Startup and Continuing AML/CFT Compliance Support

For sweepstakes and regulated online operators

AML/CFT means anti-money laundering and countering the financing of terrorism. When a payment provider asks for a written policy and the name of the person responsible for compliance, BCA can help with the startup work and the continuing compliance role.

One-time startup and approval work

- Review the payment provider's requirements, legal opinion, customer documents, funds flow, and current controls.
- Write an AML/CFT policy tied to the platform, payments, customer identity and location checks, and operating procedures.
- Define officer duties, monitoring, sanctions screening, training, recordkeeping, reporting, and problem escalation.
- Prepare the compliance package and answer policy or control questions during the initial review.

Continuing compliance officer service

- Continue as the named compliance officer when the requirements and payment provider accept a contract officer.
- Review agreed reports, alerts, exceptions, and records on the schedule stated in the service agreement.
- Document follow-up, report material issues to management, and use the agreed escalation process.
- Keep the program current when the platform, payments, vendors, funds flow, or risk profile changes.
- Prepare agreed periodic reports, respond to authorized reviewers, and coordinate technical questions with the operator's team.

What continuing service means

The startup project is normally the larger initial effort because the policy, controls, approval materials, and provider responses must be created. Continuing service is the recurring work that keeps the officer role active and the program current after launch.

The monthly agreement states the officer duties, access, review schedule, included time, reports, response procedures, and work that needs separate approval. A major system change, new provider, new market, investigation, or significant issue may require an additional project.

From Business Setup to Continuing Review

The legal documents, platform, compliance program, technical review, and provider submission are connected. After launch, review and corrective action continue as a business cycle.

1. BUSINESS AND LEGAL SETUP
2. PLATFORM AND COMPLIANCE PROGRAM
3. TECHNICAL REVIEW AND REPORT
4. BANK AND PROVIDER REVIEW
5. LAUNCH
6. CONTINUING REVIEW
7. CORRECT AND RE-REVIEW

1-2. Set up the business and program

- Establish the operating business and obtain a current sweepstakes legal opinion identifying the jurisdictions, assumptions, and operating conditions it covers.
- Have legal counsel prepare or review the Terms of Service, Sweepstakes Rules, Privacy Policy, and customer disclosures.
- Put the current rules and customer disclosures into the platform.
- Configure identity and location checks, payments, prize flow, transaction records, monitoring, training, and escalation procedures.

3-4. Review the technology and seek approval

- Compare the platform and transaction flows with the legal opinion, customer documents, and operating policies.
- Document the scope, tests, findings, and corrected gaps in the technical report or certification.
- Submit the opinion, policies, forms, and technical report. The bank or payment provider makes its own decision.

5. Launch under the approved documents

After the operator confirms that required provider onboarding and other launch requirements are complete, begin customer transactions, enable sweepstakes participation, and award or redeem prizes under the current rules and operating procedures.

6-7. Review, correct, and repeat

Review money movement, alerts, identity and location exceptions, sanctions results, complaints, records, and policy changes. Investigate, document, escalate, report when required, correct identified issues, and repeat technical or provider review when a material change requires it.

Technical and approval boundary

A technical report or certification states the technical scope reviewed, tests performed, and findings. It is not a legal opinion and does not guarantee approval by a bank, payment provider, or other institution.

Where BCA and Newman Law Can Help

The operator may use BCA, Newman Law, and other qualified providers at different points. The written agreements define who performs each task.

Business and legal setup

BCA: Plans the startup compliance work and organizes operating, payment, transaction-flow, and technical information.

Newman Law: Provides the sweepstakes legal opinion and prepares or reviews the rules, privacy policy, Terms of Service, and customer disclosures.

Platform, policies, and technical review

BCA: Prepares AML/CFT and operating policies, monitoring, training, recordkeeping, controls, technical readiness review, and technical certification. Contract officer support is available only when accepted and defined in writing.

Newman Law: Answers legal questions and determines whether changes require updates to the legal opinion, rules, or customer documents.

Provider review and launch

BCA: Helps assemble the compliance package, explain operating and technical controls, and establish launch procedures, reports, records, and escalation contacts.

Newman Law: Answers legal questions directly and provides needed updates concerning the opinion, rules, jurisdictions, customer documents, or operating conditions.

Continuing review and corrective action

BCA: Performs scheduled compliance reviews, documents and escalates problems, supports corrections, and performs additional technical review when separately required.

Newman Law: Advises the operator about legal questions arising from incidents, jurisdiction or business-model changes, reporting questions, and revisions to customer documents.

Legal relationship and responsibility

When Newman Law is included as Legal Advisor, the written three-party agreement among the operator, BCA, and Newman Law defines the legal, compliance, operating, and communication duties. Newman Law provides legal advice directly to the operator.

The operator remains responsible for its business, platform, compliance program, records, decisions, and approvals. If BCA wrote or operates the AML/CFT program, any required formal independent test must be performed by a separate qualified reviewer.

Service Terms and Plain-Language Definitions

Terms used in this overview

Business and control terms

- **Operator:** The company responsible for the platform and sweepstakes.
- **AML/CFT:** Policies and procedures for identifying financial risk, monitoring activity, handling problems, keeping records, and making required reports.
- **Customer identity verification:** Confirming who a customer is. Financial documents may call this Know Your Customer or KYC.

Technical and reporting terms

- **Location verification:** Confirming where a customer is physically located. Technical documents may call this geolocation.
- **Technical certification:** A statement of the controls reviewed, tests performed, and findings. It is not legal advice or provider approval.
- **Suspicious Activity Report or SAR:** A confidential FinCEN report filed by a financial institution or other eligible filer when required or permitted. This does not mean every sweepstakes operator must file one.

What the service agreement should state

- Startup deliverables and provider-review support
- Officer duties, authority, access, and management reporting
- Review schedule, included time, reports, records, and escalation contacts
- Technical, legal, operator, and independent-reviewer responsibilities
- Changes or events that require separately approved project work

Next step

Provide the legal opinion, current customer documents, payment-provider request, platform description, funds flow, and requested officer role. BCA can then define the startup project, continuing service, technical work, and any coordinated Newman Law support in writing.

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1. BCA AML and Compliance Officer Services. Effective January 2026.