

New Patterns in Anti-Money Laundering Enforcement

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In [this article](#), Ann Sultan and William Barry discuss the latest shift in anti-money laundering enforcement trends: actions focused on programmatic compliance deficiencies rather than particular transactions. The authors provide a short recap of the recent enforcement actions and relevant issues likely to arise under the enforcement strategy. "It is no longer enough to simply implement transaction and suspicious activity monitoring programs... Compliance officers, boards, and counsel should ensure that their AML compliance programs are running effectively to address their specific risks and that processes are in place to update programs when risks change," wrote Sultan and Barry.