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Luis Alberto Aleman, CFE, CAMS Senior Consultant



Luis Alberto Aleman advises and provides consulting services in International Banking with specialization in Anti-Money Laundering, Fraud Investigations, Due Diligence, Bank Operations, Audit and Compliance in Latin America, Asia/Pacific, and Europe/Middle East regions. Mr. Aleman possesses over four decades of experience at the Bank of Nova Scotia in San Juan, Puerto Rico, and Bank of America in San Juan and Miami, where he mastered a diverse set of banking operations and audit programs. Mr. Aleman has executive-level financial services experience with proven ability to quickly assess and understand new environments, allowing him to make difficult risk/reward decisions.

Mr. Aleman has participated and led as auditor-in-charge numerous examinations and audits in countries throughout the Caribbean, Central America, South America, Asia, and Europe. In his role as Senior Vice President of Audit with Bank of America, Mr. Aleman developed close, working relationships with the Bank's AML Compliance Head, AML Legal Head, and the Executive General Auditor. These partnerships have led to the build out, development and the execution of effective audit programs that contributed to identifying weaknesses and deficiencies in AML/CFT programs, high risk products and services, and high-risk customers.

In addition to his roles and responsibilities as senior auditor, Mr. Aleman has participated in internal, complex, cross-jurisdictional AML investigations that resulted in exiting account relationships and high-risk products to avoid potential enforcement actions. Mr. Aleman also led audits that included methodical risk-reward analysis which identified elevated risk associated with offshore private banking and bearer share personal investment companies. These audits resulted in recommendations to re-evaluate the business models which ultimately led to exiting the client relationships and products. During his many audits and examinations, Mr. Aleman worked closely with Federal Reserve Board and Office of Comptroller of Currency to enhance the international regulatory coverage of Bank of America.

Fluent in Spanish and English, Mr. Aleman is a sought-after speaker on the topics of AML/CFT compliance and audit. He has spoken at conferences hosted by the Mexican Bankers Association and the Costa Rican Bankers Association. Mr. Aleman is a Certified Anti-Money Laundering Specialist (CAMS), Certified Fraud Investigator (CFE) and holds a Six Sigma Green Belt Certification. He graduated with a B.A. in History from the University of Puerto Rico. He recently retired as a Senior Vice President/Audit Manager S.M.E. with Bank of America Global Financial Crimes Audit.

AREAS OF EXPERTISE

- International Audits; Corporate Anti-Money Laundering Audit Programs
- Special Investigations; Complex Fraud and Anti-Money Laundering Investigations
- Pre-Acquisition/Due diligence examinations in Latin America (Mexico, Argentina and Brazil)
- Emerging Markets knowledge in current political and economic developments in banking industry
- Experience and Interface with US/Local Regulators and Law Enforcement on Audits/Investigations in Latin America and APAC
- Guest Speaker on AML at the Mexican and Costa Rican Bankers Association conferences

EXPERIENCE

Bank of America-Global Financial Crimes Audit
Senior Vice President

Miami, FL
2013 – June 2021

Bank of America-Corporate Audit
Senior Vice President

San Juan, P.R., and Miami, FL
1981 – 2013

Bank of America-San Juan Branch
Assistant Operations Manager

San Juan, P.R.
1979 – 1981

The Bank of Nova Scotia (Scotia Bank)
Operations Assistant

San Juan, P.R.
1974 – 1979

MAJOR ACCOMPLISHMENTS

- Directed and Managed Audits in Emerging Markets (Ex-Japan) – Latin America/APAC with staff based in New York, Miami, Mexico City, Sao Paulo, Singapore, New Delhi and Hong Kong.
- Directed Corporate Audit Anti-Money Laundering Program for Bank of America Corporation.
- Directed Corporate Audit Special Investigation team for Bank of America Corporation.
- Directed complex fraud and AML investigations in Brazil, Argentina, Peru, Mexico, Chile, Italy, UK, Singapore, and the USA.
- Pre-acquisition/due diligence of Bank of America purchase of Security Pacific Bank, Continental Bank Argentina, MBA Argentina (Investment Bank), Santander Mexicano, Banco Liberal (Brazil), Merrill Lynch Brazil and Merrill Lynch Uruguay.
- Created Anti-Money Laundering Audit Programs/Procedures and Methodology.
- Created Special Investigation International Programs and Methodology.
- Provided training in Anti-Money Laundering to Corporate Audit Staff.
- Strong/effective verbal and written presentation skills in providing summary/briefing to Bank Senior Management, Regulators, External Legal Counsel and Law Enforcement.
- Strong Leadership, Project Management skills and Relationship Network throughout LATAM.
- Strong ability to influence senior management throughout Latin America.
- Highly respected by Bank of America Senior Management throughout Latin America, Miami, New York and Charlotte.

EDUCATION & CERTIFICATIONS

Certified Anti-Money Laundering Specialist (CAMS)
Six Sigma Green Belt Certification
Certified Fraud Investigator (CFE)
B.A. from the University of Puerto Rico

LANGUAGES

Fluent (Written & Verbal) in English and Spanish
Italian and Portuguese (entry level)