



Anti Money Laundering

Following the Money through **ATMs** and **Payments**

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The question behind every alert

Can we explain **where** the money came from and **why** it moved?

- Know the customer and expected activity.
- Compare actual activity with that baseline.

Where ATM risk enters

1 CASH SOURCE

**Merchant receipts,
bank withdrawal, or
another source**

This is the point to verify.

2 ATM LOAD

**Operator places cash
into the machine**

Record who loads it.

3 CUSTOMER WITHDRAWALS

**Cash leaves through
ordinary ATM
transactions**

Compare with expected
volume.

4 SETTLEMENT

**Electronic funds
return to the
operator**

A clean-looking deposit can
mask illicit cash.

Opening an ATM deposit account

Build the customer profile before relying on the activity.

WHO Owner, operator, cash loader, and applicable beneficial owners

WHERE Business location and ATM footprint; visit when useful

HOW FUNDED Origin of seed cash and each replenishment source

WHAT TO EXPECT ATM count, volume, and other business activity



Reconcile the cash story

Compare like periods and investigate the unexplained difference.

Use a documented review cadence, such as quarterly or annual, based on risk.

Cash in

Bank withdrawals, merchant cash records, vault or provider reports

Cash out

Cash dispensed and cash remaining in the ATM

Money returned

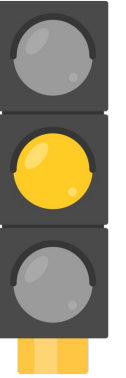
EFT/processor settlements and account credits

Context

ATM count, locations, business sales, seasonality



Changes that deserve a closer look



01 Unexplained cash

Replenishment comes from outside or unknown sources.

02 Volume jumps

Deposits or settlements outpace the known business.

03 Fast expansion

Multiple ATMs or accounts appear before funding and relationships are clear.

Make the review repeatable



01 Written policy

Define intake, monitoring, and escalation for ATM accounts.

02 Review cadence

Set a risk-based interval and triggers for an earlier look.

03 Evidence and owner

Keep reconciliation, source documents, decisions, and follow-up.



The same question applies to payments

CARD PROCESSING

Who is actually selling?

Hidden sellers, invented sales, chargebacks, or volume outside the stated business.

ACH AND ACCOUNT MOVEMENT

Why did the funds move?

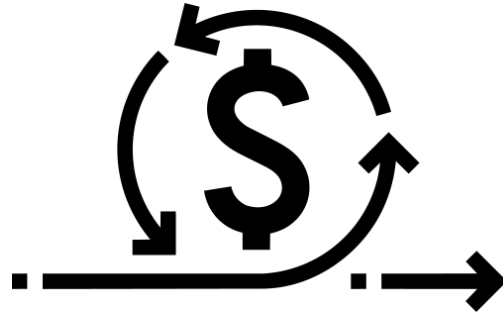
High returns, unrelated incoming payments, or rapid onward transfers.

Connect fraud alerts with the customer profile and AML review.

Can we explain the money?



Who generated
the funds?



What activity
produced them?



Does their movement fit
the customer's business?

Reference notes

FFIEC BSA/AML Examination Manual

Independent ATM Owners or Operators

<https://bsaaml.ffiec.gov/manual/RisksAssociatedWithMoneyLaunderingAndTerroristFinancing/12>

FinCEN, June 22, 2022

Statement on BSA Due Diligence for Independent ATM Owners or Operators

<https://www.fincen.gov/news/news-releases/statement-bank-secrecy-act-due-diligence-independent-atm-owners-or-operators>

FFIEC BSA/AML Examination Manual

Third-Party Payment Processors; Automated Clearing House Transactions

<https://bsaaml.ffiec.gov/manual>

