



# Cornerstone

## Financial and Trade Crime Red Flag Indicators

- Any evidence of structuring, including:
  - Frequent transactions or purchase of negotiable instruments under \$10,000 in order to avoid filing a Currency Transaction Report (CTR)
  - Customer making cash deposits under \$10,000 at multiple locations or cash deposits made to one account at the same location by multiple individuals
  - Customer depositing less than \$10,000 after being told of CTR reporting requirement
  - Splitting large currency deposits among several accounts
- Frequent/unusual use of night deposit drops or ATM machines for deposits
- Purchase of any monetary instrument by a non-customer with large amounts of currency
- Transactions involving a high volume of incoming or outgoing wire transfers, with no logical or apparent purpose, that comes from, goes to, or transit through locations of concern (i.e., sanctioned countries, sympathizer nations, non-cooperative nations)
- Wire transfers by charitable organizations to companies located in countries known to be bank or tax havens
- Using multiple accounts to collect funds that are then transferred to the same foreign beneficiaries
- Cash debiting schemes in which deposits in the U.S. correlate directly with ATM cash withdrawals in countries of concern, and vice-versa
- Issuing checks, money orders, or other financial instruments, often numbered sequentially, to the same person or business, or to a person or business whose name is spelled similarly
- Reluctance or refusal of individuals to provide identifying information to bank employee
- Transactions inconsistent with usual and customary business or personal practices (i.e. wire transfers that do not coincide with the type of business or activity in which customer is normally engaged; negotiation of third party checks inconsistent with type of business customer is involved in)
- Sudden, unexplained change in banking habits or activity
- Transfer of funds to a commercial account with no logical relationship or connection to the sender of the funds (i.e. jewelry store account wiring money to auto parts exporter)