



Human Trafficking Concerns Stemming from Ukraine-Russia Crisis

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Technology can help win the war on human trafficking with enhanced reporting and information sharing on behavioral and transaction patterns. This can increase the broader financial ecosystem's ability to detect and prevent human trafficking and proceeds related to it.”

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Background of the Ukraine-Russia Crisis

On February 24, 2022, Russia started an unprovoked war against Ukraine. The fighting forced millions of Ukrainians out of their homes, causing a steady migration stream of Ukrainians abroad. According to the martial law of Ukraine, men between 18 and 60 years of age are banned from leaving the country.¹ As a result, a vast majority of refugees are women and children.

War alone is a perfect environment for human traffickers to operate, and with such an unprecedented rise in volunteering and non-profit organizations, the risks of predators and criminal networks elevate. In this paper, we discuss at-risk populations, common channels for trafficking, anticipated transactional activity trends, and how to address them. Criminals may attract displaced Ukrainians with promises of free transportation, lodging, employment, or other forms of assistance.

Human trafficking is a lucrative crime that makes more than \$30,000 every 30 seconds,² and it relies on access to banks and financial institutions for laundering the proceeds of the crimes. According to Jack Williams, a law professor at Georgia State University, “Financing is the lifeblood of [the] trafficking organizations and essential to sustain themselves globally. If you can turn off that spigot, [it] will crumble from the inside.”³ That is why financial institutions (FIs) should comply with the regulatory requirements and strengthen their human trafficking screening techniques and controls to prevent funds being moved across borders and profits funneled back to gang leaders.

Multiple agencies target human trafficking on the international as well as local levels. These include the United Nations Office on Drugs and Crime, the US Department of Homeland Security, and its Immigration and Customs Enforcement, the US Department of Labor, the Office of the US Attorney General, Polaris,⁴ Finance Against Slavery and Trafficking,⁵ and others. Banks and financial institutions should be on the lookout for human trafficking, as they are required to detect and report these egregious crimes to law enforcement.



¹ Asha C. Gilbert, “Reports: Ukraine bans all male citizen ages 18 to 60 from leaving the country,” USA Today, February 25, 2022, <https://www.usatoday.com/story/news/world/2022/02/25/russia-invasion-ukraine-bans-male-citizens-leaving/6936471001/>

² Daniela Guzman, “How Financial Institutions Lead Way in Battle Against Human Trafficking,” May 6, 2014, InsightCrime.org, <https://insightcrime.org/news/analysis/how-financial-institutions-lead-way-in-battle-against-human-trafficking/>

³ See footnote 2.

⁴ Polaris, “About Us,” <https://polarisproject.org/about-us/>

⁵ Finance Against Slavery & Trafficking, <https://www.fastinitiative.org/>

⁶ UNHCR.org, “Ukraine Refugee Situation,” August 3, 2022, <https://data2.unhcr.org/en/situations/ukraine>

⁷ See footnote 6.

⁸ Allie Gardner, “Ukraine War Increases Risks of Human Trafficking,” April 22, 2022, UnitedWay.org, <https://www.unitedway.org/blog/ukraine-war-increases-risks-of-human-trafficking#>

⁹ Margaret Besheer, “UN: Sexual Violence, Trafficking Increasing in Ukraine War,” April 11, 2022, Voanews.com, <https://www.voanews.com/a/un-sexual-violence-trafficking-increasing-in-ukraine-war-/6525193.html>

Populations At Risk

Ukrainian Refugees

Since the beginning of the war, more than 9 million⁶ people have fled Ukraine.⁷ The United Nations named it the fastest-growing refugee population in Europe since World War II.⁸ Another 7.1 million people are internally displaced within the nation's borders.⁹

As 90% of the refugees are women and children, this large-scale refugee movement is viewed as more vulnerable to kidnapping, sex trafficking, forced labor, domestic servitude, and organ harvesting. Moreover, according to UNICEF statistics, 5.7 million school-age children and 1.5 million college-age students are missing out on school.¹⁰ The additional risk lies in the online form of sexual exploitation and trafficking of children.

As of early June 2022, around 200,000 Ukrainian children were forcibly taken to Russia. Some children were taken from orphanages and others had been separated from families. According to Ukrainian authorities, these children are at risk of illegal adoption.¹¹

Russian Nationals Abroad

After the Russian Federation launched a full-scale invasion of Ukraine, many Russian citizens found themselves stranded overseas or unwilling to return to or remain in Russia due to expected political oppression and persecutions. However, due to the sanctions and foreign cash withdrawal restrictions imposed by the Russian Central Bank, these individuals have a very limited ability to access their assets.^{12,13} Generally, Russians can only stay outside their country for 90 days. Left with no financial means to support themselves, no possibility of returning to Russia, and no legal status to stay in a foreign country, Russians stranded abroad become perfect targets for human traffickers.

Non-Ukrainians Fleeing the War in Ukraine

The less noticeable category of individuals who are also at significant risk of human trafficking and exploitation is non-Ukrainians who fled the war. Among them are students from Asian, Latin American, and African countries, seasonal employees, and other non-Ukrainian migrants, such as minority ethnic groups,¹⁴ who lived in Ukraine as of February 24, 2022. Per Migration Data Portal, as of May 26, 2022, more than 252,000 third-country nationals have fled Ukraine. Many of them were disconnected from support networks, lacked access to sufficient funds and adequate information, and were unable to afford onward transportation. Resources to facilitate communication in languages used by these minority groups are not available at every border.¹⁵

¹⁰ "Every single minute, 55 children have fled their country. A Ukrainian child has become a refugee almost every single second since the start of the war," March 15, 2022, unicef.org, <https://www.unicef.org/press-releases/particularly-shocking-every-single-minute-55-children-have-fled-their-country>

¹¹ Sasha Petrova, "Ukrainian children reported seized, missing amid war with Russia," July 1, 2022, Aljazeera.com, <https://www.aljazeera.com/news/2022/7/1/ukraines-missing-children-2#:~:text=Ukraine's%20President%20Volodymyr%20Zelenskyy%20said,separated%20from%20families%2C%20he%20said>

¹² Uliana Pavlova, "Putin Is the Only Leader They've Known. And They're Done With Him," April 7, 2022, Politico.com, <https://www.politico.com/news/magazine/2022/04/07/russians-putin-fleeing-00023482>

¹³ "Russian central bank imposes \$10,000 limit on foreign cash withdrawals," March 8, 2022, Reuters.com, <https://www.reuters.com/article/ukraine-crisis-russia-cenbank-accounts/russian-central-bank-imposes-10000-limit-on-foreign-cash-withdrawals-idUSL2N2VB349>

¹⁴ Dr. Ella Cockbain and Dr. Aiden Sidebottom, "The war in Ukraine and associated risks of human trafficking and exploitation," April 29, 2022, Antislaverycommissioner.co.uk, <https://www.antislaverycommissioner.co.uk/media/1801/ucl-iasc-2022-roundtable-report-the-war-in-ukraine-human-trafficking-and-exploitation.pdf>

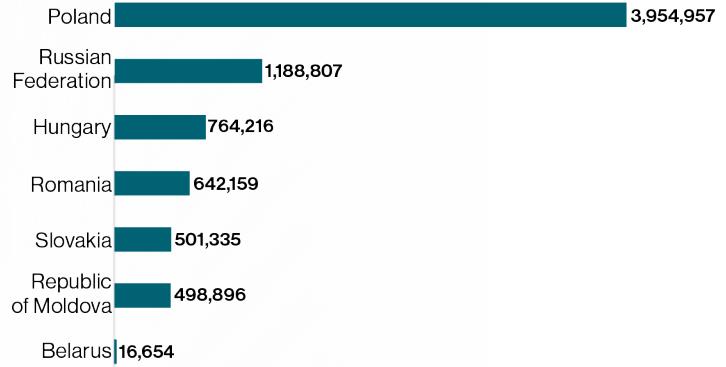
¹⁵ Lucian Stirb, "New Beginnings: Safety and Solace in Romania for Third-Country Nationals Fleeing Ukraine," April 18, 2022, Reliefweb.int, <https://reliefweb.int/report/romania/new-beginnings-safety-and-solace-romania-third-country-nationals-fleeing-ukraine#:~:text=Harold%20is%20one%20of%20over,a%20safe%20haven%20in%20Romania>

Escape Routes

As the war rages on, people continue crossing the borders to neighboring countries, seeking refuge. The major direction is to the west of Ukraine into countries like Poland, Romania, Hungary, and Slovakia forcibly relocated to Russia through separatist-controlled republics in eastern Ukraine.¹⁶

Many EU countries started implementing the Temporary Protection Directive, which granted refugees assistance with access to the labor market, housing, medical care, and other key legal rights for at least one year while in the EU.^{17,18} In most cases, those fleeing the war in Ukraine can either stay in the bordering country or travel to other EU countries.¹⁹ According to the Independent Anti-Slavery Commissioner roundtable findings, “The ability of Ukrainian refugees to travel through Europe quickly, safely, and cheaply through regular routes and have ready access to the labor market and other social infrastructure were identified as major sources of resilience to human trafficking and exploitation.”²⁰

At the same time, thousands of Ukrainian refugees tried to use an informal route through the US-Mexico border to seek asylum.²¹ Even though the Mexico City camp provides a safe place to wait, the refugees there have been warned that while they are free to leave the complex, no one is responsible for their safety.²² To streamline this process, the US launched a new program called Uniting for Ukraine²³ and is expected to admit up to 100,000 refugees for a temporary stay of up to two years.²⁴ Ukrainians participating in Uniting for Ukraine must have a sponsor in the US who agrees to provide them with financial support for the duration of their stay in the US.²⁵



Border Crossings from Ukraine

Between 2017 and 2020, Turkey and Israel were in the top five countries where Ukrainian victims of trafficking were identified.²⁶ Both countries welcomed Ukrainian people. However, Turkey does not provide refugee status or a full social security package.²⁷ Israel's Law of Return enables anyone with Jewish heritage (e.g., a Jewish grandparent) to enter Israel and become a citizen. Others were granted a three-month entry visa, which is being automatically extended. Refugees would need to find resettlement solutions before their temporary permissions run out, or risk being left in an undocumented status.

¹⁶ Mary Ilyushina, “Ukraine says Russia forcibly relocated thousands from Mariupol,” March 30, 2022, Washington Post, <https://www.washingtonpost.com/world/2022/03/30/ukraine-mariupol-russia-evacuation-filtration/>

¹⁷ “European Union/Ukraine: EU Member States Start Implementing Temporary Protection Directive,” August 4, 2022, Fragomen.com, <https://www.fragomen.com/insights/european-unionukraine-eu-member-states-start-implementing-temporary-protection-directive.html>

¹⁸ Audiovisual.eu, “Solidarity with Ukraine: Your right to a basic bank account,” March 16, 2022, <https://audiovisual.ec.europa.eu/en/video/I-221808>

¹⁹ Information for people fleeing the war in Ukraine, ec.europa.eu, https://ec.europa.eu/info/strategy/priorities-2019-2024/stronger-europe-world/eu-solidarity-ukraine/eu-assistance-ukraine/information-people-fleeing-war-ukraine_en

²⁰ See footnote 14.

²¹ Ben Fox, Associated Press, “U.S. launches new program to welcome Ukraine refugees but no longer through Mexico,” April 21, 2022, pbs.org, <https://www.pbs.org/newshour/politics/u-s-launches-new-program-to-welcome-ukraine-refugees-but-no-longer-through-mexico>

²² AP in Mexico, “Ukrainian refugees waiting at Mexico camp urge US to open doors,” May 3, 2022, theguardian.com, <https://www.theguardian.com/us-news/2022/may/03/ukraine-refugees-mexico-camp-us-immigration>

²³ “Information for Nationals of Ukraine,” May 27, 2022, travel.state.gov, <https://travel.state.gov/content/travel/en/News/visas-news/information-for-nationals-of-Ukraine.html#:~:text=Uniting%20for%20Ukraine%3A%20The%20Department,for%20up%20to%20two%20years>

²⁴ See footnote 21.

²⁵ Uniting for Ukraine, April 21, 2022, <https://www.dhs.gov/ukraine>

²⁶ UNODC.org, “Conflict in Ukraine: Key Evidence on Risks of Trafficking in Persons and Smuggling of Migrants,” https://www.unodc.org/documents/data-and-analysis/tip/Conflict_Ukraine_TIP_2022.pdf

²⁷ “Turkey: Rules for Refugees from Ukraine,” <https://visitukraine.today/blog/197/turkey-rules-for-refugees-from-ukraine>



Common Channels

Human trafficking is fueled by the demand for cheap labor, services, and commercial sex,²⁸ which makes some sectors more vulnerable to human trafficking than others:

Hospitality

The hospitality industry is especially vulnerable to human trafficking due to guest privacy and anonymity, the priority of meeting customers' requests that exceed ethical boundaries, lack of background checks on new employees, lack of experience to spot the signs of human trafficking, and sometimes fear of retribution by staff if they report suspected incidents.²⁹

Entertainment (casinos, clubs, movies, and TV)

Sex trafficking operations also frequently rely on other legal industries and businesses, including hotels, classified advertising websites, and matchmaking and dating services. There can often be an overlap between sex and labor trafficking in the adult entertainment industry. In areas such as adult film and exotic dancing, individuals can be forced to work for little to no pay and sexual abuse and exploitation often follow.³⁰

²⁸ "Human Trafficking and the Hospitality Industry," National Human Trafficking Resource Center, <https://humantraffickinghotline.org/sites/default/files/Human%20Trafficking%20and%20the%20Hotel%20Industry.pdf>

²⁹ Information for people fleeing the war in Ukraine, ec.europa.eu, https://ec.europa.eu/info/strategy/priorities-2019-2024/stronger-europe-world/eu-solidarity-ukraine/eu-assistance-ukraine/information-people-fleeing-war-ukraine_en

³⁰ "Exploitation and the Private Sector," humanrightsfirst.org, <https://www.humanrightsfirst.org/exploitation-and-private-sector#:~:text=Industries%20that%20are%20at%20highest,manufacturing%2C%20transportation%2C%20and%20warehousing>

Healthcare

International organ trafficking is a major global business and a side of human trafficking that is frequently overlooked.³¹ Global Financial Integrity estimates that 10 percent of all organ transplants are done via trafficked organs.³² Poor people can reportedly earn between \$3,000 to \$15,000 for selling their organs, specifically kidneys, to middlemen who re-sell them to wealthy buyers at a profit.³³

According to the UN, Russian forces have destroyed most of Ukraine's healthcare facilities, cut-off supply routes having jeopardized access to medicine and medical services.³⁴ These circumstances are conducive to elevating the risk of organ trafficking, as people may seek medical assistance abroad and can be lured into organ trafficking medical facilities.

Most people vulnerable to organ trafficking are coerced by middlemen into selling their organs through a combination of misinformation, deception, and poverty.³⁵ For example, in 2017, a growing number of organ trafficking cases were uncovered in Lebanon, as Syrian refugees were desperate to support themselves and their families.³⁶ More recently, a deception was uncovered when nearly 30 mothers and children were rescued after a bus carrying them to be trafficked was stopped.³⁷ According to Cardinal Vincent Nichols, Archbishop of Westminster who leads the anti-trafficking Santa Marta Group,³⁸ "Leaflets had been prepared to warn those who were crossing the border against the dangers of being trafficked."³⁹

When a Ukrainian mother was encouraged to get on a bus and realized they were not going in the direction she expected, she called a number indicated in the anti-trafficking leaflet, narrowly avoiding falling into the hands of human traffickers for herself and nearly 30 women and children.⁴⁰

The former Soviet countries in Eastern Europe are already known to be major locales for the organ-trafficking industry.⁴¹ The invasion of Ukraine by Russia could increase the number of organ-trafficking victims. According to UNICEF, children fleeing war in Ukraine are at heightened risk of trafficking and exploitation due to chaos and large-scale population movements.⁴² The UNICEF Regional Director for Europe and Central Asia, Afshan Khan, states that "displaced children are extremely vulnerable to being separated from their families, exploited, and trafficked."⁴³ The UN agency reported at least 5.2 million children in Ukraine now need humanitarian assistance—three million inside the country and more than 2.2 million in refugee-hosting countries.⁴⁴ Children and teens in this conflict are at a higher risk of falling victims to organ trafficking due to representing a large population among the refugees and also being one of the most vulnerable groups.

³¹ "Organ Trafficking: The Unseen Form of Human Trafficking," June 25, 2018, acamstoday.org, <https://www.acamstoday.org/organ-trafficking-the-unseen-form-of-human-trafficking/>

³² "Transnational Crime and the Developing World," Channing May, March 2017, Global Financial Integrity, https://www.gfintegrity.org/wp-content/uploads/2017/03/Transnational_Crime-final.pdf

³³ "Organ trafficking: 'Her heart was missing,'" Chris Arsenault, May 17, 2021, aljazeera.com, <https://www.aljazeera.com/features/2011/5/17/organ-trafficking-her-heart-was-missing>

³⁴ Ashish Kumar Sen, "Russia's War Has Created a Human Trafficking Crisis, Says U.N. Envoy," June 7, 2022, USIP.org, <https://www.usip.org/publications/2022/06/russias-war-has-created-human-trafficking-crisis-says-un-envoy>

³⁵ "Trafficking in Persons for the Purpose of Organ Removal," 2015, UNODC.org, https://www.unodc.org/documents/human-traffickng/2015/UNODC_Assessment_Toolkit_TIP_for_the_Purpose_of_Organ_Removal.pdf

³⁶ Juan Gonzalez, Ignacio Garijo, and Alfonso Sanchez, "Organ Trafficking and Migration: A Bibliometric Analysis of an Untold Story," May 5, 2020, nih.gov, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7246946/>

³⁷ Deborah Castellano Lubov, "Cardinal Nichols: Ukrainian mothers & children rescued from human traffickers," vaticannews.va, <https://www.vaticannews.va/en/vatican-city/news/2022-05/cardinal-nichols-mothers-children-turned-bus-backward.html>

³⁸ Santa Marta Group, <https://santamartagroup.com/>

³⁹ See footnote 37.

⁴⁰ See footnote 37.

⁴¹ See footnote 33.

⁴² See footnote 10.

⁴³ See footnote 10.

⁴⁴ "Ukraine: At least two children killed in war every day, says UNICEF," June 2022, un.org, <https://news.un.org/en/story/2022/06/1119432>

Expected Transactional Activity Trends & How to Address Them

Behavioral and Financial Red Flags

European banks lightened know-your-customer (KYC) and anti-money laundering (AML) checks on Ukrainians due to the recent crisis, so they could open basic bank accounts in the EU.⁴⁵ As a result, the European Banking Authority warned banks and FIs to be on the lookout for signs of exploitation or human trafficking.⁴⁶ Traffickers may use victims to open bank accounts in their names without going through the regular KYC/AML scrutiny. Unusual transactional activity may include an abrupt increase in funds deposits or withdrawals, high-dollar wire transfers, potentially related to human trafficking, organ trafficking, and “premeditated” adoption of abducted minors. Additionally, the red flag may arise when the same person assists migrant customers to open and manage multiple bank accounts within one or more banks.

To promote enforcement of KYC and AML policies and procedures during this unprecedented crisis, banks and FIs must be aware of the behavioral and financial red flags and be able to identify indicators of potential human trafficking.

In the Supplemental Advisory on Identifying and Reporting Human Trafficking and Related Activity, the Financial Crimes Enforcement Network included four new typologies, which describe some of the techniques used by traffickers to conceive activity related to human trafficking.⁴⁷ FIs may likely observe them in the context of the Russia-Ukraine war:

- Front Companies, such as massage salons, escort services, bars, restaurants, and cantinas, can be used to hide the true nature of the business.
- Exploitative Employment Practices: Traffickers may mislead refugees by promising them employment, and then either withhold their salaries, require “additional services,” charge “fees,” or pay less than agreed upon. For example, victims’ salaries could be transferred to the traffickers or their co-conspirators via teller checks or wire transfers. Financial institutions may see multiple employees receiving their salaries in the same account, or payment for employment may be followed by immediate withdrawal or transfer into another account.⁴⁸ Further, banks may see inconsistencies between KYC documents and transactional activity. For example, the customer’s profile may indicate that they are employed at a certain company or establishment, but transactional history is missing regular payments or includes unusually low salary payments.
- Funnel Accounts: Criminals may open funnel accounts in victims’ names and use them for cross-border transactions.
- Alternative Payment Methods: In addition to using cash, traffickers are utilizing alternative payment methods, such as prepaid credit cards, convertible virtual currency, and mobile payment applications, to keep transactions anonymous.

What makes detection of human trafficking even more challenging for banks and FIs is that refugees rarely speak the local language and often require an interpreter to accompany them to the bank.

⁴⁵ Hannah Brenton, “EU banks must give Ukrainian refugees access to bank accounts: regulator,” April 27, 2022, politico.eu, <https://www.politico.eu/article/eu-banks-must-give-ukrainian-refugees-access-to-bank-accounts-regulator/>

⁴⁶ See footnote 45.

⁴⁷ FinCEN Advisory, “Supplemental Advisory on Identifying and Reporting Human Trafficking and Related Activity,” October 15, 2020, https://www.fincen.gov/sites/default/files/advisory/2020-10-15/Advisory%20Human%20Trafficking%20508%20FINAL_0.pdf?utm_campaign=NEWSBYTES-20201016&utm_medium=email&utm_source=Eloqua

⁴⁸ FATF Report, “Financial Flows from Human Trafficking,” July 2018, <https://www.fatf-gafi.org/media/fatf/content/images/Human-Trafficking-2018.pdf>

Cash Transactions/Crypto Transactions

Banks and FIs may encounter a challenge identifying human trafficking when reviewing cash or cryptocurrency transactions, as traffickers recognize their speed, pseudonymity, and cross-border functionality. Most refugees are neither aware of cash-related schemes nor have ever used cryptocurrency. All in all, they become perfect targets for traffickers, especially in the online realm.

Some commercial sex transactions are usually managed privately in cash between traffickers and customers (especially VIP customers) in bars, hotels, or organized residential brothels.⁴⁹ That is why AML investigators and analysts should focus on cash deposits and withdrawals, paying close attention to the location of the ATMs, transactional amounts, and surveillance materials. More profound scrutiny and enhanced due diligence should be conducted on cash-based businesses and their accounts.

The rising use of cryptocurrencies allows users to limit their interactions with traditional banks and carries a tremendous risk of human trafficking. For example, cryptocurrencies are used to facilitate trafficking through the purchase of online commercial sex advertisements.⁵⁰ Some sites have even created their own cryptocurrencies to facilitate payments for sex services.⁵¹ Cryptocurrency ATMs are traffickers' invaluable tools for cross-border remittance and payments. While technically savvy criminals can use cryptocurrencies, they are typically traceable, and there is still a relatively high entry barrier to using virtual currencies without the involvement of any kind of third party. These third parties, which are either licensed or unlicensed exchanges, provide an opportunity to monitor the source and use of cryptocurrencies.⁵² On blockchains, where transactions are permanently and publicly recorded, investigators can leverage designated tools to identify the cash-out points of illicit actors.⁵³

That is why it is crucial for banks and FIs to keep up with transaction-monitoring trends and utilize the latest technology tools to be able to hit traffickers in their virtual wallets.

Using Machine Learning and AI to detect HT

The financial industry has made significant strides in combating human trafficking in recent years. Unfortunately, despite these efforts, they only account for a small percentage of the transactions that make up the \$150 billion estimated in illicit funds connected to human trafficking each year. The tools used to detect human trafficking are very limited in their utility because of the complex structure of the crime. AI and machine learning (ML) offer a potential solution to detection and prevention of human trafficking. AI/ML is a scalable tool that enables computers to learn as they analyze data and recognize patterns, essentially erasing the limitation of the human programmer. AI/ML can analyze financial activity, social, economic, and even political conditions from hundreds of thousands of data sources.⁵⁴ The recent developments in technology enable investigators to understand behavioral and transaction patterns to detect and prevent human trafficking and help financial institutions and law enforcement to review the big picture of criminal activities. These connections provide context, visibility, and insights into transactional data, which may not have been detectable from a standard human review. These connections also allow FIs to scale their investigations, assess transactions more meaningfully, and reduce time spent on human reviews while investigating unproductive alerts.

⁴⁹ Brittany Anthony, "On-Ramps, Intersections, and Exit Routes," July 2018, polarisproject.org, <https://polarisproject.org/wp-content/uploads/2018/08/A-Roadmap-for-Systems-and-Industries-to-Prevent-and-Disrupt-Human-Trafficking-Financial-Industry.pdf>

⁵⁰ See footnote 49.

⁵¹ Bassem Banafa, "U.S. HOUSE OF REPRESENTATIVES COMMITTEE ON FINANCIAL SERVICES SUBCOMMITTEE ON OVERSIGHT AND INVESTIGATIONS," January 30, 2018,https://financialservices.house.gov/uploadedfiles/01.30.2018_bassem_banafa_testimony.pdf

⁵² See footnote 49.

⁵³ Gurvais Grigg, "Combatting Trafficking With Blockchain Analysis," April 12, 2022, Chainalysis, <https://blog.chainalysis.com/reports/combatting-trafficking-with-blockchain-analysis/#:-text=Cryptocurrency%20ATMs%2C%20a%20valuable%20tool,identity%20documents%2C%20and%20launder%20money>

⁵⁴ Alma Angotti and Balki Aydin, "Artificial Intelligence: A New Tool in the Fight Against Human Trafficking," June 18, 2019, guidehouse.com, <https://guidehouse.com/insights/global-investigations-and-compliance/2019/ai-new-tool-in-the-fight-against-human-trafficking>

How Guidehouse Can Help

Guidehouse financial crime consultants work with financial institutions of all sizes to build effective and efficient risk management and compliance frameworks to help clients protect against legal, fiduciary, shareholder, and reputational risk. In addition, Guidehouse specialists' experience spans Sanctions and TM systems, Financial Crimes Compliance, Gap Analysis, KYC Support, Transaction Lookbacks, Financial Intelligence Unit Support, Transaction Reviews, and Suspicious Activity Report Alert Processing for banks and FIs. Further, Guidehouse's experts offer regional, cultural, and linguistic investigative expertise in relation to customers and third parties that pose risks of being tied to Russian oligarchs. Guidehouse professionals include distinguished former prosecutors, regulators, compliance officers, attorneys, and consultants, who leverage their combined experience to help clients conquer their compliance challenges.



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