

Money Laundering Schemes


Reference Material

Documents to Support Money Laundering Investigations


Bank Records used to support Investigations

 Obtain information about entity's Customer Identification Program

- Hold them to their own policies and programs

 Information and supporting documents collected or generated used to identify individuals, businesses and Beneficial Owners

- ex. Driver's License or Organization Documents

 Any Customer Due Diligence account opening questionnaires performed on the customer and/or accounts

- Any internal assessments, notes, reports or consideration of this information

 Beneficial Ownership Information Certification Forms(s)

- Including recertification forms or documentation for each accounts

Bank Records used to support Investigations



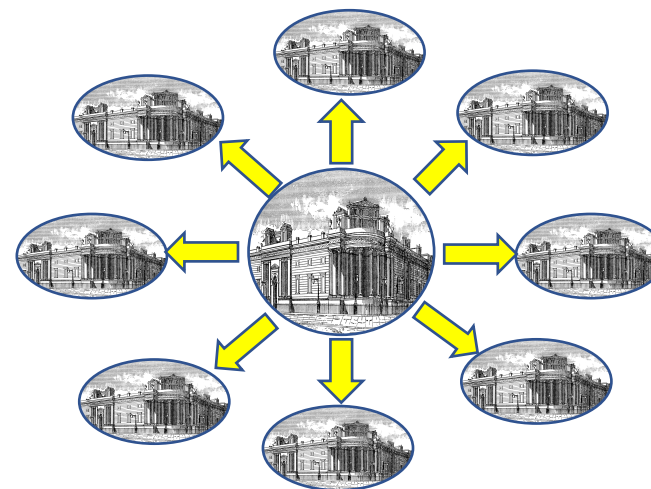
Electronic data extract file of all customer(s) transaction activity for the time period identified

- Directly from the Bank's core system or the TMS
- Other files located outside of the Bank's core system



Account Number, Account Type, Transaction Description, Transaction Type

- Internal account transfers
- All Automated Clearing House activity
- Wire Transfer data
- Foreign Exchange activity
- Cashed Checks



Bank Records used to support Investigations

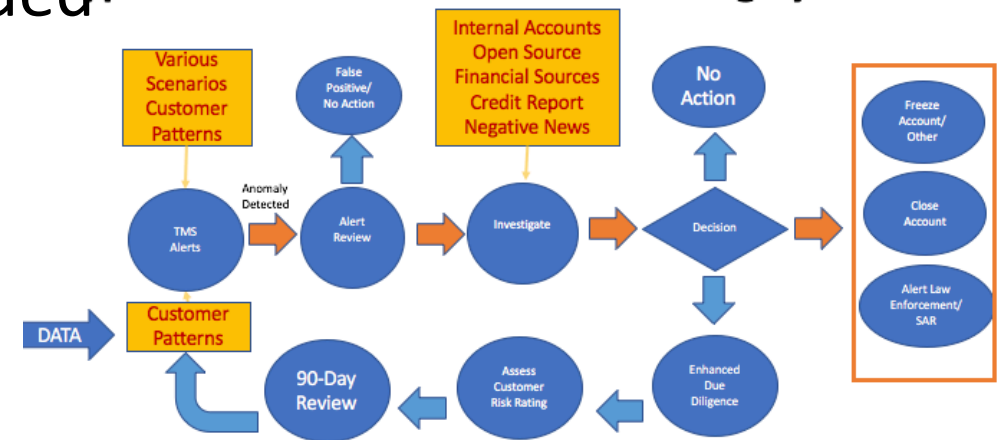
- Enhanced Due Diligence/High Risk Customer reviews
 - ✓ For each of the customer and/or account
- Any alerts generated through the bank's transaction monitoring processes that included accounts or transactions pertaining to the named parties, regardless of if the alert resulted in a regulator filing.
 - ✓ For any alerts and/or cases, provide the parameters that were triggered.
- Copies of Cash Transaction Reports
- Copies of Monetary Instrument Reports

Bank Records used to support Investigations

Obtain any case reviews or similar analysis such as internal investigations performed, including supporting documentation about the customer derived from the financial institution's suspicious activity monitoring or fraud software







Do not include any copies of actual SAR filings

However, ensure (as applicable) that any supporting document that may have been a part of a SAR filing decision is included.



Suggestions for Bank Subpoenas








Activity Requests:

-  Wires originated online and within the branch
-  Cash activity, including deposits and withdrawals
-  Cash advances
-  Credit memos
-  Currency Exchanges (foreign and domestic)
-  Cashed third-party and cashed-on-us checks



Suggestions for Bank Subpoenas

Activity Requests:

-  Foreign, domestic and foreign exchange (FX) wires
-  Monetary Instrument purchases or encashments performed by or on behalf of the customer
-  Checks negotiated against the customer's account and all check deposits
-  Account Transfers including the receiving and sending account numbers
-  P2P (Payment to Payment) details (mobile app related transfers)
-  ACH debits and credits, including international ACH transactions
-  Foreign ATM withdrawal information



Bank Records used to support Investigations



Transaction Dates



Credit/Debit Activity

- Include any ATM, night drop, or bulk cash activities



Safe Deposit Box information

- Account Name
- Box Number
- Location of Box
- Copies of Access Records

