

TOOLKIT · INDICATORS

Red Flag Indicators for VASPs and Banks

Transaction, customer, and counterparty risk signals

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1. Executive Summary

Consolidated red-flag indicators tuned for digital-asset risk, drawn from FATF, FinCEN, and national supervisor publications.

2. Scope & Applicability

- VASP MLROs and compliance officers
- Bank financial-crime teams
- Supervisors conducting examinations

3. Regulatory Framework

- FATF Red Flag Indicators of Money Laundering and TF using VAs
- FinCEN advisories on convertible virtual currency
- National supervisor advisories

4. Controls & Implementation

- Customer onboarding indicators
- Transactional indicators (size, velocity, structuring)
- Counterparty and wallet-based indicators
- Geographic and sanctions indicators

5. Supervision & Enforcement

- Thematic-review question banks
- Sample escalation thresholds
- Documentation and audit-trail standards

6. References & Primary Sources

- FATF Red Flag Indicators paper
- FinCEN FIN-2019-A003 and successors
- National supervisor advisories

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