition)Money launderers may use this step to distance funds from their original source through setting up multiple transactions. Examples include transfers between multiple bank accounts, the purchase real estate, or gambling casinos where individuals frequently exchange large sums of money. [ 40 words ]
    - **Layering (correct)**
    - Integration
    - Placement
  + 5. Question TBD by Jane Difference between traditional ML and transaction ML. *to be written.*
    - True/False
    - Multiple Choice
    - Multiple Response
  + 5. (T/F) Vulnerability for criminals occurs when they introduce massive wealth into the financial system seemingly from nowhere.
    - **True (correct)**
    - False

## Describe Client’s Name’s role as a Payment Facilitator

* + 1. (M/C) What do we call our customers (churches, parachurches, and ministries)? (correct = Merchants and sub-merchants)
    - A1. Merchants
    - A2. Sub-merchants
    - A3. Merchants and sub-merchants
    - A4. None of the above.
  + 2. (M/R) What are some questions you need to ask yourself when interacting with a customer?
    - A1. TBD
    - A2. DeClient’s Nameection option
    - A3. TBD
    - A4. TBD
    - A5. All of the Above ( ← deClient’s Nameection option)
  + 3. (M/C) In the event you question the identity or intention of a customer, what should you do?
    - A1. TBD
    - A2. DeClient’s Nameection option
    - A3. TBD
    - A4. TBD
    - A5. All of the Above ( ← deClient’s Nameection option)
  + 4. (T/F) Funds can be sent to and individual found on the Office of Foreign Assets Control’s sanctions list.
    - True
    - **False** (correct)

## Identify regulations that govern anti-money-laundering programs

* + Question 2: TBD
    - True/False
    - Multiple Choice
    - Multiple Response
  + Question 3: TBD
    - True/False
    - Multiple Choice
    - Multiple Response
  + Question 4: TBD
    - True/False
    - Multiple Choice
    - Multiple Response
  + Question 5: TBD
    - True/False
    - Multiple Choice
    - Multiple Response
  + Question 6: TBD
    - True/False
    - Multiple Choice
    - Multiple Response

## Explain why it’s important to “Know Your Customer

* + Question 2: TBD
    - True/False
    - Multiple Choice
    - Multiple Response
  + Question 3: TBD
    - True/False
    - Multiple Choice
    - Multiple Response
  + Question 4: TBD
    - True/False
    - Multiple Choice
    - Multiple Response
  + Question 5: TBD
    - True/False
    - Multiple Choice
    - Multiple Response
  + Question 6: TBD
    - True/False
    - Multiple Choice
    - Multiple Response

## Report Unusual Activity

* + 1. (M/C) When you spot or suspect unusual activity, what’s the timeframe for reporting the activity to the Compliance Team?
    - A1: 5 days
    - A2: Immediately
    - A3: 24 hours
    - A4: 7 days
  + Question 2: TBD
    - True/False
    - Multiple Choice
    - Multiple Response
  + Question 3: TBD
    - True/False
    - Multiple Choice
    - Multiple Response
  + Question 4: TBD
    - True/False
    - Multiple Choice
    - Multiple Response
  + Question 5: TBD
    - True/False
    - Multiple Choice
    - Multiple Response
  + Question 6: TBD
    - True/False
    - Multiple Choice
  + Multiple Response

# Related Resources

## Course Resources

Risk Policy

**Maryise’s Notes to Maryise Only:**

Customer Success has effectively 3 departments that all make up the Team

\*Sales - Sales reps focus on new customer acquisition

\*Customer Success Managers - Onboarding, implementation, account expansions, and churn mitigation

\*Customer Support - 1800#, break/fix

I believe each of these are in a unique place to see/report ML.