



# 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).
- Financial connections and/or transactions occurring among unusual business types (e.g., a food importer dealing with an automobile parts exporter).
- Transactions that are unusual and unexpected when compared with the stated business type and/or the volumes of similar businesses operating in the same locale.
- An 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 conducted in bursts of activities within a short period, especially in previously dormant accounts.
- An unusually large number/volume of wire transfers and/or repetitive wire transfer patterns.
- Bulk cash and monetary instrument transactions of a suspicious nature.
- Suspected shell entities.
- Beneficiaries maintaining accounts at foreign banks that have been subjects of previously filed suspicious activity reports.
- Transactions and/or volumes of aggregate activity inconsistent with the expected purpose of the account and the 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 are different, it does not mean that he or she is suspicious.*

### What Should I Do?

#### Be part of the solution

- ✓ Know your customers.
- ✓ Require valid identification.
- ✓ Talk to customers, ask questions, and listen to and observe their responses.
- ✓ Watch for behaviors and activities that are out of place.
- ✓ Make note of suspicious statements, behaviors, activities, and/or transactions.
- ✓ Submit Financial Crimes Enforcement Network (FinCEN) reports on suspicious transactions.
- ✓ Recognize that your institution could be targeted by criminal extremists.

#### Remember...

- ✓ If something seems wrong, notify law enforcement authorities.
- ✓ Do not jeopardize your safety or the safety of others.
- ✓ Focus on behaviors and activities that are unusual or out of place for the situation.
- ✓ Individually, these activities could be innocent and must be examined by law enforcement professionals in a larger context to determine whether there is a basis to investigate.

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 these 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 in this handout are by no means all-inclusive but have been compiled from a review of terrorist events over several years.