



REPETITIVE

INTRODUCTION

The *Repetitive Transactions* rule will allow PWM to flag repetitive transactions of the same type that occur within a predefined timeframe and exceed a predefined dollar value. Repetitive transactions of the same type and/or similar amount may be an indicator of suspicious activity in the sense that the transacting parties may be attempting to mask the magnitude/nature of the transactions and the financial relationship between the parties by breaking large transactions into smaller components.

Repetitive transactions may also be suspicious in the sense that multiple wires to the same party within a short timeframe will incur multiple transaction fees, making them financially less efficient than sending a single large wire. The dollar thresholds for this rule are set at or near the average dollar amount for each transaction type at PWM, and the transaction count thresholds are set to flag situations where the number of average dollar size transactions in one week is unusual because it is more in line with what would be expected in a full month.

ANALYTICAL PROCESS

Rule Name	Additional Details/Parameter Settings
RepATMOut	5 ATM transactions exceeding \$250. Runs weekly.

The rule is designed to flag accounts that have 5 or more ATM transactions of at least \$250 each within 7 days.

The analysis included in this document is based on the population of transactions with a "bookdate" between 3/1/2011 and 3/31/2011.

Total number of ATM withdrawals for this period: 4,563.

In 1Q 2012, about 11% or 527 of 4,563 ATM withdrawals were captured in an ATM alert.

Week	Total # accounts with ATM w/d	# accounts with 1 ATM w/d	% of accounts with only 1 ATM w/d	Week	Avg. ATM w/d per account		Avg. ATM w/d per account (excl. accounts with only 1 w/d)	
					Vol	Amt	Vol	Amt
1	194	97	50.0%	1	2.505155	\$ 874.06	4.010309	\$ 1,375.41
2	111	77	69.4%	2	1.720721	\$ 635.34	3.352941	\$ 1,193.30
3	167	103	61.7%	3	1.964072	\$ 648.21	3.515625	\$ 1,137.24
4	172	107	62.2%	4	1.773256	\$ 635.31	3.046154	\$ 1,126.91
5	186	115	61.8%	5	1.903226	\$ 706.49	3.366197	\$ 1,244.88
6	167	91	54.5%	6	2.419162	\$ 729.13	4.118421	\$ 1,192.63
7	188	103	54.8%	7	2.06383	\$ 762.31	3.352941	\$ 1,243.13
8	158	99	62.7%	8	2.044304	\$ 713.62	3.79661	\$ 1,349.79
9	172	97	56.4%	9	2.197674	\$ 726.80	3.746667	\$ 1,248.25
10	177	103	58.2%	10	1.949153	\$ 624.82	3.27027	\$ 990.71
11	156	81	51.9%	11	2.262821	\$ 773.29	3.626667	\$ 1,193.82
12	183	107	58.5%	12	1.928962	\$ 682.03	3.236842	\$ 1,165.90
13	168	100	59.5%	13	2.113095	\$ 746.64	3.75	\$ 1,335.18
average	169.1538462	98.46153846	58.2%	average	2.065033	712.1587	3.55305	1215.166431