WILLIAM TALBOT

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FINTECH · SPONSOR BANKING · BaaS · EMBEDDED FINANCE · FINANCIAL CRIME & COMPLIANCE

01 WHERE I WORK

THE ECOSYSTEM

I have worked financial crime from inside a sponsor bank and from the fintech side of the same industry — partner risk at Stripe on assignment through AML RightSource, then BSA and partner oversight at a chartered BaaS bank. I know where the picture breaks between a bank, its middleware and its fintechs, because I have sat in all three conversations.

SPONSOR BANK
The charter. Where the risk finally lands.

MIDDLEWARE
Least visible. Most often assumed to be someone else's.

FINTECH PROGRAM
Owns the customer. Carries obligations it did not write.

CONSUMER
The end of the chain the industry treats as an externality.

02 WHAT I BRING

30+ YEARS

- **Investigative intuition** — knows which thread to pull first
- **Pattern recognition** — one actor behind unrelated events
- **Risk judgment** — separates real risk from policy noise
- **Adversarial thinking** — thinks like whoever is working around the control
- **Systems thinking** — sees the second-order effect before it lands
- **Operational know-how** — knows what a team can actually execute
- **Domain context** — thirty years of how the money really moves
- **Regulatory instinct** — hears the exam question before it is asked
- **Evidentiary discipline** — builds so the conclusion survives challenge
- **Translation** — turns domain judgment into something buildable

03 HOW I WORK

01 **SEE THE SYSTEM**

02 **ARCHITECT THE MODEL**

03 **BUILD THE SOLUTION**

04 **SCALE WHAT WORKS**

04 FIVE TEAMS BUILT FROM ZERO

NONE INHERITED

11	**Investigators and office staff** PROTECH INVESTIGATIONS · FOUNDED	Recruited and trained the team, wrote the investigative procedures and evidence standards, carried cases through to court testimony. Firm later sold.
9	**Store, delivery and service staff** RETAIL STORE · FOUNDED	Two teams hired and trained, plus subcontractors and a full site buildout from lease to opening day. Grew to $1.6M and Premier Store recognition.
5	**Licensed agents and service staff** INSURANCE AGENCY · FOUNDED	Built and licensed the team, owned regulatory compliance and production standards for the agency. Profitable, and later sold.
4	**Sales and service team** ALLSTATE · BUILT AND LED	Integrated compliance into onboarding, service and advisory work. Final decision-maker on escalated matters.
4	**Cross-border analyst team** STRIPE ENGAGEMENT · AML RIGHTSOURCE	Selected to lead. Built the partner risk program end to end with Stripe risk leadership, then trained and transitioned it to their internal team. It went into production.

Not one was handed to me running. Every one started with an empty room and a standard that had to be written first.

05 THE DECISION THESIS

UNDERSTAND BEFORE EXIT

More debanking isn't the answer. Better understanding is. Some relationships absolutely need to end. But closure should not become the default substitute for understanding the customer, the behavior, the history and the actual source of risk. Sometimes the decision is exit. Other times it is a more precise intervention: restrict, monitor, escalate, remediate or redesign the control.

Which means the appeal has to be real work, not a formality: a position is only worth what stands behind it.

WHAT AN APPEAL HAS TO CARRY

THE FACTS
Activity history, EDD on file, source of funds, licensing, complaint record.

THE ARGUMENT
Why the pattern is consistent with the business the customer actually runs.

THE ALTERNATIVE
The proportional control that manages the risk short of closing.

THE RECORD
Rationale and adverse-action evidence documented whichever way it lands.

Appeal a decline the same way. A rejected application is a file, not a verdict.

06 GRYPHON SENTINEL — BUILT FOR THE FINTECH

SHIPPED · WORKING SOFTWARE

Most financial-crime tooling is built for the bank. This is built for the company on the other end — the fintech that owns the customer, carries obligations it did not write, and has to prove its program to a sponsor bank that can slow every launch. Three years inside a sponsor bank watching fintech programs struggle with the same things. Built on my own time, from that vantage point.

BANK COORDINATION
RFIs, escalations, 314(b), refer-up packages and monthly MIS in one relationship view. The fintech refers up; the bank owns SAR decisioning.

COMPLIANCE & TRUST CENTER
The program surface the bank actually sees. Every control drills to policy, procedure, control and evidence — harvested from daily operations, not assembled before an exam.

PROGRAM ROOM
A change request — a product, a rail, a card — triggers a product-driven RFI package with due dates and open questions. AI guides and pre-checks; it never approves.

CUSTOMER REVIEW ORCHESTRATION
Continuous review across the fintech's own book instead of periodic sweeps, with the risk model owned by the fintech rather than inherited.

APPLICATION REVIEW
A decline is not the end of the file. Rejections get appealed on facts; the disputable ones become a reconsideration package to the bank.

ACCOUNT DECISIONS
Restrict, close, keep open, appeal, offboard. Every proposed closure is argued both ways before anyone acts, and the burden sits on the closure.

BUILT BANK-AGNOSTIC

The sponsor bank is referenced generically throughout. The same program, evidence and coordination surface runs against a second bank — or two at once — without a rebuild.

PRIVACY WALL

The platform sees the fintech's side only. Requests, due dates, questions and decisions — never the bank's internal notes or its risk ratings.

Built solo, AI-assisted, no engineering team. React / Vite, cloud deployed. Two provisional patents filed. Six working screens at **wmtalbot.com**.

07 OPERATING PRINCIPLES

P01
START WITH THE REAL PROBLEM

P02
WIDEN THE FRAME

P03
SIMPLEST RELIABLE TOOL

P04
PRESERVE WHAT THE INSTITUTION LEARNS

P05
HUMANS WHERE JUDGMENT MATTERS

08 CREDENTIALS, SIGNALS & STACK

CAMS · ACAMS CHAPTER BOARD · FORMER FINRA 6 · 7 · 63 · 66 · MULTI-STATE INSURANCE LICENSURE

UT AUSTIN COCKRELL · CIVIL ENGINEERING, ATTENDED · BUSINESS DEGREE · COMPLETED LATER

MILITARY + LAW ENFORCEMENT · 4 FOUNDED · 2 SOLD · 1 LOST

CLAUDE CODE · COWORK · MCP · CHATGPT · HATZ AI · REACT / VITE · GITHUB · CLOUDFLARE · APIs · SNOWFLAKE

POWER BI · UNIT21 · UNIT · FOOTPRINT · SARDINE · ALLOY