

#### 2024 U.S. Regulatory Roundup

2024 has been a pivotal year for U.S. anti-money laundering (AML) regulations, marked by final rules that reshape financial compliance landscapes, and proposed changes that promise to further tighten regulations.

### Rules finalized in 2024



- Residential real estate rule
- Registered investment adviser & exempt reporting adviser rule

## Proposed changes ahead



- Customer Identification Program (CIP) for RIAs/ERAs
- 2 AML/CFT program modernization
- Recordkeeping for custodial accounts

#### Who will feel the impact?



- Certain parties to non-financed residential real estate transfers
- Registered investment advisers (RIA)
- Exempt reporting advisers (ERA)
- FDIC- insured depository institutions and potentially third-party non-bank companies (e.g. payment providers & fintechs)

#### Notable Implications

RIA/ERA rule extends to

certain "foreign located IAs"

from death or divorce are exempt from rule requirements

Real estate transfers resulting

for each reportable real estate transfer

Proposed CIP requirements

Only one "reporting person"

include a risk assessment process

AML/CFT programs must

are generally consistent with the CIP requirements for brokers or dealers and mutual funds With some additional requirements, an IDI could maintain the records through an arrangement with a third-party

# Let's solve it together Amidst these regulatory shifts, technology plays a pivotal

role and it is imperative that institutions and firms find the right mix of technology to ensure effective risk management and compliance.

- Flexible & adaptive risk assessment tools
- Entity resolution & network analysis
- Generative AI & copilots

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