Audenwell.

AML operations and independent testing

FOR US BANKS AND COMPLIANCE CONSULTANCIES

SERVICES

Backlog Diagnostic. Queue composition, evidence gaps, complexity and capacity from an agreed sample.

Alert Review & Investigations. TM and sanctions/OFAC alert review (L1), investigations (L2), SAR decision packages and draft narratives, lookbacks, QA of client reviews.

KYC & EDD Reviews. CIP/KYC onboarding reviews, periodic refresh, EDD on high-risk clients and KYC remediation.

Independent Test / Remediation Validation. Risk-based test plans, population and sample testing, supporting workpapers, findings and limitations against agreed criteria.

DELIVERY MODEL

David Francis leads scoping, client communication and agreed QA. Philippine analyst support is selected for the funded scope and remains subject to availability and client approval. AI-assisted drafting is used only with approval of the tool and data flow. Every disposition is a recommendation, ready for client decision; the client closes or escalates and keeps every SAR decision and filing.

FOUNDER BACKGROUND

David Francis, CAMS, CCAS · 15 years in financial services · BGC, Taguig

Bank of America. VP, Audit Supervisor, Global Financial Crimes Governance (April 2024–October 2026); final role: Global Financial Crimes Investigator (2026). Independent validation of BSA/AML and economic sanctions remediation; risk-based test plans; population and sample testing; workpapers.

Santander Bank (2022–2024). Senior QA Analyst, AML Compliance. Second-line QA and independent testing across AML and fraud SARs, OFAC/sanctions screening, non-actionable alerts, EDD reviews, currency transaction reports, and monetary instrument logs.

First Republic Bank (2014–2017). High-risk client EDD/KYC, including onboarding of private equity and venture capital funds, hedge funds, and registered investment advisers; complex financial crimes investigations and SAR preparation; QA of FIU alerts and investigations (2016–2017).

Citigroup (2011–2014). BSA/AML investigations; KYC remediation; structuring reviews; reviews of personal accounts used for business activity.

2017–2022: relationship management at First Republic Bank (2017–2020); mortgage loan origination at SoFi (2020–2022). BA Economics, Virginia Tech. Builds AI-assisted workflow software with source-linked outputs and human approval.

Prior employment is listed for context. These organizations are not presented as clients or endorsers of Audenwell.

ENGAGEMENT AND ACCESS

Direct engagement or disclosed subcontract to a consultancy. Philippine delivery and all proposed providers are disclosed up front. No customer-data access before written client approval and other required approvals. SAR information is handled only where the client's SAR-confidentiality and data-location requirements allow, by approved personnel.

INDEPENDENCE AND BOUNDARIES

A client engages Audenwell for operations (Alert Review & Investigations, KYC & EDD Reviews) or independent testing, never both. A Backlog Diagnostic counts toward the independence screen. A diagnostic that supports operations or designs remediation rules out later independent testing by Audenwell for that client under this policy.

Audenwell does not hold, transmit or exchange client funds, provide legal or tax advice, make BSA decisions, including SAR decisions, or file SARs. Services and access are subject to an agreed scope and client approval.

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Audenwell is a business name of Echo Innovations LLC, a Wyoming limited liability company.