



Case in Point

Standout SARs that Get Attention

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Gulf Coast Anti-Money Laundering Forum

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The Man Who Fell From Trump Tower

- Disclaimer
- Matinee edition
- Story background

The Man Who Fell From Trump Tower

- Featured Film - “A Simple Plan”
 - Billy Bob Thornton, Bridget Fonda
- Movie about money laundering (badly)
- Ben’s simple plan
 - Goal
 - Phase 1

The Man Who Fell From Trump Tower

- Phase 2
- Get the money out of the bank
- Untraceable
- CTR generated

The Man Who Fell From Trump Tower

- Phase 2a
- Hide the cash somewhere safe

The Man Who Fell From Trump Tower

- Phase 3
- File for bankruptcy

The Man Who Fell From Trump Tower

- Phase 4
- Get the cash back into the bank
- CTRs filed
- Opportunity for SAR filing?

The Man Who Fell From Trump Tower

- Phase 5
- Check out
- Trump Tower

The Man Who Fell From Trump Tower

- Phase 6
- Have a party at the new place

The Man Who Fell From Trump Tower

When could SARs have been filed?

- **Phase 2** – cash withdrawals, large amounts
- **Phase 3** – cash deposits, structured amounts
- **Phase 6** – when lender discovers fraud
- **Any phase** – large cash transactions with recent bankruptcy case

The Devil Carries Gucci

- Featured Film - (Ripped off from) “The Devil Wears Prada”
 - Meryl Streep, Anne Hathaway
- Drug trafficking and money laundering

The Devil Carries Gucci

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The Devil Carries Gucci

- Drug Seizure
- Cash seizure
- Financial records

The Devil Carries Gucci

- Money laundering scheme
 - Placement – structured cash deposits
 - Layering
 - Integration
- Additional seizures

The Devil Carries Gucci

When could a SAR have been filed?

- **Structured cash deposits** – multiple deposits, multiple branches, multiple customers
- **KYC issues** – people on welfare/unemployed, not account holder
- **Cashier's check purchases** – large checks with unclear purpose

The Man Who Would be King

- Featured Film - “The Man Who Would be King”
 - Sean Connery, Michael Caine
- Official corruption
- Money laundering

The Man Who Would be King

- Disclaimer
- Matinee edition
- Story background
- Personal interest

The Man Who Would be King

- Corruption scenarios
- Money laundering scenarios

The Man Who Would be King

When could a SAR have been filed?

- **Bank 1** – structured cash deposits
- **Bank 2** – bank transfers
- **Bank 3** – purchase of cashier's check(s) for real property transaction

A Murder Most Foul

- Featured Film - None
- Murder
- Fraud

A Murder Most Foul

- Facts of the underlying crime
- Facts relating to the fraud
- Financial transactions

A Murder Most Foul

- Part II
- Suspicious Activity Information

A Murder Most Foul

What made these transactions “suspicious?”

When could a SAR have been filed?

- **Cash withdrawals**
- **Notoriety of party conducting the transactions**
- **Activity not commensurate**

The Sting

- Featured Film - “The Sting”
 - Paul Newman, Robert Redford
- Also: ”Supergator”
 - Kelly McGillis, Brad Johnson
- Fraud
- Money laundering

The Sting

- Disclaimer
- Story background
- Personal interest

The Sting

- Ponzi Scheme background
- Kauai background

The Sting

- Ponzi Schemes, generally
- Kauai scheme

The Sting

- **Total transactions** – TD Ameritrade purchases/sales - \$500,000,000
- **Total investor funds actually invested** – \$8,000,000
- **Total received from investors** – \$13,000,000
- **Total fraud** - \$18,000,000

The Sting

- Ponzi Schemes, bottom line
 - 86 percent lose all or almost all
 - Time sensitive
 - Recovery is rare and difficult

The Sting

- **Total seized** – \$4,500,000 (bank account, investment account, condo, car, motorcycles)
- **Restitution ordered** - \$11,000,000

The Sting

What made these transactions “suspicious?”

When could a SAR have been filed?

- **CTR filing** – investor check cashed
- **Check deposits** – checks deposited from numerous unrelated persons
- **Structuring** – cash deposits and withdrawals

The End of the Stories

- Were they ***compelling*** – let you see what I saw?
- Were they ***personalized*** – got you in touch with real people?
- Were they told with ***emotion*** – use words, imagery to excite passion or reaction?