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recent

prosecutions:

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Restaurant Owner

Sentenced to 48

Months for

Structuring

Financial

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(2009) In Madison,
Wisconsin, the
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restaurant was
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the effort to
conceal the origins
of the proceeds of
crime, is an old
activity but a
recently created
criminal offense,
beginning in the
United States and
the United
Kingdom in the
1980s and rapidly
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financial
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meeting their
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'Code') by
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is 'relevant
guidance' and is

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the policies and
procedures
established under
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include systems
and controls that:

1. (1) enable it to
identify, assess,
monitor and

manage money
laundering risk;

and. (2) are

comprehensive and
proportionate to

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the nature, scale
and complexity of
its activities. SYSC
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