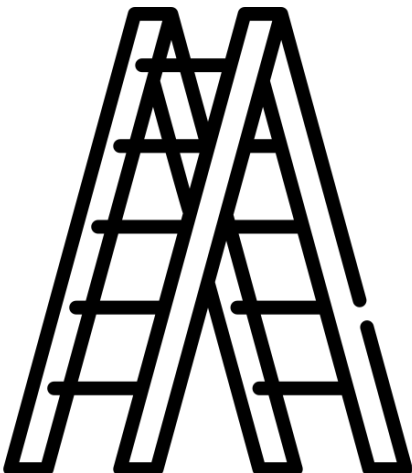


QUICK GUIDE TO SUSPICIOUS TRANSACTIONS & MONEY LAUNDERING AUDIT/INVESTIGATION

- **Who was involved?**
 - Identify person or persons involved—at any level
 - Can be natural persons or entities/organizations/businesses
- **Chronology (when?)**
 - Sequence of events
 - Timeline (create a chronology)
- **What occurred?**
 - Specific conduct or actions executed or attempted
 - Evidence (bank records, emails, surveillance, interviews, etc.)
 - Any ties or links to suspicious activity or SUAs?
- **Where?**
 - Locations of transactions
 - Locations of business
 - Review addresses and begin assessing potential network links
 - Where did the funds originate from? (source)
- **How the transaction(s) implemented?**
 - wire transfer, deposit, ATM withdrawal, check, cash
 - obtain all relevant underlying/source documents
- **Why?**
 - What purpose did the transaction serve?
 - What was the benefit of the transaction from a legitimate business?
 - Was this part of a pattern of odd or unusual behavior?

The Ladder of Money Laundering Investigation



- Transaction
- Proceeds
- Knowledge
- Purpose



What is the
Specified Unlawful
Activity?
(what are the elements?)