

# 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.