



## **RULES:**

1. Divide the group into 2-4 teams. We call the teams: **Money Launderers, Bankers, Regulators and Customers**  
(We got some box lids and wrote the names of the teams on side of the lids. We use 2 to 4 teams depending on the size of the group.)
  2. We laminated the “answers” with the point value on the front of colored sheets of paper and the “answer” and the corresponding question on the back. We choose a different color for each category. We created a huge board with the categories across the top, and stuck the laminated cards, \$ side out, on the board with Velcro. (We do not have any “double jeopardy” questions, but feel free to add them if you want to.)
  3. We begin the game by choosing Privacy for \$100. After that first question, we allow the team that answers the question correctly to chose the \$ amount and category. We read the question aloud to the entire room. When someone knows the answer, they must call out the name of their team. (We tried giving them buzzers, but they were playing with them and it was incredible annoying!) If they answer correctly, we place the laminated card in their box so those scores can be tallied up at the end of the game.
  4. We read the question once. If a team “rings” in before we finish, they must answer the question. (No second readings!) If a team misses, another team gets the chance to “ring in”. The team that answers correctly gets to choose the next category and question.
- Note: We DO NOT DEDUCT POINTS FOR INCORRECT ANSWERS!      The object of the game is to have fun and to learn.
5. At the end of the game, each team totals their points and announces aloud to the group how many points they have. They then wager and we ask the final jeopardy question. Each team gets together and writes down the question on their form. (We actually have a CD of the Final Jeopardy music! That always gets a chuckle!) When the music ends, we ask each team for the answer and how much they wagered. We begin with the lowest team first.
  6. Once the winner is determined everyone gets a big round of applause. We have a basket full of small gifts like pencils, pencil toppers, pinwheels, bookmarks, etc., and everyone gets to pick from the same basket. The winning team gets to pick first.
  7. We ask them to complete and evaluation form for us. Most all comments have been really positive!

Reminders:

If you have a mixed group from different areas of your bank, its best to mix them up and not let them sit with their buddies. That way they can learn from each other and the get much more involved in the game.

Before each game, I tell them a little about the Patriot Act, and the changes in names from Suspicious Activity to AML and from Know your Customer to EDD. (I sometimes ask questions about this in final jeopardy!)

We always remind them that the Suspicious Activity category is T/F each time we read a question from that category. Otherwise, they get confused!

I always try to tell them not to over-think the questions. (They do, anyway!).

Sometimes they get really rowdy, and the sales people are very competitive! Its best to conduct this training with another person, who can act as a judge in the case of disputes over who answered what when!

Before we begin, we give each class member a review sheet, and we posted the review on our Intranet page. However, they must put the sheet away when we begin the game.

Please feel free to contact me if you have any questions!

## **JEOPARDY ANSWERS/QUESTIONS: (Sample questions: feel free to create your own!)**

### **SUSPICIOUS ACTIVITY/MONEY LAUNDERING**

*The following are True/False questions, but must be phrased in the form of a question. (Example: What is True?)*

100 – The following are examples of suspicious activity: Large cash exchanges, structuring, wires into an account followed immediately by transfers out.

**What is True?**

200 - All suspicious activity should be reported to (Name)

**What is True/False?**

*The following is an example of suspicious activity:*

300 - Customer deposits a \$2000 check on Monday, and it's gone by Wednesday.

**What is False?**

*The following is an example of suspicious activity:*

400 - Client purchases a TD for cash and uses it as collateral for a loan.

**What is True?**

*The following is an example of suspicious activity:*

500 - Customer suddenly pays down a large problem loan with cash

**What is True?**

### **KYC (Know Your Customer)**

100 - Driver's License, State Photo ID Card, Credit Card, Resident Alien Card, utility bills, Social Security number.

**What are some ways to identify a customer?**

200 - Articles of Incorporation; prior banking relationship, type of business activity, business address, EIN.

**What are some ways to establish the identity of a business customer?**

300 – This phrase can't be written on the back of a check by a teller in lieu of ID.

What is "Known Customer"?

400 - Site visit, Thank You letter, calling the client, D-TEC, monitoring of transactions.

**What are some things that can be done after the account is opened to ensure the legitimacy of that account?**

500 - Close the account, notify Security, Notify Regulatory Management, and send the client a letter.

**What can be done if information given by the client cannot be verified?**

## **INFORMATION SECURITY**

100 - The best way to dispose of customer sensitive material, reports and account information.

**What is shredding?**

200 - Vault or locked file cabinet.

**What are ways to store customer sensitive information?**

300 - Downloading software, porn sites, AOL instant messenger.

**What types of things should not be on your SSB computer?**

400 - Key pads, locked doors, and security cameras

**What are some types of physical security devices?**

500 - The Information Security Officer

**Who is XXXX?**

## **PRIVACY/IDENTITY THEFT**

100 – Reg. P calls consumers this when they have an ongoing relationship with the bank. (hint: we call them clients)

**What is a customer?**

200 - Deluxe, Equifax, Metavante, ChexSystems. (note: Metavante is our Data processor)

**What are types of non-affiliated third parties with whom we can share information under a Reg. P “exception”?**

300 – The bank must give the customer this when establishing a relationship, closing a loan, and annually.

**What is a Privacy notice?**

400 - Banks that share personally identifiable financial information with non-affiliated third parties outside of the exceptions must allow consumers and customers to do this.

**What is opt-out?**

500 - Types of criminal activity where an individual wrongly obtains and uses another person’s personal data without their knowledge in order to commit fraud.

**What is identity theft?**

## OFAC

100 - The OFAC Officer

**Who is XXXX?**

200 - Cuba, Iran, The Taliban, Osama Bin Laden

**Who/what are blocked entities on the OFAC list?**

300 - The division of the Department of the Treasury that administers and enforces economic trade sanctions.

**What is OFAC? (Office of Foreign Asset Control)**

400 - Blocking and Freezing

**What are actions the bank can take if an OFAC transaction is identified?**

500 - \$11,000 - \$1million dollars; 2X the amount of the Transaction; and imprisonment.

**What are penalties for OFAC violations?**

### **Sample Final Jeopardy Question: (chose one)**

This law carries the highest criminal and civil penalties of any other banking law or regulation.

**What is the Bank Secrecy Act?**

The new name for “Know your Customer”?

**What is Enhanced Due Diligence?**

The new name for Suspicious Activity?

**What is Anti-money Laundering?**