



Suspicious Transaction Potential Examples

Real Estate

1. A client negotiates a purchase for the market value or above the asking price but requests that a lower value be documented, paying the difference "under the table."
2. A client purchases a property in someone else's name such as an associate or relative (other than a spouse).

Legal Practitioners

1. A client who pays for significant legal services in actual cash.
2. Instructions given by a client to create complicated ownership structures where there is no legitimate or economic reason.

High Value Goods Dealers

1. A client who pays for high value goods with cash only.
2. A client purchases a high value good and the purchase appears to be beyond the means of the client based on their stated or known occupation or income.

Accountants

1. Instructions given to the accountant to conduct transactions without legitimate or economic reason.
2. Client/company records consistently reflect sales at less than cost, thus putting the company into a loss position, but the company continues without reasonable explanation of the continued loss.

Non-Profit Organisations

1. Where the donation does not match the donor's known source of funds and wealth.
2. Where the donation of funds or other properties derives from donors residing in high-risk countries.

Financial Institutions

1. Deposits were structured below the reporting requirements to avoid detection.
2. Divergence from the type, volume or frequency of transactions expected in the course of the business relationship.

