



Crystal Noe, M.S.

Crystal is known by her colleagues, peers, and past clients as a passionate leader and innovator specializing in the convergence of compliance, regulations, technology and data. Her leadership has transcended all areas of regulatory compliance, she is experienced in Program Management, AML Transaction Monitoring, Sanctions Screening, Risk Models, Scenario Development, Risk Assessments, Statistical Analysis and Model Management. For the past 20+ years, Crystal has successfully led and executed efforts at various Financial Institutions, MSBs, and FinTech companies across the globe to meet the expectations of regulators by building reputable compliance programs that are battle tested, as well as successfully remediating and closing enforcement actions in the areas of BSA, AML, and Sanctions compliance. She is known to regulators as a compliance expert, proficient at identifying risk, implementing innovative sustainable controls, & enabling global scaled solutions.

May 2020 – August 2021

Head of Sanctions Compliance • Facebook (FB)

September 2012 – May 2020

Director • ICRM Global Sanctions Screening Program • Citi

April 2009 – September 2012

Governance Head • BSA/OFAC Compliance Systems • Ocean Bank

December 2006 – April 2009

Founder • Compliance Solutions, Services & Automation • McAdams Group

January 2000 - December 2006

Product Manager • AML & OFAC solutions & installs • Experian



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[LinkedIn](#)

LANGUAGES

Fluent

English, Spanish

Intermediate

Portuguese

Beginner

Cantonese, Hindi

EDUCATION

FIU – Psychology, B.A. 2008

FIU – M.I.S., M.S. 2011

COURSERA

Quantitative Modeling;
Modeling Risk and Realities

IMPACT

- Built Sanctions GOM for global Fintech; moving from 254 resources 1,200
- Implemented Real Time Screening for global FinTech (120B+ revenue)
- Pioneered internal Sanctions Training dedicated to Engineering and Data Risks
- Sanctions time-to-market reduced by 80%, enabling First To Market competition
- Reduced Name Screening False-Positives by over 60%, reducing Ops Costs
- Work Complimented by OCC, FDIC, OFAC/Treasury throughout career
- Track Record for successfully closing regulatory issues (C&D, MRA, MRIA, MOU)
- Successfully moved top tier global bank from 100+ screening solutions to one
- Designed banking Optimizations Infrastructure approved by OCC
- Designed Sanctions Statistical Sampling Methodology, Sanctions Model Management, Data Quality Program, Governance Program, and Enterprise Wide OFAC Risk Assessment models, approved by OCC
- Design of Customer Risk Rating, AML & Sanctions Risk Assessment, Scenarios, Model Management, Issue Management Resolution, and Policies

Achievements and Highlights

Exams, Internal Audits, Compliance Testing, and Third-Party Reviews

- 20+ years of working with regulators (OCC, OFAC, FDIC, FRB, OTS, FRB, HKMA, SARB, MAS, MAT, and CBI)
- Built my career on successfully remediating Consent Orders, Deferred Prosecutions, MRAs, MRIAs, & MOUs
- Complimented by senior OCC CRAD and head OCC Examiner for knowledge and execution of management of compliance systems, tuning, and model management

Risk Models & Risk Assessments

- Design of Citi's Enterprise Wide OFAC Risk Assessment (EWORA) models, quants, and reports.
- Presented Citi's EWORA to OCC and OCC CRAD examiners, was rated as satisfactory with no findings.
- Perform and Automation of BSA/AML and OFAC Risk Assessments while at McAdams Group and Citi

Program Management

- 20 years of building BSA/AML and/or OFAC compliance programs and solutions for FIs in the US and abroad
- Process Improvement/design, problem solver, system repair/implementation, remediation of issues
- Policy/Procedure/Guidelines documentation content creation and/or repair
- Penchant for building high performing teams of diverse backgrounds with a focus on inclusivity and diversity

Assurance Program

- Designed Citi's Global Sanctions Compliance Assurance program responsible for assurance of detection, reporting, and Sanctions compliance across 200 countries. Assurance framework includes: Risk Models, System Validation, Data Governance, Test Design, Documentation, Statistical Sampling Methodology, Model Management, and continuous improvements to meet exceeding demands of global sanctions regimes.
- Citi and FB remit included ownership for all sanctions screening logic, algorithms, and technology affecting screening detection from inception through case management conclusion, including false-positive reduction.

Screening Programs / Operating Model

- Led Facebook's transition from relying on batch screening processes to implementing real time screening for 98%+ of its accounts (spanning Ads, P2P, P2M, B2C, Subscriptions, Oculus, Developers, In Game Purchases, Verifications, etc.), implemented Employee Screening program; partnered with engineers to enhance in-product controls reducing overall sanctions exposure; designed sanctions risk training content aimed at engineers/data scientists and aided in the launch of multiple FB, IG, and WhatsApp products.
- Propelled Citi from legacy state (*spanning 100 decentralized screening filters*) to an enterprise wide screening platform with centralized data, metrics, and uniform screening requirements. Designed and implemented Model Management and Issue Management Resolution Programs. Created a culture rooted in data, statistics, and industry guidance for decision making, model design, and governance.

Optimizations

- Sanctions Screening Optimizations reducing operations impact of false positive by 50% to 80% across globe. Most recently, saving 15M of FB's forecasted Sanctions costs, reducing time to market.
- At Citi, efficiencies, leveraging internal expertise, and the use of proprietary tools saved 35M+ (2016-2018)
- 20+ years of experience in leading innovative efforts aimed at applying enhanced design, rule based intelligence, and artificial intelligence for reduction of false-positives and/or redundant case work for AML Transaction Monitoring Systems and Sanctions Screening Filters.

Technology

Oracle, SQL, SAS, VBA, Access, Excel, Tableau, Qlikview, MSFT Office Suite; AML/OFAC Technology: FircoSoft, Global Interdict, Metavante, ASSIST CK, AFACS, FIS, Accuity, Bridger, Prime, Mantas, WorldCheck, Dow Jones, CSI, Ocean Systems and SWIFT STS testing tool.