

EXHIBIT G

REFLECTIONS ON THE TYPOLOGIES IN VIEW OF THE GOOD PRACTICES GUIDANCE

1. In the first typology, the legal representation requested by the client falls within the "specified activities" defined in the Good Practices Guidance (i.e., the creation of a legal person or arrangement --- the trust). Since the situation is covered by the Good Practices Guidance, risk assessment is required.

The first risk category is geographic risk. Mexico may or may not be named on any particular "credible sources" list, but drug-related trafficking and associated violence in Mexico are well documented and commonly understood. Therefore, this client poses a country or geographic risk.

There is also service risk, because the lawyer here is "touching the money." In addition, the source of the client's funds is not known to the lawyer.

Thus, this lawyer is confronted with a new client whose background and source of funds are unknown, who comes to the lawyer without references, and whose request for legal services appears to be a "one-shot" transaction.

Under the Good Practices Guidance intake protocol, a comprehensive background check is clearly appropriate. As it turns out, Sra. Guzman's son is a known drug dealer, and that relationship might come up in a simple Google search of her name. While it is not certain that Google will reveal the connection, this entire scenario strongly suggests the need for a thorough background search. Perhaps more important, requesting references from Sra. Guzman and documenting the source of her wealth is very important. To be cautious, the lawyer might also require that the client use her own personal bank account to receive the funds instead of accepting her wire transfer into the law firm's trust account. Such an approach will necessarily involve a financial institution which will engage in its own federally mandated due diligence exercise regarding the client.

2. In the second typology, the activity requested of the lawyer falls within the "specified activities" of the Good Practices Guidance because the lawyer is being asked to manage client money. There is a high likelihood that the lawyer will be asked to create legal entities later, and the particular client business involved here includes the buying and selling of real estate (another "specified activity"). Consequently, the situation is covered by the Good Practices Guidance and risk assessment is required.

With respect to risk factors, the client is requesting anonymity which is tantamount to a "masking of beneficial ownership." Under service risk, the lawyer is "touching the money" and the client is offering "extraordinary legal fees." Finally, the source of funds is not known. All of these factors indicate a high risk circumstance and the need to perform enhanced due diligence.

Under the Good Practices Guidance intake protocol, the lawyer should undertake a comprehensive background check. The lawyer should request references and seek clarification of the source of the client's wealth. The lawyer is advised to insist that the client's funds be transferred to an account in a local bank in the client's name, as this approach will necessarily engage the bank in its own federally mandated due diligence exercise regarding the client.

3. The circumstances in the third typology are more challenging because the client's need for anonymity in this serial acquisition of real estate seems justified for legitimate business reasons. Nevertheless, the lawyer's work falls within the "specified activities" of the Good Practices Guidance because it involves both the buying and selling of real estate and the creation of entities.

In terms of service risk, the lawyer will be "touching the money" when it is wired into the law firm's trust account, and the client's source of wealth is not known. Other than these factors, there is not a clear indication that anything is amiss here, but the work requested is a "specified activity" and there are these two identifiable service risks. Thus, the lawyer should follow the Good Practices Guidance client intake protocol with respect to this client.

If the client has indeed made a lot of money in hedge funds, there should be some record of those earnings. The lawyer should perform a full background check, request references, and document the source of wealth. Finally, the lawyer would be well advised to insist that the funds be transferred to an account in the client's name. That approach will necessarily involve a financial institution which will engage in its own federally mandated due diligence exercise regarding the client.