



Compliance eNewsletter

September 13, 2019 Vol. 13, Issue 35

InfoSight News

ANNUAL SURVEY – Final Reminder!

A big THANK YOU to everyone who has already taken the survey! For those who haven't, we would love your input! The thoughts and opinions you provide in our annual survey are used to guide our product development. We want to hear what you think are the critical elements for InfoSight and CU PolicyPro! [Please fill out the survey](#) and let us know what you like, what could be improved, and what you hope to see from our products in the future.

Should any questions arise as you're taking the survey and you'd like more assistance, please contact us at: info@leagueinfosight.com.

Compliance News

Nebraska bank pays \$37K flood penalty

The Federal Reserve Board has issued an Order of Assessment of a [civil money penalty of \\$37,000](#) on First State Bank Nebraska for its pattern or practice of unspecified violations of Federal Reserve Regulation H, 12 CFR 208.25, which implements the requirements of the National Flood Insurance Act.

Source: FRB

FinCEN Expects Credit Unions to up Their Game to Combat Cyber Crimes

FinCEN is cautioning financial institutions to report all cyber-crime indicators, as described in the agency's 2016 [FAQs](#), and expect your examiners to ask about your efforts to combat this growing criminal trend. To assist in this reporting, FinCEN updated the SAR form to have fields allowing you to report cyber-indicators ranging from source and destination information, file information, subject user names, system modifications,

and account information. FinCEN receives about 80,000 cyber-related SAR filings per year.

According to the agency, to effectively combat cyber-crimes will require a strong culture of compliance within your credit union. FinCEN expects all financial institutions to share information across all departments, for example, between IT and compliance. FinCEN notes that this type of enterprise-wide communication is not “just a best practice, but a requirement under the AML program rule.”

FinCEN reports that the agency is working hard to combat the rise of large-scale cyber theft, and in particular, business email compromise fraud, or BEC, in which criminals misappropriate funds by deceiving financial institutions into conducting wire transfers that are diverted into accounts controlled by cyber criminals. According to the agency, these schemes are among the growing trend of cyber-enabled crime and is estimated to have resulted in losses of more than \$12.5 billion since 2013.

Additionally, FinCEN, in coordination with the FBI, created and implemented the Rapid Response Program. Under this program, when United States law enforcement receives a BEC complaint from either a victim or an interested third party the relevant information is forwarded to FinCEN, where they move quickly to track and recover the funds on behalf of the financial institution and its members.

Source: CUNA Compliance Blog

CFPB files complaint against CFLA, Lehman, and Carrigan

The Consumer Financial Protection Bureau [announced on Friday](#) it has filed a [complaint](#) in federal court in the Central District of California against Certified Forensic Loan Auditors, LLC (CFLA), Andrew Lehman, and Michael Carrigan. The complaint alleges that CFLA and Lehman have engaged in deceptive and abusive acts and practices and have charged unlawful advance fees in connection with the marketing and sale of financial advisory and mortgage assistance relief services to consumers.

CFLA is a foreclosure relief services company incorporated in California and headquartered in Houston, Texas. Lehman is CFLA’s president and CEO. The Bureau’s complaint alleges that Carrigan, who was the company’s sole auditor, provided substantial assistance to CFLA and Lehman. Concurrent with the complaint, the Bureau and Carrigan filed a [proposed stipulated final judgment and order](#) to resolve the substantial assistance claims against Carrigan.

Source: CFPB

Other Articles of Interest:

- [ABA Revealed as Owner of Secretive Anti-Credit Union Website](#)

Advocacy Highlight

Hike the Hill

Hike the Hill is a grassroots program sponsored by CUNA and the state leagues to provide credit unions with the opportunity to visit Washington to educate decision makers on credit union issues. When credit unions participate in Hike the Hill, they demonstrate that credit union support has a real face, real concerns, and real stories of how credit unions affect the lives of working Americans. If you are interested in participating in Hike the Hill, **please contact your state league for more information.**

CUNA's Advocacy Resources

- [CUNA's 2019 Advocacy Agenda](#)
 - [Input to lawmakers and regulators](#)
 - [CUNA Advocacy page](#)
 - [CUNA's Removing Barriers blog](#)
 - [CUNA's Priorities](#)
 - [Actions You Can Take](#)
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Compliance Calendar

- September 20th, 2019: Providing Faster Funds Availability (Effective Date)
- October 14th, 2019: Columbus Day - Federal Holiday
- October 22nd, 2019: Appraisals (NCUA)
- October 22nd, 2019: Fidelity Bonds (NCUA)
- November 11th, 2019: Veterans Day - Federal Holiday

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