

# BRION NAZZARO

## CONTACT

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## EDUCATION

### University of Denver

Master of Business Administration – Finance

Bachelor of Science – Computer Science

### Certified Commercial Cannabis Expert (CCCE) 2020-Present

Association of Certified Commercial Cannabis Experts (ACCCE) Member

### Certified Anti Money Laundering Specialist (CAMS) 2007-Present

Association of Certified Anti-Money Laundering Specialists (ACAMS) Member

### Certified Fraud Examiner (CFE) 2009-Present

Association of Certified Fraud Examiners (ACFE) Member

### Certified Regulatory Compliance Manager (CRCM) 2010-Present

Institute of Certified Bankers (ICB) Member

### Governance Fellow 2019-2022

National Association of Corporate Directors (NACD) Member

### Project Management Professional (PMP) 2008-2012

Project Management Institute (PMI) Member

## OVERVIEW

- 20 years of financial institution risk management and compliance expertise, 10 of them global in nature across 40+ jurisdictions
- Deep knowledge of state, federal, and international regulatory and licensing issues and risk program development
- Board experience as an internal director overseeing a US financial services company.

## WORK EXPERIENCE

### Managing Director | A7 Advisors LTD

June 2018 – Present

- Compliance, AML, and risk audit advisory and independent review services for US financial institutions and FinTech providers, 1 to 5 Billion in valuation
- Financial services consulting on licenses and bank charters in jurisdictions around the world
- Fractional compliance officer for multinational FinTechs entering the US market
- Compliance, AML and AML lookback advisory services for US casino, online gaming, and gaming license holders, 1 to 3 billion in valuation

### President | Association of Certified Commercial Cannabis Experts

August 2019 – Present

- Developing and launching the first risk management certification and association for the cannabis industry
- Responsible for driving the ACCCE business strategy in the US and Canada
- Formalizing the Cannabis Risk Management Framework

### Managing Director | Copacetic Strategies

June 2019 – November 2020

- Developing Commercial Cannabis Business customer programs and risk assessments for financial institutions in the US and Canada
- Developing institution-specific Commercial Cannabis Business risk management training for financial institutions in the US and Canada

### Global Compliance Director and N.A. Managing Director | WorldRemit

August 2014 – June 2019

- Held numerous leadership and executive roles across departments
- Designed and implemented AML, Compliance, and Loss Prevention Management Committees within local entities
- Oversaw 100+ compliance employees in 8 countries, covering 43 send countries and 150 receive countries
- Implemented a cross-jurisdictional training program and COSO standard control environment to centralize employees
- Initiated risk and vendor-management governance, program, and risk assessment
- Drove U.S. state, federal, and international money-transfer licensing applications
- Led creation/management of 15 separate AML/CTF programs for licensing

## **SPEAKING ENGAGEMENTS**

### **ACAMS | Webinars**

- Streamlining Processes When Banking Third-Party Payment Processors and Merchants
- The Art of Self-Defense: Guarding Against Personal Liability Risks
- Lessons Learned from Recent Broker-Dealer Disciplinary Actions
- ABCs of MSB Risk Management Programs
- Banking MSBS
- Stirring the Pot: Managing Compliance Risks of Banking Marijuana-Related Businesses
- Applying the Cannabis Risk Management Framework to Financial Institution Due Diligence

### **20th Annual International AML & Financial Crime Conference | Seminar**

- Balancing Customer Risk Management with Your Institution's Risk Appetite

### **Farm Credit Digital Alliance | Seminar**

- Platform Strategies: Utilizing FinTech to Modernize Treasury Management
- Platform Strategies: Integrating RegTech as a Service

### **Independent Bankers Association | Seminar**

- Third-Party Payment Processor Risk Management
- Money Service Business Licensing
- Risk Considerations for Marijuana and Marijuana Related Business Cross Border Payments
- Compliance as a Competitive Advantage (Canada)

- Managed reduction of card chargeback losses by more than \$1 million/year (85% reduction between December 2015 and December 2017) while transaction volumes tripled
- Implemented Machine Learning
- Designed and implemented monitoring and testing program based on U.S. Large Banking Supervision Compliance Program and IIA standards
- Oversaw risk and compliance issue management globally
- Managed all third-party regulatory audits and exams

### **Chief Compliance and BSA Officer | NBH Bank NA**

June 2012 – August 2014

- Envisioned and executed compliance strategy to hold off and settle regulatory enforcement issues privately by reorganizing and retooling the entire AML and Compliance Management and Testing function across a de novo national bank charter during its IPO
- Managed \$5-million-annual compliance budget for Compliance Audit, AML, and Fraud departments
- Proposed and managed internal control design/standards, implementation, and P&L oversight of complex financial products

### **PM for Global Compliance and Ethics – Consultant | Western Union**

November 2011 – June 2012

- Created the governance documents specific to Exhibit A section 23.1 of \$94-million settlement agreement between Arizona and Western Union
- Assured proper governance and assurance of off-shore service centers to maintain cost efficiency in low- to moderate-risk compliance activities

### **Project Manager for AML Technology – Consultant | TD Bank**

July 2011 – November 2011

- Created and presented (with EY) 5-year, \$210-million technology plan to address group wide AML/CTF monitoring across Toronto Dominion group
- Addressed numerous international regulatory violations to settle multiple enforcement actions and drive efficiency into customer monitoring
- Delivered customer CIP onboarding tool (based on FFIEC SDLC regulatory standards) to reduce customer friction across TD Bank footprint (20+ business lines)

### **Senior Vice President | ANB Bank**

February 2008 – June 2011

- Responsible for compliance across the entire bank, trust, and brokerage activities
- Envisioned and executed compliance strategy that held off and settled regulatory enforcement issues privately by reorganizing and retooling AML function
- Implemented centralized, rules-based AML system to monitor all bank activities

### **AML Senior Consultant | Various**

May 2004 – February 2008

- Resolved regulatory issues at Brown Brothers Harriman, Bank Tokyo Mitsubishi / Union Bank of California, Western Union, and AMEX
- Provided guidance and oversight to centralize compliance governance across private banking, retail banking, lending, trust, brokerage, insurance, trade finance, FX, and add-on products
- Developed IT solutions utilizing behavioral analytics, probability engines, and complex decision engines
- Provided guidance to unify fragmented data sources and complex layering of core and ancillary system to enable automation