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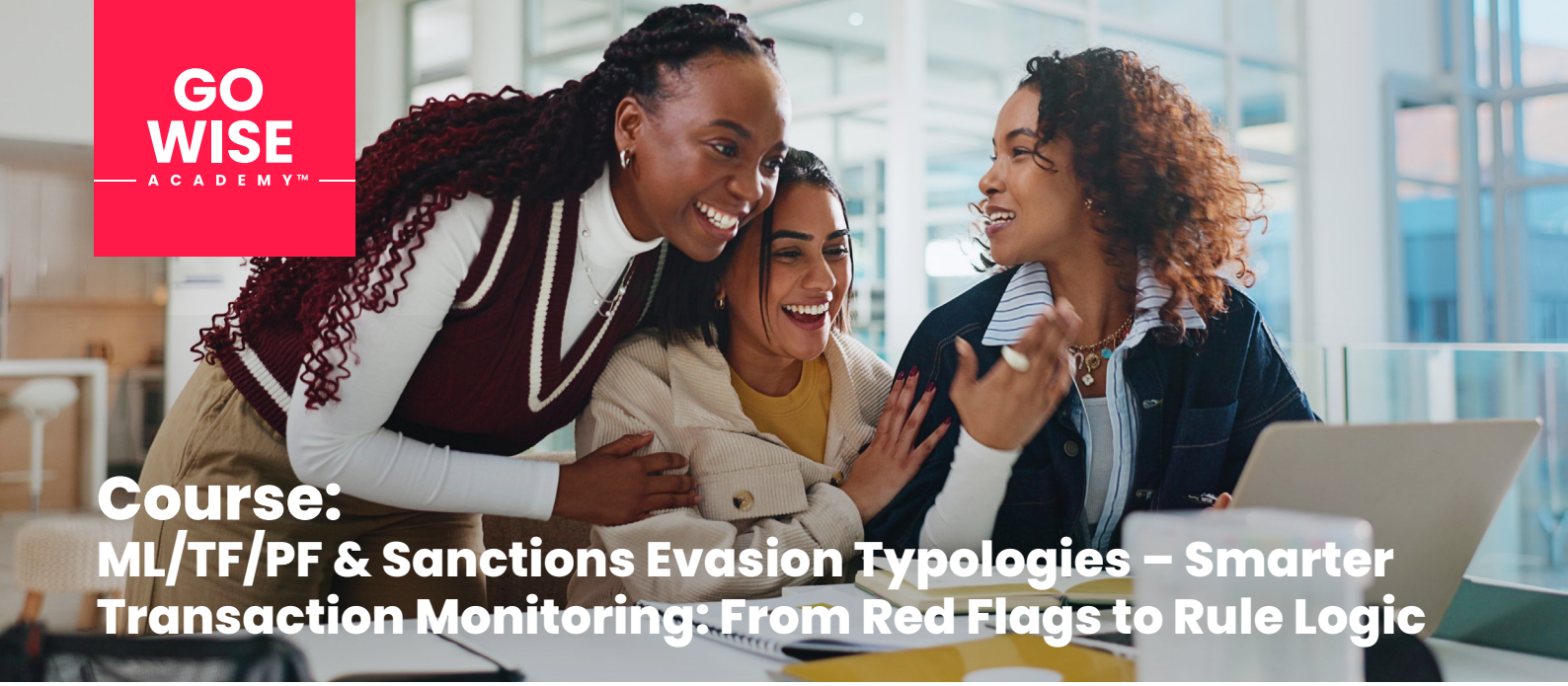

Course:
ML/TF/PF & Sanctions Evasion Typologies – Smarter Transaction Monitoring: From Red Flags to Rule Logic

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 ML/TF/PF and sanctions evasion typologies across placement, layering, and integration stages
- Analyze how illicit funds are placed, layered, and integrated through real-life schemes
- Identify key transactional and behavioural red flags linked to each typology
- Design and calibrate TM rules with appropriate thresholds, lookback windows, and suppression logic per customer segment
- Apply multi-signal correlation logic to reduce false positives and improve alert-to-SAR conversion rates
- Understand continuous TM tuning principles — rule retirement, baseline benchmarking, and dynamic risk lists
- Link typologies to TM rule parameters and internal control frameworks
- Apply practical case-based examples illustrating detection and escalation techniques

SKILLS DELIVERED:

- Ability to map ML/TF/PF typologies to specific TM detection rules and risk scenarios
- Understanding of TM rule parameters: thresholds, lookback windows, velocity baselines, and calibration logic
- Competence in designing risk-based rules for structuring, shell companies, TBML, real estate, virtual assets, and loan-back schemes
- Skill in applying multi-signal correlation and behavioural baseline analysis to reduce false positives
- Awareness of alert-to-SAR conversion benchmarks and continuous tuning best practices
- Enhanced red flag detection and escalation judgment in a TM context

DESIGNED FOR:

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

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COURSE PROGRAMME:
ML/TF/PF & SANCTIONS EVASION TYPOLOGIES – SMARTER TRANSACTION MONITORING: FROM RED FLAGS TO RULE LOGIC

TOPIC	DURATION

1. Structuring / Smurfing – TM Rule Calibration for Cash Placement Detection

20 min.

- Near-threshold deposit rules: parameters, segment tuning, and suppression logic
- Cumulative structuring: sliding window vs. calendar lookback
- Multi-depositor same-account detection and velocity spike calibration
- Automated monitoring triggers and red flag cross-matching

TM System Calibration & Scenarios:

- How to set and tune near-threshold rules across different customer segments
- Choosing the right lookback window to catch structuring that spans month-ends
- When and how to suppress rules to reduce false positives on legitimate cash businesses
- Building a multi-signal scenario that links deposit patterns to behavioural red flags

2. Online Casino "Cash-In, Cash-Out" – Threshold and Cycling Rules

20 min.

- Deposit–minimal gambling–withdrawal cycle detection
- Structured withdrawal rules below reporting thresholds
- Prepaid card and crypto deposit monitoring parameters
- Mixing illicit and legitimate winnings: behavioural baseline rules

TM System Calibration & Scenarios:

- How to detect deposit-to-withdrawal cycling with minimal genuine gambling activity
- Calibrating structured withdrawal rules specific to gaming platform behaviour
- Monitoring parameters for non-standard payment methods including prepaid and crypto
- Using behavioural baselines to distinguish legitimate players from placement activity

3. Cryptocurrency Mixing ("Tumbler") – Blockchain Analytics and TM Integration

20 min.

- Fiat-to-crypto conversion rules: thresholds and VASP identification
- Mixer / high-risk wallet detection: zero-tolerance escalation logic
- Privacy coin transaction monitoring (Monero, Zcash, Dash)
- High-velocity fiat -> crypto -> fiat cycling rules

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TOPIC	DURATION

TM System Calibration & Scenarios:

- How to configure fiat-to-crypto conversion rules and integrate VASP identification
- What zero-tolerance escalation looks like in practice for mixer-linked transactions
- Designing monitoring rules for privacy coins where blockchain transparency is limited
- Detecting high-velocity cycling between fiat and crypto as a layering indicator

4. Peer-to-Peer Loan Churning – Behavioural Monitoring Rules — 20 min.

- Rapid borrow–repay cycle detection and multi-platform indicators
- Loan-back scheme: deposit-collateral-loan match calibration
- Third-party repayment rules and early repayment spike detection
- Mixing legitimate and illicit funds: behavioural baseline analysis

TM System Calibration & Scenarios:

- How to configure the deposit-collateral-loan match rule as a high-precision signal
- Identifying third-party repayment patterns that indicate the integration phase
- Calibrating early repayment spike detection alongside source-of-funds controls
- Using behavioural baselines to flag loan activity inconsistent with customer profile

5. Trade-Based Money Laundering – Invoice Deviation and Jurisdiction Mismatch Rules — 20 min.

- Invoice price deviation rules: commodity benchmarks and min-value thresholds
- Multiple invoicing detection: reference matching and flag logic
- Jurisdiction mismatch: payment country vs. shipping origin/destination
- Payment ahead of goods: advance payment thresholds and sector whitelists

TM System Calibration & Scenarios:

- How to integrate trade pricing data to power invoice deviation detection rules
- Designing multiple invoicing detection using reference matching across systems
- Building jurisdiction mismatch logic that flags payment routes inconsistent with trade flows
- When to apply sector whitelists and how to avoid suppressing genuine advance payments

6. Shell Companies & Straw-Men – Beneficial Ownership and Passthrough Monitoring — 20 min.

- High-risk jurisdiction wire rules: dynamic FATF/EU list integration
- Rapid passthrough detection: inflow/outflow ratio and net movement thresholds
- Circular intragroup flow rules: graph analytics and round-tripping detection
- New entity high-value rules: KYB cross-referencing and EDD triggers

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TOPIC	DURATION
TM System Calibration & Scenarios: • How to maintain and consume dynamic jurisdiction risk lists within your TM system • Calibrating passthrough ratios and time windows to catch layering without over-alerting • What graph analytics capability is needed to detect circular intragroup flows • Linking new entity onboarding data to TM rules so high-value activity triggers EDD from day one	
7. Circular Transactions – Graph-Based Detection and Network Logic • Funds-returning-to-origin: hop count, time window, and minimum amount thresholds • Repeated below-threshold transactions: rolling window calibration • Transaction network logic and graph-based detection principles • Multi-signal correlation: combining circular flow with jurisdiction and entity risk **TM System Calibration & Scenarios:** • How to configure graph-based rules to detect closed transaction loops across entities • Calibrating hop count, time windows, and minimum amounts to reduce noise • What transaction network monitoring looks like and what tooling it requires • Combining circular flow signals with jurisdiction and entity risk for smarter escalation	20 min.
8. Complex Ownership Structures & OFAC 50% Rule – Sanctions Screening Integration • Direct and indirect ownership calculations in TM screening workflows • Cumulative control mechanisms and hidden sanctioned exposure detection • Integrating OFAC 50% rule into automated ownership risk assessment • Linking ownership risk flags to transaction monitoring escalation **TM System Calibration & Scenarios:** • How to automate OFAC 50% rule calculations across multi-layer ownership chains • Feeding ownership screening outcomes into TM rules as a dynamic risk input • Triggering TM re-scoring when beneficial ownership structures change • What integrated sanctions-TM escalation looks like end-to-end	20 min.

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TOPIC	DURATION
9. Sanctions Evasion – Mislabeling, Re-routing, and Trade Payment Monitoring • Dual-use goods manipulation: TM indicators and trade document cross-checks • Falsified documentation and shipping route detection rules • Intermediary jurisdiction flags and payment-route anomaly detection • Trade and payment monitoring indicators for sanctions evasion typologies **TM System Calibration & Scenarios:** • How to design payment description anomaly rules that flag goods mislabeling • Building jurisdiction chain logic to detect indirect routing through non-sanctioned intermediaries • Integrating trade documentation data into payment screening workflows • What a combined trade-and-payment TM scenario for sanctions evasion looks like in practice	20 min.
10. TM Best Practice Principles & Conclusions • Risk-based thresholds: segment calibration (retail, SME, corporate, institutional) • Rolling lookback windows, baseline benchmarking, and false-positive reduction • Dynamic risk lists: FATF updates, PEP databases, and sanctions screening • Continuous tuning: alert-to-SAR conversion benchmarks and rule retirement **TM System Calibration & Scenarios:** • A framework for calibrating TM rules by customer segment rather than applying uniform thresholds • How to measure TM system effectiveness and set realistic alert-to-SAR conversion targets • Building a continuous tuning cycle that keeps rules relevant as typologies evolve • Practical next steps for strengthening your organisation's TM calibration framework	20 min.
TOTAL	**3 hours**

18/05/2026
Starts at 10:00 UCT +3
2 parts (1.5h each) + 15 min. break

Duration: 3 hours (3 Non-ACAMS Credits)

Language: English

Delivery mode: Live Online

Skills level: Advanced

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