

MSBs Can Help Fight Money Laundering

What Should MSBs Look For? (Cont.)

Unusual Characteristics or Activities

Notice any unusual characteristics, such as:

- An individual customer purchases products/services on a regular basis but seems neither to reside nor work in the MSB's service area.
 - A customer pays for MSB products/ services using musty bills that have an unusual or chemical-like odor.
 - A customer pays for MSB products/ services using money orders or traveler's checks without relevant entries on the face of the instrument. (e.g., for money orders — no payee, and for traveler's checks — no signature or countersignature).
 - A customer pays for MSB products/ services using money orders or traveler's checks with unusual symbols, stamps or written annotations (such as initials) that appear either on the face or on the back of the instruments.
- A customer purchases money transfers, money orders, traveler's checks, etc., with large amounts of cash when the MSB does not require payment in cash.
 - An individual or business customer asks to purchase traveler's checks or money orders in large bulk orders.
 - A customer purchases a number of money transfers, money orders, or traveler's checks for large amounts or just under a specified threshold without apparent reason.
 - A customer starts frequently exchanging small bills for large bills, or vice versa, when the customer does not normally use cash as a means of payment.
 - A customer sends and receives money transfers in equal amounts at or about the same time.

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- A customer receives a number of small money transfers and the same day, or within several days, initiates one or more send money transfers to a person in another city or country in about the same amount.
- A customer sends or receives frequent or large volumes of money transfers to or from persons located in foreign countries, especially countries listed as non-cooperative jurisdictions.
- A customer receives money transfers and immediately purchases monetary instruments prepared for payment to a third party.

Changes in Transactions or Patterns of Transactions

Be alert for changes in activity, such as:

- Major changes in customer behavior, for example:
 - An individual money order customer begins to make weekly purchases of money orders in the same amounts (when previously he or she only purchased money orders on pay day for rent, utilities, etc.).
 - An individual customer begins to bring in large amounts of cash (when previously he or she cashed his or her paycheck to purchase instruments or transfers).
- Sudden and inconsistent changes in money transfer send or receive transactions.

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What Should MSBs Look For? (Cont.)

- Rapid increase in size and frequency of cash used by a particular customer.

Employees

Watch out for employee behavior, such as:

- An MSB employee whose lifestyle cannot be supported by his/her salary, which may indicate receipt of tips or bribes.
- An employee who is reluctant to take a vacation, which may indicate he/she has agreed, or is being forced, to provide services to one or more customers in violation of law or company policy.
- An employee who is associated with unusually large numbers of transactions or transactions in unusually large amounts, which may indicate he/she has agreed, or is being forced,

to provide services to one or more customers in violation of law or company policy.

Situations like those described in this section often will be found, upon further examination, to be completely legitimate. By the same token, other situations not mentioned here might be suspicious if they are inconsistent with the normal activity of a particular customer or employee. As an MSB or MSB employee, you must make a reasonable judgement.

MSBs Can Help In Other Ways

MSBs must comply with other BSA reporting and recordkeeping regulations. The following outlines certain of these requirements.

File Currency Transaction Reports (CTRs)

An MSB must file a report of each currency transaction involving cash-in or cash-out of more than \$10,000 conducted by, through, or to the MSB on any one day by or on behalf of the same person.²

Therefore, a CTR is required when a transaction meets all of the following conditions:

- In currency,
- Greater than \$10,000 in either cash-in or cash-out,
- By, or on behalf of, the same person, and
- Occurs on one business day.

² See 31CFR103.22

Aggregation

Multiple transactions conducted by or on behalf of the same person on the same day are considered to be one transaction for CTR purposes. In other words, the MSB must file a CTR if it knows the customer's aggregate cash-in or cash-out transactions total more than \$10,000 in one day.

Cash-in and Cash-out

Cash-in transactions must be added together with cash-in transactions and cash-out transactions must be added together with cash-out transactions to determine whether the CTR threshold (greater than \$10,000) has been met in any one business day.

CTR Filing

The CTR is IRS Form 4789, Currency Transaction Report, and is available on www.msb.gov or by calling the IRS Forms

MSBs Can Help In Other Ways

File Currency Transaction Reports (CTRs) (Cont.)

Distribution Center at 1-800-829-3676.
The form must be filed within 15 days
from the date of the transaction(s).

The CTR requirement requires an MSB to:

- Verify and record customer ID,
- Obtain transaction information,
- Complete and file the CTR,
- Retain a copy of the CTR for five years
from the date of filing the report.

Keep Records

Monetary Instrument "Log" — for Cash Purchases of Money Orders, Travelers Checks, Other Instruments

An MSB that sells money orders, traveler's
checks, or other instruments for cash
must verify the identity of the customer

and create and maintain a record of each
purchase when the purchase involves cash
between \$3,000 and \$10,000, inclusive.³

Thus, a record is required when:

- Cash-in of \$3,000-\$10,000, inclusive,
and
- Cash-in is for the purchase of money
orders, traveler's checks, or other
monetary instruments.

The Monetary Instrument "Log" requirement requires an MSB to:

- Verify and record customer ID,
- Record transaction information (for
each money order, traveler's check, or
other instrument purchased: amount,
serial number, and date sold),
- Retain the record for five years from the
date of the transaction.

MSBs Can Help In Other Ways

Funds Transfer Rules For Senders of Money Transfers

An MSB that accepts an instruction to send a money transfer of \$3,000 or more must verify the identity of the send customer and create and maintain a record of the money transfer, regardless of the method of payment.⁴

In addition, certain information must "travel," that is, the MSB must send on certain information, to the next MSB or financial institution processing the transfer.

For Receivers of Money Transfers

An MSB that accepts an instruction to pay a money transfer of \$3,000 or more must verify the identity of the receiving customer and create and maintain a record of the money transfer, regardless of the method of payment.

The requirement to record funds transfers requires a money transmitter to:

- Verify customer ID,
- Record customer information,
- Record transaction information,
- Send information to receiving MSB,
- Retain the record for five years from the date of the transaction.

Currency Exchange Record

Each currency exchanger must create and maintain a record of each exchange of currency in excess of \$1,000.⁵ The currency exchange may be either domestic or foreign currency, or it may be both. Thus, a currency exchange record is required when:

- Currency-in greater than \$1,000, or
- Currency-out greater than \$1,000.

⁴ See 31 CFR 103.33(f)

⁵ See 31 CFR 103.37

MSBs Can Help In Other Ways

Keep Records (Cont.)

Example. A customer wishes to exchange \$3,000 in Canadian dollars for its equivalent in U.S. dollars, or a customer wishes to exchange \$1,500 in \$20 bills for \$1,500 in \$100 bills.

In each case, the transaction must be recorded.

The requirement to record currency exchanges includes the following — the currency exchanger must:

- Record customer ID and information,
- Record transaction information,
- Retain the record for five years from the date of the transaction.

Reports That Can Help MSBs Identify Suspicious Transactions

The following list of reports can be used to look for possible money laundering activity in MSBs.

Cash-In and Cash-Out of Large Transaction Reports

Many MSBs prepare, or have systems that generate, reports of cash-in and cash-out. Often these reports include transactions that exceed a certain threshold. Many money transmitters, for example, have established identification requirements at levels below the \$3,000 threshold. Such reports can help identify customers who may be structuring transactions to evade BSA reporting and recordkeeping requirements or who are engaging in other unusual activity.

Kiting Reports

Issuers of traveler's checks and money orders and money transfer companies often prepare, or have systems that generate, reports that identify transactions that may involve kiting. Kiting is depositing and drawing checks between accounts at two or more banks and thereby taking advantage of the float — that is, the time it takes the bank of deposit to collect from the paying bank. Reports that indicate kiting may also disclose other unusual patterns of activity possibly associated with money laundering.

Money Transfer Reports

Money transfer companies prepare, or have systems that generate, daily transaction reports and other reports that identify different groupings of transfer activity processed through their systems

Reports That Can Help MSBs Identify Suspicious Transactions

Money Transfer Reports (Cont.)

(e.g., corridor reports showing all transfers from country A to country B in a specific time period). These reports can help identify unusual patterns that may suggest possible money laundering.

Depending on the type of report and the frequency, these reports can help identify unusual customer behavior. Such reports also may help identify unusual behavior of businesses serving as agents of money transfer companies.

\$3,000 Instrument “Log”

Reports of cash sales of instruments between \$3,000 - \$10,000, inclusive, required by BSA regulations, can help MSBs identify possible currency structuring patterns. Recorded information can, for example, help identify customers who may be structuring transactions to evade the BSA reporting and recordkeeping requirements.

Clearance Records/Receipts

Issuers of money orders and traveler’s checks prepare, or have systems that generate, daily records of items that have been presented for payment against the issuer’s bank account. Many issuers have designed programs to identify unusual patterns of cleared instruments. Such reports can be extremely useful in the identification of items that may have been used for illicit purposes.

\$3,000 Funds Transfer Records

These records, required by BSA regulations, can help money transmitters identify possible structuring patterns. Records of \$3,000 or more in money transfers regardless of the method of payment may help identify customers who could be structuring transactions to evade BSA reporting and recordkeeping requirements.

Reports That Can Help MSBs Identify Suspicious Transactions

Customer Activity Reports

Some MSBs use customer reward programs to encourage repeat use by customers. Reports generated to monitor individual customer responses or general customer activity can be useful in identifying unusual transactions or patterns of transactions.

Some Money Laundering Schemes

The following descriptions are intended to help MSBs identify activities that criminals use to launder money. They are also intended to reinforce the need for strict customer identification programs. Finally, although these examples are of landmark investigations that primarily involve banks, they provide lessons to be learned by MSBs as well.

Operation Polar Cap

Two banks reported suspicious activities related to changes in operations by customers. Those two reports and an analysis of CTRs by the U.S. Customs Service helped bring together a national investigation.

At one bank, an employee noticed that a customer, a jewelry broker, was making large cash deposits (\$25 million over three months) that did not seem commensurate with his usual business. In addition

to filing the CTRs required for cash transactions by this customer of more than \$10,000 in a business day, one bank also notified the IRS Criminal Investigation Division (IRS-CID).

At the other bank, an observant employee became suspicious when a customer, who ran a grocery store and check cashing service, stopped taking cash back for the checks he deposited in the bank. This change led the banker to notify law enforcement authorities.

Together, these two suspicious banks helped uncover and disrupt an operation that had laundered about \$1.2 billion over two years. More than 127 people were arrested, a foreign bank was indicted, and one ton of cocaine was seized. Numerous convictions resulted.

Some Money Laundering Schemes

Operation C-Chase

A Luxembourg-based bank, two of its subsidiaries, nine bank officials, and 75 other individuals in several countries were indicted for possible involvement in a worldwide money laundering scheme. Convictions were obtained in a significant number of cases. The operation relied on the launderers' associates picking up cash from drug activities in cities around the

United States and, either through funds transfers or by physically transporting the cash, depositing it into undercover accounts in a U.S. bank.

The associates signed blank checks drawn on the undercover accounts, and after a cash pickup occurred, the head of the laundering operation would enter the amount onto one of the blank checks and forward it to the owner of the funds or sell it on the currency black market.

As the operation expanded, the head of the operation developed several variants on that process. Some funds from the undercover accounts were wired to similar accounts in a Central American bank to further disguise their origin. Others were transferred through another U.S. bank to a foreign bank.

In both instances, the funds transferred to the foreign bank were placed in 90-day certificates of deposit and used as collateral on loans made by the Central American bank to its associates. The loan proceeds were then deposited in undercover accounts in the bank and forwarded through the chain as before.

At a later date, funds wired through two foreign banks were used to purchase certificates of deposit at a second foreign bank. The certificates were then used as collateral on loans made at a third foreign bank, the proceeds of which were wired

Some Money Laundering Schemes

Operation C-Chase (Cont.)

back to the undercover accounts at the U.S. banks, and transferred from there to the owner's account in South America. The organizers of this ring were careful to warn participants that transactions should be handled in varying combinations to avoid developing a pattern. They used many legitimate businesses, such as hotels and restaurants, to originate funds transfers to the undercover accounts. Together, the network was able to absorb about \$10 million per month in drug proceeds.

Bank of Credit and Commerce International (BCCI)

Established in the 1970s, the Bank of Credit and Commerce International emerged in the 1980s as one of the world's largest privately owned financial institutions, with operations in over

70 countries. During the years of its operations, BCCI employees were found to have engaged in a number of illicit activities, including money laundering. BCCI was financially distressed in the 1970s because of troubled shipping loans, but through an intricate shell game, it shuttled assets and liabilities among its subsidiaries, giving the appearance of being a well-capitalized financial institution.

Investigations resulted in the 1991 seizure of BCCI's operations by regulators in seven countries. BCCI points out a number of important issues for financial institutions: financial institutions should be careful about knowing other institutions with which they do business. They should carefully screen potential major owners or shareholders, pay attention to the quality and extent

Some Money Laundering Schemes

of supervision that foreign institutions receive in their home countries, and be aware that asset forfeiture laws put institutions at risk of having assets, including bank accounts and outstanding instruments and money transfers, frozen or seized.

Operation Green Ice

Law enforcement agencies in eight nations cooperated in a sting operation which resulted in the arrest of 167 people and the seizure of \$54 million in cash and other assets. Operation Green Ice led to the arrest of several high-ranking financial officers of cocaine cartels, and ultimately their conviction. Accounts at banks around the world were frozen after receiving transfers and cash deposits of laundered funds. In the United States, bank accounts were frozen and seized in

San Diego, Los Angeles, Chicago, Houston, Miami and New York.

The U.S. banks that received the cash deposits in this case cooperated with agents of the Drug Enforcement Agency and continued to file detailed CTRs, which provided further evidence. Intermediary banks had less access to information and were more at risk of unwittingly being used as part of the money laundering chain.

This case points out the need for institutions to be aware of such risks and to protect themselves by noting frequent transfers of substantial sums sent to persons or accounts in drug source countries.

Legislation

Over the years, Congress has passed many laws to combat money laundering. Perhaps the most significant of these are the Bank Secrecy Act of 1970, the Money Laundering Control Act of 1986, the Anti-Drug Abuse Act of 1988, the Annunzio–Wylie Act of 1992, the Money Laundering Suppression Act of 1994, the Money Laundering and Financial Crimes Strategy Act of 1998 and the USA PATRIOT Act of 2001.

The **Bank Secrecy Act of 1970 (P.L. 91-508)** was designed to:

- Prevent tax evasion and provide tools to fight organized crime.
- Create an investigative "paper trail" for large currency transactions by establishing reporting standards and requirements (e.g. the Currency Transaction Report requirement).

- Verify the identity of customers and keep certain basic records of customer transactions, including cancelled checks and debits, signature cards, and statements of account.
- Impose civil and criminal penalties for noncompliance with its reporting requirements.
- Improve detection and investigation of criminal, tax, and regulatory violations.

The **Money Laundering Control Act of 1986 (P.L. 99-570)**, part of the Anti-Drug Abuse Act of 1986, made money laundering a federal crime. It created three new criminal offenses for money laundering activities by, through, or to a financial institution. These offenses are:

- Knowingly helping launder money derived from criminal activity.

Legislation

- Knowingly (including being willfully blind) engaging in a transaction of more than \$10,000 that involves property or funds derived from criminal activity.
- Structuring transactions to evade BSA reporting requirements.

The **Anti-Drug Abuse Act of 1988 (P.L. 100-690)** reinforced anti-money laundering efforts in several ways. The Act:

- Significantly increases in civil and criminal penalties for money laundering and other BSA violations, including forfeiture of any property, real or personal, involved in a transaction or attempted transaction in violation of laws relating to the filing of Currency Transaction Reports, money laundering or structuring transactions.
- Requires strict identification and recording of cash purchases of certain monetary instruments, including

money orders and traveler's checks between \$3,000 and \$10,000, inclusive.

- Permits the Department of the Treasury to require certain financial institutions in specific geographic or "target" areas to file additional BSA reports of currency transactions in amounts less than \$10,000 by use of "Geographic Targeting Orders."
- Directs the Department of the Treasury to negotiate bilateral international agreements covering the recording of large U.S. currency transactions and the sharing of such information.
- Increased the criminal sanction for tax evasion when money from criminal activity is involved.

Legislation

The **Annunzio-Wylie Anti-Money Laundering Act of 1992 (P.L. 102-550)** strengthened penalties for financial institutions found guilty of money laundering. Annunzio-Wylie required the Secretary of the Treasury to:

- Adopt a rule requiring all financial institutions, both banks and non-banks (including MSBs), to maintain records of domestic and international funds transfers, which can be used in law enforcement investigations.
- Establish a BSA Advisory Group (BSAAG), comprised of representatives from the Department of the Treasury and Department of Justice, Office of National Drug Control Policy and other interested persons and financial institutions, including MSBs. The BSAAG, established in 1994, meets twice per year and informs representatives of the financial

services industry about new regulatory developments and how reported information is used.

Annunzio-Wylie also permitted the Secretary of the Treasury to:

- Require any financial institution, or any financial institution employee, to report suspicious transactions relevant to any possible violation of law or regulation.
- Require any financial institution to adopt an anti- money laundering program.

In addition, Annunzio-Wylie:

- Makes it illegal for a financial institution, or an employee of a financial institution, to disclose to anyone involved in a suspicious transaction when a Suspicious Activity Report (SAR) has been filed.
- Protects any financial institution, and any director, officer, employee, or agent

Legislation

of a financial institution, from civil liability for reporting suspicious activity.

- Makes it a federal crime to operate an illegal money transmitting business (i.e. operating a money transmitting business without a state license in a state where such license is required under state law.)

The **Money Laundering Suppression Act (MLSA) of 1994 (P.L. 103-325)** specifically addressed MSBs. The MLSA:

- Requires each MSB to be registered by an owner or controlling person of the MSB.
- Requires every MSB to maintain a list of businesses authorized to act as agents in connection with the financial services offered by the MSB.
- Makes operating an unregistered MSB a federal crime.
- Recommended that states adopt uniform laws applicable to MSBs.

The **Money Laundering and Financial Crimes Strategy Act of 1998 (P.L. 105-310)** requires:

- The President, acting through the Secretary of the Treasury and in coordination with the Attorney General, to develop a national strategy for combating money laundering and related financial crimes and to submit such strategy each February 1st to Congress.
- The Secretary of the Treasury, upon consultation with the Attorney General, to designate certain areas—by geographical area, industry, sector or institution—as being vulnerable to money laundering and related financial crimes. (Certain areas were subsequently designated as High Intensity Financial Crime Areas (HIFCAs).

Legislation

The **USA PATRIOT Act of 2001 (P.L. 107-56)**, which is the United and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act of 2001, requires:

- Establishment of anti-money laundering compliance programs by all financial institutions. At minimum each program must include: policies procedures and controls; designation of a compliance officer; training; and an independent audit function.
 - Establishment of a confidential communication system between government and the financial services industry.
 - Implementation of customer identification procedures for new accounts.
 - Enhanced due diligence for correspondent and private banking accounts maintained for non-U.S. persons.
- Establishment of a highly secure network by FinCEN for electronic filing of BSA reports.

International Money Laundering Efforts

The United States is not alone in the fight against financial crimes. Many countries have enacted significant anti-money laundering legislation. A number of international organizations and regional groups have adopted anti-money laundering rules and regulations as well.

Basel Committee

The Basel Committee consists of representatives of central banks and supervisory authorities of Belgium, Canada, France, Germany, Italy, Japan, Luxembourg, the Netherlands, Spain, Sweden, Switzerland, the United Kingdom and the USA. In 1988 the Basel Committee published a "Statement of Principles" on money laundering, which generally recommended obtaining proper identification from customers and complying with laws and regulations governing financial transactions.

United Nations (UN)

The UN Convention Against Illicit Traffic in Narcotic Drugs and Psychotropic substances (the Vienna Convention) calls on signatories to criminalize money laundering, to assure that bank secrecy is not a barrier to criminal investigations, and to promote removal of legislative barriers to investigation, prosecution, and international cooperation.

Financial Action Task Force (FATF)

FATF was created at the Economic Summit of the major industrialized countries in 1989. It issued a report in which it made 40 recommendations, consistent with the Vienna Convention, for implementing and coordinating money laundering laws in member countries. They also formed the basis of money laundering rules and regulations established by the Caribbean Financial Action Task Force and the Organization of America States.

Country Advisories and Economic and Trade Sanction Lists

FinCEN Advisories

FinCEN has issued country advisories urging enhanced scrutiny of financial transactions with countries that had deficient anti-money laundering controls. Advisories can be viewed at: www.fincen.gov under [Publications/Advisories](#).

Office of Foreign Assets Control (OFAC) List

The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) issues the Specially Designated Nationals and Blocked Entities List (SDN List). OFAC regulations require businesses to identify and freeze the assets of targeted countries, terrorists, drug cartels and other specially designated persons. For these lists and specific instructions regarding what businesses may or may not do under OFAC regulations, refer to the OFAC website at: www.treas.gov/offices/enforcement/ofac/.

Glossary

Agent

A business that an issuer authorizes, through written agreement or otherwise, to sell its instruments or, in the case of funds transmission, to sell its send and receive transfer services.

Aggregation

Adding together multiple transactions that an MSB knows have been conducted by or on behalf of the same person on the same day, for BSA reporting and record-keeping purposes. For example, the MSB must file a CTR if it knows a customer's aggregate cash-in or cash-out transactions during one day totals more than \$10,000.

Branch

An owned location of either an issuer or agent at which financial services are sold.

Issuer

The business ultimately responsible for payment of money orders or traveler's checks as the drawer of such instruments, or a money transmitter that has the obligation to guarantee payment of a money transfer.

Money Laundering

A process by which criminals seek to disguise the true source of their illegally obtained funds or proceeds of crime. It involves three different, and sometimes overlapping, stages:

Placement — Physically placing criminal proceeds into the financial system.

Layering — Separating the proceeds of criminal activity from their origins through layers of financial transactions.

Integration — Moving the proceeds of crime into a "final" form that provides an apparently legitimate explanation for the illegally obtained funds.

Glossary

Money Services Business (MSB)

Any person doing business, whether or not on a regular basis or as an organized business concern, providing one or more of the following services:

- money orders
- traveler's checks
- check cashing
- currency dealing or exchange
- stored value

-AND-

- Conducts more than \$1,000 in money services business activity
 - with one person
 - in one or more transactions (in one type of activity)
 - on any one day.

OR

- Provides money transfers in any amount.

Money Transmitter

A person that engages as a business in the transfer of funds through a financial institution is a money transmitter and an MSB, regardless of the amount of transfer activity. Generally, the acceptance and transmission of funds as an integral part of a transaction other than the funds transmission itself (for example, in connection with a sale of securities or other property), will not cause a person to be a money transmitter.

Redeemer

A business that accepts instruments in exchange for currency or other instruments for which it is not the issuer is a redeemer. For example, a hotel that provides a customer with \$1,500 in cash in exchange for the customer's \$1,500 money order (issued by another MSB) is a redeemer. The MSB definition in 31 CFR 103.11(u)(4) extends to "redeemers" of

Glossary

money orders and traveler's checks only insofar as the instruments involved are redeemed for monetary value — that is, for currency or monetary or other negotiable or other instruments. The taking of the instruments in exchange for goods or general services is not redemption under BSA regulations.

Structuring

A term used in reference to any conduct engaged in to evade a reporting or recordkeeping threshold and the corresponding BSA reporting or recordkeeping requirement (e.g. \$1,000 for currency exchange and \$3,000 for funds transfer records or more than \$10,000 in currency for filing CTRs). Structuring is a federal crime.

Examples of Structuring

1. One person breaks a large transaction into two or more smaller transactions —

A customer wishes to conduct a \$10,500 cash transaction on one day. However, knowing that the threshold for filing a CTR (more than \$10,000 cash transaction) would be met, he conducts two \$5,250 cash transactions, thereby trying to evade the CTR reporting requirement/threshold.

2. A large transaction is broken into two or more smaller transactions conducted by two or more persons —

A customer wishes to send \$10,000 to a friend in London. The customer and three others each purchase a \$2,500 money transfer to London, thereby evading the Funds Transfer Rule recordkeeping requirement/threshold of \$3,000.

Request More Information

BSA Forms

To Download:

FinCEN website at: www.fincen.gov

MSB website at: www.msb.gov

IRS website at: www.irs.gov

To Order:

IRS Forms Distribution Center at:
1-800-829-3676

Free MSB Information and Guidance Materials

To Order:

MSB Web site at: www.msb.gov
Money Services Business Outreach Office
at: 1-800-386-6329

Answers to Questions about Filing BSA Forms

IRS-Detroit Computing Center

Hotline
1-800-800-2877

Interpretation of BSA Regulations

Financial Crimes Enforcement Network

Regulatory Helpline
1-800-949-2732

Report Terrorist Related Financial Activity

Financial Institutions Hotline
1-866-556-3974



Financial Crimes Enforcement Network
U.S. Department of the Treasury
Washington, DC