

11. **High Risk Commodity:** The type of commodity being shipped is designated as “high risk” for trade-based money laundering activities (e.g. precious metals, stones, consumer electronics, military goods, laser systems, flying objects, etc.).
12. **Inconsistent Shipping Routes:** The commodity is trans-shipped through one or more jurisdictions for no apparent economic or other logistical reason.
13. **Dual-Use Commodities:** The commodity includes dual-use goods, products and technologies normally used for civilian purposes but which may also have military applications.
14. **Letter of Credit Use:** The transaction involves the use of repeatedly amended or frequently extended letters of credit without reasonable justification or for reasons like changes of the beneficiary or location of payment.
15. **Sanctioned Individuals/Organizations:** The transaction involves individuals or organizations listed in U.S. sanctioned lists. Business partner’s transactions involve individual(s)/entity(ies) identified by media or law enforcement as the subject of a terrorist financing or national security investigation.
16. **Suspicious Countries:** The parties to the transaction (owner, beneficiary, etc.) are from countries known to support terrorist activities and organizations.
17. **Uncharacteristic Purchases:** Business partner conducts uncharacteristic purchases (e.g. camping/outdoor equipment, weapons, ammonium nitrate, hydrogen peroxide, acetone, propane, etc.).
18. **Identity Variations:** Business partner provides multiple variations of name, address, phone number or additional identifiers.
19. **High Risk Jurisdiction Travel:** Business partner mentions he/she will be or have conducted travel to high-risk jurisdictions (including cities or districts of concern), specifically countries (and adjacent countries) under conflict and/or political instability or known to support terrorist activities and organizations.
20. **Proxies under Singular Control:** Numerous sole proprietorship businesses/private limited companies set up by seemingly unrelated people (proxies) are found to be controlled by the same group of people. For the setting up of such businesses false addresses are registered.

Supplemental Warning Indicators

Additional Warning indicators, by category, that CTPAT Partners may want to use in order to screen potential business partners or monitor current business partners and transactions.

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6. **Coded/Disguised Goods:** There are indications that the descriptions of the goods are coded or disguised.

7. **Letter of Credit Requests:** The Business partner requests (a) a letter of credit without calling for a transport documents or documents evidencing shipment or delivery of goods; or (b) an amendment to a letter of credit removing the transport document or document evidencing

