

BOLO:

Human Trafficking Victims

...a Banking Industry Primer



Being **O**n the **L**ook**O**ut (BOLO) for Human Trafficking (HT) victims presents a myriad of nuances unique to the banking industry. On the other hand, the indicators are much the same as when you are in any public venue. The best tool any one of us has in our toolkit is our own judgement. Does something seem off? When you get that gut feeling that “something is just not right here”...trust your instincts and do something. If something does not feel right, there is a good chance it may not be right.

When you are **face-to-face** with customers, here are some **red flags** to pay mind to:

- When the customer is alone, do they make **eye contact**? Do they **speak** at a conversational volume?
- Do they appear **disoriented**? Are they **tentative** in their actions? Is **hygiene** lacking?
- Do they **look to** the door or another person at a seemingly abnormal frequency?
- If the transaction is time consuming, does the person become **agitated**? **Fearful**?
- Are they showing signs of **physical abuse**? Visible **bruises** in various stages of healing?
- Are they wearing **sunglasses** indoors?
- Does the person show signs of having been **denied** food, water, sleep, or medical care?
- Is there **another person** with them? Is that person overly attentive? Do they appear to be minding every word said? Are they a translator or do they speak for the account holder?
- Does the person appear to be **coached** on what to say, or look to someone else before speaking?

This list is not exhaustive, but a good place to start when doing a gut check. Being mindful and present to the person in front of you is good practice no matter the situation.

When looking at their **account transactions**, do you note any of the following **red flags**?

- Little to no **living** expense transactions.
- Account is **credited** through cash deposits, account transfers or email transfers.
- Deposits are quickly **followed** by significant transfers to a different account or withdrawn.
- **Cash** deposits made in different cities throughout the city, state, region or country.
- Paychecks from **multiple** people deposited into a **single** account.

Follow your institution's protocols, first and foremost. All the while, note details of the situation you are privy to. Note parties involved. Ask for identification when it seems reasonable to “verify a transaction”. When the party of concern leaves, note time they arrived, as well as left your location. This information will assist further review and serve as potential evidence should law enforcement become involved. Note vehicles (make, model, 2 or 4 door, COLOR, plates, distinguishing marks/damage, etc.), occupants of vehicle, direction of travel, any and all details are useful. Write them down ASAP. You will use these details to augment video surveillance.

In addition to those shared on the previous page, the **behind-the-scenes red flags** are more complex. Financial Intelligence Unit (FIU) investigators face a different batch of flags. Although not all-encompassing, here a few more complex indicators of potential human trafficking:

- Ongoing **ATM/credit card** transactions in even amounts between 10 PM and 6 AM
- A **sudden change** in the customer's business account activity that is inconsistent with the customer's profile
- Several structured cash deposits conducted at **multiple** bank branch **locations**
- If a customer is a **foreign** worker or a student and his/her employment agency or employer is acting as a **custodian**.
- High volume of deposits that are funneled and **immediately withdrawn** (especially in locations near the southern border)
- Several customers are using the **same** address and employment **information** to open multiple accounts in different names.
- Customer is using **anonymous** monetary instruments to pay for expenses instead of traditional methods such as personal/business checks.
- Regular **hold transactions** for hotels and rental cars that never go through because cash payment was made upon check-in or vehicle pick-up in an attempt to be untraceable.

Customers using anonymous monetary instruments to pay expenses instead of traditional large/frequent purchases of food, motel/hotel rooms, movies and entertainment, vehicle rentals, phones, advertisements and online classified websites, are trying to stay "under the radar". We think **credit card departments** should be aware of such **red flags** and should notify their FIU in these instances so they can be further investigated.

The [Anti-Human Trafficking Intelligence Initiative](#) (ATII) was formed to combat global human trafficking by leveraging corporate social responsibilities directly through advocacy awareness, intelligence integration, technology advancement and strategic data collaboration. ATII provides advisory services to banks and financial institutions in order to help detect, prevent and report suspicious activity that is indicative of Human Trafficking.

For more information on **industry-specific training**, email us at info@followmoneyfightslavery.org.



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