



PREPAID COMPLIANCE

JULY 14-15, 2014

Hyatt Regency • Atlanta, GA

The Only Idea Exchange for Prepaid Peers to Build Best Practices in Compliance

COMPREHENSIVE GUIDANCE TO SAFEGUARD YOUR ORGANIZATION



COMPLIANCE

- Case Studies on Third Party Risk & Program Oversight
- Managing Consumer Complaints
- Remittance Transfer Rules
- Aligning Institutional Risk Appetite with Programs



LEGAL

- Insights Beyond the Latest Statutes
- Direct Information from State and Federal Regulators and Law Enforcement
- Roundtable to Meet the Regulators
- Analysis on Peers' Handling of OFAC, Reg E, Durbin and More



FRAUD

- Examples on Fraudster Tactics
- Creating a Risk Assessment Framework
- Data on Fraud in Global Card Usage & New Add-Ons, like RDC
- Building Robust BSA/AML Programs from Scratch



MARKETING

- De-Mystify Murkiness in UDAAP in Marketing & Back-Office
- Past Enforcement Actions Analysis
- Opportunities to Bring in Marketing Collateral for Review
- Can You Ever Use the Word Free?



INNOVATION

- Innovate Without Restricting Opportunities
- Creating Legal Frameworks for New Products
- Addressing UDAAP Concerns to Marketing Products Without Clear Regulatory Guidelines



OPERATIONS

- How to Handle Audits & Examinations, from the First Notice
- Managing Data Flow Across Multiple Partners
- Interpreting Exit Interviews & Legal Follow-Up
- Case Studies from Those Who've Lived It

LEADING PRACTITIONERS, CHIEF COMPLIANCE OFFICERS & EXECUTIVES:

Scotty Perkins, Chief Compliance Officer, **PayNearMe** • Roseanne Lazer, Chief Compliance Officer, **CoinX** • Travis Campbell, Operational Risk Manager, **U.S. Bank** • Ron Rubin, Partner, **Hunton Williams** • Rusty Pickering, General Counsel, Chief Compliance and Corporate Development Officer, **Ingo Money** • Philip Lerma, VP, Risk and Compliance, **NetSpend** • Diane Piccolo, Chief Compliance Officer, **Insight Card Services** • Juan Llanos, Co-founder, EVP and Compliance Officer, **Unidos Financial** • Michael Aleles, Founder & CEO, **Quippi Corporation** • Mabel Wilson, Chief Compliance Officer, **Blackhawk** • Ted Kitada, Senior Company Counsel, **Wells Fargo Bank, N.A.** • Sheila Hoeppner, Director of Fraud & Risk Products, **Xerox Services** • Joan Herman, SVP Prepaid Division, **Sunrise Banks** • John Hagy, Chief Legal Officer, **Meta Payment Systems** • Darin Petty, Chief Operating Officer, **Origins Financial Services** • John Tyson, Vice President of Compliance, **RealPage, Inc.** • Craig James, CEO, **Neopay Ltd** • Jim Tingey, President, Financial Service Solutions; Past E-Banking Division President, PWB, **First California Bank & PDBN** • Liz Nutting, SVP, Strategic Partnerships & Network Relations, **BofI Federal Bank** • Henry Thoman, VP and General Counsel at **UniRush, LLC** • Paul Landry, SVP of Operations, **The Bancorp Bank** • LouAnn Anstis, Director of Compliance & Risk, **TSYS Prepaid & Loyalty** • Brad Fauss, Co-Chair, **NBPCA**; COO, **Brightwell Payments** • Christina Hunt-Fuhr, Chief Compliance Officer, **Green Dot** • Daniel Tannebaum, Director - Financial Services Risk and Regulatory Practice, **PricewaterhouseCoopers LLP** • Duncan Douglass, Partner, **Alston & Bird LLP** • Donna Gregory, Internet Crime Complaint Center (IC3), **Federal Bureau of Investigation** •

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APEX: Prepaid Compliance is devoted to helping the prepaid industry build best practices amongst executive compliance, risk and operating officers. Brought to you by All Payments Expo, the leading producers of alternative financial service and emerging payments events.





PREPAID COMPLIANCE

The Only Idea Exchange for Prepaid Peers to Build Best Practices in Compliance

Prepare for the Changing Compliance Culture

As a compliance, risk, fraud or operations executive, the nature of your role is changing. Issuers are seeing an escalation of scrutiny from state and federal regulatory bodies. Meanwhile, the scope of said regulation is moving downstream to program managers and service providers, causing an industry migration from checklist approached to risk-based compliance programs. New innovations, from mobile technologies to Bitcoin, are further complicating new products' development, marketing and protection. Amidst uncertainty, the best way to forge your path is side-by-side with your peers.

A Peer-Led Prepaid Compliance Idea Exchange

This is the only event devoted to helping prepaid professionals build best compliance practices with their peers in an intimate, productive way. Beyond the legal-ese, you'll get real-world templates, frameworks, guidance and experience from those in the trenches, including practitioners in compliance, risk, operations, marketing, fraud and legal.

Guidance From Regulatory & BSA/AML Compliance Experts

Attendees have two days to build best practices with their peers, gleaning information from peer-led examples, such as:

- Penetrating insights from executives who've sat across from regulators during examinations and audits
- Real-world frameworks for new products not clearly covered in existing rules or regulations
- Oversight in third party management, from the issuer and program manager perspectives
- Closed-door UDAAP session to dissect issues with marketing materials
- Examples of monitoring transactions, including new innovations like RDC
- Legal expertise – without the "fear factor"
- Insight into unspoken rules in state transmitter licensing for prepaid and MSBs
- Direct access to regulators for education and insight

Compliance pressures have multiplied in the past two years, and will only increase as payment products evolve and murkiness in legal interpretation continues. APEX: Prepaid Compliance takes a distinctive approach to preparing compliance, risk and operations professionals for this new future.

All the best,



Diana Middleton
Global Payments Director
APEX: Prepaid Compliance

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Where Senior Executives Build Best Practices

APEX: Prepaid Compliance was built for issuers, program managers and third parties to elevate the industry's compliance by building best practices side-by-side.

Issuers & Program Managers/MSBs:

- Chief Compliance Officers
- Chief Risk Officers
- Chief Operations Officers
- Chief Marketing Officers
- General Counsel
- Professionals in Due Diligence, Fraud, Risk Analysis, BSA/AML and Audit Compliance

Processors/Networks

- Chief Compliance Officer
- Corporate Counsel
- CRO
- VP Client Relationships/ Vendor Management
- Executives focusing on Fraud, Risk & Due Diligence

Start-Ups

- CEO
- CCO
- COO

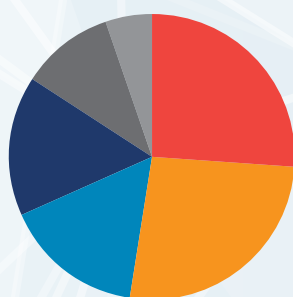
Legal:

- Partners, Counsel & Associates focusing on Financial Services and Payments

Technology & Consulting

- Security
- Fraud Detection
- Smart Card Printing
- Risk Software
- Social Media Monitoring

Multi-Faceted Company Perspectives



- Issuers: 25%
- MSBs & Program managers: 25%
- Start-Ups: 15%
- Processors & Networks: 15%
- Legal & Government: 10%
- Technology & Consulting: 5%

Compliance is increasingly important to the entire prepaid ecosystem. APEX: Prepaid Compliance gathers compliance, risk and operating officers from across the universe for **maximum cross-industry collaboration** and **idea exchange**.

Speaking Faculty of Practitioners

- Scotty Perkins, Chief Compliance Officer, **PayNearMe**
- Roseanne Lazer, Chief Compliance Officer, **CoinX**
- Travis Campbell, Operational Risk Manager, **U.S. Bank**
- Ron Rubin, Partner, **Hunton Williams**
- Rusty Pickering, General Counsel, Chief Compliance and Corporate Development Officer, **Ingo Money**
- Philip Lerma, VP, Risk and Compliance, **NetSpend**
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- Joan Herman, SVP Prepaid Division, **Sunrise Banks**
- John Hagy, Chief Legal Officer, **Meta Payment Systems**
- Darin Petty, Chief Operating Officer, **Origins Financial Services**
- John Tyson, Vice President of Compliance, **RealPage, Inc.**
- Craig James, CEO, **Neopay Ltd**
- Jim Tingey, President, Financial Service Solutions; Past E-Banking Division President, **PWB, First California Bank & PDNB**
- Liz Nutting, SVP, Strategic Partnerships & Network Relations, **BofI Federal Bank**
- Henry Thoman, VP and General Counsel at **UniRush, LLC**
- Paul Landry, SVP of Operations, **The Bancorp Bank**
- LouAnn Anstis, Director of Compliance & Risk, **TSYS Prepaid & Loyalty**
- Brad Fauss, Co-Chair, NBPCA; COO, **Brightwell Payments**
- Christina Hunt-Fuhr, Chief Compliance Officer, **Green Dot**
- Daniel Tannebaum, Director - Financial Services Risk and Regulatory Practice, **PricewaterhouseCoopers LLP**
- Duncan Douglass, Partner, **Alston & Bird LLP**
- Donna Gregory, Internet Crime Complaint Center (IC3), **Federal Bureau of Investigation**

DID YOU KNOW?

APEX: Prepaid Compliance has the highest concentration of **COMPLIANCE PRACTITIONER SPEAKERS** of any event.

PRACTICAL WORKSHOPS

This is where you'll get unfiltered, deep-diving insights into the challenges facing compliance, risk and fraud-focused program managers and issuers. You'll tackle challenges impacting your program, leverage the knowledge of the speakers and interact with fellow attendees for maximum impact to your program(s).

8:30	Virtual Currency & MSB Money Transmitter Licensing: What You Need to Know <p>With many companies being rules as MSBs, ensuring a smooth state money transmitting licensing process has never been more important.</p> <p>PEER-LED BEST PRACTICES:</p> <ul style="list-style-type: none"> • How to prepare for the process and anticipate hiccups • What to expect during applications, including unspoken requirements • How to interact effectively with state regulators <p>Roseanne Lazer, Chief Compliance Officer, COINX</p>	Moving Your Program Abroad <p>Europe is a popular market for payments & e-money institutions. How should you approach an international expansion?</p> <p>PEER-LED BEST PRACTICES:</p> <ul style="list-style-type: none"> • Gaining a license to operate • Controlling expenses when applying for authorization • Understanding the approach of regulators, card scheme and third parties • Business-centric approach to regulation <p>Craig James, CEO, NEOPAY LTD.</p>	Make an Impact: Building a Compliant AML Program <p>Geared toward program managers and MSBs, with varying budgets and resources. Perfect for companies that are building these program from scratch or migrating from a checklist approach.</p> <p>PEER-LED BEST PRACTICES:</p> <ul style="list-style-type: none"> • Develop a risk-based framework • Leveraging example templates • Detect & report suspicious activity • Analyze processors' role in evolving data analysis • What gives you the right coverage if something goes wrong? <p>Liz Nutting, SVP, Strategic Partnerships & Network Relations, BOFI FEDERAL BANK</p>
11:00	Lunch for Workshop Participants		

REGULATORY PERSPECTIVES

APEX: Prepaid Compliance is focused on bringing together industry and regulators for educational conversations. Many sessions will be closed for industry-only, but both days have opportunities to hear from the regulators themselves.

Invited for Day 1: CFPB, FDIC, IRS, FTC, Federal Reserve, OCC

12:00 Opening Remarks

Duncan Douglass, Partner, **Alston & Bird LLP**

12:15 Recent Federal Agency Rulings & the Impact on Your Bank or Program

Hear from regulators and legal experts on regulators' expectations in the new compliance culture, and what does correct oversight look like? Includes the latest perspectives on money transmission, Reg. E, unfair and deceptive practices and more.

1:15 Third-Party Guidance

Dive into the new rules governing vendors and vendor controls, as well as related enforcement actions. What is the appropriate level of due diligence for issuers to expect of program managers, processors, and service providers?

1:45 Federal Remittance Transfer Rule

Murkiness continues to abound around the intended and unintended impact of this new federal rule on GPR products sold, used or reloaded abroad. Includes a discussion of the rule; application of the rule to GPR products; and compliance strategies and best practices under the rule.

Ted Kitada, Senior Company Counsel, **Wells Fargo Bank, N.A.**

2:30 The Future of KYC

How is KYC being innovated for opaque prepaid products? Geared for issuers, processors and program managers looking to implement consumer-level KYC, some prepared with questions.

Scotty Perkins, Chief Compliance Officer, **PayNearMe**

3:00 Networking Break

DID YOU KNOW?



Private Sessions are for **INDUSTRY ONLY**. These sessions were built solely for candid discussions for the prepaid industry. So you can ask questions, get unfiltered insight and dig deeper.

“This kind of conference is well overdue. The focus is helping everyone together, instead of cryptic sessions that never have enough information.”

- Darin Petty, Chief Operating Officer, Origins Financial Services

	Unfair, Deceptive or Abusive Acts or Practices	Responding to Fraud & Building an AML Program	Innovation Amidst Uncertainty
3:30	<p>HOT TOPIC The Scope of UDAPP & the Impact to Your Organization</p> <p>UDAAP's murkiness has made it difficult for organizations to be sure your company complies, both in back-office and marketing efforts.</p> <p>PEER-LED BEST PRACTICES:</p> <ul style="list-style-type: none"> • What is the scope of UDAAP and what is susceptible • How rules are changing for social media • How to handle UDAAP across many programs and life cycles • Can you ever use the word free? • Leveraging internal & external counsel • Should there be standardized fee schedules for all players, or would this hamper differentiation? <p>Joan Herman, SVP Prepaid Division, Sunrise Banks John Tyson, Vice President of Compliance, RealPage, Inc. Henry Thoman, VP and General Counsel at UniRush, LLC</p>	<p>Building a Risk Assessment Framework</p> <p>Compliance programs built on risk appetite are honing in on more sophisticated risk assessments.</p> <p>PEER-LED BEST PRACTICES:</p> <ul style="list-style-type: none"> • How to handle data breaches, and who should be held accountable? • Insight into how program managers are building out robust frameworks against money laundering/fraud and to monitor transactions across programs • Data reporting guidelines and policies/procedures <p>Sheila Hoeppner, Director of Fraud & Risk Products, Xerox Services</p>	<p>Legal Frameworks for New Products & Programs</p> <p>How to stay ahead of the curve without restricting opportunities by protecting new products.</p> <p>PEER-LED BEST PRACTICES:</p> <ul style="list-style-type: none"> • The necessary framework for a product that isn't clearly covered by existing regulations • Aligning the approach with your company's risk appetite • How to incorporate new statutes • When to re-evaluate the framework • Leverage lessons learned by recent UDAAP-related enforcement actions • Why speed-to-market is not the enemy of compliance <p>Darin Petty, Chief Operating Officer, Origins Financial Services</p>
4:15	<p>PRIVATE UDAAP Hands-On Workshop</p> <p>What practices will the CFPB consider to be unfair, deceptive and abusive? This session will help industry participants avoid finding out the hard way.</p> <p>PEER-LED BEST PRACTICES:</p> <ul style="list-style-type: none"> • Explaining UDAAP while standing on one foot: Unfair, Deceptive, Abusive • Specific examples of what to avoid • Discuss and dissect materials you submit ahead of time <p>Ron Rubin, Partner, Hunton Williams LLP (Former CFPB Enforcement Attorney)</p> <p><i>*Participants can submit marketing collateral to discuss 2 weeks before this session. Important information will be redacted upon request.</i></p>	<p>Ongoing Training for Your Partners in BSA/AML</p> <p>With so many outside companies playing a role in a prepaid program, how can stakeholders build a robust plan for training on all levels of an organization?</p> <p>PEER-LED BEST PRACTICES:</p> <ul style="list-style-type: none"> • Oversight of key partners and internal employees • How do your standards align with regulators' expectations? • Information for training retail partners where cards are sold <p>John Hagy, Chief Legal Officer, Meta Payment Systems Daniel Tannebaum, Director - Financial Services Risk and Regulatory Practice, PricewaterhouseCoopers LLP</p>	<p>Digital Currencies' Compliance</p> <p>Digital currency is ground breaking, but it has yet to be fully tested by the regulatory community.</p> <p>PEER-LED BEST PRACTICES:</p> <ul style="list-style-type: none"> • What are the evolving rules at the program, bank and network level? • How is a KYC methodology being developed? • How will regulators handle these currencies as they gain momentum? <p>Juan Llanos, Co-founder, EVP and Compliance Officer, Unidos Financial</p>
5:00	<p>Managing Consumer Complaints</p> <p>How to manage the flow of consumer complaints from all channels — web, phone, Better Business Bureau and social media — and subsequent interactions with regulators and internal management.</p> <p>PEER-LED BEST PRACTICES:</p> <ul style="list-style-type: none"> • How to best track and package complaints from web, BBB, phone, etc. • Reporting outlines • How are regulators tracking complaints made in new channels • Tactical guidance to comply with regulators' expectations • Identifying problems vs. isolated incidents <p>Christina Hunt-Fuhr, Chief Compliance Officer, Green Dot</p>	<p>REAL EXAMPLES Monitoring Transactions in Products for the Under-Served</p> <p>What's the risk-based approach for monitoring fraudulent transactions?</p> <p>PEER-LED BEST PRACTICES</p> <ul style="list-style-type: none"> • Serving the underbanked/underserved – what are they really looking for? • Duplicate check risk • Accepting checks as a source of funds for prepaid cards and the compliance issues involved <p>Rusty Pickering, General Counsel, Chief Compliance and Corporate Development Officer, Ingo Money</p>	<p>Aligning Risk Appetite with Compliance</p> <p>De-silo efforts within a bank or program manager's structure and align risk appetite with compliance efforts. How to educate and develop a consensus between different stakeholders, such as consumer compliance and business line managers. Plus, how to partner as a team to enforce it.</p> <p>Travis Campbell, Operational Risk Manager, U.S. Bank</p>

REGULATORY PERSPECTIVES

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Invited for Day 2: State regulators from Florida, Georgia, New York, Ohio, Washington, California & Texas; Money Transmitters Regulators Association, Conference of Bank Supervisors Organization, NFCTA, FFIEC, FBI, DOJ and Secret Service.

8:30 Roundtable: The States' Perspective

States are stepping up their regulatory gaze on prepaid, and we'll hear from state regulators on their analysis of the risks involved in money transmitters, recent attorney generals fines, MSB examinations, virtual currencies and trends they are seeing.

9:15 Roundtable: Trade Organizations' POV

How trade organizations are impacting the audits and examinations landscape, as well as insight into forthcoming actions and guidance.

10:00 *Networking Break*

10:30 FinCEN & OFAC

The rules have changed for program managers and providers of prepaid access. Meanwhile, there are new products emerging that are difficult to categorize in a traditional AML framework. This session will include insight from FinCEN that will help you improve compliance, as well as the oversight of your partners. We'll examine the shifting compliance culture and learn whether entities will be allowed to enter into settlements in the new paradigm. In addition, you'll get insight into the recent OFAC ruling, and what this will mean for program managers.

11:15 Q&A with Law Enforcement Officials

A must-see for anyone concerned about fraudulent activity, organized crime and other damaging crimes.

Donna Gregory, Internet Crime Complaint Center (IC3),
Federal Bureau of Investigation

11:45 Industry Perspectives: Fighting Fraud

Fraud is growing on all financial products, including prepaid. The criminals are organized, so must industry be to win the ongoing and growing battles. You'll hear from industry in the NBPCA's Financial Crimes Task Force to see what could apply to your company and partners to proactively predict and prevent fraud in your portfolios.

PEER LED BEST-PRACTICES:

- Hear examples of what industry is seeing in the field, including POS, tax fraud and other cases
- What to do when fraud is identified
- Learn tools the industry is using to help combat fraud
- Gain a scoping of the hard & soft costs of fraud, including brand impact, regulatory perceptions, etc.

Brad Fauss, Co-Chair, **NBPCA**; COO, **Brightwell Payments**




12:30 *Lunch*

Private Discussion Groups:



* Limited to 12 participants.
Sign up on-site

	Regulatory Examinations & Audits	Third-Party Management
1:30	<p>PRIVATE Preparation Prior to Audit for Banks & Program Managers</p> <p>Before you ever get notice of an impending audit or examination, how should you be prepared?</p> <p>PEER-LED BEST PRACTICES:</p> <ul style="list-style-type: none"> • Matching data across all stakeholders • Consistency in fee-related it • Building reports for management and creating policies & procedures for statements • What it's like to get a letter from the FDIC or CFPB? 	<p>Measuring Third-Party Risk</p> <p>How does an organization measure third-party risk?</p> <p>PEER-LED BEST PRACTICES:</p> <ul style="list-style-type: none"> • Aligning operating, litigation and reputational risks with third party management (includes vendor, service provider, and delegate agent for money transmission) • Developing a risk assessment of your third-party relationships • Possible controls to identify and mitigate risk • What is the upcoming guidance from the regulatory community on vendor management? • Until you are examined, how will you know what is sufficient? <p>Philip Lerma, VP, Risk and Compliance, NetSpend Corporation</p>
2:15	<p>PRIVATE During Audits & Examinations: Your Checklist</p> <p>This is a stressful time for issuers and program managers alike. How can you manage the experience on both a state and federal level?</p> <p>PEER-LED BEST PRACTICES:</p> <ul style="list-style-type: none"> • How to structure your "war room" team • Organize your data across multiple teams and partners • How will examinations be tweaked in the future? <p>Paul Landry, SVP of Operations, The Bancorp Bank</p>	<p>Ongoing Third-Party Evaluations</p> <p>Go beyond initial due diligence on your partners.</p> <p>PEER-LED BEST PRACTICES:</p> <ul style="list-style-type: none"> • How are contracts changing to reflect the new reality of third party management? • How are examiners evaluating your relationships? • What is the future of prepaid agent oversight? • How will these changes be integrated from issuers, to distributors to retail partners? <p>Michael Aleles, Founder & CEO, Quippi Corporation Mabel Wilson, Chief Compliance Officer, Blackhawk Duncan Douglass, Partner, Alston & Bird LLP</p>
3:00	<i>Networking Break</i>	

	Regulatory Examinations & Audits	Third-Party Management
3:30	 What to do Post-Audit You may not receive the exam results for up to a year. What do you do in the meantime? PEER-LED BEST PRACTICES: <ul style="list-style-type: none"> Guidelines on documenting the exit meeting How to handle legal analysis behind the initial findings What does the bank do when it disagrees with the regulator? Anticipating what comes next 	Getting Approved in an Increasingly Complex World Networks and banks are becoming more conservative when accepting programs onto their platforms. PEER-LED BEST PRACTICES: <ul style="list-style-type: none"> How are the rules changing? What makes an issuer drop a program, and are those standards changing? Diane Piccolo, Chief Compliance Officer, Insight Card Services
4:15	 Experiences in Audits A must-see session focusing on real-world experience. PEER-LED BEST PRACTICES: <ul style="list-style-type: none"> Discussion regarding audit preparation; how to conduct yourself during an audit. Recent published findings in examinations Impacts to all entities in the payment service practices Jim Tingey, President, Financial Service Solutions; Past E-Banking Division President, PWB, First California Bank & PDNB	 When Should Program Managers Push Back With evolving expectations, when is it appropriate for program managers to push against issuer requirements? PEER-LED BEST PRACTICES: <ul style="list-style-type: none"> Program managers only LouAnn Anstis, Director of Compliance & Risk, TSYS Prepaid & Loyalty <i>*This closed-door session is a dialogue between the program manager speaking faculty and peer attendees.</i>

5:00 Conference Concludes

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FEE: The standard fee for attending All Payments Expo – Prepaid Compliance is outlined on the registration form. This includes the luncheon and refreshments, and the conference documentation and materials submitted by the speakers. You may enclose payment with your registration or we will send an invoice. Payment is due within 30 days of registering. If registering within 30 days of the event, payment is due immediately. Payments can be made by check, Visa, MasterCard, Discover, Diners Club or American Express. Please make all checks payable to the "Institute for International Research, Inc." and write the name of the delegate(s) on the face of the check, as well as our reference code: U2842. If payment has not been received prior to registration the morning of the conference, a credit card hold will be required.

DATES AND VENUE

Hyatt Regency Atlanta
265 Peachtree, NE
Atlanta, GA 30303
404-577-1234

ACCOMMODATIONS: There will be a block of specially priced rooms for APEX: Prepaid Compliance attendees. Please go to the venue tab of www.APEXPrepaidCompliance.com for your room block code and pricing.

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If for any reason IIR decides to cancel this conference, IIR accepts no responsibility for covering airfare, hotel or other costs incurred by registrants, including delegates, sponsors, speakers and guests.

Due to unforeseen circumstances, the program may change and IIR reserves the right to alter the venue and/or speakers.

DOCUMENTATION ORDER: If you are unable to attend the program, or would simply like to order

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