

## Bachir A. Al-Nakib

---



CRCMP, IARCP, CISRCP, QMS Certified Lead Auditor, CAMS, ACFE, ARMP

Doha Mobile: +974 6615 1040

Office : +974 4496 8070

Email: [nakib.ba@compliancealert.org](mailto:nakib.ba@compliancealert.org)

[Nakib.ba@calert.org](mailto:Nakib.ba@calert.org)

[bashirnakib@yahoo.com](mailto:bashirnakib@yahoo.com)

### EDUCATION

- BS Political Sciences, Business Management
- MS International Relations, MS International Public Law

### PROFILE

Banker by profession >25 years Commercial Banks and Financial Institutions

Trainer/Instructor, Frequent speaker and Expert in:

- Governance, Risk and Compliance
- Financial Crimes/AML-CFT
- MENA Regulatory Compliance Supervision Risks
- Enterprise Risk Management-Operational Risks
- Insurance Risks
- Anti-Bribery and Corruption
- Internal Control
- Internal Audit Policies/Procedures
- BSA, USA Patriot Act Sections 312-326, CISADA, NDAA
- FATCA
- Familiar with the BDL, QFCRA, QCB, UAE, DIFC and DFSA, Bahrain Financial Crimes Modules, UK FSA regulations, SAMA & CMA compliance requirements.
- Familiar with 3<sup>rd</sup> EU Directive and MiFiD

Bankers Associations

- Member Lebanon Bankers Association AML Committee
- Member World Union of Arab Banks – Group Certified Compliance Officers (Research and Best Practices Committee),
- Founder and Moderator of Compliance Alert, Compliance Officers Forums. Co-Moderator Middle East Compliance Officers Forum

An accomplished financial professional, experience covers regulatory investigations, Bank Secrecy Act ("BSA"), Anti Money Laundering ("AML") remediation and other risk management matters in global and domestic retail banks, correspondent banks, broker-dealers, private equity funds, mutual funds, money services businesses and insurance companies. Has worked in the Russian Federation, Indonesia, Bahrain, Mexico, Saudi Arabia, the U.A.E, Malawi, and Bermuda.

Conducted more than thirty AML and OFAC sanctions projects for clients including assessments of fund transfers and global sanctions implementations, payment processing, currency transaction reporting, private and correspondent banking, high risk customer investigations, investigative training and customer risk ranking methodology, under both US and FATF standards. Specializes in project management, complex investigations, risk mitigation and outsourced functions and internal audits.

- Led project to evaluate and suggest enhancements to Qatar Financial Centre Regulatory Authority Corporate Credit Policy and Procedures to align with Qatari Central Bank laws and regulations. Team included Chief Risk Officer and General Manager –
- Led team on AML / OFAC sanctions independent testing of a Omani-owned private bank, including determination of compliance with OFAC, due diligence, customer acceptance, funds transfers, adequacy of AML monitoring rules and thresholds and the Bank's internal AML policies and procedures. AML monitoring application rules and scenarios optimization efforts led to improved efficiencies and cost savings.
- Coordinated Branch office examinations of various broker dealers for compliance with FINRA regulations and assessment of their firms' compliance with internal policies and procedures and controls.
- Led AML and fraud investigation into suspicious cross-border banking transactions during divorce proceedings.
- Designer, content developer and moderator of live, monthly seminars Bankers Association. Topics include terrorism and economic crime, suspicious activity trends, global OFAC implantation challenges, correspondent banking issues in tax evasion, Foreign Corrupt Practices Act issues, trade facilitated terrorist financing and external and internal frauds in financial institutions.

**Summary of representative project work indicating depth and breadth of AML and forensic professional experience.**

**Process Improvements**

AML / Sanctions Policies & Procedures Development, Global European Bank, New York, USA

End to end AML Strategic Re-Alignment - Diversified Financial Services Institution (Broker Dealer, two Banks and Insurance Company), Lebanon and GCC

AML & OFAC Program Governance & Cost Reduction - Major Lebanese Financial Institutions

Currency Transaction Reporting/Suspicious Activity Reporting - Global Money Services Business, Qatar and KSA

Customer Identification Program Evaluation, Global Broker-Dealer, New York, Qatar and KSA

Credit Files Review and Review of AML Program Testing, Global Bank, Netherland, Holland

**Regulatory Order Compliance (AML & OFAC)**

Developed remediation plan and conducted risk assessment. Large Retail Bank, Doha, Qatar

QFCRA Cease & Desist Order/ Deferred Prosecution – Look Back: Managed bank's team of transactional review analysts. Major Islamic Financial Institution, Doha, Qatar

QFCRA Cease & Desist Order/ Deferred Prosecution – Look Back: internal audit of remediation efforts of another global consultant and bank's risk analyst team. Worked with teams of multiple consultants, bank compliance, IT and risk personnel in several locations to audit the controls around their regulatory remediation process. Global Financial Institution, Doha, Qatar

Written Agreement – Enterprise Risk Assessment, customer risk ranking and program testing. Mid-Size Lebanese Bank, Beirut, Lebanon

QFCRA Examination Comments – Look Back: Led analyst team to assess AML/OFAC controls on checks, currency ACH and wires. Foreign Owned Insurance company, Doha, Qatar

### **Technology Process Enhancements**

Transactional Analysis /Assist Rules and Scenarios Development - Correspondent Bank & EU Agency, Prague, Czech  
Assessment of Risk Parameters in Metavante PRIME Transaction Monitoring Application, **Financial Institution**, Doha, Qatar  
Post System Implementation Rules/Scenarios IDOM Optimization – Regional Bank, Lebanon

### **Independent Testing / Internal Audit of AML & OFAC Sanctions**

KSA and UAE Bank with Multiple Correspondent Bank Clients, Jeddah and Dubai, KSA/UAE  
Global Securities Clearing Company, Dubai, UAE  
Correspondent Bank & GCC Agencies, GCC  
Global Bank/Card Issuer, Testing against global corporate banking controls as well as local Poland laws, using client's Polish team of auditors, operations and compliance staff. Warsaw, Poland  
Correspondent Bank, Doha, Qatar  
Money Services Business, Testing of IT systems to US/KSA standards and currency exchange controls.

## **Training courses and seminars:**

---

### **Training on AML & Economic Sanctions (OFAC)**

Senior Management & Staff - Global Correspondent Bank, Jeddah, KSA  
Internal Control - Global Professional Audit Organization, Budapest (FATF Standards)  
Internal Auditors - Global Consulting Firm, Lagos, Nigeria  
Insurance Examiners - Global Insurance Company, Doha, Dubai, New York, USA  
Master Class, **Lebanon Bankers Association**  
Online AML Course Development, FINRA, Dubai  
Brokerage Compliance Officers - Regional Compliance Association, Baghdad, Iraq

### **Pre-Acquisition AML & OFAC Due Diligence**

Bank and Broker Dealer, Dubai, Bahrain & Saudi Arabia. Program Assessment and compliance testing under FATF, Saudi Arabian, UAE and Bahraini standards

### **Fraud & AML Investigations**

Employee Embezzlement, Regional Financial Institution, Dubai, UAE

High Risk Customers Investigation, South American Correspondent Bank & U.S. Agency, Muscat, Oman

- **Correspondent Banking/USA Patriot Act**  
Sponsored by *Union of Arab Banks and the Federal Reserve Bank of New York (N.Y.)*
- **Sanctions, AML/CFT**  
Sponsored by *Association of Certified AML Specialists*
- **HAWALA**  
Sponsored by *the Central Bank of UAE*

- **Enterprise Compliance Strategies**  
Sponsored by *Fleming Gulf*
- **Risk Management in the GCC**  
Sponsored by *Fleming Gulf*
- **Compliance Function in Financial Institutions**
- **Credit Risk Management**  
Sponsored by the *Lebanese Banks Association*
- **International Banking Relationship**  
Sponsored by the *Lebanese Banks Association*
- **Reading and Analysis of Economic**  
Sponsored by the *Lebanese Banks Association*
- **Stock Exchange**  
Sponsored by the *Lebanese Banks Association*
- **Analysis of Financial Markets Techniques**  
Sponsored by the *Lebanese Banks Association*
- **Financial and Banking Conference**  
Sponsored by the *Lebanese Banks Association*
- **Fiduciary Accounts**  
Sponsored by the *Lebanese Banks Association*
- **Euro Currency**  
Sponsored by the *Lebanese Banks Association*
- **Fixed Income Markets**  
Sponsored by *Union of Arab Banks*
- **Leadership Skills in Banks**  
Sponsored by *Union of Arab Banks*
- **Debit and Credit Cards**  
Sponsored by *the Union of Arab Banks*
- **Risk Management**  
Sponsored by *Banque Degroof Luxembourg & Lebanese Banks Association*
- **ISO 9000 Quality Management System Standards Implementation and documentation**  
Sponsored by *Management Integrated Consultants*
- **Government Bonds and Eurobonds Markets**  
Sponsored by *ACI Lebanon and CCF Paris*
- **Computers in Banking**  
Sponsored by the *NDU University Lebanon*
- **Treasury Management**  
Sponsored by the *NDU University Lebanon*
- **Introduction to Travellers Cheques, Sales and Operations**  
Organized by *American Express Bank*

- **Foreign Exchange & Treasury Seminar**  
Sponsored by *JJ Associates – London and ACI Lebanon*
- **Technical Analysis**  
Sponsored by *Dow Jones Telerate*

### **Independent Consultant- Compliance Alert**

- **AML / OFAC Program Assessment, Lebanese Domestic Bank Beirut**

Enhanced AML internal controls and conducted independent annual assessment of AML program, including customer acceptance, KYC due diligence, account profiling, record-keeping and reporting requirements, including suspicious activity reporting, and training. Designed and implemented AML audit examination scope to ensure the firm's compliance with the USA PATRIOT Act and the Bank Secrecy Act, as well as the regulatory requirements of the New York Stock Exchange and NASD related to AML and customer identification issues.

- **AML / OFAC Program Development, Mutual Funds, Investment Advisor & Broker Dealer, Jeddah**

Designed and implemented AML policy and procedures for mutual fund group and its broker dealer subsidiary, with tailored procedures for highly specialized business lines. Conducted review of broker dealer's regulatory and operational compliance policy and procedures to synchronize outdated procedures to actual workflow practices. Assisted General Counsel to develop and implement the AML internal controls focused on management oversight and AML risk management practices.

Re-engineered firm's continuing education program's tracking system and implemented AML training for 139 employees and supervisory personnel. Designed system for tracking and analyzing employees' outside brokerage accounts and quarterly Code of Ethics filings. Completed firm-wide analysis of employee fingerprinting, registration, licensing, and regulatory element of continuing education program. Responsible for organization's Broker Dealer and Investment Advisor filings.

### **Banking Track Record**

#### **Head of Compliance Oversight/MLRO**

ICBC – Industrial and Commercial Bank of China Doha (QFC) Branch

**GRC Consultant,** Amwal Investment Qatar

#### **Consultant – Supervision Compliance & AML**

Qatar Financial Centre Regulatory Authority

**Head of Compliance** Lebanese Canadian Bank

**Branch Manager (VP)** ABN AMRO Bank Beirut