



BSA/Anti-Money Laundering Software Solution

GlobalVision Systems, Inc.

ABA Endorsed Solution Due Diligence Report



See the Seal. Trust the Solution.

Introduction

The American Bankers Association is committed to helping banks run strong and efficient organizations. This due diligence report provides an overview of the research we conducted, which led to the ABA endorsement of the AML and Counter-Terrorist Financing (CTF) transaction monitoring system, Patriot Officer®.

ABA's mission is to meet bankers' needs through product evaluations and vendor due diligence. Our process focuses on researching product solutions that have been identified by ABA member banks. We begin by soliciting feedback from bankers through committees, focus groups, surveys and our Banker Advisory Council. All of this helps us identify and prioritize our research in areas that provide significant benefits to our bankers. We then work closely with third-party industry specialists and ABA staff experts, conducting extensive research to determine the solutions that will earn the exclusive ABA endorsement.

Our research focuses on the following areas:

- Financial Analysis
- Management Strength and Ownership
- Long-Term Stability
- Solution Functionality
- Partnerships
- Pricing
- Liability
- Information Security
- Disaster Recovery
- Regulatory Requirements
- Compliance Functions
- Legal Opinions
- Customer Service
- Banker References
- Competitive Landscape

This report is designed as an industry analysis tool providing you with valuable product and third-party provider information.

We hope you find it helpful as you conduct your own due diligence on BSA/Anti-Money Laundering software solutions.

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Executive Summary

GlobalVision Systems, Inc. (“GlobalVision”) was established in 1996 to provide intelligent business management solutions to the financial services industry—banks, credit unions, insurance companies and securities brokers.

GlobalVision believes that long-term business success must be achieved through an approach founded on teamwork, dependability and integrity. While GlobalVision is a privately held company, it has actively sought leaders in the high-tech industry to provide guidance and leadership to the company. Through the outstanding management provided by visionary leaders, GlobalVision has quickly expanded its business through organic growth without the help of venture capital and does not have any long-term liabilities.

GlobalVision believes in winning market share through advanced technologies. To maintain its industry leading position, GlobalVision continues to invest heavily in research and development. One of GlobalVision’s strengths is a strong technical team, which consists of hundreds of years of combined banking knowledge and technical experience. As a result of its relentless pursuit of innovation, GlobalVision’s leading-edge product, Patriot Officer®, has incorporated over ten U.S. patents and a number of pending patents.

Patriot Officer® analyzes a bank’s transactional data and customer information using risk-based algorithms to analyze and investigate suspicious activities effectively and efficiently.

With a fully integrated, dynamic and adaptive Artificial Intelligence (AI) engine, Patriot Officer® detects suspicious activities and empowers financial institutions of all sizes to effectively comply with the risk-based policies, procedures and processes required by the Bank Secrecy Act/Anti-Money Laundering (BSA/AML) Examination Manual published by the Federal Financial Institutions Examination Council (FFIEC). It offers financial institutions risk-based intelligence and algorithms with a high degree of precision in data analysis, which leads to more accurate identification and alerts of suspicious activity. Patriot Officer® helps financial institutions comply with the Bank Secrecy Act (BSA), the USA Patriot Act, the Fair and Accurate Credit Transactions Act (FACTA), the Unlawful Internet Gambling Enforcement Act (UIGEA), and the requirements set by the Office of Foreign Assets Control (OFAC), the Financial Crimes Enforcement Network (FinCEN) and other government agencies and organizations.

Empowered by Artificial Intelligence (AI), among its many features, Patriot Officer® provides the following:

Functional Highlights

- Offers different workflows for different compliance processes to achieve high effectiveness and efficiency.
- Utilizes role-based security to enforce accountability and strengthen credibility.

- Deploys the most scalable system architecture to aggregate Hundreds of Millions of cash transactions per day, producing Currency Transaction Reports (CTR) for each large bank.
- Incorporates Automatic Link Analysis to monitor a group of customers and produce alerts based on their combined activities.
- Discovers hidden information about customers, non-customers, and beneficial owners via “one click.”
- Receives early warnings about customers, non-customers, and beneficial owners so that the bank can take actions to prevent losses and damages in time.
- Blocks criminals from opening accounts with the financial institution through the Global Shield function.
- Incorporates a Branch Automation capability to facilitate enterprise-wide cooperation.
- Enforces user accountability and system accountability through comprehensive audit trails.
- Complies with the highest security standards through advanced data encryption, tokenization, and crypto technologies.
- Performs self-examination daily to identify any potential issue, ensuring data integrity and system integrity.
- Empowers an enterprise to monitor all types of transactions of all products of all customers from all operations all the time.

Artificial Intelligence (AI)

- Applies Artificial Intelligence (AI) in data mining to produce detection algorithms, identify suspicious activities for filing Suspicious Activity Reports (SAR) and produce a comprehensive Multidimensional Risk Model.
- Applies Artificial Intelligence (AI) in alphanumeric structure analysis to accurately identify matches with regulatory lists, including OFAC list, 314(a) list, etc.

Machine Learning

- Integrates Machine Learning (ML) to further reduce false positives and false negatives in the detection of suspicious, fraudulent, and criminal activities; to dynamically produce an accurate Risk Score for each customer and to drastically reduce false positives and false negatives in the scan against regulatory lists, including OFAC list, 314(a) list, etc.

Risk Model

- Performs Multidimensional Peer Group Analysis to manage higher-risk customers based on the Multidimensional Risk Model.
- Empowers users to easily configure the Risk Model and the Detection Algorithms to meet their specific needs.
- Provides transparency in Risk Model, Detection Algorithms, Workflows Setup, Security Provisions, and System Configurations to meet the most stringent requirements during audits and regulatory examinations.
- Offers a user-configurable Interactive Customer Identification Program (ACIP) to identify risks and protect the financial institution.

Regulatory Features

- Provides a high degree of automation to streamline AML, CTF, Anti-Fraud, and Anti-Financial Crimes operations.
- Automates SAR and CTR Filing.
- Uses a Centralize Case Management Platform to provide a holistic view of all suspicious, fraudulent, or criminal activities for each suspect.
- Identifies higher-risk customers through their Risk Scores and automatically monitors them more closely exactly as mandated by the BSA/AML Examination Manual.
- Interfaces with government networks for electronic Currency Transaction Reports (CTR), Suspicious Activity Reports (SAR), and Designation of Exempt Person (DOEP) filings.

Systems Architecture

- Employs a browser-based architecture, eliminating IT maintenance and support of the client application software.
- Interfaces with all leading core data processing systems, peripheral systems, and any systems developed in-house.
- Offers fast implementation and rapid software updates to meet regulatory changes and/or technology needs.
- Integrates data from multiple data sources to automatically establish a Corporate Compliance Data Warehouse.
- Supports a holding company architecture to manage multiple banks, trust companies, insurance companies, brokerage firms, etc. on the same platform.
- Offers fault-tolerance architecture to ensure high availability for thousands of users in a large financial institution.

A comprehensive review of GlobalVision and its ability to provide flexibility in complicated and unique environments while enforcing risk-based processes effectively, led ABA to endorse the AML and CTF transaction monitoring system, Patriot Officer®.

Solution

Patriot Officer uses AI technology to automate the BSA/ AML/ CFT/ OFAC/ FACTA/ UIGEA process of monitoring, detecting, investigating, regulatory report filing, and recordkeeping. The technology that drives Patriot Officer adaptively integrates intelligence, scenarios, and risks from thousands of risk dimensions to monitor each client and each group of related clients, and detects suspicious activities of all transactions across all products at all times with a high degree of accuracy and resolution. In accordance with the “risk-based” guidelines issued by the Federal Financial Institutions Examination Council (FFIEC), Patriot Officer uses AI to automate the compliance process for financial institutions. The entire client base of a financial institution is sliced and diced by Patriot Officer with thousands of risk dimensions and each risk dimension may potentially impose a unique risk to the financial institution. Machine learning is applied to further improve the accuracy of the suspicious activities detection algorithms. By integrating the “risk policy” of the financial institution with these thousands of risk dimensions, Patriot Officer automates the “procedure” of risk management across the financial institution’s client base. With its dynamically-adjusted, risk-weighted algorithms and role-based workflow, Patriot Officer enforces the “process” of monitoring, detecting and reporting suspicious activities among all transactions of all products in a financial institution.

Because each client is monitored from thousands of risk dimensions, Patriot Officer detects suspicious activities with a much higher resolution and more accurate results than traditional methods. More importantly, Patriot Officer integrates the “risk-based policy, procedure, and process” into one effective and efficient workflow, enforces the credibility and accountability of the compliance department, and thus, is intrinsically compliant with the guidelines issued by the FFIEC. As a result of implementing Patriot Officer, a financial institution may benefit from a decrease in overhead and human error and an increase in productivity and profitability, and enhance competitiveness of the financial institution.

A comprehensive and user-configurable workflow with advanced security control boosts overall effectiveness and efficiency of the compliance department and ensures credibility and accountability of the BSA/ AML/ CTF/ FACTA/ UIGEA/ EARA/ FATCA compliance process. Suspicious Activities Reports (“SAR”), Currency Transaction Reports (“CTR”) and Designation of Exempt Person (“DOEP”) can be transmitted directly to FinCEN through FinCEN’s electronic filing system. In addition to the BSA/AML monitoring, Patriot Officer assists with the bank’s Customer Identification Program (“CIP”) and screens customers, non-customers and beneficial owners against the regulatory lists in compliance with the requirements from the Office of Foreign Assets Control (“OFAC”) and the USA PATRIOT Act (e.g., Section 314(a)). For Customer Due Diligence (“CDD”) and Enhanced Due Diligence (“EDD”) purposes, Patriot Officer also screens customers and Beneficial Owners against

Patriot Officer provides a high degree of automation to **streamline the compliance process** through an effective and efficient workflow.

other reference data sources, including the Politically Exposed Persons, Denied Persons, etc. and automatically closely monitors higher-risk clients in compliance with the BSA/AML Examination Manual. In addition, Enquirer Officer empowers financial institutions to discover hidden information about the customers and the beneficial owners in the CIP, CDD, and EDD process.

By conducting Risk Scoring at account opening and more frequently throughout the term of a customer's relationship with the financial institution, Patriot Officer can automatically calculate a risk score for each customer based on millions of combinations of risk factors, including products, services, customers, entities, transactions, and geographic locations, etc. as mandated by the BSA/AML Examination Manual. Once a risk score of a customer is obtained through the Risk Scoring process, a financial institution can conduct Enhanced Due Diligence (EDD) on the customer if the risk score is higher than a certain value determined by the policy of the financial institution.

Additionally, Patriot Officer can use the risk score of each customer to select a set of algorithms to monitor the customer. As a result, higher-risk customers will be monitored more closely than customers with moderate risk and customers with moderate risk will be monitored more closely than customers with lower risk. Without having to memorize and analyze millions of combinations of risk factors and their respective risk magnitudes, a financial institution can confidently demonstrate that they have performed their BSA/AML monitoring duties using the most advanced and scientific approach that fully complies with the BSA/AML Examination Manual.

Patriot Officer provides a Centralized Case Management Platform, which effectively consolidates and streamlines Anti-Money Laundering and Fraud Prevention processes with maximum efficiency while maintaining a holistic, accurate view of each customer at all times. As a result, a financial institution can efficiently comply with regulatory requirements, eliminate risks, avoid losses, boost productivity, minimize resources in managing transactional risks, reduce costs associated with hardware, database and software, lower IT maintenance workload and increase the overall profitability.

Technology

The best approach to comply with the BSA/AML Examination Manual is to conduct Risk Scoring at account opening just as Patriot Officer does for financial institutions. Once a risk score of a customer is obtained through the Risk Scoring process during Customer Due Diligence (CDD), a financial institution will conduct Enhanced Due Diligence (EDD) on the customer if the risk score is higher than a certain value determined by the policy of the financial institution. Enquirer Officer can be used to conduct EDD on customers,

“Every BSA Officer appreciates a tool that is effective, accurate, and thorough while not wasting valuable time looking at ‘false positives.’ Patriot Officer is just the ticket to help keep the BSA/AML program on track.”

— Thomas McArdle,
Former Security Officer,
National Bank of California

non-customers, and beneficial owners effectively and efficiently. Furthermore, the Risk Scoring process of the customer will be conducted periodically throughout the term of the customer's relationship with the financial institution. If a lower-risk customer changes its behavior and the risk score of the customer has increased substantially, this customer will be automatically identified as a higher-risk customer through the periodic Risk Scoring process.

Furthermore, Patriot Officer uses the risk score of each customer to select a set of algorithms to monitor the customer. Higher-risk customers will be automatically monitored more closely than customers with moderate risk; and customers with moderate risk will be automatically monitored more closely than customers with lower risk. Additionally, by comparing the total risk scores among a particular type of higher-risk customers, a truly suspicious higher-risk customer can be easily identified by Patriot Officer. These advanced "Risk-Based" technologies used by Patriot Officer are the true next-generation technologies that empower a financial institution to fully comply with the FFIEC's BSA/AML Examination Manual.

The Patriot Officer system uses the most advanced and flexible 3-tiered architecture based on Microsoft standards. These three tiers are (1) Client Computer, (2) Web Server, and (3) Database Server. This architecture is highly scalable for financial institutions of all sizes without any limitation. This technology eliminates the need to install and maintain any software on the client computer and thus eliminates a tremendous amount of IT overhead. A user can log into the system through Microsoft Internet Explorer. The Web Server is based on Microsoft Internet Information Server. The Database Server is based on Microsoft SQL Database.

Patriot Officer uses Microsoft Windows Server as the operating system. It supports multiple-level and multiple-group security protection. An authorized user can only access the software module, function, page, report, data element, and workflow that he/she is allowed to access based on his/her role and responsibility. Single sign-on is supported so that a user can seamlessly access the system through the corporate network. Data encryption is provided through a variety of technologies.

Patriot Officer can be installed on a standalone server or a virtual server. This flexibility in delivery gives financial institutions the choice of how to best implement the technology within their operational environment based on each individual's needs and preference. Patriot Officer supports fault tolerance, auto failover, and instant data backup and disaster recovery to ensure uninterrupted operations in financial institutions.

Patriot Officer uses a **corporate compliance data warehouse** utilizing the data repository for additional applications.

To integrate the data from multiple systems in a financial institution, Patriot Officer uses a compliance data warehouse to collect customer and transactional data. The data repository can be used for other applications, such as fraud prevention. Based on this architecture, a holding company with many different subsidiaries, such as banks, trust companies, insurance companies, stockbrokers, etc., can share the same hardware, database, and software. In this environment, the hardware cost is tremendously reduced and the overhead is thus eliminated.

To provide the maximum protection to its clients, GlobalVision has developed all the application software programs by its own research and development team. GlobalVision owns all the intellectual property rights of Patriot Officer. In addition, to prevent its software from being copied or infringed by competitors, GlobalVision has incorporated over ten (10) patents and pending patents into Patriot Officer.

Customer Support/Training

To provide high-quality support, GlobalVision has employed three different types of experts to support its customers. When a customer has issues about the system, network, data format, data download, etc., GlobalVision's technical experts will handle these issues. If a customer has questions about how to use the Patriot Officer product, GlobalVision's product experts will respond. When a customer has questions about regulatory requirements and guidelines, GlobalVision's compliance advisors will respond. GlobalVision's experts work around the clock, covering all time zones to support the users of the Patriot Officer system.

GlobalVision provides three training options: onsite training, remote WebEx training, and classroom training at the Patriot Officer Academy. A private training session can be performed based on the roles of the trainees. GlobalVision offers two different types of training programs for its customers. These two different programs are designed to (1) train the users to use the product, and (2) train the system administrators to handle the system administration. The training courses include (a) Suspicious Activities Detection and Compliance Automation, (b) Currency Transactions Detection and Compliance Automation, (c) Risk Management, (d) Customer Identification Program, Customer Due Diligence, and Enhanced Due Diligence, (e) Scanning of Regulatory Lists and Other Reference Lists, (f) Fraud Detection and Elimination, (g) System Configurations, and (h) System Administration.

To further support its clients, GlobalVision supports the various Patriot Officer User Groups. Users in the same region may meet together periodically to exchange their experience in using the Patriot Officer system and submit their suggestions to GlobalVision. Users can also participate in the online User Groups hosted on the Internet. A national User Group Meeting is hosted by GlobalVision every year to present the future direction of Patriot Officer and to discuss the regulatory matters among all the users.

“From sales, to IT support, to R&D, to educational opportunities, the Patriot Officer team provides customization to meet our needs to properly monitor, report and risk rate, to comply with regulatory demands.”

— Patrick Goo, CAMS,
Vice President,
BSA/AML Manager
& Deputy BSA Officer,
Rabobank, N.A.

Risk Management

Regulatory Compliance

Financial institutions in the United States know the importance of complying with regulatory guidelines. This is not only of importance due to regulatory examinations, but equally as important, to the overall soundness of the financial institution. The BSA/AML Examination Manual, published by the FFIEC, has outlined the requirements for U.S. financial institutions to pass regulatory examinations. Risk-based policy, procedure and process have become a top priority for financial institutions. Basic computerized approaches, such as producing reports to listing unusual transactions, querying the database for specific information, or detecting unusual activities through rules, are no longer sufficient to meet the standard of this new risk-based era. Patriot Officer adaptively integrates intelligence, scenarios and risks to conduct data mining on all transactions of all product lines of a financial institution and effectively detects suspicious activities with high resolution and accurate results. Patriot Officer helps financial institutions quickly comply with the most stringent risk-based requirements set by the FFIEC and smoothly pass BSA/AML examinations.

In order to fully comply with the BSA/AML Examination Manual, a bank must (1) identify the higher-risk customers, (2) conduct EDD on these higher-risk customers, and (3) monitor these higher-risk customers and their transactions more closely as long as their accounts are open. Patriot Officer uses Risk Scoring to empower a bank to comply with the risk-based principles of the BSA/AML Examination Manual. Risk Scoring enables a financial institution to immediately identify higher-risk customers based on millions of risk factors. Most importantly, Risk Scoring allows a financial institution to automatically monitor higher-risk customers more closely, exactly as the regulations mandate. Furthermore, Patriot Officer adaptively integrates intelligence, scenarios and risks to conduct data mining on all transactions of all products of a financial institution and effectively detects suspicious activities with high resolution and accurate results. Patriot Officer helps financial institutions quickly comply with the most stringent risk-based requirements set by FFIEC and smoothly pass BSA/AML examinations.

GlobalVision has a staff of compliance professionals that continually monitor regulations, closely communicate with compliance professionals, and work with regulatory agencies to understand how existing, new or changing regulations may affect financial institutions. This group works closely with the technology development team to make enhancements to the Patriot Officer product. In the past few years, GlobalVision has been delivering an average of two new software releases every year to meet the ever-changing regulatory requirements. GlobalVision will continue to make enhancements based on regulatory requirements and marketplace needs, ensuring that the Patriot Officer system is an up-to-date BSA/AML/CTF/OFAC/FACTA/UGIEA solution.

Patriot Officer is compliant with the BSA/AML Examination Manual published by the FFIEC and **focuses on risk-based policy, procedure and process.**

To provide the maximum protection to its clients, GlobalVision has developed all the application software programs by its own research and development team. GlobalVision owns all the intellectual property rights of the Patriot Officer. In addition, to prevent its software from being copied or infringed by competitors, GlobalVision has incorporated over ten U.S. patents and pending patents into the Patriot Officer. For security purposes, the data is encrypted in the database and during the transmission. As a result, the customers' non-public, personal, confidential data and the secret SAR data is fully protected for financial institutions in accordance with the Bank Secrecy Act and the Gramm-Leach-Bliley (GLB) Act.

Information Security/Disaster Recovery

According to the Bank Secrecy Act (BSA), SAR data should be kept "secret" – a much higher standard than "confidential." Regulators, Security Officers, BSA Officers, Compliance Officers, Internal Auditors, Loss Prevention Managers, and Industry Leaders all agree that keeping the BSA/AML system inside the financial institution is the most secure approach to protecting the financial institution. Some financial institutions keep their SAR data on a public cloud. Under such circumstances, when SAR data is stolen and published on the Internet, the following repercussions have been known to occur:

- Retaliation from suspected criminals reported in the SARs
- Severe reputational damage to the financial institution
- Career damage to the Senior Managers, BSA Officer, Compliance Officer, Security Officer, and Internal Auditor
- Countless trouble with government agencies
- Loss of shareholder confidence in the management team

Patriot Officer is an in-house solution, and keeps the secret SAR data safely inside the financial institution. As result, the financial institution can easily comply with the data security requirements, such as the PCI compliance, the GLB compliance, the FACTA compliance, etc.

Patriot Officer uses advanced software architecture to support multiple financial institutions under the same holding company based on the same database engine (i.e., Database Management System or DBMS). Each financial institution has its own database assigned by Patriot Officer under the same DBMS. For this reason, although multiple financial institutions under one holding company may share the same hardware, software, and DBMS, each financial institution under the same holding company can only access its own data. For security purposes, the data is encrypted in the database and during

the transmission. As a result, the customers' nonpublic personal confidential data and the secret SAR data is fully protected for financial institutions in accordance with the Bank Secrecy Act and the Gramm-Leach-Bliley (GLB) Act.

According to the guidelines issued by government regulators, financial institutions have to be responsible for the performance and integrity of the software system they are using. To help its customers ensure the performance and integrity of the system, Patriot Officer performs a self-examination test on a daily basis. If there is any unusual condition detected within the system, Patriot Officer will inform the users so that proper action can be taken to address the issues. Consequently, the system maintenance task is further simplified.

In 2011, GlobalVision expanded into a new corporate center with over four (4) acres in campus size and 100,000 square feet in office space. GlobalVision has established a technologically advanced data center within this new corporate center. The data center is backed up by advanced, uninterrupted power supplies, and comprehensive scope of disaster-proof provisions has been deployed to ensure smooth operations of the data center on a 24 x 7 basis.

The corporate campus was designed with security as one of the highest priorities. The building is surrounded by military grade fencing. The flow of traffic in and out of the campus is controlled through two monitored gates and all crucial paths inside the building are controlled by sophisticated access units ensuring that only authorized personnel may pass. Numerous cameras have been installed inside and outside the building to monitor and record activities on a 24/7 basis. By implementing a comprehensive set of security policies with this advanced corporate center, GlobalVision has met and exceeded the highest security standards adopted by the financial technology industry.

Company Overview

GlobalVision Systems, Inc. (GlobalVision) was established by Oliver Song in 1996 as a California corporation. Mr. Song is a well-known technical and business consultant with a focus in business management through information technology. He holds more than 20 patents and pending patents. In his early career, Mr. Song founded Galaxy Networks, Inc., (Galaxy Networks) in Los Angeles, California, in 1986. Galaxy Networks had divisions and distributors in more than 20 countries and served thousands of corporate clients worldwide.

GlobalVision believes that a long-term business success must be achieved through an approach founded on teamwork, dependability and integrity. While GlobalVision is a privately held company, it has actively sought leaders in the high-tech industry to provide guidance and leadership to the company. Through the outstanding management provided

by visionary leaders, GlobalVision has quickly expanded its business through organic growth without the help of venture capital and does not have any long-term liabilities.

GlobalVision believes in winning market share through advanced technologies. To maintain its industry leading position, GlobalVision continues to invest heavily in research and development. One of GlobalVision's strengths is a strong technical team, which consists of over hundreds of years of combined banking knowledge and technical experience. As a result of its relentless pursuit of innovation, GlobalVision's leading-edge product, Patriot Officer, has incorporated over ten U.S. patents and pending patents and possesses advanced technology.

GlobalVision's leading-edge technologies and comprehensive scope of products and services serve to keep financial institutions of all sizes on the forefront of regulatory compliance, risk management anti-fraud and anti-financial crimes requirements. GlobalVision Systems' solutions empower the executives and managers of financial institutions to minimize risk exposure, eliminate fraud, prevent financial crimes, monitor business activities, maximize business profits, optimize return on investment, perform internal control, analyze business problems, establish strategies, boost branch productivity, enhance customer relationships, improve product performance, forecast the financial status of their business and perform corporate planning. These products automatically re-engineer and streamline the business management process and greatly enhance the productivity and profitability of the entire organization. As a leader in the regulatory compliance, risk management and fraud prevention software industry, GlobalVision is fully committed to developing, supporting and enhancing products and processes that assist financial institutions of all asset sizes in preventing financial crimes. GlobalVision is dedicated and determined to further maximize the return on investment for financial institutions and the aggregate strengthening of homeland security.

In 2007, GlobalVision developed the Guardian Officer® system, which is fully integrated with Patriot Officer and may share the same hardware and database. Guardian Officer empowers financial institutions to detect and prevent check fraud, deposit fraud, check kiting, credit card fraud, debit card fraud, ATM fraud, wire fraud, ACH fraud, Internet fraud, identity theft, employee fraud and also perform internal control monitoring as required by the Sarbanes-Oxley Act. Guardian Officer streamlines the case review and filing of the SAR in compliance with the requirements set by FinCEN.

Patriot Officer has helped financial institutions pass **the most stringent U.S. regulatory examinations** thousands of times.

In 2012, GlobalVision delivered Enquirer Officer which is protected by five (5) patents and is fully integrated with the Patriot Officer system. Enquirer Officer empowers financial institutions to discover hidden information about customers, non-customers and beneficial owners; block criminals from opening accounts at the financial institution; receive early warnings about possible suspects of crimes; detect and prevent financial crimes; and eliminate losses and damages.

GlobalVision's leading-edge technologies and comprehensive scope of products and services have constantly kept its customers ahead of their competitors. With its best-in-class reputation, strong R&D team, superb customer services and patented technologies, GlobalVision is committed to maintaining its renowned position as the leading supplier of AML, CTF, Anti-Fraud, and Anti-Financial Crimes solutions for financial institutions.

About the American Bankers Association

ABA is the voice of the nation's \$17 trillion banking industry, which is composed of small, regional and large banks that together employ more than 2 million people, safeguard \$13 trillion in deposits and extend more than \$9 trillion in loans.

About ABA Endorsed Solutions

In a rapidly changing landscape, banks turn to the proven expertise of ABA Endorsed Solutions for the most advanced technologies and products to grow their business, cut costs and transform the customer experience. From compliance and insurance to payments and mortgage lending, you'll find products and services that can enhance your bank's bottom line.

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