

Communities Against Terrorism

Potential Indicators of Terrorist Activities Related to Financial Institutions

What Should I Consider Suspicious?

- A lack of evidence of legitimate business activity—or any business operation at all—undertaken by many of the parties to a transaction(s).
- Unusual financial nexuses and transactions occurring among certain business types (e.g., a food importer dealing with an auto parts exporter).
- Transactions that are not commensurate with the stated business type and/or that are unusual and unexpected in comparison with the volumes of similar businesses operating in the same locale.
- Unusually complex series of transactions indicative of layering activity involving multiple accounts, banks, parties, or jurisdictions.
- Unusual mixed deposits of money orders, third-party checks, and/or payroll checks into a business account.
- Transactions being conducted in bursts of activities within a short period, especially in previously dormant accounts.
- Unusually large number/volume of wire transfers and/or repetitive wire transfer patterns.
- Beneficiaries maintaining accounts at foreign banks that have been subjects of previously filed Suspicious Activity Reports.
- Bulk cash and monetary instrument transactions.
- Suspected shell entities.
- Transactions and/or volumes of aggregate activity inconsistent with the expected purpose of the account and levels and types of account activity conveyed when the account was opened.
- Parties and businesses that do not meet the standards of routinely initiated due diligence and anti-money laundering oversight programs (e.g., unregistered/unlicensed businesses).
- Transactions seemingly designed to or attempting to avoid reporting and recordkeeping requirements.
- Correspondent accounts being utilized as “pass-through” points by foreign jurisdictions with subsequent outgoing funds to another foreign jurisdiction.

It is important to remember that just because someone's speech, actions, beliefs, appearance, or way of life is different, it does not mean that he or she is suspicious.

What Should I Do?

Be part of the solution.

- ✓ Require identification.
- ✓ Talk to customers, ask questions, and listen to and observe their responses.
- ✓ Watch for people and actions that are out of place.
- ✓ Make note of suspicious statements, people, and/or transactions.

Recognize that your institution could be targeted by terrorists/extremists.

If something seems wrong, notify law enforcement authorities.

Do not jeopardize your safety or the safety of others.

Preventing terrorism is a community effort. By learning what to look for, **you** can make a positive contribution in the fight against terrorism. The **partnership between the community and law enforcement** is essential to the success of anti-terrorism efforts.

Some of the activities, taken individually, could be innocent and must be examined by law enforcement professionals in a larger context to determine whether there is a basis to investigate. The activities outlined on this handout are by no means all-inclusive but have been compiled from a review of terrorist events over several years.