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April 27, 2011

The Honorable Carl Levin  
Chairman  
Permanent Subcommittee on Investigations  
Committee on Homeland Security and  
Governmental Affairs  
United States Senate  
Washington, D.C. 20510

The Honorable Tom Coburn, M.D.  
Ranking Minority Member  
Permanent Subcommittee on Investigations  
Committee on Homeland Security and  
Governmental Affairs  
United States Senate  
Washington, D.C. 20510

Dear Chairman Levin and Ranking Member Coburn:

Thank you for your letter to ABA President Stephen N. Zack last October, in which you referenced your Subcommittee's bipartisan staff report titled "Keeping Foreign Corruption Out of the United States: Four Case Histories." In that letter, you asked us to meet with your staffs to discuss the ABA's plans to educate and encourage bar members to follow the Voluntary Good Practices Guidance for Lawyers to Detect and Combat Money Laundering and Terrorist Financing ("Guidance").

After receiving your letter, ABA representatives had a very productive meeting with your staffs last November. During the meeting, we provided them with a written action plan and report describing the ABA's efforts to disseminate and promote the Guidance. Enclosed for your information is a newly updated version of that document titled "Summary of Completed and Proposed Steps to Implement Voluntary Good Practices Guidance" that includes a description of all the various actions that the ABA has undertaken in recent months to further disseminate the Guidance to state courts, state and local bar associations, and practicing lawyers throughout the country.

The ABA remains committed to making the Guidance an effective resource for lawyers who provide legal services to clients across the United States. Towards that end, the ABA continues to develop and implement a multi-pronged approach to disseminate the Guidance as widely as possible and to educate lawyers and others in the legal community about the Guidance. These efforts include obtaining the endorsement of various specialty bar associations; reaching out to state and local bars, state supreme courts, practicing lawyers, and others; engaging the international community; and implementing a variety of other strategies to publicize and encourage compliance with the Guidance.

As noted in the enclosed detailed summary, the ABA has recently taken many specific steps to implement the Guidance, including:

- Developing a set of "Frequently Asked Questions" and answers explaining the Gatekeeper Initiative and the Guidance (and posting the FAQs and the text of the Guidance on the ABA Gatekeeper Task Force's website);
- Sending a letter from the President of the ABA to all state and local bar association presidents and other key bar leaders that (1) describes the Guidance, (2) asks the bar leaders to educate their members about the Guidance and (3) asks them to encourage their members to follow the

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Guidance; (see ABA letter to bar leaders dated April 8, 2011, available on the ABA's website at: [http://www.americanbar.org/content/dam/aba/uncategorized/2011/2011apr08\\_goodpractices\\_o.a\\_uthcheckdam.pdf](http://www.americanbar.org/content/dam/aba/uncategorized/2011/2011apr08_goodpractices_o.a_uthcheckdam.pdf))

- Preparing a short story about the ABA President's letter to bar leaders to be included in an upcoming issue of the ABA President's monthly e-newsletter to the managing partners of large U.S. law firms (with web links to the ABA letter, the FAQs, and the text of the Guidance), as well as exploring other opportunities for the ABA President to highlight the Guidance in future editions of the *ABA Journal* magazine and other publications;
- Reaching out to the Conference of Chief Justices, which is comprised of the Chief Justices of all 50 states, in an effort to enlist its support in disseminating the Guidance to state supreme courts and their state bar agencies and encouraging lawyers to follow it;
- Working with ABA Publishing on an initial draft of a monograph or book—and exploring the possibility of developing a separate informational DVD—on the Gatekeeper Initiative and the Guidance to provide practical advice to U.S. lawyers on the Guidance and the risk-based approach to client due diligence;
- Actively developing and delivering numerous Continuing Legal Education (CLE) programs on the Gatekeeper Initiative and the Guidance (see detailed list of CLE programs contained in Schedule 1 of the enclosed summary);
- Posting the Guidance, the FAQs, and numerous other materials relating to anti-money laundering (AML) compliance on the ABA Gatekeeper Task Force's website and the websites of many other ABA sections and committees; and
- Reaching out to the Association of American Law Schools and others in an effort to incorporate AML content into law school curriculum, and engaging the ABA Ethics Committee to explore the impact of the Guidance on the ABA Model Rules of Professional Conduct

The ABA will continue to pursue these and other steps described in the attached summary in an effort to educate lawyers and encourage their compliance with the Guidance. Compliance will allow lawyers to combat money laundering and terrorist financing in ways that do not compromise the attorney-client privilege, the duty of client confidentiality, and the attorney-client relationship.

Thank you very much for your continued interest in this issue. If you or your staff would like to discuss the ABA's ongoing efforts to promote the Guidance or other related issues, please feel free to contact Kevin Shepherd, Chair of the ABA Gatekeeper Task Force, at (410) 244-7772, [kshepherd@venable.com](mailto:kshepherd@venable.com), or Larson Frisby, our Senior Legislative Counsel, at (202) 662-1098, [larson.frisby@americanbar.org](mailto:larson.frisby@americanbar.org).

Sincerely,



Thomas M. Susman

Enclosure

## **SUMMARY OF COMPLETED AND PROPOSED STEPS TO IMPLEMENT VOLUNTARY GOOD PRACTICES GUIDANCE**

In August 2010, the ABA House of Delegates adopted the Voluntary Good Practices Guidance For Lawyers to Detect and Combat Money Laundering and Terrorist Financing (“**Guidance**”) as official ABA policy (see ABA Resolution 116). Set forth below is a summary of the steps that the ABA and other stakeholders have taken, or plan to take, to implement the Guidance. This plan is dynamic and is subject to change based on evolving circumstances.

### **Endorsement/Support by Specialty Bar Associations**

- American College of Mortgage Attorneys
- American College of Trust and Estate Counsel (“ACTEC”)
- American College of Real Estate Lawyers
- American College of Commercial Finance Lawyers

### **Outreach to State and Local Bar Associations and to State Supreme Courts**

- The ABA Task Force on Gatekeeper Regulation and the Profession (“Gatekeeper Task Force”) has developed a frequently asked questions (“FAQs”) summary of the effort by governmental authorities to impose anti-money laundering (“AML”) and counter-terrorist financing obligations on gatekeepers to the domestic and international monetary systems (“Gatekeeper Initiative”) and the Guidance. The FAQs are posted on the Gatekeeper Task Force’s website at [http://www.americanbar.org/content/dam/aba/publications/criminaljustice/gatekeeper\\_faq.authcheckdam.pdf](http://www.americanbar.org/content/dam/aba/publications/criminaljustice/gatekeeper_faq.authcheckdam.pdf) , along with a link to the full text of the Guidance.
- The ABA President sent a letter in April 2011 to all state and local bar association presidents and other key bar leaders describing the Guidance and asking them to educate their members about the Guidance and encourage the members to follow the Guidance. The letter also contained links to the FAQs and the Guidance. The ABA letter to state and local bar leaders is posted on the ABA’s website at: [http://www.americanbar.org/content/dam/aba/uncategorized/2011/2011apr08\\_goo\\_dpractices\\_o.authcheckdam.pdf](http://www.americanbar.org/content/dam/aba/uncategorized/2011/2011apr08_goo_dpractices_o.authcheckdam.pdf)
- Representatives of the Gatekeeper Task Force and ACTEC gave a presentation on the Guidance to the National Conference of Bar Presidents (“NCBP”) at the ABA’s February 2011 Mid-Year Meeting in Atlanta, Georgia. The NCBP has invited these representatives to deliver an encore program at the NCBP’s meeting at the ABA’s August 2011 Annual Meeting in Toronto.

- The ABA will continue to coordinate, through members of the Gatekeeper Task Force, the dissemination of the FAQs and Guidance to various ABA sections and their liaisons with state and local bar associations.
- Representatives of the Gatekeeper Task Force and ACTEC delivered a presentation on the Guidance to the Board of Directors of the Conference of Chief Justices (“CCJ”) in July 2010. The CCJ, which is comprised of the Chief Justices of all 50 states, referred the matter to a committee chaired by Chief Justice Michael C. Heavican (Neb.). The Gatekeeper Task Force will follow-up with Chief Justice Heavican to enlist the CCJ’s support in disseminating the Guidance to state supreme courts and their state bar agencies and encouraging lawyers to follow it. The chair of the Gatekeeper Task Force gave a follow-up presentation to the CCJ in Washington, D.C. in January 2011. Chief Justice Heavican asked that the Gatekeeper Task Force propose a resolution for the CCJ’s consideration at its annual meeting in July 2011.

### **Educational Efforts and Outreach to Practicing Attorneys, Law Students and Others**

- The ABA Division for Media Relations & Communication Services plans to include a short story about the ABA President’s recent letter to state and local bar presidents encouraging adherence to the Guidance in an upcoming issue of the ABA President’s monthly e-newsletter to the managing partners of large U.S. law firms, with links to the ABA letter, the FAQs, and the text of the Guidance
- The ABA also is exploring other opportunities to highlight the Guidance through the office of the ABA President, including a possible article or “ABA President’s Message” column in the *ABA Journal* magazine.
- The Gatekeeper Task Force is maintaining a comprehensive list of CLE programs on the Guidance, the Gatekeeper Initiative, and the U.S.A. PATRIOT Act as it relates to Gatekeeper-issues. Attached as Schedule 1 is a copy of the current list. The ABA and various specialty bar associations are actively developing and delivering CLE and other informational programs on the Guidance.
- ABA Publishing has approved a proposal to produce a monograph on the Gatekeeper Initiative and the Guidance. The purpose of this book is to collect in a single location the leading scholarship in the area and to provide practical guidance to U.S. lawyers on the Guidance and the risk-based approach to client due diligence. Representatives of the Gatekeeper Task Force are beginning to work on the initial draft of this monograph.
- The Gatekeeper Task Force and ACTEC are exploring the possibility of developing a Gatekeeper/Guidance DVD that would be widely distributed to state and local bar associations and other CLE providers. Funding support may be sought from US Treasury.

- The Gatekeeper Task Force has revised and updated its website so that it is more robust and will be a content-rich website for AML compliance matters, the Gatekeeper Initiative, and the Guidance.
- The Task Force also is in the process of posting the Guidance on the websites of numerous transactional law sections and committees within the ABA.
- Several Gatekeeper Task Force leaders are expanding publication efforts by preparing magazine and e-magazine articles (e.g., *Probate & Property*) on the Guidance. For example, a cover article on the Guidance was published by Task Force Chair Kevin Shepherd in the March/April 2011 issue of *Probate & Property*. See Kevin L. Shepherd, *Risky Business: The Gatekeeper Initiative and the Risk-Based Approach to Client Due Diligence*, *Prob. & Prop.* 10 (Mar./Apr. 2011).
- The Gatekeeper Task Force also is seeking support to incorporate AML content into law school curriculum, including engaging with the Association of American Law Schools.
- Outreach to the ABA Standing Committee on Ethics and Professional Responsibility also is in progress to explore the impact of the Guidance on the ABA Model Rules of Professional Conduct. Representatives of the Gatekeeper Task Force and ACTEC are scheduled to meet with the chair of this key ABA committee in June 2011.

### **Engagement with International Community**

- Representatives of the ABA Gatekeeper Task Force are continuing engagement with the Financial Action Task Force on Money Laundering (“FATF”) by attending meetings involving the legal profession sector and other designated non-financial businesses and professions. The Gatekeeper Task Force also submitted comments to the FATF in January 2011 relating to proposed revisions to the Forty Recommendations.
- The Gatekeeper Task Force and ACTEC also continue to maintain liaison relationships with relevant law societies and bar associations, e.g., CCBE, Law Society of England and Wales; Japanese Bar Federation; and International Bar Association.

**SCHEDULE 1**

**GATEKEEPER/USA PATRIOT ACT CLE PROGRAMMING**

**2011**

<b>Date</b>	<b>Presenter</b>	<b>Title/Location</b>
May 3, 2011	Martin Lybecker Kevin L. Shepherd Cari Stinebower	The Gatekeeper Initiative and the Voluntary Good Practices Guidance: Risky Business for Transactional Lawyers, ABA Business Law Section, Tri-Bar, New York, New York.
March 25, 2011	Jack Terrill	The Financial Action Task Force & The Good Practices Guidance, New York State Bar Association, New York, NY
March 7-8, 2011	Leigh-Alexandra Basha	IBA – 16 <sup>th</sup> International Wealth Transfer Practice Conference: Private Clients in 2011 - caught in the crossfire or the crosshairs?, London, U.K.

**2010**

<b>Date</b>	<b>Presenter</b>	<b>Title/Location</b>
November 5, 2010	Kevin L. Shepherd	Gatekeeper Initiative and Client Due Diligence: The New Reality, ICSC Law Conference, Miami, FL
November 3, 2010	Cari N. Stinebower	Evolving Compliance Requirements and Ethical Considerations for the Business Law Attorney CT Corporation's 2010 Seminar Series, New York, NY
November 2, 2010	Duncan Osborne	"FATF and the Good Practices Guidance," 55 <sup>th</sup> Annual Estate Planning Seminar, Seattle, WA
October 17, 2010	Bruce Zagaris	International Money Laundering Panel, Annual Money Laundering Conference, American Bankers Association/American Bar Association, Washington, D.C.
October 5, 2010	Claudio Cocuzza Stephen Revell Claudia Seibel Kevin L. Shepherd	Panel, "Real Estate and Anti Money Laundering Regulations: What a Real Estate Lawyer Should Know," International Bar Association, Vancouver, British Columbia, Canada

October 4, 2010	Stuart Cameron Emile van der Does de Willebois Jonathan Goldsmith Stephen Revell Linda Lee Kevin L. Shepherd Luis Urrutia Corral	Panel, “Where did the money come from? What should be the lawyers’ role in the fight against money-laundering?,” International Bar Association, Vancouver, British Columbia, Canada.
August 19, 2010	Bruce Zagaris	Ethical Issues in Offshore Planning, ALI-ABA International Trust and Estate Planning, Chicago, IL
August 2010	Gideon Rothschild	“FATF and Patriot Act Requirements: What Should a Transactional Lawyer Worry About?,” Lawline.com (online continuing legal education).
July 28, 2010	Cari N. Stinebower	The Foreign Corrupt Practices Act and Anti-Money Laundering, ILI’s Orientation in the U.S. Legal System
July 24, 2010	Duncan E. Osborne Kevin L. Shepherd	Voluntary good practices guidance—presentation of Board of Directors of Conference of State Chief Justices, July 24, 2010, Vail, Colorado.
June 17, 2010	Cari N. Stinebower	Evolving Compliance Requirements and Ethical Considerations for the Business Law Attorney CT Corporation’s 2010 Seminar Series, St. Louis, MO
May 24, 2010	Duncan Osborne	“FATF and the Good Practices Guidance,” The International Academy of Estate and Trust Law, Barcelona, Spain.
May 11, 2010	Gideon Rothschild	STEP Presentation
May 11, 2010	Duncan Osborne	“FATF and the Good Practices Guidance,” Society of Trust and Estate Practitioners (STEP), New York, NY
May 7, 2010	Kevin L. Shepherd	“Risky Business: Transactional Lawyers and the Gatekeeper Initiative,” ABA Real Property, Trust and Estate Law Section Symposium, May 7, 2010, Philadelphia, Pennsylvania.

April 24, 2010	Kevin L. Shepherd	“Lawyers as Gatekeepers: AML Guidance for Transactional Lawyers,” ABA Business Law Section Meeting, Denver, Colorado.
March 11, 2010	Duncan E. Osborne Henry Christensen, III	“FATF and the Good Practices Guidance,” The American College of Trust and Estate Counsel, Bonita Springs, Florida.
February 4, 2010	Cari N. Stinebower	“Preventing Federal Intrusion into State Supreme Court Regulation of Lawyers,” ABA Midyear Meeting, Orlando, Florida.
January 28, 2010	Duncan E. Osborne	“The Financial Action Task Force and Its Impact on The Practice of Law,” 44 <sup>th</sup> Annual Heckerling Institute on Estate Planning, Orlando, Florida.
January 23, 2010	Kevin L. Shepherd	Panel, “Money Laundering Investigations: Soup-to-Nuts Discussion Regarding Structuring Transactions and Money Laundering Investigations,” ABA Taxation Section Meeting, San Antonio, Texas.
January 18, 2010	Duncan E. Osborne	“The Financial Action Task Force and Its Impact on The Practice of Law,” Austin Tax Study Group, Austin, Texas.
January 9, 2010	Kevin L. Shepherd Laurel Terry Colin Tyre	Panel, “The Transformative Effect of International Initiatives on Lawyer Practice and Regulation: A Case Study Focusing on FATF and its 2008 Lawyer Guidance,” Association of American Law Schools Annual Conference, New Orleans, Louisiana.

## 2009

<b>Date</b>	<b>Presenter</b>	<b>Title/Location</b>
October 2009	Bruce Zagaris	Panel, Gatekeeper and AML Issues, ABA/ABA Money Laundering Enforcement Conference, Washington, D.C.
October 20, 2009	Gideon Rothschild	“What Lawyers Need to Know to Combat Money Laundering and Terrorist Financing,” Lighthouse International, New York, New York.



October 2009	Bruce Zagaris	Role of lawyers and other professionals (fiduciaries) on AML, tax and related matters, ALI-ABA International Estate Planning Institute.
October 11, 2009	Cari N Stinebower	Corporate Transparency and Other International Issues, 21st Annual ABA/ABA Money Laundering Enforcement Conference, Washington, D.C.
October 7, 2009	Kevin L. Shepherd	“Risky Business—Transactional Lawyers and the Gatekeeper Initiative,” Advanced Real Property Institute, Maryland Institute for Continuing Legal Education, Baltimore, Maryland.
October 5, 2009	Stephen Revell Kevin L. Shepherd	Panel, “Gatekeeper Initiative,” International Bar Association, Madrid, Spain.
October 2, 2009	Cari N. Stinebower	“How Well Do You Know Your Client?”, 2009 Canadian Transportation Lawyers Association, Ontario-on-the-Lake, Canada.
June 10, 2009	Duncan E. Osborne	“The Financial Action Task Force and Its Impact on The Practice of Law,” 33 <sup>rd</sup> Annual Advanced Estate Planning and Probate Course, Houston, Texas.
April 29, 2009	Duncan E. Osborne	(1) “Money Laundering and Anti-Money Laundering Rules – United States,” The International Academy of Trust and Estate Law, Cartagena, Columbia.  (2) “What if FATF Rules Our Practice: A Brave New World for Private Wealth Attorneys,” The International Academy of Trust and Estate Law, Cartagena, Columbia.
April 3, 2009	Cari N. Stinebower	Terrorism and the Corporation: Ethical Implications for Officers, Directors and Their Counsel, Seattle University School of Law: The Annual James L. Holman Ethics Program, Seattle, Washington.
March 28, 2009	Kevin L. Shepherd	Workshop, “Money Laundering and Terrorist Financing: Why Dirt Lawyers Should Worry,” American College of Real Estate Lawyers, San Juan, Puerto Rico.

January 29, 2009	Kevin L. Shepherd	“The USA Patriot Act: What Real Estate Lenders Need to Know,” Commercial Real Estate Financing 2009: How the World Changed, San Francisco, California.
January 15, 2009	Gideon Rothschild Leigh-Alexandra Basha G. Warren Whitaker	My Client Married an Alien – International Planning Update, 43 <sup>rd</sup> Annual Heckerling Institute on Estate Planning, Orlando, FL

**2008**

<b>Date</b>	<b>Presenter</b>	<b>Title/Location</b>
2008 Spring Meeting	State and Local Bar Relations (ABA Business Law Section)	Amendments to State Entity Laws to Address AML and Anti-terrorism Issues
November 12, 2008	Edward Manigault Kevin L. Shepherd	Panel, “Exclusive on the FATF and the OECD: Preserving Privacy in View of Recent Efforts and Offshore Challenges,” 20 <sup>th</sup> Annual International Trust and Estate Planning Summit, Coral Gables, Florida.
October 2008	Bruce Zagaris	Role of lawyers and other professionals (fiduciaries) on AML, tax and related matters, ALI-ABA International Estate Planning Institute.
October 19, 2008	Kevin L. Shepherd Bruce Zagaris	Panel, “The Gatekeeper Initiative: It’s Time to Pay Attention,” ABA/ABA Money Laundering Enforcement Conference, Washington, D.C.
September 24, 2008	Duncan E. Osborne	FATF Due Diligence on Clients: The Financial Action Task Force Clashes with The Model Rules,” 43 <sup>rd</sup> Annual Southern Federal Tax Institute, Atlanta, Georgia.
September 5, 2008	Duncan E. Osborne	“What if FATF Rules Our Practice: A Brave New World for Private Wealth Attorneys,” American Law Institute-American Bar Association Course of Study, Sophisticated Estate Planning Techniques, Boston, Massachusetts.

August 10, 2008	William Clark Edward J. Krauland Kevin L. Shepherd	Panel, "Working Group Meeting on Global Developments Relating to Anti-Money Laundering & Counter-Terrorism Financing Compliance for the Legal Profession," ABA Annual Meeting, New York, New York.
May 28, 2008	Gideon Rothschild	"FATF, International Money Laundering Initiatives and the Lawyer's Ethical Dilemma, New York State Bar Association.
May 1, 2008	Edward J. Krauland Duncan Osborne Kevin L. Shepherd	"Guardians at the Gate: Update on the Gatekeeper Initiative," ABA Section of Real Property, Trust and Estate Law Spring Symposia, Washington, D.C.
April 9, 2008	Kevin L. Shepherd Gary W. Sutton	Panel, The Patriot Act and Its Offspring - Ethical Issues For Real Estate Attorneys and the Real Estate Industry, The Benjamin S. Crocker Symposium 2008 (UCLA), Los Angeles, California.
March 6, 2008	Duncan E. Osborne Judith McCue Gideon Rothschild	"FATF and Patriot Act Requirements: What Should a Trust and Estates Lawyer Worry About?", The American College of Trust and Estate Planning Counsel, Chicago, Illinois.
March 5, 2008	Gideon Rothschild	"FATF and Ethical Considerations," American College of Trust and Estate Counsel, Boca Raton, Florida.

## 2007

<b>Date</b>	<b>Presenter</b>	<b>Title/Location</b>
2007 Committee Meeting	Banking Law Committee (ABA Business Law Section)	Roundtable Discussion, Part II: Basel II, AML/OFAC and Preemption
2007 (Spring Meeting)	Cyberspace Law, Banking Law, White Collar Crime (ABA Business Law Section)	Hype or Reality?—Anti-Money Laundering Risks from Prepaid Payment Products and What Can be Done About Them (Audio)

October 2007	Bruce Zagaris	Panel, Gatekeeper and AML Issues, ABA/ABA Money Laundering Enforcement Conference, Washington, D.C.
October 2007	Bruce Zagaris	Role of lawyers and other professionals (fiduciaries) on AML, tax and related matters, ALI-ABA International Estate Planning Institute.

## 2006

<b>Date</b>	<b>Presenter</b>	<b>Title/Location</b>
November 30, 2006	Kevin L. Shepherd	The Patriot Act, Building Security and Anti-Terrorism Protection/Compliance with the Patriot Act, Advanced Commercial Real Estate Leases, Washington, D.C.
November 15, 2006	Bruce Zagaris	Webinar, “ Friend or Foe: The Roles Gatekeepers Play and the Dangers They Pose.”
October 27, 2006	Kevin L. Shepherd	Panel, USA Patriot Act and Executive Order 13224, International Conference of Shopping Centers Law Conference, Orlando, Florida.
October 2006	Bruce Zagaris	Role of lawyers and other professionals (fiduciaries) on AML, tax and related matters, ALI-ABA International Estate Planning Institute.
October 2006	Bruce Zagaris	Panel, Gatekeeper and AML Issues, ABA/ABA Money Laundering Enforcement Conference, Washington, D.C.
May 26, 2006	Kevin L. Shepherd	The USA Patriot Act: An Update, Section of Real Property, Probate and Trust Law of the Florida State Bar Association, Orlando, Florida.
January 10, 2006	Kevin L. Shepherd	The USA Patriot Act, Gatekeeper Initiative, and OFAC: An Update, Section of Real Property, Planning & Zoning of the Maryland State Bar Association, Baltimore, Maryland.

## 2005

<b>Date</b>	<b>Presenter</b>	<b>Title/Location</b>
2005	Banking Law	The New Era of Enforcement and Compliance—

Spring Meeting	Committee (ABA Business Law Section)	Bank Secrecy Act, Anti-Money Laundering, and More
October 2009	Bruce Zagaris	Role of lawyers and other professionals (fiduciaries) on AML, tax and related matters, ALI-ABA International Estate Planning Institute.
October 2005	Bruce Zagaris	Panel, Gatekeeper and AML Issues, ABA/ABA Money Laundering Enforcement Conference, Washington, D.C.
April 16, 2005	Kevin L. Shepherd	The USA Patriot Act: An Update, ABA Section of Real Property, Probate and Trust Law, Washington, D.C.

#### 2004

Date	Presenter	Title/Location
October 2004	Bruce Zagaris	Panel, Gatekeeper and AML Issues, ABA/ABA Money Laundering Enforcement Conference, Washington, D.C.
August 21, 2004	Kevin L. Shepherd	The USA Patriot Act: Surprising Implications for Transactional Lawyers, New Mexico Chapter, American Civil Liberties Union, Albuquerque, New Mexico.
May 13, 2004	Kevin L. Shepherd	The USA Patriot Act: Surprising Implications for Transactional Lawyers, ABA Section of Real Property, Probate and Trust Law, Seattle, Washington.

#### 2003

Date	Presenter	Title/Location
December 3, 2003	Kevin L. Shepherd	Real Estate Implications of the USA Patriot Act, Pennsylvania State Bar Association, Real Estate Symposium, Philadelphia, Pennsylvania.
October 25, 2003	Kevin L. Shepherd	USA Patriot Act and Gatekeeper Initiative: "Ratting on Your Clients," American College of Real Estate Lawyers.
October	Kevin L. Shepherd	Gatekeeper Initiative and the USA Patriot Act--

2003		Real Estate Lawyers as Federal Agents, Montgomery County Bar Association, Rockville, Maryland.
October 1, 2003	Kevin L. Shepherd	USA Patriot Act and Real Estate Lawyers: What's All the Fuss?, Maryland Institute for Continuing Legal Education, Baltimore, Maryland.
June 13, 2003	Kevin L. Shepherd	Gatekeeper Initiative and the USA Patriot Act-- Real Estate Lawyers as Federal Agents, Maryland State Bar Association, Ocean City, Maryland.
May 13, 2003	Kevin L. Shepherd	USA Patriot Act: Federalizing Real Estate Transactions, Maryland State Bar Association Real Estate Roundtable Series, Baltimore, Maryland.

**2002**

<b>Date</b>	<b>Presenter</b>	<b>Title/Location</b>
2002 Spring Meeting	Consumer Financial Services, Banking Law, and White Collar Crimes Committee (ABA Business Law Section)	Patriot Games: What You Need to Know About the Anti-Money Laundering and Anti-Terrorism Provisions of the Patriot Act to Represent Corporations and Financial Institutions
October 16, 2002	Kevin L. Shepherd	USA Patriot Act: Real Estate Regulations May Go Too Far, University of Baltimore School of Law, Baltimore, Maryland.
October 12, 2002	Kevin L. Shepherd	Gatekeeper Initiative and the USA Patriot Act: Surprising Implications for Transactional Lawyers, American College of Real Estate Lawyers, Los Angeles, California.