

**BEKKER COMPLIANCE CONSULTING PARTNERS, LLC  
BEKKER COMPLIANCE INSTITUTE (BCI)**

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*USA • ASEAN • EMEA • Caribbean*



*With Us It's All About You<sup>SM</sup>*

**CARRIE F. RINEHART-BEKKER**  
**CORPORATE FINANCE & REGULATORY COMPLIANCE**

**EXECUTIVE PORTFOLIO**

**Carrie Bekker** is an Entrepreneur and Founder/Chief Executive Officer of Bekker Compliance Consulting Partners, LLC (BCCP), a boutique consultancy that provides consulting and training Experts to our financial and law firm clients in the US, ASEAN, EMEA, Caribbean, and other regions worldwide.

I founded BCCP in 2006. I am a global compliance expert with 38 years' legal and regulatory experience derived from my tenure as a Legal Executive in law firms, corporate law departments, and trust companies throughout the United States and internationally. I also served as a Senior Compliance Officer with several global financial conglomerates, including AEGON/Transamerica, Pacific Life Insurance Company, and AIG Sunamerica.



**PROFESSIONAL HIGHLIGHTS**

**June 2006 - Present**

**[Bekker Compliance Consulting Partners, LLC \(BCCP\)](http://www.bccp-llc.com)**

**Bekker Compliance Institute (BCI)**

Global Headquarters: Porter Ranch (Los Angeles County), California

Caribbean: St. Thomas, US Virgin Islands

ASEAN: Bangkok, Thailand

***Founder, Chief Executive Officer, Managing Member***

BCCP is a niche consultancy that specializes in global compliance consulting and training to financial institution and law firm clients. **For more information, please visit our website at [www.bccp-llc.com](http://www.bccp-llc.com).**

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Executive Portfolio (cont'd)

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**CONSULTING & TRAINING ENGAGEMENTS**  
**HANDLED PERSONALLY BY THE CEO**

May 2012

Client: [Financial Services Volunteer Corporation \(FSVC\)](#)

Donor: US Department of State

Agency: [VEP and Association of Regional Banks of Russia \(AsRos\)](#)

NOVOSIBIRSK AND YEKATERINBURG, RUSSIA

**Workshop: Anti-Money Laundering/Counter-Terrorism Financing (AML/CTF) Typologies:  
How to strengthen and fine tune your organization's risk-based AML/CTF program**

***Pro Bono Trainer***

- These training workshops took place at [Siberian Banker Training Center](#) in Novosibirsk, which was a two-day training course with approximately 25 banking compliance officers attending; and at [Sberbank](#) in Yekaterinburg, which was a one-day training course with approximately 56 banking compliance officers attending, as well as members of the [Central Bank of Russia](#), which participated via live video streaming from Sberbank's training center.
- This training project was funded and supported by the U.S. Department of State in cooperation with Russia pursuant to an existing mutual agreement between the two countries. The program's focus was to help Russia strengthen its Anti-Money Laundering (AML) compliance. The goals of this program included combating financial corruption and criminal activity in the Russian banking sector; specifically, to help AML compliance officers of Russian commercial banks and non-bank financial institutions improve their AML compliance programs, including how to better detect, monitor, and report suspicious activity.
- Components of the training program activities included briefing compliance officers on how to strengthen a banks' KYC program during the onboarding process, providing up-to-date information on the methods money launderers were using, and refreshing red flags to detect suspicious activity early; sharing the latest international norms and standards, and providing technical advice on improving AML/CFT techniques to strengthen the integrity and stability of Russia's financial system.

**January 2010 - March 2010**

**USAID Modernizing Financial Institutions (MFI) Project**

**Ramallah, West Bank, Palestine**

***AML Expert for Gold and Precious Metals/Jewelry Products in Palestine***

Onsite consulting engagement for a USAID-funded project to provide technical assistance, capacity building and other support to the [Palestine Monetary Authority](#) (PMA) and its financial institutions, with the principal focus in the area of anti-money laundering. The scope of the engagement pertained to the legal requirement of financial institutions and certain types of non-bank businesses to implement AML measures at the wholesale/manufacturing/retail level for gold and other precious metals/stones/commodities businesses. The scope of the project included:

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- Reviewing and assessing the current Palestinian legal framework (laws and regulations) that govern gold and precious metals/stones/commodities businesses relating to the duties and obligations of these businesses to create records and reports for AML purposes in light of international standards.
- Meeting with senior officials from the [Financial Follow-Up Unit](#) (FFU) and other regulatory agencies, including the Hallmarking and Controlling Precious Metals Directorate at the Ministry of National Economy, to determine any issues or concerns which should be addressed in the proposed AML regulations.
- Incorporating recommendations from the separate Gold Study Consultancy to include in developing AML regulations for these businesses.
- Developing AML regulations, including proposed forms and procedures, for implementing AML recordkeeping and reporting requirements for gold, precious metals, stones, and commodities businesses at the wholesale, manufacturing and retail levels to satisfy requirements under the Palestine AML Decree Law of 2007, as well as incorporating international best practices.
- Preparing a workshop for gold and precious metals/stones/commodities businesses to inform them of the proposed regulatory AML requirements.

### June 2009 - December 2009

*JRG International Brokerage DMCC*

Dubai, United Arab Emirates

*Independent Compliance Consultant*

Onsite consulting engagement with commodities brokerage firm specializing in futures: gold, silver, steel, oil, pearls, and currency. Scope of engagement included providing the following consulting services:

- **Regulatory Compliance:** [Dubai Gold & Commodities Exchange](#) (DGCX), [Emirates Securities Compliance Authority](#) (ESCA), and [Dubai Multi Commodities Centre](#) (DMCC).
- **Marketing:** Writing original content for and designing JRG International brochures and company website, including ensuring that all marketing materials and website content was in compliance with DGCX, ESCA, and DMCC regulatory requirements.
- **Business Enhancement:** Giving improvement advice and recommendations pertaining to marketing techniques, public relations, regulator relations, client relations, ethical considerations, branding techniques, multimedia advertising strategies, and office décor makeover program.
- **Conferences and events:** Speaker at JRG International's *Investor Awareness Campaign 2009* held in Ruwais, Abu Dhabi, UAE.

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**PROFESSIONAL ACCOMPLISHMENTS**  
**PRIOR TO LAUNCHING BCCP**

**2005 - 2006**

**[AIG SunAmerica Retirement Markets](#)**

Woodland Hills, California

***Director of Variable Annuity Compliance***

- Handled the firm's very first 38a-1 compliance review for AIG Sunamerica's variable annuity products. My responsibilities included handling all aspects of Rule 38a-1 compliance under the Investment Company Act of 1940. My position involved analyzing risk by performing periodic risk assessments, determining the appropriate auditing methodology for each procedure, and auditing all of the firm's compliance procedures according on the frequency specified in the risk assessment and audit plan. In an effort to ease the burden of fellow departments having to contend with overlapping auditing walkthroughs/testing, I took the initiative to develop close relationships with the SOX Team and Internal Audit, in order to augment synergies among the three teams by meeting regularly, sharing information where appropriate, and streamlining walkthroughs and testing whenever possible.
- Responsible for creating, implementing and maintaining 38a-1 test plans, narratives, and audit reports; performing walkthroughs and testing; and working closely with senior management in communicating auditing results and recommendations; building consensus and implementing action plans to ensure that all recommendations were carried out in a timely fashion.
- Worked closely with in-house counsel, senior management and department heads in developing auditing results disclosure for the very first 38a-1 annual report presented to the Board of Directors.
- Handled industry-related research, focusing on regulatory trends and developments, industry best practices, and competitor information.

**2004**

**[Pacific Life Insurance Company](#)**

Newport Beach, California

***Senior Project Compliance Analyst***

- Responsible for overseeing all aspects of compliance-related projects involving the company's variable annuity products. Such projects included: Section 38a-1 of the 1940 Act, USA PATRIOT Act, Sarbanes-Oxley, and SEC Regulation S-P (privacy).
- Created, implemented and documented all compliance-related project plans. I also facilitated communication with all project plan participants and stakeholders during the entire project life cycle.
- Handled pilot testing of Aquilan Patriot Manager, one of the first automated anti-money laundering compliance software programs specifically designed to detect and monitor suspicious activity in variable insurance products and retail mutual funds. I analyzed and documented testing

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results, including providing recommendations for program adjustments, the reports for which I provided directly to Pacific Life's Chief Financial Officer.

### **1999- 2004**

#### **AEGON/Transamerica**

St. Petersburg, Florida

***Assistant Vice President, AML Compliance Officer, 1940 Act Compliance Supervisor (Variable Annuities)***

- I was initially hired to help rewrite 15 variable insurance product prospectuses, from legalese into plain English, in order to comply with the SEC's Plain English mandate. I also handled all aspects of creating new and updating existing variable product prospectuses, including certain aspects of the cloned fund prospectuses. I took the lead in updating all variable annuity prospectuses on an annual basis and getting them filed with the SEC. The entire process took about six months to complete.
- When Enron/WorldCom, 9/11, and the SEC mutual fund sweeps happened, I was integrally involved at the outset with all new compliance mandates which arose from those events: Sarbanes-Oxley, USA PATRIOT Act, and SEC 1940 Act Rules 38a-1 and 206-4(7).
- As a result of these events, my responsibilities expanded to include analyzing and tracking fund-related SEC regulations – from reviewing the proposed rule, participating in industry-related conference calls and comment letters, and listening to SEC rulemaking webcasts, to analyzing the final SEC rule published in the Federal Register. I Also took the lead in working with the business units to create and implement risk-based policies, procedures and training materials to assure full compliance before the rule's compliance deadline. For example, I analyzed final mutual fund rules implementing USA PATRIOT Act Sections 314, 326 and 352; created comprehensive, risk-based AML policies, procedures and training materials; investigated suspicious activities, and creating and filing the very first SARs with FinCEN.
- With respect to the mutual fund sweeps, I took the lead in coordinating with Law Department personnel, outside counsel, senior management and departmental staff in gathering, analyzing and submitting electronic data in response to periodic SEC and FINRA requests over a two-year period.
- Worked closely with in-house counsel in connection with handling all aspects of due diligence for a large broker/dealer acquisition.

### **1996 - 1999**

#### **Harney, Westwood & Riegels/HWR Services Limited**

Tortola, British Virgin Islands

***Legal Executive, Offshore Incorporations and Mutual Funds Compliance Units***

- Department head of high-volume offshore incorporations trust company, servicing clients in Europe, the Americas, and the Far East.

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- Responsibilities included constant verbal and written communication with overseas clientele; devising departmental forms and written procedures to boost efficiency and accuracy; supervising departmental staff in the day-to-day operations; and training and mentoring staff to ensure stateside-style quality service to the trust company's clientele.

### **1981 - 1996**

**Berman Wolfe & Rennert, P.A.**, Miami, Florida • Shutts & Bowen, Miami, Florida • **Farella Braun & Martel**, San Francisco, California • **Heller, Ehrmann, White & McAuliffe, P.A.**, Palo Alto, California • **Johnson, Pope, Bokor, Ruppel & Burns, LLP**, Clearwater and Tampa, Florida  
***Paralegal Manager and Senior Corporate/Securities Paralegal***

- Specialized in all aspects of public offerings, private placements, SEC, state securities, FINRA, and stock exchange compliance; transactional, including mergers and acquisitions; and domestic/offshore corporate finance matters, from inception to liquidation.
- Under attorney supervision, drafted offering documents, SEC reports, agreements, and closing documents. I also created and coordinated broker/dealer and investment adviser registrations.
- Performed extensive legal research pertaining to federal and state regulatory requirements, including documentation of results. I also handled and documented all client and target company due diligence.
- Authored course materials for continuing legal education publications and newsletters for client use. Also developed and delivered in-house educational training programs covering real estate, corporate, and securities law matters.
- Frequently presided as a guest speaker for local paralegal association meetings. Topics included federal and state securities law developments.

### **Continuing Education**

- 2018: Attended SBA Emerging Leaders Mini MBA program.
- 1981: A.S. Degree, Business/Legal, *cum laude*, **St. Petersburg College**, Clearwater, Florida. Curriculum included general business, business law, business writing, accounting, and technical courses.
- Regularly attend business conferences to stay abreast of global regulatory compliance developments in the financial services industry.

### **Credentials & Licenses**

- **FINRA** Series 6 license in 2000: Investment Company and Variable Contracts Products (inactive since 2005)
- **FINRA** Series 26 license in 2001: Investment Company and Variable Contracts Products Principal (inactive since 2005).
- CLA (Certified Legal Assistant) in 1988 (inactive since 1996). The CLA designation was awarded by the **National Association of Legal Assistants (NALA) Certification Board** after passing a two-day written examination. Areas tested included communications, human relations, ethics, legal

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research and writing, as well as five substantive law areas: general, corporate, contractual, administrative, and criminal law.

### **Professional Memberships and Community Involvement**

- [100 Women in Hedge Funds](#)
- California 1940 Acts Compliance Group
- [Surfrider Foundation](#) (Malibu Chapter)
- [Humane Society of St. Thomas](#), US Virgin Islands
- [Los Angeles County Bar Association](#) (LACBA)
- [Lucky Paws Foundation](#) of St. Thomas, US Virgin Islands
- [Branson Centre of Entrepreneurship -- Caribbean](#)

### **Philanthropy**

- **Financial Services Volunteer Corps (FSVC):** Volunteer to provide pro bono training to financial professionals in various countries, including AML Typologies Seminars in the Russian Federation.
- **USAID:** Short-term engagements, including AML Specialist – Precious Metals and Gems – in Ramallah, West Bank, working with the Palestinian Monetary Authority and other regulatory bodies in connection with compliance, training, governance and other areas to help Palestine strengthen its financial system and infrastructure in anticipation of Palestine becoming an independent State.
- **Branson Center of Entrepreneurship:** Mentoring budding Entrepreneurs in Jamaica who need practical advice, coaching and encouragement to help their fledgling enterprises succeed, thrive, and become profitable and sustainable.