

## **WHAT WE DO | Financial Integrity and Compliance Services**

IGI provides investigative support and best practices advice to support clients' compliance with existing and emerging governance, transparency, anti-corruption and reporting and disclosure regulations including Sarbanes-Oxley, the Bank Secrecy Act, the Foreign Corrupt Practices Act, the Anti-Kickback Act, anti-money laundering laws and provisions of the USA Patriot Act.

Clients often retain IGI in compliance cases to work on a preemptive or prescriptive basis to help prevent violations before they occur, including thorough due diligence, review of internal controls, independent monitorship and the design of fraud-reporting and ethics programs. In other cases, clients call upon IGI to perform internal investigations after violations are suspected or alleged, to interface with law enforcement and regulatory authorities and to propose and help implement guidelines to prevent the recurrence of wrongdoing.

### **Case Studies**

- A U.S. financial services company with global operations retained IGI to provide investigative due diligence and consulting on internal controls in order to conform to Bank Secrecy Act and USA Patriot Act compliance requirements. IGI performed extended due diligence on a large book of foreign correspondent banking relationships the client was acquiring from another bank; our due diligence examined 220 banks in 35 foreign countries. Concurrently, we created on behalf of the client a proprietary suspicious financial transaction monitoring system to identify and flag potential money-laundering, tax evasion and terrorism financing-related transactions, which resulted in the discovery of billions of dollars in suspect transactions. On behalf of the client, IGI drafted Suspicious Activity Reports (SARs) and facilitated reporting to the relevant U.S. government agencies.
- A U.S. bank with embassy and foreign government banking business was embroiled in a scandal related to money laundering for heads of state and officials of foreign governments. At the time IGI was brought into the case, U.S. government agencies and the bank's auditors had already conducted investigations. IGI was retained by the bank's outside counsel to independently review the scope of the findings of the previous probes and to identify and investigate additional concerns.