



LAGUNA BEACH POLICE DEPARTMENT

TRAINING BULLETIN # 22-02

How to initiate a Financial Fraud Kill Chain

Criminal actors are laundering billions of dollars overseas through financial fraud schemes like corporate account takeovers, business e-mail compromise scams, and other financially motivated crimes. The Financial Fraud Kill Chain (FFKC) is a process for stopping large international wire transfers initiated from U.S. victim bank accounts. The FFKC utilizes Financial Crimes Enforcement Network (FINCEN) relationship with the federal law enforcement placement in countries all over the world to help stop the successful withdrawal of cybercrime funds by criminal actors.

The FFKC is intended to be utilized as another potential avenue for US financial institutions to get victim funds returned. Normal bank procedures to recover fraudulent funds should also be conducted in what is called a wire recall.

The FFKC can only be implemented if the fraudulent wire transfer meets the following criteria:

- the wire transfer is \$50,000 or above;
- the wire transfer is international;
- a SWIFT (Society for Worldwide Interbank Financial Telecommunications) recall notice has been initiated by the victim's bank; and
- the wire transfer has occurred within the last 72 hours.

Any wire transfers that occur outside of these thresholds should still be reported to law enforcement but the FFKC cannot be utilized to return the fraudulent funds.

In order to initiate the FFKC, officers must provide the following information into a www.IC3.gov complaint:

Victim Name:

Victim Location (City, State):

Originating Bank Name:

Originating Bank Account Number:

Beneficiary Name:

Beneficiary Bank:

Beneficiary Account Number:

Beneficiary Bank Location (if available):

Intermediary Bank Name (if available):

SWIFT Number:

Date:

Amount of Transaction:

Summary of the Incident: describing the fraud/scam, ex. Refund scam.





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Once the complaint is submitted, contact OCIAC/LBPD Detective Kyle Milot, who will then access the complaint and forward it to F.B.I. CyWatch triage unit. If the complaint meets all the elements, CyWatch forwards the complaint to the FinCEN Rapid Response Team (RRT) and the F.B.I. LEGAT (legal attache) office in the country involved to freeze the funds.

Once the funds are frozen in place. It is the victim's bank manager's responsibility to contact the wire services manager to initiate the return of the funds to the victim's account. It can take up to a month for the victim to get their funds returned, minus some fees involved.

If the fraudulent funds are ultimately returned to the victim's account, the FBI requests this information be passed back to their local field office contact. This will most likely be completed by Detective Milot.

Typically, you will get these calls for service on Friday afternoons. This is because criminals want to delay the kill chain process over the weekend until Monday, in hopes the kill chain will not succeed due to the time delay.

If you have any questions, feel free to reach out to Detective Milot or Officer Michaud.