

Deborah Ferrara

Consultant

Deborah Ferrara (Debbie) is a senior financial crimes compliance executive whose career spans law enforcement, independent regulatory monitoring, and compliance leadership within financial institutions. She helps banks, fintechs, and other financial services firms diagnose compliance deficiencies, design programs that meet regulatory expectations, and sustain them under close supervisory oversight. Having served both on behalf of regulators and inside the institutions they oversee, Debbie brings a two-sided perspective on what examiners expect and what it takes to deliver it.

Debbie has hands-on experience with the industry's principal regulators, including the New York Department of Financial Services (NYDFS), the Federal Reserve, the Office of the Comptroller of the Currency (OCC), and the Federal Deposit Insurance Corporation (FDIC). She has served as an independent monitor for NYDFS and the Federal Reserve Bank of New York, and she has worked to remediate insufficient controls identified by the OCC. As part of a five-year due diligence workstream monitoring a bank's compliance program, she reviewed and tested policies and procedures, assessed how they were applied in practice, and identified opportunities for improvement. Throughout that engagement, she met with regulators weekly and delivered monthly and annual reports.

Debbie has particular expertise in Banking-as-a-Service (BaaS), where banks provide the regulated infrastructure behind fintech products. She has extensive experience with Know Your Customer (KYC) and Know Your Customer's Customer (KYCC) requirements, helping sponsor banks and their fintech partners manage the financial crime risk that flows through these relationships.

Her broader expertise includes conducting annual BSA/AML and OFAC risk assessments to inventory controls, identify residual risks outside the institution's risk appetite, and develop action plans to address them; developing BSA/AML policies and procedures for international financial institutions with a U.S. presence; conducting KYC remediations; transaction monitoring, investigations, historical look-backs, and

EDUCATION

- Lehigh University, BA
- Rutgers University, MBA

AREAS OF EXPERTISE

- Bank Secrecy Act (BSA)/Anti-Money Laundering (AML)
- Know Your Customer (KYC) and Enhanced Due Diligence (EDD)
- Risk and Compliance Programs
- Regulatory Remediation, Response, and Reporting
- Independent Compliance Consulting
- Corporate Monitorships
- BSA/AML, OFAC, and Fraud Risk Assessments
- Suspicious Activity Report (SAR) drafting and filing with FinCEN
- FinTech – Banking as a Service (BaaS)

Suspicious Activity Report (SAR) writing; and managing projects and quality assurance reviews.

Debbie began her career in law enforcement, including service on a joint terrorism task force identifying money laundering schemes used to fund terrorist operations. She has since served multinational financial institutions, broker-dealers, BaaS providers, money services businesses, and community banks. Past employers and clients include Guidehouse, Navigant Consulting, the Federal Bureau of Investigation (FBI), the Federal Emergency Management Agency (FEMA), JPMorgan Chase, Cross River Bank, Credit Suisse, Standard Chartered Bank, Wells Fargo, UBS, Bank of Tokyo-Mitsubishi UFJ, Interactive Brokers, Intesa Sanpaolo, TD Bank, and Nordea Bank.

Debbie is a Certified Anti-Money Laundering Specialist (CAMS) and a Certified Fraud Examiner (CFE).