

## CHARLENE A. CIESLIK, CAMS

An AML and Sanctions subject matter executive with a Masters in Criminology, CAMS designation, and nearly 20 years of relevant regulatory, advisory and financial institution experience in both AML and non-AML compliance. Has a track record of building and presenting regulatory and remediation programs to various governing bodies, both domestically and abroad. Exemplifies a strong respect for compliance requirements, cross-departmental cooperation, policy and procedure development and risk-oriented remediation. Business areas of coverage include Domestic and Global Banking, Correspondent Banking, Institutional Lending, Capital Markets, as well as Credit Union and Non-Bank Financial Institutions, with a current focus on cryptocurrency. Process-oriented individual who demonstrates professionalism and an ability to manage and execute multiple projects in collaboration across regions. Demonstrated design ability and application of technological solutions to compliance requirements.

### CURRENT PROFESSIONAL EXPERIENCE

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#### **Complifact AML Inc.**

**July 2020 - Current**

*Toronto, Ontario*

- Develops and implements policies, procedures, training on AML, KYC and Sanctions, risk assessment requirements for companies in the financial services and digital asset space in Canada, the US, EU and Carribean.
- Recent client includes a global cryptocurrency startup located in Canada, Antigua, Israel, Cyprus and Estonia operating an MSB-registered and Securities-registered platform.
- Current client includes a bitATM company operating in Canada and the USA.

#### **Coinsquare Ltd and subsidiaries (Coinsquare LLC & JustCash [CNI])**

**March 2018 - July 2020**

*Toronto, Ontario*

##### **Chief Compliance Officer, Chief Anti Money Laundering Officer, and Privacy Officer (CCO/CAMLO/CPO)**

- Developed and implemented policies, procedures and desktop guides, completion of AML, KYC and Sanctions risk assessments, develop and implement local training programs company-wide, risk and control mapping, and monitoring output results for KYC/on-boarding, risk assessment, sanction and politically exposed persons (PEP) screening and filtering for Coinsquare group of companies – Canada, US, EU.
- Responsible for the development, oversight, supervision and implementation of the first digital currency anti-money laundering (AML) and Sanctions (ATF) Program, resulting in the approval of the first legitimate 'big-4' bank account approval for a digital asset trading platform. Achieved no-findings external firm audit of the AML/ATF program in support of Coinsquare's banking application.
- Management of service provider relationships as it relates to KYC services providers (Equifax, Trulioo), screening software (Refinitiv/World Check), and transaction monitoring software (Chainalysis and Caseware), and in support of vendor oversight and risk management requirements.
- Daily oversight responsibility for non-AML regulatory requirements around Privacy, Canada Anti-Spam Legislation (CASL), and Complaints Handling.
- Generate and present weekly status and monthly dashboard updates, performance metrics and risk issue management and resolution to the Executive in support of the AML, Sanctions and Compliance program. Reporting responsibility to CEO; supervision of a team of 3 staff.
- Participates in local and global efforts to regulate cryptocurrency, including dealing with regulators and government bodies such as FINTRAC, AMF, OSC, IIROC, SEC, FINRA, UN FATF and Canada's Department of Finance.

#### **Rogers Bank**

**September 2017 - February 2018**

*Toronto, Ontario*

##### **Chief Compliance Officer, Chief Anti Money Laundering Officer, and Privacy Officer (CCO/CAMLO/CPO)**

- Responsible for the development, oversight, supervision and implementation of the Bank-wide anti-money laundering (AML) and Sanctions (ATF) Program and overall bank Compliance regime.
- Responsible to create local policies, procedures and desktop guides, completion of AML and Sanctions risk assessments, develop and implement local training programs for the Bank, and call centers, risk and control mapping, execute

regulatory compliance management (E-13) mapping, and monitoring output results for sanction and politically exposed persons (PEP) screening and filtering, including responding to and participating in internal and external audit requests.

- AML lead on KYC software installation (Equifax), including tuning matching scenarios, and alignment with Canadian regulation.
- Daily oversight responsibility for non-AML regulatory requirements around Privacy, Canada Anti-Spam Legislation (CASL), and Bank Complaints Handling (FCAC).
- Generate and present weekly status updates, performance metrics and risk issue management and resolution to the Executive in support of the AML, Sanctions and Compliance program. Reporting responsibility to CCO; supervision of a single staff member.

### **China Construction Bank, Toronto Branch**

**June 2015 - August 2017**

*Toronto, Ontario*

#### **Chief Compliance Officer, Chief Anti Money Laundering Officer, and Privacy Officer (CCO/CAMLO/CPO)**

- Responsible for the development, oversight, supervision and implementation of the Branch-wide anti-money laundering (AML) and Sanctions (ATF) Program and overall bank Compliance regime; and aide the new-to-Canada foreign bank (Schedule III) operation through the enhanced licensing application process.
- Responsible to create local policies, procedures and desktop guides, completion of AML and Sanctions risk assessments, deliver local training programs, risk and control mapping, execute regulatory compliance management (E-13) mapping, and monitoring output results for sanction and politically exposed persons (PEP) screening and filtering, including responding to and participating in internal and external audit requests.
- Project managed and customized the design of an off-the-shelf AML/ATF software to automate AML/ATF KYC, sanctions, and behaviour monitoring software.
- Supervision of 2 staff, and a rotation of interns for the execution of day-to-day AML and Sanctions responsibilities, including completion of new account opening, periodic and high risk client reviews and enhanced due diligence, payments filtering, sanction and politically exposed persons screening, and transaction monitoring for suspicious transactions.
- Management of service provider relationships as it relates to the customized AML/ATF software, and in support of vendor oversight and risk management requirements.
- Complete review and decisioning of escalated suspicious transactions from outsourced drafting and submission to STR Committee with recommendations for regulatory filing. Oversight and control management of Electronic Funds Transfer (EFT) reporting, and monthly OSFI terrorist property reporting.
- Daily oversight responsibility for non-AML regulatory requirements around Privacy, Canada Anti-Spam Legislation (CASL), Foreign Account Tax Compliance Act (FATCA), and Branch Complaints Handling (FCAC).
- Creation of the Anti-Bribery and Corruption (ABC) regime, including local training program for ABC, and oversight testing against requirements for Senior Management reporting.
- Generate and present monthly status updates, performance metrics and risk issue management and resolution to the Domestic Risk Management Committee (RMC) and local Management Committee (MC) in support of the AML, Sanctions and Compliance program. Reporting responsibility to CCB Global Head Office (Shanghai), and cooperate with IT support in Hong Kong, as well as global overseas branches of CCB (London, Chile, Luxembourg, Russia and NYC).

### **Royal Bank of Scotland plc, Canada Branch**

**April 2014 - June 2015**

*Toronto, Ontario*

#### **Chief Anti Money Laundering Officer, Country Anti-Bribery and Corruption Officer (CAMLO/CABCO)**

- Responsible for the oversight, supervision and implementation of the Branch-wide anti-money laundering (AML) and Sanctions (ATF) Program. Includes the ownership and responsibility to maintain local policies, procedures and desktop guides, completion of AML and Sanctions risk assessments, delivery of local and global service provider training programs, completing risk and control mapping, regulatory compliance management (E-13) mapping, gap assessment quarterly program testing and remediation, and monitoring output results for sanction and politically exposed persons (PEP) screening and filtering, including responding to and participating in internal and external audit requests.
- Supervision of 5 outsourced service providers in 3 countries, comprised of nearly 75 staff, for the execution of day-to-day AML and Sanctions responsibilities, including completion of new account opening, periodic and high risk client reviews and enhanced due diligence, payments filtering, sanction and politically exposed persons screening, and transaction monitoring for suspicious transactions. Includes monitoring over 68 key performance indicators (KPIs) of various frequencies, for the timely and quality delivery of outsourced functions in line with regulator expectations.

- Complete review and decisioning of escalated suspicious transactions from outsourced drafting and submission to STR Committee with recommendations for regulatory filing. Oversight and control management of Electronic Funds Transfer (EFT) reporting, and monthly OSFI and IIROC terrorist property reporting.
- Successful completion of Branch project to halt manual processes for ACH and correspondent banking transactions and implement system-based monitoring. Successful negotiation with Americas service providers in respect of transactions with Cuban-owned entities in accordance with Canadian Foreign Extraterritorial Measures Act (FEMA).
- Daily responsibility for oversight and approvals of gifts, entertainment and charities payments in respect of Anti-Bribery and Corruption (ABC) requirements. Delivery of local training program for ABC, and quarterly oversight testing against requirements for Global reporting.
- Synthesize and present monthly status updates, performance metrics and risk issue management and resolution to the Americas Anti-Money Laundering Executive Steering Group (AML ESG) and local Group Compliance Committee (GCC) in support of the AML, Sanctions and Anti-Bribery and Corruption Programs.
- In support of Branch wind-down (end of 2015), assumed responsibility for branch-wide Operational Risk Management (ORM) program, and non-AML compliance monitoring and reporting requirements at the executive committees. Responsible for status reporting to OSFI on AML and non-AML compliance wind-down processes.

**Ernst & Young LLP**

**September 2012 to October 2013**

*Toronto, Ontario*

**Senior Manager, Financial Advisory Services, Risk Management**

- Oversaw an anti-money laundering (AML) alert backlog remediation project at Schedule II Bank, including training project staff on case investigation techniques, and overall supervision of 15 EY staff for Quality Assurance and resolution. Provided daily and weekly Client status updates, metrics and problem resolution. Completed post-remediation suspicious transaction report (STR) drafting and submission to STR Committee with recommendations for regulatory filing.
- Provided Project Management Office (PMO) oversight and subject matter expertise (SME) assistance during OSFI-mandated AML remediation over a 12-month timeframe for a Schedule II Foreign Bank. At the request of OSFI, provided revised project plans with assigned tasks, milestones for implementation and weekly status meetings to identify potential project shortfalls and staffing concerns. Provided SME assistance to the clients' AML remediation team of 10 internal staff and coordinated with the Chief Anti-Money Laundering Officer (CAMLO), Board of Directors and CEO to inform on project status and regulator stipulations throughout. Liaised with OSFI on a daily basis to provide updates on project completion concerns or challenges. Reached successful remediation with OSFI declining to "stage down" in October 2013.
- Provided recommendations to a Schedule I Bank on appropriateness of Key Performance Indicators (KPI's) and Key Results Indicators (KRI's) for the AML Regime. For the same entity, produced an industry-wide role review presentation for the appropriate placement of the AML functions within the Compliance mandate.
- Completed 3 OSFI-mandated Compliance Framework Review projects for 2 Canadian Insurance Companies and a Schedule II Bank, with a focus on AML compliance, and overall Compliance Governance. Completed Legislative Compliance Management (LCM) reviews for 2 Schedule II Banks, reviewing completeness of requirements, appropriate mapping to business units and ownership, policies and procedures review and mapping, and remediation plans identified gaps.

**PAST PROFESSIONAL EXPERIENCE**

**Verafin Inc.**

*Toronto, Ontario & St. John's, Newfoundland*

**Client Relationship Manager & Services**

**May 2011 to August 2012**

**Williams McGuire AML Inc. & vCAMLO Solutions**

*Markham, Ontario*

**Senior Manager & Director of vCAMLO**

**April 2009 to April 2011**

**Royal Bank of Canada**

*Toronto, Ontario*

**Manager, Enterprise Anti-Money Laundering Compliance**

**August 2007 to April 2009**

**Deloitte & Touche LLP & KPMG LLP**

*Toronto, Ontario*

**December 2003 to August 2007**

Senior, Forensic & Dispute, Financial Advisory / Senior, Transaction Services, Regulatory Risk Advisory

**Financial Transactions Reports Analysis Centre - FINTRAC**

**May 2002 to December 2003**

Ottawa, Ontario

Tactical Analyst (Money Laundering), Financial Intelligence Analyst Sector

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**EDUCATION**

<b>Association of Certified Anti-Money Laundering</b> Certified Anti-Money Laundering Specialist	2004-Present
<b>University of Toronto, Toronto, Ontario</b> Master of Arts Degree, School of Criminology	1997-1998
<b>Wilfrid Laurier University, Waterloo, Ontario</b> Honours Bachelor of Arts Degree, Sociology (minor Economics)	1993-1997

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**OTHER RELEVANT EXPERIENCE**

**SPEAKING ENGAGEMENTS**

- Key engagements include: ACAMS, American Institute, Blockgeeks, Blockchain Conference Toronto, Blockchain Futurist, Canadian Institute, Canadian MSB Association, IdeaCity, NICE Actimize FINTECH Forum, Thomson Reuters, and Transparency International.

**PROFESSIONAL MEMBERSHIPS & COMMITTEES**

- Representative, United Nations FATF – Private Sector Consultative Forum, Vienna, May 2019
- Advisor, Transparency International – Beneficial Ownership Working Group, 2019-present
- Advisor, FINTRAC Virtual Currency Reporting Working Group, 2018-present
- Advisor, National Crowdfunding and Fintech Association of Canada (NFCA), 2018-present
- Small Bank Working Group (and Committees), Canadian Bankers Association (CBA), 2014-2017
- Small Bank Forum, Norton Rose Fulbright Law Firm, 2016
- RBS Focused Women’s Network (FWN) - Canada Branch Committee Member, 2015
- Verafin Representative - Risk Management Steering Committee, Atlantic Credit Unions, 2011 - 2012
- vCAMLO Representative - Risk Management Steering Committee, Atlantic Credit Unions, 2009 - 2011
- Canadian Chapter Founding Member - Association of Certified Anti-Money Laundering Specialists (ACAMS), 2002

**ACADEMIC EXPERIENCE**

- Program Advisory Council, The Chang School of Continuing Education, Ryerson University, 2019
- Faculty, Osgoode Certificate in Blockchains, Smart Contracts & the Law, 2018-2019
- Lecturer, Global Leadership Development Program, University of Toronto, 2017-2019
- Guest Speaker and Mentor, Masters in Forensic Accounting/Diploma in Forensic Accounting, University of Toronto, 2017-2019
- Member, Seneca College of Applied Arts and Technology, Financial Services Compliance Administration (FCA) Program Advisory Committee, 2006 to 2015
- Guest Speaker, University of Toronto, Graduate Centre of Criminology, 2011 – 2012
- Professor, Anti-Money Laundering Administration, Seneca College of Applied Arts and Technology, Financial Services Compliance Administration (FCA), 2006 - 2010