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Interpretive Notices

END • NFA COMPLIANCE RULE 2-B: FCM AND INT-MONEY LAUNDERING PROGRAM

Revised November 16, 2006; January 15, 2008; March 26, 2008; and January 3, 2010

INTERPRETIVE NOTICE

The International Money Laundering (Statement and Anti-Terrorist Financing Act of 2001 ("Title III"),¹ which was signed into law on October 26, 2001, imposed significant new anti-money laundering requirements on all "financial institutions," as are defined under the Bank Secrecy Act (BSA).² Including FCMs,³ in particular, Section 302 of Title III and NFA Compliance Rule 2-B(a) requires all financial institutions to establish anti-money laundering (AML) programs which, at a minimum, must include internal policies, procedures and controls, a designated compliance officer to coordinate day-to-day operations of the program, an ongoing training program for employees, and an independent audit function to test the program.

NFA's Board of Directors adopted NFA Compliance Rule 2-B(a) to impose these requirements on NFA Member FCMs and IBs.⁴ NFA recognizes, of course, that the exact form of program adopted by a Member will vary based on a Member's type of business, the size and complexity of its operations, the breadth and scope of its customer base, the number of firm employees, its risks and vulnerabilities to money laundering and the firm's resources. Nevertheless, the Board believes that certain minimum standards must be a part of any AML program. The purpose of this interpretive notice is to highlight those minimum standards and provide Members with additional guidance on satisfying the requirements of Compliance Rule 2-B(a). Members must be aware, however, that the laws in this area are changing rapidly and that they need to conduct a regular review of their anti-money laundering program to ensure that the program is in compliance with any subsequent changes to the federal law or NFA Rules.

Many of the procedures discussed in this Notice are practices that financials already employ in their businesses. In particular, banks or bank holding company owned FCMs or IBs are already required to comply with certain components of the anti-money laundering programs of the BSA. Firms should also have procedures in place related to deposits of cash or cash like instruments and procedures to obtain identifying information on customers. FCMs and IBs should use their existing programs and procedures as the building blocks for their anti-money laundering compliance programs. Moreover, FCMs and IBs that are registered securities dealers under the federal securities laws are subject to similar anti-money laundering requirements. In most cases, programs that comply with requirements applicable to the securities industry will comply with the requirements of this Notice.

Money laundering occurs when funds from an unlawful activity are moved through the financial system in such a way as to make it appear that the funds have come from legitimate sources. Money laundering usually follows three stages. First, cash or cash equivalents are placed into the financial system. Second, the money is transferred or moved to other accounts (e.g., futures accounts) through a series of financial transactions designed to obscure the origin of the money (e.g., ensuring trades with little or no financial risk or transferring account balances to other accounts). Finally, the funds are reintroduced into the economy so that the funds appear to have come from legitimate sources (e.g., closing a futures account and transferring the funds to a bank account). Trading accounts that are carried by FCMs are one vehicle that can be used to launder BSA funds. In particular, a trading account could be used to execute financial transactions that help obscure the origin of the funds. FCMs and IBs need to be aware of potential money laundering abuses that could occur in a customer account and implement a compliance program to, among other things, detect, defend and report potentially suspicious activity.

DEVELOPING POLICIES, PROCEDURES AND INTERNAL CONTROLS

The starting point for an FCM and IB is to adopt a policy statement that clearly outlines the firm's policy against money laundering and commitments to follow all applicable laws and regulations to ensure that its business is not used to facilitate money laundering. The policy statement should also make clear that all employees of the firm have a responsibility to follow the firm's anti-money laundering procedures and controls, and to abide by all applicable laws and regulations involving anti-money laundering programs. The policy statement also should discuss the consequences of not following these procedures. The firm's procedures and controls should include appropriate controls to limit a reasonable belief that they know the true identity of each customer, recognize suspicious customers and transactions, and require personnel report suspicious or unusual activity to appropriate supervisory personnel, including senior management, and to FinCEN when appropriate. The firm's procedures and controls should also ensure that the firm maintains an adequate built-in or added law enforcement agencies in any investigation. The key components of these policies, procedures and controls are discussed below.

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