



# Course: ML/TF/PF & Sanctions Evasion Typologies – Practical Detection Framework

## DELIVERED BY:

### Renars Degro, CAMS

Seasoned expert with over 18 years of professional experience in finance, compliance, operational risk, and leadership across banking, investment, and regulatory domains.



#### OBJECTIVES:

- Explain the structure and logic of money laundering, terrorist financing, proliferation financing, and sanctions evasion typologies.
- Analyze how illicit funds are placed, layered, and integrated into the financial system through real-life schemes.
- Identify key transactional and behavioral red flags linked to digital, corporate, trade-based, and sanctions-related typologies.
- Examine complex ownership structures and apply the OFAC 50% rule in sanctions risk assessment.
- Understand how circular transactions and transaction chains are used to obscure illicit origins.
- Evaluate how mislabeling, rerouting, and intermediary structures are used in sanctions evasion.
- Link typologies to transaction monitoring scenarios and internal control frameworks.
- Provide practical case-based examples illustrating detection and escalation techniques.



#### SKILLS DELIVERED:

- Ability to identify structured ML/TF/PF typologies
- Understanding layering and circular transaction mechanisms
- Recognition of sanctions evasion through ownership and trade manipulation
- Strengthening red flag detection and escalation judgment
- Improving transaction monitoring awareness
- Enhancing risk-based thinking in compliance functions



#### DESIGNED FOR:

- AML/CFT Officers
- Compliance and Sanctions Professionals
- Risk Management Specialists
- Transaction Monitoring Analysts
- Internal Audit Professionals
- Senior Management and Decision Makers

TOPIC	DURATION
<p><b>1. Structuring / Smurfing – E-commerce Model</b></p> <ul style="list-style-type: none"> <li>• Payment fragmentation and transaction splitting</li> <li>• Multiple seller accounts and nominee structures</li> <li>• Crypto conversion and layering</li> <li>• Automated monitoring triggers and red flags</li> </ul>	20 min.
<p><b>2. Online Casino “Cash-In, Cash-Out” Typology</b></p> <ul style="list-style-type: none"> <li>• Deposit–minimal gambling–withdrawal cycle</li> <li>• Prepaid cards and crypto deposits</li> <li>• Structured withdrawals below thresholds</li> <li>• Mixing illicit and legitimate winnings</li> </ul>	20 min.
<p><b>3. Cryptocurrency Mixing (“Tumbler”)</b></p> <ul style="list-style-type: none"> <li>• Wallet obfuscation techniques</li> <li>• Multi-address layering logic</li> <li>• Altcoin conversion and P2P cash-out</li> <li>• Blockchain monitoring challenges</li> </ul>	20 min.
<p><b>4. Peer-to-Peer Loan Churning</b></p> <ul style="list-style-type: none"> <li>• Rapid borrow–repay cycles</li> <li>• Multi-platform activity</li> <li>• Mixing legitimate and illicit funds</li> <li>• Behavioral monitoring indicators</li> </ul>	20 min.
<p><b>5. Trade-Based Money Laundering (Car Parts Model)</b></p> <ul style="list-style-type: none"> <li>• Over- and under-invoicing</li> <li>• Export–import manipulation</li> <li>• Price discrepancies and fictitious shipments</li> <li>• Trade monitoring red flags</li> </ul>	20 min.
<p><b>6. Straw-Men Facilitated Money Laundering</b></p> <ul style="list-style-type: none"> <li>• Shell corporations and nominee UBOs</li> <li>• Fake documentation and inflated contracts</li> <li>• Cross-border layering structures</li> <li>• Professional enabler risks</li> </ul>	20 min.

**COURSE PROGRAMME:**  
**ML/TF/PF & SANCTIONS EVASION TYPOLOGIES –  
PRACTICAL DETECTION FRAMEWORK**

TOPIC	DURATION
<b>7. Circular Money Laundering Transactions</b> <ul style="list-style-type: none"> <li>Funds returning to origin</li> <li>Repeated below-threshold transactions</li> <li>Transaction network logic</li> <li>Graph-based detection principles</li> </ul>	20 min.
<b>8. Complex Ownership Structures &amp; OFAC 50% Rule</b> <ul style="list-style-type: none"> <li>Direct and indirect ownership calculations</li> <li>Cumulative control mechanisms</li> <li>Hidden sanctioned exposure</li> <li>Practical ownership risk assessment</li> </ul>	20 min.
<b>9. Sanctions Evasion – Mislabeling &amp; Re-routing of Goods</b> <ul style="list-style-type: none"> <li>Dual-use goods manipulation</li> <li>Falsified documentation and shipping routes</li> <li>Intermediary jurisdictions</li> <li>Trade and payment monitoring indicators</li> </ul>	20 min.
<b>10. Conclusions and Q&amp;A</b> <ul style="list-style-type: none"> <li>Summary of key typology structures</li> <li>Mapping typologies to monitoring controls</li> <li>Frequently asked questions</li> <li>Practical next steps for strengthening internal frameworks</li> </ul>	20 min.
<b>TOTAL</b>	<b>3 hours</b>

 **20/04/2026**

**Starts at 8:00 AM UCT**  
**2 parts (1.5h each) +**  
**15 min. break**

 **Duration:**  
**3 hours (3 CPD Units)**

 **Language:**  
**English**

 **Delivery mode:**  
**Live Online**

 **Skills level:**  
**Advanced Level**

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