

“Patriot Act Compliance Officer”

Sum2 is pleased to offer the definitive solution for broker dealers and fund managers to implement and administer an in-house Anti-Money Laundering (AML) program that complies with the provisions of the USA PATRIOT Act.

PACO is an interactive multimedia package of services that address the AML compliance requirements of Sections 352, 326 and 314 of the USA PATRIOT Act.

PACO's unique design integrates numerous compliance services onto a single platform for a fraction of the cost it would take to contract out for these services separately. PACO incorporates all required compliance applications in an easy to use integrated environment.

Customer Identification Program

Section 326 of the USA PATRIOT Act requires financial companies to adopt a Customer Identification Program (CIP). PACO provides a powerful rule based CIP application for all institutional and retail investor types. PACO enables the financial company to conduct and maintain a risk-based review of all investor and client types.

PACO integrates Penley's FAST WATCH data verification system. FAST WATCH verifies the identity information presented by applicants seeking to open an account, maintains records of the

information used to verify the person's identity, including name, address, and other identifying information; and determines whether the applicant appears on any lists of known or suspected terrorists or terrorist organizations provided to the financial institution by any government agency. PACO assures compliance with all Section 326 requirements.

SAR Filing and Reporting

If your firm suspects a potential money laundering incident, PACO provides a rules based application of government reporting guidelines and procedures and a full compliment of government agencies reporting forms for ease of use, quick access and expeditious filing with enforcement agencies.

AML Compliance Training

A provision of Section 352 of the USA PATRIOT Act stipulates that all financial companies must institute and provide an AML Training Program for all relevant personnel. PACO offers three AML Training modules that address:

- ***Administering an AML Program for Financial Companies***
- ***The USA PATRIOT Act and Financial Institutions***
- ***Money Laundering Trends and Practices***

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AML Compliance Program Audit

PACO provides an audit template to help you undertake a thorough review of your firm's existing AML Compliance Program. Focus areas include, Know Your Customer Procedures, SAR Filings, Record Retention, Training Program Review, and Review of Procedures with Service Providers. This review must be conducted and presented to Regulatory and enforcement agencies as proof of Section 352 independent audit review compliance requirement.

AML Compliance Manual

Section 352 of the USA PATRIOT Act requires financial companies to document and maintain AML administrative and operational policy manual. PACO offers the choice of three AML Compliance templates that address the operational and administrative requirements of the USA PATRIOT Act. Each template clearly outlines CIP Procedures, SAR Detection and Reporting, Training Guidelines, Responsibilities of the AML Compliance Officer and Documentation and Record Management Requirements. PACO also provides Sample AML Adoption Board Resolutions and offers suggested Guidelines for Agreements with Service Providers and Subscription Documents.

AML Resource

PACO is more than a compliance application. It is an indispensable tool and informational resource that will protect your business from the risk of money laundering and the irreparable harm that a money laundering incident can cause to your company's reputation.

Program Features

- **Supports e-mail**
- **Browser Based Applications**
- **AML Glossary, Acronyms and Definitions**
- **Features Music and Pictorial Graphics**
- **Runs on MS Windows Environment**
- **Access to 15 AML Websites**
- **Section 326 Compliance Icon**
- **OFAC Notification Bulletins**
- **Sum2 Customer Service Hotlink**

About Sum2, LLC

Sum2's objective is to assist businesses and industries to implement corporate Sound Practices that add exponential value for shareholders, employees, and clients and to the communities in which they operate and serve.

Sum2 is dedicated to corporate responsibility, ethical business practices, customer service excellence and delivering to our clients a unique and essential value proposition. We uphold these values in all our work and continually strive to deliver on the commitments that we make to our clients.

To Order PACO, contact Sum2 at
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