ANALYZING BANK RECORDS



Association of Certified Fraud Examiners

GLOBAL HEADQUARTERS • THE GREGOR BUILDING
716 WEST AVE • AUSTIN, TX 78701-2727 • USA

TABLE OF CONTENTS

I. INTRODUCTION

Course Objective and Overview....1
Components of Bank Record Analysis....2
- Plan for the Collection of the Records....3
- Obtain and Inventory the Records....3
- Develop a Schedule, Database, or Spreadsheet Template for the Records....4
- Place the Records into the Template....4
- Review the Records for Investigative Leads....5
- Review the Records for Patterns....5
- Identify Unusual Deposits or Payments....5
- Compare the Records to Known Indicators and Schemes....5
- Analyze Flows Among Multiple Accounts if Present....5
- Create Graphics if Necessary....5
- Prepare a Summary of the Financial Activities....6
- Develop Conclusions from the Records....6
- Make Recommendations Based on the Records....6
- Collate Materials and Present to Management....6

Overview....6
- Tips....6

II. OBTAINING AND INTERPRETING BANK RECORDS

Methods to Obtain Records....7
- Subpoena....7
- Search Warrant....11
- Prior Consent....12

Obtaining Bank Records in International Investigations....12
- Investigating Abroad....13
- Civil Searches Versus Public Searches....14
- Tools for Obtaining Foreign Bank Records....15
- Tools for Obtaining Evidence in Civil Proceedings....18

Legal Pitfalls When Obtaining Bank Records....19
- Pretexting....19
- Financial Privacy Laws....20

What Types of Records to Look For....21
- Account Opening Documents....21
- Bank Statements....22
- Other Financial Instruments....31
- Electronic Banking....38
- Mobile Payment Systems....42
- Alternative Remittance Systems....42
- Other Bank Products....44
- International Bank Account Records....45
- Analyzing Bank Records....52
- Data Formats....54
- Artificial Intelligence....54

II. OBTAINING AND INTERPRETING BANK RECORDS (CONT.)

Tips and Pitfalls 55
Review Questions 56

III. FINDING LEADS IN BANK RECORDS

Introduction 59
Extracting Leads 60
Review the Records 60
Establish a Format 62
Extract and Prioritize Leads 63
Follow the Leads 64
Examples of Extracting Leads 64
Extracting Leads from Checks 64
Extracting Leads from Nontraditional Records 69
Tips and Pitfalls 72
Exercise: Extracting Leads 73
Review Questions 87

IV. UNCOVERING PATTERNS IN BANK RECORDS

Introduction 89
Types of Patterns 89
Payee Names 89
Dates of Transactions 89
Check Numbers 90
Deposit Amounts, Dates, and Methods 90
Signatories 91
Endorsers 91
Sources of Incoming Funds 91
Types of Expenditures 91
Locations of Expenditures 92
Combinations 92
Flows Among Accounts 92
Breaks in the Patterns 92
Looking for Patterns 92
Tips 99
Exercise 101
Review Questions 104

V. IDENTIFYING INDICATORS OF ILLEGAL ACTIVITY IN BANK RECORDS

Introduction 105
Indicator Examples 105
Indicators of Potential Illegal Activity at Check-Cashing Locations 105
Indicators of Human Trafficking in Bank Records 105
Indicators of Fraud in an Organization 106
Indicators of Financial Difficulties in a Business 106
Indicators of Misappropriation of Funds from a Business Account 107
General Indicators of Misappropriation 107

V. IDENTIFYING INDICATORS OF ILLEGAL ACTIVITY IN BANK RECORDS (CONT.)

Indicators of Check Fraud 108
Indicators of Embezzlement by an Individual 108
Indicators of Embezzlement by an Organization 109
Indicators of Payroll Fraud in Bank Accounts 109
Indicators of Bankruptcy Fraud 110
Money Laundering Indicators in Bank Accounts 110
Indicators of Money Laundering for Terrorist Financing 112
Indicators of Specific Money Laundering Schemes 113
Checklist for Possible Money Laundering Charges 115
Abnormal Activity in Accounts 117
Tips and Pitfalls 117
Exercise 118
Indicators Exercise 119
Review Questions 120

VI. USING GRAPHICS TO DEPICT BANK ACTIVITY

Introduction 123
Pie Charts and Bar Graphs 123
Pie Chart 123
Bar Graphs 124
Time-Series Analysis 125
Timelines 128
Commodity Flow Charts 130
Tips and Pitfalls 136
Exercise 137

VII. APPLYING CRITICAL THINKING TO BANK RECORDS

Introduction 139
Critical Thinking 139
Mini Exercise 141
Inferences 143
Mini Exercise 145
Creating Recommendations 146
Example of Conclusions and Recommendations from Financial Records 146
Sample Conclusions 147
Sample Recommendations 147
Tips 147
Exercises 148
Financial Conclusion Exercise 148
Recommendations Example 149
Conclusions and Recommendations Exercise 150
Exercise Conclusions 150
Exercise Recommendations 151
Review Questions 152

VIII. CASE STUDY
Scenario 153
Bank Statements 154
Business and Professional 154
Personal 158
Bank Record Exercise Worksheet 160
Review Questions 165

IX. APPENDIX A: SELECTED FINANCIAL RECORD LAWS AND REGULATIONS 167

X. APPENDIX B: KNOW-YOUR-CUSTOMER/CUSTOMER IDENTIFICATION PROGRAM REQUIREMENTS 181

XI. APPENDIX C: REPORTING FORMS 183

XII. RESOURCES 187

XIII. SOLUTIONS TO EXERCISES
III. Finding Leads in Bank Records Exercise Answer 189
IV. Uncovering Patterns in Bank Records Exercise Answer 191
V. Identifying Indicators of Illegal Activity in Bank Records Exercise Answer 193
VI. Using Graphics to Depict Bank Activity Exercise Answer 195
VII. Applying Critical Thinking to Bank Records Exercise Answer 197

XIV. SOLUTIONS TO REVIEW QUESTIONS
II. Obtaining and Interpreting Bank Records 199
III. Finding Leads in Bank Records 202
IV. Uncovering Patterns in Bank Records 205
V. Identifying Indicators of Illegal Activity in Bank Records 207
VII. Applying Critical Thinking to Bank Records 210
VIII. Case Study 212

XV. SOLUTION TO CASE STUDY 215

XVI. ANALYZING BANK RECORDS FINAL EXAMINATION E-1

XVII. INDEX I-1