



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.