FINANCIAL CRIMES ENFORCEMENT NETWORK

Financial Trend Analysis

Human Smuggling: 2023 – 2025 Threat Pattern & Trend Information

August 2026

Human Smuggling:
2023 – 2025 Threat Pattern & Trend Information

This Financial Trend Analysis (FTA) focuses on patterns and trends identified in Bank Secrecy Act (BSA) data linked to suspected human smuggling. FinCEN issued government-wide priorities for anti-money laundering and countering the financing of terrorism (AML/CFT) on 30 June 2021, which included human smuggling.[1] The information in this report is relevant to the public, especially the financial industry and law enforcement agencies, and highlights the value of BSA information filed by regulated financial institutions.

This report is issued pursuant to Section 6206 of the Anti-Money Laundering Act of 2020, which requires the Financial Crimes Enforcement Network (FinCEN) to periodically publish BSA-derived threat pattern and trend information.[2]

Executive Summary: In developing this FTA, FinCEN analyzed 67,540 BSA reports associated with suspected human smuggling activity (the dataset), filed between 1 January 2023 and 31 December 2025 (the review period) and totaling more than $4.9 billion in suspicious activity.[3] FinCEN's analysis of these BSA reports identified several consistent indicators and commonalities—including unverifiable relationships between originators and beneficiaries, transactions sent along common migration routes, and excessive cash activity conducted along the southwest border of the United States.

- *Suspected Human Smuggling-Related BSA Reports Declined Significantly in 2025:* Suspected human smuggling-related BSA reports peaked in 2024 with 29,266 reports before significantly decreasing to 11,018 BSA reports filed in 2025—a 62 percent decline. The United States ranked first for subject locations by country, followed by four Latin America nations: Mexico, Guatemala, Honduras, and Colombia.

- *Money Services Businesses (MSBs) Filed the Vast Majority of BSA Reports Potentially Related to Suspected Human Smuggling Activity:* Approximately 97 percent of the BSA reports in the dataset—or 65,238 BSA reports—were filed by MSBs, with subjects primarily located in the United States and Latin America. In their BSA reports, many MSBs used similar language to describe the suspicious transactions' potential connections to human smuggling. For example, 38,683 BSA reports—or 59 percent of the BSA reports filed by MSBs—indicated no verifiable familial connection between the transaction originator and beneficiary as a basis for filing.

1. *See* FinCEN, "Anti-Money Laundering and Countering the Financing of Terrorism National Priorities," 30 June 2021, https://www.fincen.gov/sites/default/files/shared/AML_CFT%20Priorities%20(June%2030%2C%202021).pdf.
2. The Anti-Money Laundering Act of 2020 was enacted as Division F, §§ 6001-6511, of the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Pub. L. 116-283 (2021).
3. These BSA reports may refer to financial activity that occurred prior to the review period. BSA filers often reported suspicious financial activity that may have occurred over a multi-year period that began before 2023. This included instances in which filers identified derogatory information, such as arrests and indictments, involving their customers.

Other frequent reasons included transactions outside of a customer's usual pattern, money sent to locations along common migrations routes, and suspected structuring transactions to avoid recordkeeping and reporting requirements.

- *Depository Institutions Filed Fewer BSA Reports Related to Suspected Human Smuggling Activity but Had a Higher Total Suspicious Activity Amount:* Depository institutions filed 2,075 BSA reports, or approximately three percent of the total dataset. However, the suspicious activity amounts in their reports accounted for approximately 61 percent—or $3 billion—of the total amount.[4] Depository institutions highlighted several typologies in the dataset potentially indicative of human smuggling-related financial activity, including suspected structuring of cash transactions, funnel accounts receiving funds from numerous individuals, and travel agencies arranging travel for migrants—ranging from sham operations to legitimate businesses that may be unwittingly facilitating such activity.

Scope and Methodology: For purposes of this FTA, FinCEN analyzed BSA reports filed during the review period that as requested in the January 2023 FinCEN "Alert on Human Smuggling along the Southwest Border of the United States," used the Human Smuggling Alert key term "FIN-2023- HUMANSMUGGLING", and/or where filers checked "Human Smuggling" as a suspicious activity type.[5] Based on these parameters, FinCEN identified a dataset consisting of 67,540 filings. As noted above, these BSA reports are the dataset that is the basis for the analysis in this FTA.

The BSA reports in this dataset reported approximately $4.9 billion in suspected human smuggling-related activity, which may include both attempted and completed transactions, as well as duplicate transactions in some instances. FinCEN identified these BSA reports based on filing date, rather than the date of the underlying activity, and, as such, these reports may refer to incidents that occurred in previous months and years. FinCEN used a combination of automated and manual review of BSA reports to determine prominent trends and methodologies.

4. In addition, 227 BSA reports were filed by other filer types, including companies operating in the insurance/loan, casino/gaming, and securities/futures industries.
5. The "FinCEN Alert on Human Smuggling along the Southwest Border of the United States" was issued on 13 January 2023 in response to increased migrant smuggling activity in the southwest border region, providing financial institutions with red flags for detecting suspected human smuggling. *See* "FinCEN Alert on Human Smuggling along the Southwest Border of the United States," FinCEN Alert #FIN-2023-Alert001, 13 January 2023, https://www.fincen.gov/sites/default/files/shared/FinCEN%20Alert%20Human%20Smuggling%20FINAL_508.pdf.

A Note About Suspicious Activity Reporting

Suspicious activity reporting reflects only suspicious activity that has been identified and reported by financial institutions and therefore, should not be considered a complete representation of the scope of any particular type of suspicious activity. Suspicious activity reporting may include additional transactions and information beyond a specific transaction that may be reportable as suspicious and, accordingly, the total reportable suspicious activity amount in any report may be overly inclusive. For example, suspicious activity reporting may reflect both completed and attempted transactions, both inbound and outbound transactions, and transfers between accounts. These suspicious activity amounts may also include typos and errors as submitted by filers. The reported suspicious activity in any individual suspicious activity filing may include both legal and illicit activities associated with a particular subject. Suspicious activity reporting may also describe continuing suspicious activity or amend earlier reporting, or reports that cover expanded networks involved in potential illicit activity and therefore may reflect cumulative transactions from a single filer involving the same subject.

What is Human Smuggling?

Human smuggling refers to acts or attempts to bring unauthorized persons to or into the United States, transport unauthorized persons within the United States, harbor unauthorized persons, encourage entry of unauthorized persons into the United States, or conspire to commit such acts.[6]

Human smuggling networks often consist of smaller organizations that perform specialized functions at different stages of the smuggling process.[7] Many of these networks are associated with larger transnational criminal organizations (TCOs), such as Mexico-based cartels, which "control" territory spanning key migration corridors.[8] These TCOs profit from human smuggling through multiple revenue streams, including by collecting a piso, or territorial tax, from smugglers operating through areas under their control.[9]

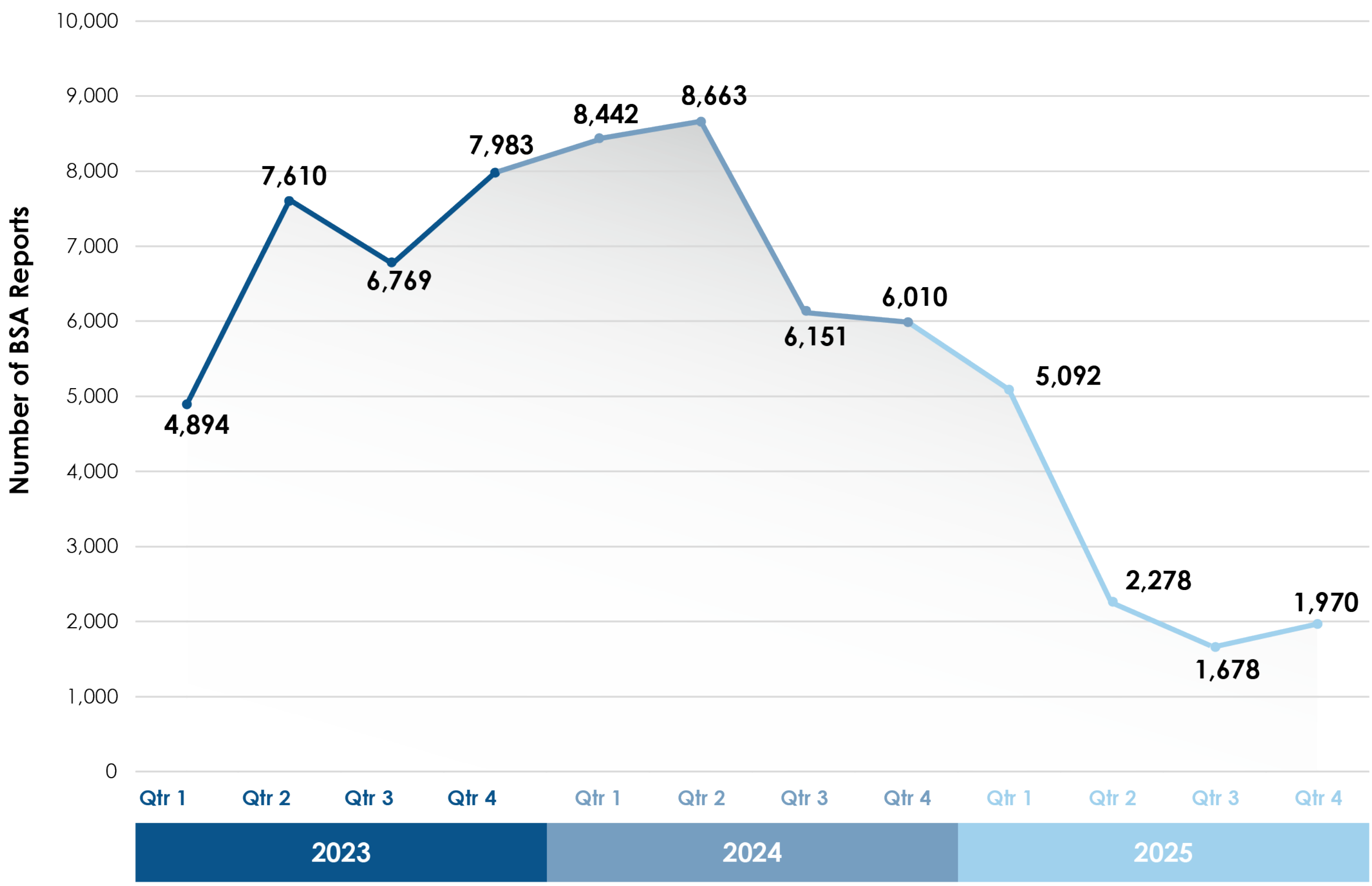
Although they are separate crimes, human smuggling is often referenced alongside human trafficking in BSA reports because they share some overlapping financial typologies. Human trafficking is the act of recruiting, harboring, transporting, providing or obtaining a person for forced labor or commercial sex acts through the use of force, fraud or coercion.[10]

6. *See* 8 U.S.C. § 1324.
7. *See* "FinCEN Alert on Human Smuggling along the Southwest Border of the United States," FinCEN Alert #FIN-2023-Alert001, 13 January 2023, https://www.fincen.gov/system/files/shared/FinCEN%20Alert%20Human%20Smuggling%20FINAL_508.pdf.
8. *Ibid*.
9. *See* "Drug Enforcement Administration National Drug Threat Assessment 2024," Drug Enforcement Administration, 23 May 2024, https://www.dea.gov/sites/default/files/2024-05/5.23.2024%20NDTA-updated.pdf.
10. *See generally* 18 U.S.C. §§ 1581, 1584, 1589, 1590, 1591, 24121, 2422, 2423 and 2425, The Victims of Trafficking and Violence Protection Act of 2000 (Pub. L. No. 106-386), and applicable state laws.

Suspected Human Smuggling-Related BSA Reports Declined Significantly in 2025

The highest number of suspected human smuggling-related BSA filings during the review period occurred in 2024, with 29,266 BSA reports—or approximately 43 percent of the total dataset—filed that year. The next highest number of suspected human smuggling-related BSA filings during the review period occurred in 2023, with 27,256 BSA reports—or 40 percent of the total dataset. In contrast, only 11,018 BSA reports—or 16 percent of the total dataset—were filed in 2025, showing a sharp decline. For comparison, the second quarter of 2024 had 8,663 BSA filings which would represent 79 percent of the total BSA reports submitted during the entirety of 2025. According to U.S. Customs and Border Protection, illegal crossings at the southwest border declined significantly in 2025, with May 2025 crossings 93 percent lower than those recorded in May 2024.[11]

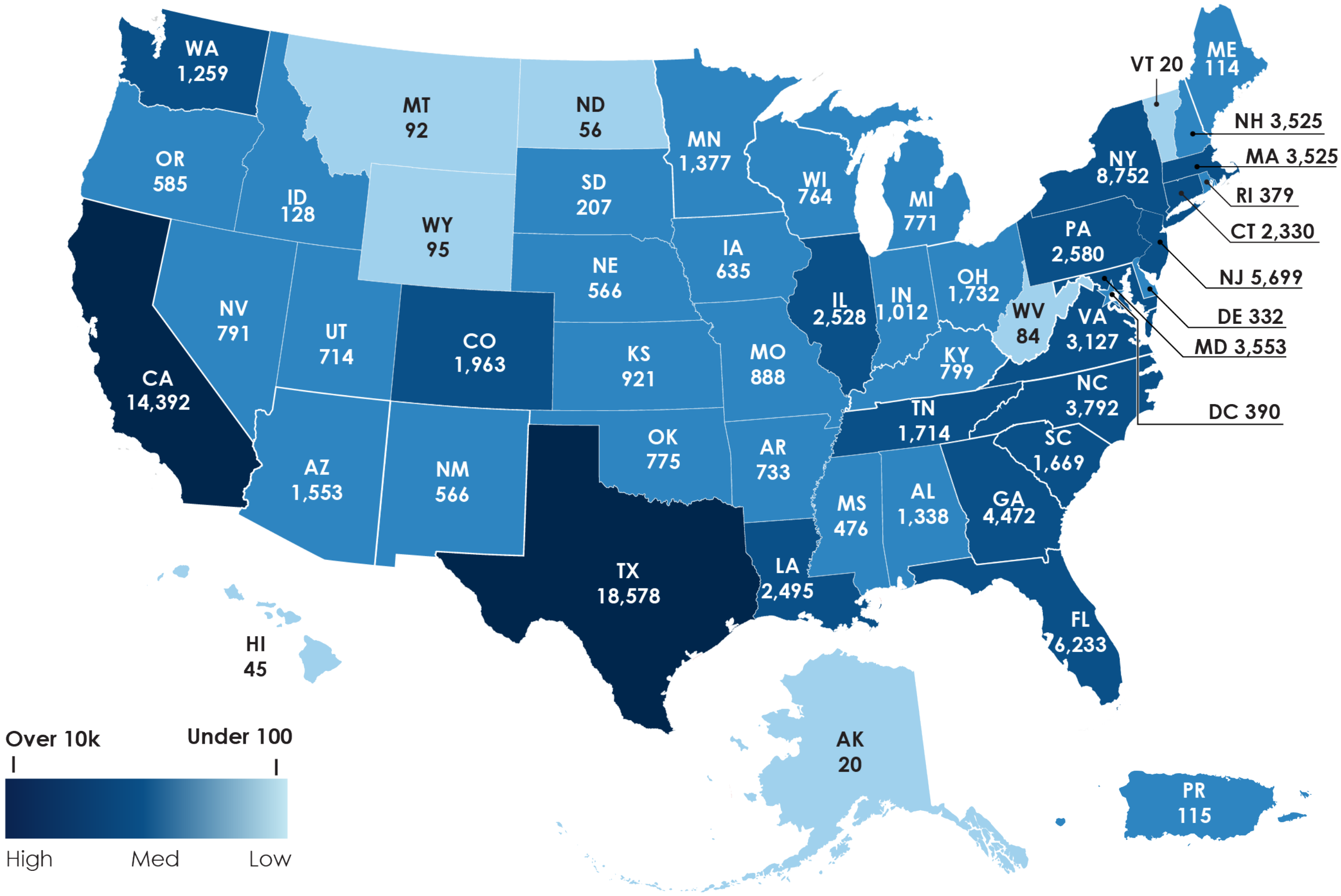
Figure 1: . Human Smuggling-Related BSA Reports Filed Quarterly, 2023 - 2025



11. *See* "CBP Releases May 2025 Monthly Update," U.S. Customs and Border Protection National Media Release, 17 June 2025, https://www.cbp.gov/newsroom/national-media-release/cbp-releases-may-2025-monthly-update.

The top subject locations in the overall dataset —including BSA reports filed by MSBs, depository institutions, and other filer types—were predominantly in the United States and Latin America, with subjects located in all U.S. states and territories, including Washington, D.C. and Puerto Rico.[12] The United States was the top location for subjects, with 67,192 BSA reports filed with at least one subject in the United States during the review period. The top five U.S. states for subject locations were Texas, California, New York, Florida, and New Jersey.

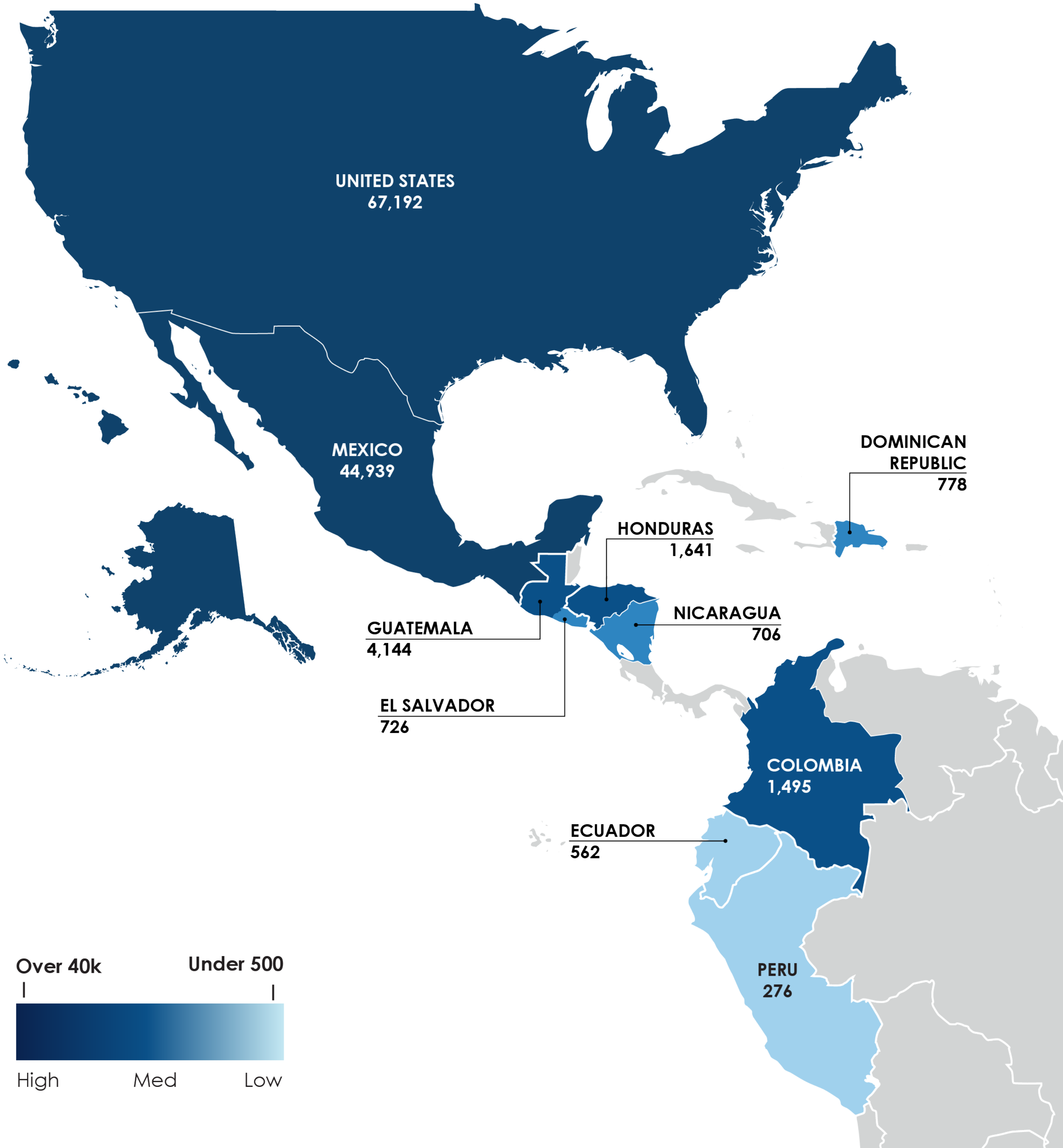
Figure 2. U.S. Jurisdictions by Subject Address, by Number of BSA Reports, 2023 - 2025[13]



The other top subject countries consisted of Latin American countries, with Mexico, Guatemala, Honduras, and Colombia following the United States in the top five. This indicates that the majority of reported potential human smuggling-related transactions occurred between the United States and Latin America, with subject locations in the Caribbean, Central America, and South America all represented.

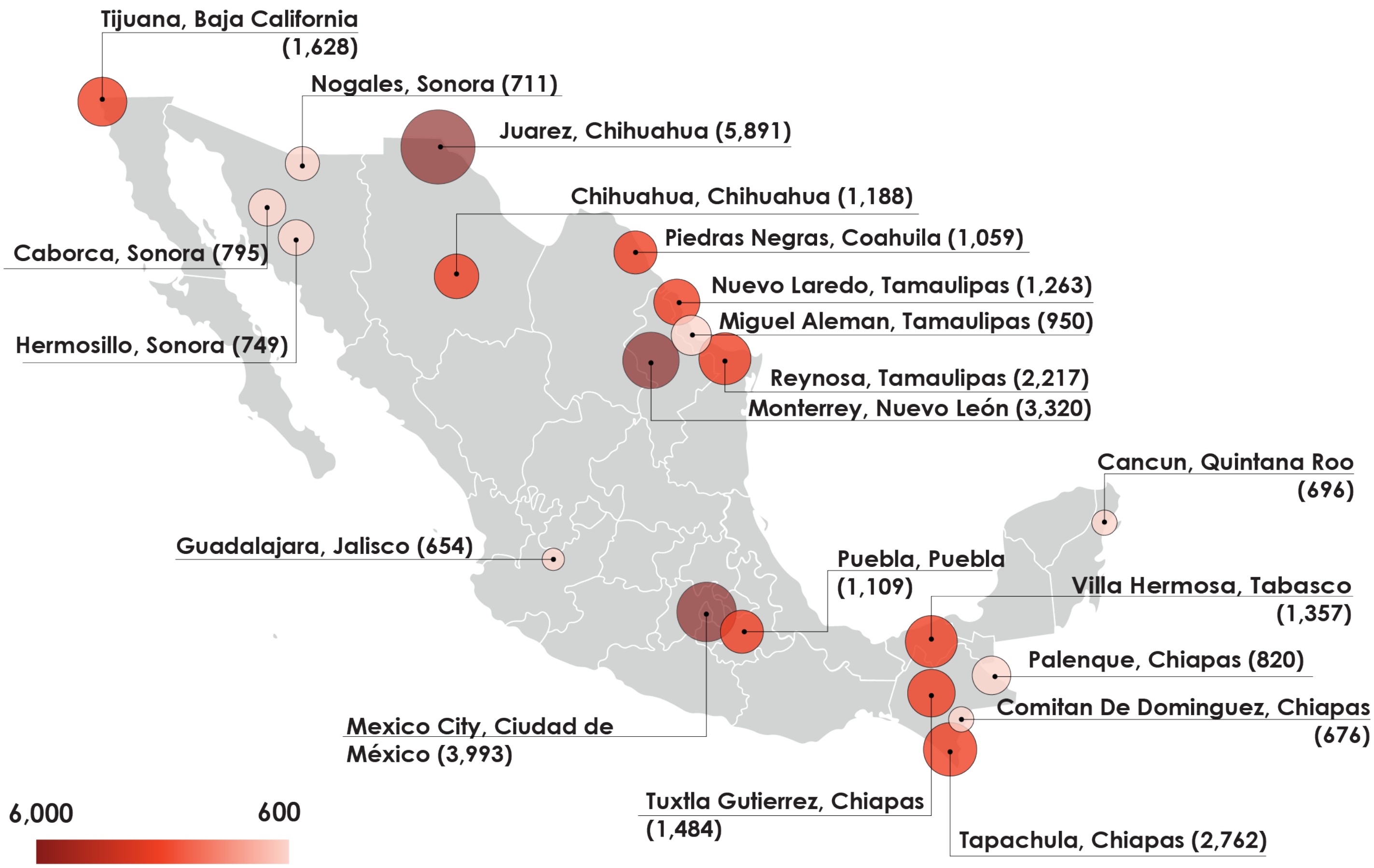
12. For this Financial Trend Analysis report, depository institutions include banks and credit unions
13. This map contains the number of BSA reports in which at least one subject was reported with a fixed field address in a particular state or territory. Each BSA report is counted once for every jurisdiction represented by an individual's address. Consequently, a single BSA report may be included in multiple totals. Subsequent maps follow this same methodology.

Figure 3. Top 10 Countries by Subject Address, by Number of BSA Reports, 2023 - 2025[14]



14. This map reflects, by country, the number of BSA reports in which at least one subject was reported with a fixed field address in each country. Based on a review of the BSA reports within the dataset, filers completed this field where subject location could be identified. However, the subject may not be known, or their information may not be available and/or reported in all instances. Note that counts reflect BSA reports, not unique subjects; individuals with addresses in multiple countries appear in multiple country totals. In addition, the identification of the United States as the most common jurisdiction is likely, in part, a reflection of the domestic nature of BSA reporting.

Figure 4. Top 20 Mexican Cities by Subject Address, by Number of BSA Reports, 2023 - 2025[15]



Many financial transactions—including those conducted at MSBs—require identification documents (IDs) from the customer initiating the transaction, providing insight as to where subjects are located or are originally from.[16] During the review period, subjects most frequently presented IDs issued by the United States and Latin American countries, which comprise the top 10 jurisdictions by ID issuance in the dataset.[17] Nearly all BSA reports in the dataset that involved international transactions involved funds originating in the United States and sent abroad by individuals using a foreign ID. This pattern suggests subjects are foreign nationals—primarily from Latin American countries—with U.S. presence that may be temporary or permanent. In some cases, the U.S.-based subjects may be sending money overseas to aid their friends or relatives in potentially being smuggled into the United States. Nearly seven percent of MSB-filed BSA reports in the dataset reported that the customer admitted the money was intended to help smuggle a friend or relative into the United States.

15. This map reflects the number of BSA reports in which at least one subject was reported with a fixed field address in one of the above Mexican cities.
16. *See* 31 C.F.R. § 1010.410(e).
17. The top 10 subject ID countries reflect only those jurisdictions whose government-issued IDs were presented at the point of transaction. Subjects without presented IDs are not reflected in this analysis.

Juarez, Chihuahua accounted for the most BSA reports by subject address in Mexico, with 5,891 BSA reports during the review period. In February 2025, U.S. and Mexican authorities dismantled a Juarez-based transnational alien smuggling organization that reportedly smuggled large groups—including children—from Mexico into Texas.[18]

Figure 5. Top 10 Subject Countries by ID Issuance, by Number of BSA Reports, 2023 - 2025

Country	Number of BSA Reports
United States	24,495
Honduras	17,473
Mexico	17,410
Guatemala	13,924
El Salvador	8,841
Ecuador	5,475
Nicaragua	2,895
Colombia	1,736
Dominican Republic	1,129
Venezuela	800

18. *See* "Law Enforcement Cooperation Between United States and Mexico Results in Mexican Takedown of Cartel-Linked Alien Smugglers," Department of Justice, Office of Public Affairs Press Release, 20 February 2025, https://www.justice.gov/opa/pr/law-enforcement-cooperation-between-united-states-and-mexico-results-mexican-takedown-cartel.

Suspected Human Smuggling at the U.S.-Canada Border

In May 2026, a New York-based Indian national plead guilty to directing human smuggling operations across the U.S.-Canada border.[19] The operation included smuggling routes that started in India, then traversed the United Kingdom and Canada, before ultimately crossing into the United States.[20]

Within the BSA reports in the dataset, filers reported large numbers of suspicious peer-to-peer (P2P) transactions, cash and foreign currency exchanges, and debit card purchases conducted in a manner consistent with human smuggling activity at the U.S.-Canada border. The BSA reports in the dataset identified over $32 million in suspicious transactions across various MSBs located in Canada. Some financial institutions flagged transactions occurring in Minnesota and North Dakota—states along northern border human smuggling transit routes—as suspicious based on multiple indicators, including geographic deviation from the customer's residential area inconsistent with expected account activity.[21] One individual was observed exchanging Canadian dollars to U.S. dollars, sometimes weekly, and in one instance, even questioned the bank teller about the Internal Revenue Service's possible oversight of the transactions. This individual also sent over $250,000 in P2P transfers to a person indicted on alien smuggling charges.

MSBs Filed the Vast Majority of BSA Reports Potentially Related to Suspected Human Smuggling Activity

During the review period, approximately 97 percent of BSA reports in the dataset—or 65,238 BSA reports—were filed by MSBs. MSBs also accounted for nine of the top 10 filing institutions in the dataset. Three MSBs accounted for 86 percent of all MSB filings, with one MSB alone comprising approximately 43 percent—or 27,879 BSA reports. Suspicious human smuggling-related transactions that were sent through MSBs during the review period totaled approximately $519 million, averaging $7,961 per filing, and with a median amount of $3,560 per filing. MSB filings often only mentioned human smuggling, as opposed to mentioning both human smuggling and human trafficking, based on a manual review of the data.

19. *See* "Indian National Pleads Guilty for Smuggling a Dozen Illegal Aliens Across Canadian Border into United States," Department of Justice, Office of Public Affairs Press Release, 14 May 2026, https://www.justice.gov/opa/pr/indian-national-pleads-guilty-smuggling-dozen-illegal-aliens-across-canadian-border-united.

20. *Ibid*.

21. *See* "Guidance on Recognizing Activity that May be Associated with Human Smuggling and Human Trafficking – Financial Red Flags," FinCEN Advisory #FIN-2014-A008, 11 September 2014, https://www.fincen.gov/system/files/advisory/FIN-2014-A008.pdf.

Many MSB filings mentioned typologies highlighted in FinCEN's Alerts and Advisories on human smuggling and human trafficking, for example, noting that there was no verifiable relationship between the transaction originator and beneficiary, money flows did not follow typical transaction patterns, and funds sent to locations along known migration routes.[22] [23] [24]

Figure 6. Human Smuggling Typologies Cited by MSB Filers, by Number of BSA Reports, 2023 - 2025

Typology	Mentions in BSA Reports[25]	Percentage of Total
No verifiable familial connection	38,683	57%
Money flows did not follow typical transaction patterns	26,614	39%
Little concern for product performance penalties, fees, or tax consequences	15,706	23%
Funds were sent to geographic locations outside of the customer's usual pattern	15,706	23%
Money sent to high-risk jurisdictions	13,408	20%
Money sent to different unrelated receivers	11,422	17%
Money sent to locations along known migration routes	9,018	13%
Structuring transactions to avoid record keeping requirements	7,477	11%
One originator sent money to many beneficiaries	3,169	5%
Many originators sent money to one beneficiary	829	1%

The top financial institution branches—the branch locations where the transactions took place—in BSA reports filed by MSBs were concentrated in the United States and Latin America.[26] Notably, branches in Mexico appeared in the most BSA reports in the dataset. BSA reports identifying suspicious transactions involving money orders—a type of monetary instrument commonly offered

22. *See* "FinCEN Alert on Human Smuggling along the Southwest Border of the United States," FinCEN Alert #FIN-2023- Alert001, 13 January 2023, https://www.fincen.gov/sites/default/files/shared/FinCEN%20Alert%20Human%20Smuggling%20FINAL_508.pdf.
23. *See* "Supplemental Advisory on Identifying and Reporting Human Trafficking and Related Activity," FinCEN Advisory #FIN-2020-A008, 15 October 2020, https://www.fincen.gov/system/files/advisory/2020-10-15/Advisory%20Human%20Trafficking%20508%20FINAL_0.pdf.
24. *See* "Guidance on Recognizing Activity that May be Associated with Human Smuggling and Human Trafficking – Financial Red Flags," FinCEN Advisory #FIN-2014-A008, 11 September 2014, https://www.fincen.gov/system/files/advisory/FIN-2014-A008.pdf.
25. A single BSA report can contain more than one red flag.
26. FinCEN's analysis included only those MSB-related BSA reports containing identifiable branch location data, comprising approximately 30 percent of total MSB filings examined.

by MSBs—allows for a more granular look at specific cities of transaction origin and destination.[27] Some of the highest-value money order locations—defined as either the place of origin or destination of funds—were in cities near the Mexico-Guatemala border, near the U.S.-Mexico border, and in major U.S. cities.

Figure 7. Top 10 MSB Branch Location Countries, by Number of BSA Reports, 2023 - 2025

Country	Financial Institution Branches
Mexico	11,575
United States	11,455
Guatemala	898
Dominican Republic	291
Honduras	170
Colombia	144
Nicaragua	102
El Salvador	90
Costa Rica	37
Peru	36

Figure 8. Top 10 Money Order Sender Cities, by Number of BSA Reports, 2023 - 2025

Location	Number of BSA Reports	Sum of Total Suspicious Amount
Houston, TX, United States	645	$9,479,252
Los Angeles, CA, United States[28]	497	$6,916,599
Dallas, TX, United States	392	$5,283,593
San Francisco, CA, United States	292	$4,263,185
Las Vegas, NV, United States	143	$2,899,113
Fort Worth, TX, United States	131	$2,140,046
Irving, TX, United States	113	$1,648,089
New York, NY, United States	99	$1,719,364
Hempstead, TX, United States	89	$1,330,058
Bronx, NY, United States	84	$1,533,799

27. *See* "Am I an MSB?," Financial Crimes Enforcement Network, https://www.fincen.gov/am-i-msb.
28. Reports filed with a location "Panorama City, CA, United States" were consolidated under "Los Angeles, CA, United States" to standardize geographic analysis. Panorama City is a neighborhood within the City of Los Angeles.

Figure 9. Top 10 Money Order Receiver Cities, by Number of BSA Reports, 2023 - 2025

Location	Number of BSA Reports	Sum of Total Suspicious Amount
Ciudad Juarez, Mexico	378	$5,613,455
Villahermosa, Mexico	287	$4,110,670
Tapachula, Mexico	255	$4,142,073
Monterrey, Mexico	202	$3,663,736
Tuxtla Gutierrez, Mexico	200	$2,635,408
Houston, United States	194	$3,151,649
Aguilera, Mexico	187	$2,800,971
Tijuana, Mexico	162	$2,107,624
Guatemala City, Guatemala	141	$3,651,100
Comitán De Dominguez, Mexico	135	$1,867,966

Depository Institutions Filed Fewer BSA Reports Related to Suspected Human Smuggling Activity but Had a Higher Total Suspicious Activity Amount

Depository institutions filed approximately three percent of the BSA reports in the dataset—or 2,075 BSA reports. However, the suspicious activity amounts in those filings accounted for approximately 61 percent—or $3 billion—of the total amount during the review period with an average transaction amount of about $1.5 million and a median amount of $82,965 per transaction. These amounts were skewed by several BSA reports that reported large amounts of transactions of more than $100 million. Based on manual analysis, BSA reports filed by depository institutions were less likely than those filed by MSBs to involve an international transfer; while very few depository institution filings in the dataset referenced an international money transfer, most of the BSA reports filed by MSBs did.

BSA reports filed by depository institutions were primarily focused on U.S.-based subjects. Many of the filings only included suspicious financial activity that occurred within the United States, flagging activity such as excessive travel purchases or negative news on subjects of the filings. BSA reports filed by depository institutions were also more likely to mention both human smuggling and human trafficking, with most mentioning both terms in relation to the suspicious activity, based on a manual review of the dataset.

The dataset highlights a strong U.S. focus in BSA reports filed by depository institutions, with 2,029 BSA reports with U.S.-based subjects compared to just 41 BSA reports with Mexico-based subjects, the next most represented country. In addition, 227 BSA reports in the dataset were filed by other filer types, including companies operating in the insurance/loan, casino/card club, and securities/futures industries.

Figure 10. Top 10 Subject Countries by Address in Depository Institution Filings, by Number of BSA Reports, 2023 – 2025

Country	Number of BSA Reports
United States	2,029
Mexico	41
People's Republic of China	26
Venezuela	10
Uzbekistan	9
Colombia	9
Guatemala	7
Hong Kong	7
Spain	7
Dominican Republic	6

Depository Institutions Highlighted Red Flag Indicators from FinCEN Alert

Depository institution filers reported suspicious financial activity consistent with numerous red flag indicators potentially indicative of human smuggling activity highlighted in the 2023 Alert.[29] Filers often reported transactions involving frequent cash deposits, P2P payments, as well as wire transfers, between various individuals and businesses with no apparent relationship. In addition, filers cited excessive cash deposits and withdrawals at Automated Teller Machines (ATMs) located along the U.S.-Mexico border. Notably, individuals involved in these transactions frequently reported occupations in non-cash-intensive businesses.

- One depository institution identified an account that displayed multiple human smuggling indicators, including potentially functioning as a funnel account receiving numerous small-dollar monthly P2P transfers from over 30 different senders. The filer reported more than 500 suspicious transactions totaling approximately $68,000 between March and July 2023. The subject maintained separate checking and savings accounts to process these transactions, systematically transferring incoming funds to savings before making structured cash withdrawals below currency transaction reporting thresholds at multiple branch and ATM locations, in what appears to be an effort to evade detection.
- Another filer reported suspicious charter flight-related transactions totaling more than $3 million, which were suspected of financing human smuggling from the United Arab Emirates (UAE) to Nicaragua with the ultimate destination being the United States. The transactions involved multiple discrepancies, including inconsistent payment amounts, unexplained

29. *See* "FinCEN Alert on Human Smuggling along the Southwest Border of the United States," FinCEN Alert #FIN-2023- Alert001, 13 January 2023, https://www.fincen.gov/sites/default/files/shared/FinCEN%20Alert%20Human%20Smuggling%20FINAL_508.pdf.

refunds, and contracts that did not align with actual money movements. The filer connected one of the involved companies to human smuggling incidents, including a chartered flight carrying Indian nationals from Egypt to Jamaica through the UAE, and finally on to Nicaragua. Nicaragua is a disembarkation point for migrants who continue to the U.S. border by land, according to a 2024 Joint Alert to the aviation sector from the U.S. Departments of State, Homeland Security, and the Treasury.[30]

- One depository institution identified over $195,000 in unusual cash deposits sourcing debit card purchases to a tactical thermal equipment supplier. The two customers—a student and a produce company owner—also conducted excessive cash withdrawals at ATMs in Nogales and Phoenix, Arizona. The customers reportedly purchased nearly $30,000 worth of merchandise from a company that sells thermal binoculars and digital night vision attachments, which could aid in human smuggling operations.

Sham Travel Agencies Potentially Facilitating Human Smuggling-Related Activity

Human smuggling networks can include individuals who help organize travel arrangements to facilitate the journey to the southwest border, according to the 2023 FinCEN Alert to financial institutions.[31] Migrants pay smuggling networks fees for travel packages that include airline tickets, bus rides, and hotel stays throughout the route to the U.S.-Mexico border, according to open-source reporting.[32] BSA reports in the dataset frequently identified individuals who were reportedly travel agency owners engaging in suspicious financial transactions consistent with potential human smuggling activity. Some reports involve potentially legitimate travel agency businesses that may be unwitting participants in these operations.

- One BSA filer identified excessive cash deposits totaling over $150,000 conducted at ATM and bank branch locations along the southwest border into an account owned by a Juarez, Mexico-based travel agency. The cash deposits, which almost solely funded the account, were conducted by the owner of the travel agency—a Texas-based Mexican national—and other unknown depositors. In addition, there was an absence of any payroll activity that further heightened suspicions of the business.
- Several financial institutions reported suspicious financial activity linked to an international human smuggling organization associated with purported Florida-based travel agencies allegedly engaging in alien smuggling and fraudulent visa schemes. The filers reported: cash

30. *See* "Disrupting Irregular Migration," U.S. Departments of State, Homeland Security, and the Treasury, 15 May 2024, https://ofac.treasury.gov/media/932876/download?inline.
31. *See* "FinCEN Alert on Human Smuggling along the Southwest Border of the United States," FinCEN Alert #FIN-2023- Alert001, 13 January 2023, https://www.fincen.gov/sites/default/files/shared/FinCEN%20Alert%20Human%20Smuggling%20FINAL_508.pdf.
32. *See* Mica Rosenberg, Rupam Jain, Jackie Botts, Churchill Ndonwie, and Jose Maria Del Pino, "New $72,000 migrant smuggling routes to the US start with charter flights," Reuters, 21 June 2024, https://www.reuters.com/investigates/special-report/migration-usa-smuggling/.

deposits conducted across several U.S. states; P2P transfers from individuals who appear to have been paying for these visa services; and airline refunds. Under the guise of legitimate travel payments, the travel agency owner would use the funds received to purchase multiple airline tickets in bulk for various individuals across several airlines, in addition to chartering private planes to transport groups of aliens.

The information in this report is based on potential human smuggling-related information obtained from analysis of BSA data and open-source publications, as well as insights from law enforcement and other partners. FinCEN welcomes feedback on this report, particularly from financial institutions. Please submit feedback to the FinCEN Regulatory Support Section at www.fincen.gov/contact.