



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

DELIVERED BY:

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



OBJECTIVES:

- Understand common ML/TF/TPF typologies, including layering, smurfing, trade-based money laundering, and cryptocurrency misuse, and how they manifest in financial activity.
- Identify sanctions evasion techniques involving false documentation, shell companies, front persons, and complex ownership structures.
- Recognize key red flag indicators highlighted by Financial Intelligence Units (FIUs) and international standard setters.
- Develop practical approaches to transaction review, alert handling, escalation, and case investigation.
- Explore how criminal schemes evolve in response to regulatory controls, technological developments, and market changes.
- Strengthen the application of risk-based monitoring, customer due diligence, and ongoing customer risk assessment.



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

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

TOPIC	DURATION
1. Overview of the Course <ul style="list-style-type: none"> • Lector • Objectives • Skills delivered • Programme Modules 	5 min.
2. Structuring / Smurfing – E-commerce Model <ul style="list-style-type: none"> • 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 	15 min.
3. Online Casino “Cash-In, Cash-Out” Typology <ul style="list-style-type: none"> • 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 	20 min.
4. Cryptocurrency Mixing (“Tumbler”) <ul style="list-style-type: none"> • 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 	20 min.
5. Peer-to-Peer Loan Churning <ul style="list-style-type: none"> • 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 	20 min.
6. Trade-Based Money Laundering (Car Parts Model) <ul style="list-style-type: none"> • 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 	20 min.

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TOPIC	DURATION
<p>7. Shell Companies & Straw-Men – Beneficial Ownership and Passthrough Monitoring</p> <ul style="list-style-type: none"> • 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 	20 min.
<p>8. Circular Transactions – Graph-Based Detection</p> <ul style="list-style-type: none"> • 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 	20 min.
<p>9. Complex Ownership Structures & OFAC 50% Rule – Sanctions Screening Integration</p> <ul style="list-style-type: none"> • 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 	15 min.
<p>10. Sanctions Evasion – Mislabeling, Re-routing & Trade Payment Monitoring</p> <ul style="list-style-type: none"> • 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 	15 min.
<p>11. TM Best Practice Principles & Conclusions</p> <ul style="list-style-type: none"> • 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 	10 min.
TOTAL	3 hours



**Duration: 3 hours
(3 Non-ACAMS Credits)**



**Language:
English**



**Delivery mode:
Pre-recorded**



**Skills level:
Expert**

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