



**Operational
Security
Solutions**

PRIVATE LENDER RISK MANAGEMENT



Private lenders and landlords can avoid losses associated with potentially high-risk customers through comprehensive risk management consisting of - assessment, ongoing monitoring and mitigation planning.

Customer risk management can be an extremely complex undertaking with certain categories of customers who represent heightened risks and thus require very specific due diligence techniques. Due to recent marijuana legalization initiatives in many states, Marijuana-related businesses (MRBs) are emerging as an increasingly attractive customer segment for private lenders and landlords. However, MRBs

also represent a heightened risk customer segment due to the cash-intensive nature of the business and the rapidly evolving regulatory environment in which they operate.

OSS are specialists in risk management (assessment, monitoring and mitigation) for private lenders and landlords preparing to conduct business with MRBs that are typically cash-intensive businesses lacking established banking relationships. OSS provides comprehensive Know Your Customer (KYC), Customer Due Diligence (CDD) and Enhanced Due Diligence (EDD) programs that are contextualized to the

unique challenges of serving MRBs as a distinct customer segment.

OSS identifies potential risks and establishes an MRB risk profile based on risk factors defined by AML/BSA guidelines. OSS establishes compliance systems specific to the MRB customer so that our clients can conduct business with MRBs while also satisfying their AML/BSA obligations. OSS provides ongoing due diligence and risk-based monitoring that includes examining MRB-specific legal and regulatory developments to ensure our clients are able to adjust to changes that could otherwise increase their risk exposure.

BUSINESS BACKGROUND CHECK: /

Key Planning Documents

Business & Financial Plan

- Business plan
- Articles of incorporation
- State EIN obtained
- City/County tax permits obtained
- City/County business licenses obtained
- DBA obtained
- Financials with P&L's
- Bank Secrecy Act/Anti-Money Laundering (BSA/AML) compliancy program

Legal Affairs Coordination

- Retained attorney selected
- Local/county/state government lobbyist identified

Architectural Drawings & Facility Plan Completed

- Architect selected
- General contractor identified
- Electrician identified



Security Infrastructure Development Plan

- Camera, access control, secure storage
- Facility guard services (armed and/or unarmed) plan
- Good neighbor/neighborhood watch plan

Cash Management Plan

- Cash storage
- Cash transportation
- Cash payments for employees, vendor and local & state tax agencies

Government Engagement Plan

- City councilman/county supervisor plan
- City/county planners office relationship plan
- Law enforcement engagement plan

Employee Handbook Plan

Consumer Protection Plan

Water Source Plan

Wastewater Management Plan

Environmental Impact Study (if required by local/county ordinances)

Hazardous Material Handling Plan

Odor Control Plan

Solid Waste/Recycling

INDIVIDUAL BACKGROUND CHECK: /

Criminal Background Check

Customers, partners and employees entrusted with critical affairs of a business must be properly vetted with a thorough criminal background check. Businesses are potentially exposed to considerable risk when engaging with individuals whose backgrounds are marked by a conviction for financial or violent crimes. And, convictions for very specific crimes like embezzlement, fraud, money laundering, violent assault, homicide, etc. are clear indicators of unacceptable risk for most businesses. OSS can minimize or eliminate these risks with its multi-faceted criminal background check.

Commercial Conflicts Of Interest

Commercial conflicts of interest on the part of employees (including managers and executives) are a particularly dangerous source of risk to a business due to the likelihood of decisions and behaviors which are not in the best interest of the business. These risks are often quite difficult to discover due to the cover provided by shell corporations and other forms of commercial obfuscation. OSS experts have experience unraveling the most intricate webs of commercial obfuscation to ensure that

fiduciary responsibilities of employees are not jeopardized by commercial conflicts of interest

Reference Check

A thorough reference check is an essential component of a comprehensive individual background check. Engaging with former employers, colleagues, managers, subordinates

and various other associates provides valuable insights into the most crucial aspects of an individual's personality and character, including - trustworthiness, reliability, competency, judgment, honesty, etc. Collectively, these insights form a reliable risk indicator especially when combined with the other elements of an individual background check. And, OSS understands the subtleties of conducting reference checks in a manner that ensures accuracy and completeness.

Employment Check

Similar to an individual reference check, an employment check forms another essential component of a comprehensive individual background check. This involves verifying the individual was employed by their stated employers in the stated capacity/role, in the stated timeframe and in the stated location at the stated level of compensation. As part of the employment check, errors of omission are as important as the veracity of the individual's statements regarding their employment history. OSS ensures that an individual's employment history is complete and verifiable well beyond the target individual's statements.

