

### Human Smuggling Red Flags

Transactional and Customer Red Flags	Who would most likely see the Red Flag?
Multiple wire transfers, generally kept below the \$3,000 reporting threshold, sent from various locations across the United States to a common beneficiary located in a United States or Mexican city along the Southwest Border.	Money Transmitters Banks/Credit Unions
Multiple wire transfers conducted at different branches of a financial institutions to or from U.S. or Mexican cities along the Southwest Border on the same day or on consecutive days.	Money Transmitters/Prepaid Card Providers Banks/Credit Unions
<p>Money Flows that do not fit common remittance patterns:</p> <ul style="list-style-type: none"> <li>• Wire transfers that originate from countries with high migrant populations (e.g., Mexico, Guatemala, El Salvador, Honduras) are directed to beneficiaries located in a U.S. Mexican city along the Southwest Border.</li> <li>• Beneficiaries receiving wire transfers from countries with high migrant populations (e.g., Mexico Guatemala, El Salvador, Honduras) who are not nationals of those countries.</li> </ul>	Money Transmitters Banks/Credit Unions
Unusual currency deposits into U.S. financial institutions, followed by wire transfers to countries with high migrant populations (e.g., Mexico Guatemala, El Salvador, Honduras) in a manner that is consistent with expected customer activity. This may include sudden increases in cash deposits, rapid turnover of funds and large volumes of cash deposits with unknowns sources of funds.	Banks/Credit Unions

### Human Trafficking Red Flags

<b>Transactional Red Flags: Behaviors observed as part of account activity</b>	<b>Who</b> would most likely see the Red Flag?	<b>When</b> most likely to see the Red Flag?
A business customer does not exhibit normal payroll expenditures (e.g., wages, payroll taxes, social security contributions). Payroll costs can be non-existent or extremely low for the size of the customer's alleged operations, workforce and/or business line/model.	Banks/Credit Unions	Exploitation Stage
Substantial deductions to wages. To the extent a financial institution is able to observe, a customer with a business may deduct large amounts from the wages of its employees alleging extensive charges (e.g., housing and food costs), where the employees only receive a small fraction of their wages; this may occur before or after the payment of wages.	Check Cashers/ Prepaid Card Providers  Bank/Credit Unions	Exploitation Stage
Casing of payroll checks where the majority of the funds are kept by the employer or are deposited back into the employer's account. This activity may be detected by those financial institutions that have access to paystubs and other payroll records.	Money Transmitters/ Check Cashers/ Prepaid Card Providers  Banks/Credit Unions	Exploitation Stage

The experienced New Jersey federal criminal defense attorneys of Schwartz & Posnock practice in all New Jersey federal courts, including the United States District Courts in Newark, Trenton, and Camden, as well as the United States Court of Appeals for the Third Circuit. Our offices are conveniently located in Monmouth County, Essex County, Union County, and Middlesex County. Call us today for a consultation at 732-544-1460, or you may email us at [info@schwartzposnock.com](mailto:info@schwartzposnock.com).