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The American Bankers Association is the voice of the nation's \$23.9 trillion banking industry, which is composed of small, regional and large banks that together employ approximately 2.1 million people, safeguard \$18.8 trillion in deposits and extend \$12.5 trillion in loans.

About the ABA Foundation

The ABA Foundation, a 501(c)(3), provides free programs and resources to help banks build long-term financial capability for people of all ages, promote revitalized and resilient communities, and advance economic opportunity for all. The ABA Foundation's mission is to inspire, equip and empower banks of all sizes to build thriving, resilient and equitable communities.

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SUSPICIOUS ACTIVITY REPORTS MATTER

Suspicious Activity Reports (SARs) filed by financial institutions are critical to law enforcement efforts to fight financial crimes. SARs are especially important for identifying and combating elder financial exploitation (EFE), which the Financial Crimes Enforcement Network (FinCEN) defines as the "illegal or improper use of an older adult's funds, property or assets."

Elder financial exploitation is a growing problem. In 2017, financial institutions reported \$1.7 billion in EFE-related suspicious activities.² In the post-COVID environment, reports have dramatically increased. Between June 2022 and June 2023, FinCEN identified over 155,000 SARs, amounting to more than \$27 billion in EFE suspicious activity incidents.³ However, the \$27 billion accounts for just slightly more than half of the estimated \$48.4 billion lost annually to EFE.⁴ This gap in financial losses indicates banks and other financial institutions can do more to fight EFE by proactively filing SARs.

As a bank employee, you are essential to industry efforts to protect older people against financial exploitation, whether you work directly with customers or as part of a fraud-prevention team.

EFE is frequently committed by strangers via scams, while theft is often committed by known perpetrators, such as family members, caregivers, business associates, neighbors or other individuals trusted by older adults. Known perpetrators often exploit close relationships with older people, leveraging access and opportunity to financial resources.

Filing a detailed EFE SAR is an integral part of a three-step framework for protecting older customers: Recognize, Respond and Report. You should RECOGNIZE possible exploitation, promptly RESPOND by preventing or stopping exploitative or fraudulent activity, and REPORT suspicious activities to the appropriate authorities.⁵



SAR STATISTICS: FinCEN ANALYSIS

- From June 2022 to June 2023, financial institutions filed 155,415 EFE-related SARs with FinCEN.
- Banks filed 72% of all EFE-related filings.
- Financial institutions filed more SARs for elder scams than elder theft.
- The average loss per SAR amounted to \$129,483 for elder scams and \$98,683 for elder theft.
- Adult children were the most frequent perpetrators of elder theft.

¹ https://www.fincen.gov/sites/default/files/advisory/2022-06-15/FinCEN%20Advisory%20Elder%20Financial%20Exploitation%20FINAL%20508.pdf

 $^{2 \}quad \text{https://files.consumerfinance.gov/f/documents/cfpb_suspicious-activity-reports-elder-financial-exploitation_report.pdf} \\$

 $^{3 \}quad https://www.fincen.gov/sites/default/files/shared/FTA_Elder_Financial_Exploitation_508Final.pdf$

⁴ https://www.ftc.gov/system/files/ftc_gov/pdf/p144400olderadultsreportoct2023.pdf

⁵ https://www.aba.com/-/media/documents/infographics/aba-fbi-elder-exploitation-infographic.pdf?rev=46064d5eb9984bfc895fda72642cc767

RECOGNIZING EFE: WARNING SIGNS OF SUSPICIOUS ACTIVITY

Knowing the warning signs of suspicious activity in older customers' accounts is key to determining the course of action you should take, including filing a SAR or contacting law enforcement or adult protective services (APS). Suspicious activity is most often recognizable as changes in a customer's regular behavior combined with financial transactions that fall outside the customer's normal pattern of banking activity.

It's vital for bank employees to not only recognize unusual activity or transactions but also certain behaviors in older customers that may signal a problem. Careful observation is essential. You may need to read the body language of a customer who is being coerced or notice questionable or uncomfortable interactions between customers and individuals escorting or accompanying them. Criminals often provide older adults with answers to a bank's questions about unusual and/or large transactions. It is important for bankers to ask follow-up questions and observe whether the customer is nervous or uncomfortable when discussing the reason for a suspicious withdrawal.

BEHAVIORAL WARNING SIGNS

FinCEN issued an updated Elder Financial Exploitation Advisory in 2022 that identifies red flags to watch for that may indicate EFE:⁶

- Sudden changes to the contact information for an account, the co-signer or a power of attorney
- Authorization of new or different individuals to handle financial transactions that are out of the ordinary, not supported by proper documentation or seem suspicious
- An older customer who seems disoriented, confused or unable to answer questions about account activity
- Vague or nonsensical explanations for large transactions, or the inability to answer follow-up questions without being fed the answers

- An older customer who appears to be upset, fearful or anxious to follow directions or take feedback from you or another unrelated person, either in person or by phone
- An older customer who appears to be uninformed about their financial status, or are unwilling to discuss it
- Urgency to send money immediately, especially if the money seems to be going to a third-party individual or business, and agitation if you slow down the process
- An older customer who is accompanied by an individual who shows excessive interest in the customer's finances and doesn't allow the customer to speak

While filing a SAR is in many cases the responsibility of a compliance or fraud prevention officer, customerfacing bank employees are equally important to the reporting process — they have more opportunities to document behaviors and actions. Those observations, combined with the bank's data, can help stop and prevent EFE.

TRANSACTION WARNING SIGNS

Some bank transactions raise EFE red flags without accompanying behavioral signs. Consistent with a bank's compliance and anti-fraud policies required under the Bank Secrecy Act, any of the following points should trigger an investigation and an EFE SAR filing when reporting criteria are met.

The most common red flags include:

- Uncharacteristic attempts to wire large sums of money
- Multiple checks or wire transfers being sent, especially those that reference "tech support services," "winnings," "taxes," "home improvement" or "crypto"
- Frequent and uncharacteristically large withdrawals, including daily maximum withdrawals from ATMs
- Debit transactions that differ from previously established patterns
- The purchase of large numbers of gift cards or prepaid access cards
- Sudden or frequent non-sufficient fund account activity
- Closing of CDs or accounts despite penalties (for example, significant tax penalties associated with closing retirement accounts)
- Sudden interest in cryptocurrency or making deposits in cryptocurrency ATMs
- Account statements mailed to locations other than the customer's home
- The transaction seems indicative of a money mule scheme⁷
- Transactional patterns that are out of the ordinary for the customer

Elder fraud victims most often sent funds to scammers via check and wire transfer, according to FinCEN's 2024 Financial Trend Analysis of EFE BSA filings. In elder theft cases, perpetrators sent or withdrew money for themselves, "using stolen funds to make purchases or pay their own bills."



⁷ A scam in which the customer is used by a fraudster to transfer illegally obtained funds, often stolen from another victim.
8 https://www.fincen.gov/sites/default/files/shared/FTA_Elder_Financial_Exploitation_508Final.pdf

PERPETRATORS OF ELDER FINANCIAL EXPLOITATION

Perpetrators of EFE fall into two main categories: unknown and known. Strangers, often based abroad, deceive older people into transferring money to them for promised goods, services or financial benefits that do not exist or were misrepresented. They often contact their targets via unsolicited calls, texts, direct messages or emails and pressure victims to act immediately or pay to make a problem go away. They also typically demand secrecy.

Financial exploitation may also be committed by someone the older person knows. These known perpetrators are most often family members and non-family caregivers, but they may also be friends, neighbors, acquaintances and even service providers, such as financial professionals.

Filing a SAR is essential, whether the fraudster is an unknown or known perpetrator. In many cases older adults who are victimized by a known perpetrator, especially an adult child or grandchild, do not want to report the crime for fear of retaliation or a rift in the family. It's important to remember that a SAR is a confidential filing. In the end, you are helping to protect the customer.

Also remember that older customers may be particularly vulnerable to certain types of exploitation that create or magnify anxieties (e.g., loss of income or independence, generosity or commitment to family).

This manipulation of the victim's emotions is most often seen in scams such as:

- Cryptocurrency investment scams
- Government imposter scams
 (e.g., invoke the IRS, Medicare or Social
 Security)
- Grandparent and family imposter scams
- Lottery and sweepstakes scams
- Money mule scams
- Robocalls and phishing messages
- Romance scams
- Tech support scams



9 https://www.fincen.gov/sites/default/files/advisory/2022-06-15/FinCEN%20Advisory%20Elder%20Financial%20Exploitation%20FINAL%20508.pdf



WHEN TO FILE AN EFE SAR

Banks and other financial institutions are required to file an EFE SAR in certain situations that meet specific criteria. According to U.S. Treasury regulations, a bank is required to file a SAR if a transaction conducted or attempted by, at or through the bank involves or aggregates at least \$5,000 in funds or other assets¹⁰, and the bank knows, suspects or has a reason to suspect that it:

- Involves money derived from illegal activity (including EFE);
- Attempts to disguise or hide funds from illegal activity (including EFE);
- Attempts to evade Bank Secrecy Act (BSA) regulations;
- Lacks a business or apparent lawful purpose;
- Is not the sort of transaction in which the customer would normally be expected to engage, and the bank knows of no reasonable explanation for the transaction after examining available facts; or
- Involves insider abuse (Note: BSA regulations require banks to report all instances of insider abuse, regardless of the dollar amount)

If you notice a suspicious transaction that requires immediate attention, such as terrorist financing or an ongoing money laundering scheme, your bank must immediately notify an appropriate law enforcement authority in addition to filing a SAR. You should determine your obligations to report suspected EFE under state law, and report suspected EFE to law enforcement and the relevant state-based APS. You should also immediately report any imminent threat or physical danger to your local FBI field office¹¹ or local law enforcement.

Keep in mind other FinCEN reporting obligations. For example, if you suspect a transaction involves EFE and \$10,000 or more in cash, you are required to file a SAR and a separate currency transaction report (CTR) with FinCEN.

For transactions that do not meet FinCEN's mandatory reporting requirements (such as the \$5,000 minimum threshold), banks can still voluntarily file an EFE SAR. These voluntary reports are still important in mitigating financial harm and apprehending and prosecuting the fraudsters involved. As with mandatory SARs, banks may voluntarily report suspicious transactions under the existing suspicious activity reporting safe harbor.

There may be circumstances where it is difficult to differentiate a victim from a suspect, or where a suspect is using an unknowing victim to commit fraud against others. If a bank cannot identify a suspect at the time of reporting, the bank may delay filing a SAR for 30 additional calendar days to identify a suspect. However, all SARs must be filed within 60 days of detection of the reportable transaction.

¹⁰ Federal banking agencies require the reporting of criminal violations aggregating \$25,000 or more, regardless of potential suspect. Additionally, identification of a suspect may affect the time in which reporting is required.

¹¹ https://www.fbi.gov/contact-us/field-offices/

TIMING IS ESSENTIAL WITH SAR FILINGS

Filing a timely SAR is critical. The more quickly you file a report, the more quickly law enforcement can access the information.



Timeframes for Filing SARs

| Calendar | Requirement |
|----------|--|
| 30 Days | In instances where a bank can detect a suspect (i.e., the bad actor engaged in the suspicious activity), the SAR must be filed no later than 30 calendar days after a bank initially detects the facts that constitute the basis for filing a SAR. (Note: This does not mean the deadline is triggered the instant your bank flags a possible transaction. A bank is permitted to take preliminary steps as part of an inquiry to determine if the bank has a basis for filing a SAR before this deadline is triggered.) |
| 60 Days | If no suspect can be identified at the time the facts constituting a basis for SAR filing is determined, a bank has an additional 30 days to try to determine a suspect. In all cases, all mandatory SARs must be filed within 60 days after a bank initially detects the facts that constitute the basis for filing a SAR. |
| 5 Years | Required time for banks to maintain copies of SAR filings, along with supporting documentation |

In the event the suspicious activity continues after the initial SAR filing, FinCEN guidance encourages banks to conduct a 90-day review of the ongoing activity. If the suspicious activity continues, file a continuing SAR within 120 days of the previous SAR filing.¹²

Should the suspicious activity continue after the first continuing SAR is filed, FinCEN's guidance encourages banks to maintain reporting on the continuing suspicious activity by filing a report every 90 calendar days thereafter until the suspicious activity ceases, the bank exits the customer or terminates the account, or law enforcement provides additional direction.

You should familiarize yourself with your bank's internal policies and procedures regarding multiple SAR filings related to a single customer or account to ensure that the correct steps, reviews and actions are taken.

¹² This means for the first continuous SAR filing, it will take place either 150 days or 180 days from the date the bank initially detected the facts that constituted the basis for filing the SAR, depending on whether a suspect was initially identified.

Expedited Filing

Consider an expedited EFE SAR if circumstances are egregious or if prompt action by law enforcement or APS could make a material difference to the victim. If you see an imminent threat of harm, notify the proper authorities to help protect the victim. Expedited filing and rapid response by the authorities and APS can stem further financial losses to the victim and lead to rapid action against the perpetrator.

How to Report Financial Exploitation

Submitting an EFE SAR is part of a tiered approach to helping victims of EFE. Follow these steps:

- Alert the victim to the fraud, and restrict or freeze accounts as necessary, especially for recent wires or attempt to recall money.
- Refer possible victims of EFE to the DOJ's National Elder Fraud Hotline at 833-FRAUD-11 (833-372-8311) for support, resources and assistance for reporting suspected fraud to the appropriate government agencies.
- 3. Report the situation to Adult Protective Services¹³ in accordance with state law.
- 4. Initiate a report with local law enforcement and/or federal law enforcement (e.g., FBI¹⁴ or Secret Service¹⁵).
- 5. File a SAR with FinCEN.

IC3.gov

In addition to filing a SAR, the FBI encourages reporting elder fraud through the FBI's Internet Crime Complaint Center (IC3.gov) for victims 60 and older. As with any type of fraud, reporting elder fraud or attempted elder fraud does not need to meet a specific dollar threshold. Victims or their families may file themselves, and institutions may file on behalf of victims.

Submitted complaints may be pursued by FBI field offices and/or referred to other federal, state, local or international law enforcement or regulatory agencies for further action. Through the IC3's Recovery Asset Team (RAT), the FBI has successfully recovered over \$750 million in assets. Often, for EFE cases, time is of the essence, so reporting quickly is vital. Please note: IC3 cannot respond directly to every submission, but in all cases complaints will help the FBI investigate crimes, respond faster, track trends and threats, and strengthen our nation's collective response locally and nationally.

Rapid Response Program

The Rapid Response Program (RRP) is a partnership between FinCEN; U.S. law enforcement including the FBI, U.S. Secret Service (USSS), Homeland Security Investigations (HSI), and U.S. Postal Inspection Service (USPIS); and foreign partner agencies like FinCEN that are the financial intelligence units (FIUs) of their respective jurisdictions and are used to aid in recovering funds stolen as a result of certain cyber-enabled financial crime schemes, including cyber-enabled fraud against older adults.

RRP has confronted cyber threats involving approximately 70 foreign jurisdictions to date and has the capacity to reach more than 160 foreign jurisdictions through FIU-to-FIU channels. Since the inception of the RRP program in 2015, FinCEN has successfully assisted in the recovery of over \$1.1 billion domestically and internationally.

The activation of RRP begins with a complaint to federal law enforcement via IC3.gov or the nearest USSS field office. Banks should leverage their partnerships with state, local and federal law enforcement (including the FBI, USSS, the IRS's criminal investigation division and HSI) to initiate these investigations.

¹³ https://napsa-now.org/help-in-your-area/

¹⁴ https://ic3.gov

¹⁵ http://secretservice.gov/field_offices.shtml

CREATING AN EFFECTIVE EFE SAR

An effective SAR is one that concisely alerts law enforcement to a problem.

A SAR should be easy to understand and read (e.g., avoid using all caps or unusual fonts) so law enforcement can quickly respond.

Remember that there is no universal definition of an EFE "victim." The laws applicable to EFE vary by state, with some states defining victims as individuals ages 60 or older, while others define victims as individuals ages 65 or older. Federal laws protect individuals 60 and up. In the FIN-2022-A002 FinCEN Advisory on EFE, an older adult is an individual 60 years of age or older, which is consistent with other U.S. government agencies' definition. In addition to this federal standard, you should consult the laws in your state.

FinCEN has identified best practices and guidelines for banks to follow when filing a SAR involving potential EFE. These are not regulatory obligations (unlike the mandatory SAR requirements) but recommendations by FinCEN to improve the ability of law enforcement to take further action.

FinCEN recommendations for EFE SARs:

- Reference FinCEN's 2022 Elder Financial Exploitation Advisory by including the key term "EFE FIN-2022-A002" in SAR field 2 ("Filing Institution Note to FinCEN") and the narrative to indicate a connection between the suspicious activity being reported and the activities highlighted in the EFE Advisory.
- In addition, mark the checkbox for Elder Financial Exploitation (<u>SAR Field 38(d</u>)) as it makes it easier for law enforcement to locate and analyze BSA data related to EFE.
- Include a "bottom-line-up-front" paragraph at the beginning of each SAR narrative. Clearly identify and explain why the activity is suspicious within the first paragraph of the narrative. This helps law enforcement quickly understand the potential importance and scope of the reported activity and triage its further review and analysis.

The narrative should document the age and location (county/city) of the target or victim. Provide details about the reporting entity's response (e.g., whether accounts were closed, whether the person was warned that transactions appear to involve fraud and whether the bank has taken specific

protective steps).

- If the RRP is activated, reference the key terms "Rapid Response Program," "RRP" and, if known, the RRP case number in the SAR.
- If it appears that other financial institutions, domestic or foreign, are involved, the bank should provide all available information regarding other domestic and foreign financial institutions that may be involved in the activity; where appropriate, financial institutions should consider filing a SAR jointly on shared suspicious activity.
- Provide details about the amounts involved and, if applicable and available, whether
 any amounts have been recovered on behalf of the older customer (as of the
 submission date of the SAR).
- Reference supporting documentation, including any photos or video footage, in the narrative.
- Cross-report the circumstances leading to the filing of EFE SARs directly to local law
 enforcement if there is any indication that a) a crime may have been committed and/
 or b) the older adult may still be at risk for victimization by the suspected abuser.
 Include the same information that may have been reported to law enforcement or
 adult protective services. Note that filing a SAR with FinCEN does NOT satisfy state
 law reporting requirements.
- Take advantage of the law enforcement contact field to indicate if the suspicious activity was also reported to law enforcement or APS, as well as the name and phone number of the contact person.
- Provide direct liaisons or points of contact at the reporting entity who are familiar with the suspicious transaction so investigators can ask questions and request additional documentation in a timely manner.
- Expedite responses to law enforcement requests for supporting documents.



THE EFE SAR NARRATIVE

In general, the same rules apply to the narrative in EFE SARs that apply to all SAR reporting. The narrative should be clear, concise and complete to avoid possible confusion about what, when, where, how and who. The bank should also include the relevant internal bank reference number and readily identifiable contact information about who at the bank is knowledgeable about the SAR and can easily assist investigators.

Law enforcement officers and, where authorized by statute, APS workers are the audience for SAR narratives. In addition to potentially assisting the EFE victim, potentially recovering funds or helping build a case to prosecute the perpetrator of this individual crime, the narrative can potentially help law enforcement and APS identify larger national or international patterns of elder fraud or elder financial exploitation. **Be sure to include all pertinent details and include:**

- 1. A short, high-level summary of a few sentences that briefly describes the nature of the suspicious activity and the parties involved. For example, clearly distinguish the suspect the bad actor from the victim of the possible EFE. In the event of possible account compromise, be clear about who the compromised account belongs to, and the potential suspect who may have compromised the account. In the event a money mule account may be involved, identify the possible money mule account and explain why you believe it may relate to the victim's account. If you believe that a victim may inadvertently or unknowingly be facilitating fraud or exploiting other individuals, make that clear in the narrative.
- 2. A detailed description of the suspicious activity that includes, at a minimum, the following information:
 - a. Who performed the suspicious activity the "suspect" or "subject." Only use a name if you know it, but include any aliases, if known, in the narrative. If you believe a victim may be unknowingly participating in fraud or exploiting other individuals, make that clear.
 - The victim and his/her age.
 - The victim's history of financial exploitation, if any.
 - The relationship between the victim and suspect, if known.
 - **b. What** is the nature of the fraud or suspicious activity.
 - The facts that have led you to conclude that a suspicious transaction meets the filing standards.
 - The account numbers, types of transactions or financial products, or any other methods used to facilitate the activity. (For example: Did the subject call the victim? Contact the victim over social media? Was the victim's email or computer compromised? Was his/her ATM card stolen? Was his/her signature forged on a check? Was this a case of mail fraud?)

- How much money was lost, if any.
 Remember that a transaction involving \$10,000 or more requires a currency transaction report (CTR).
- Outcome of the suspicious activity, if known. This would include whether you were able to prevent a fraudulent transaction or recover any funds, and whether the victim contacted DOJ's Elder Fraud Victim Hotline when you referred the victim to it, or whether ic3.gov and/or federal law enforcement was contacted.
- when the suspicious activity took place and when it was first detected. Was it a one-time occurrence, or has it occurred multiple times over a specific time span? Note specific dates. In the event this activity is reported more than once in a continuing SAR, make that that clear, and refer to the earlier SARs.
- **d.** Where the suspicious activity took place. This not only includes a physical place (such as the bank branch) or an electronic place (such as social media), but also the location of accounts that were affected.

USE STANDARD KEY TERMS

When writing the narrative, it's important to use standard, consistent terms and specific, accurate names when possible to help law enforcement and other agencies when they search the SAR database. Using consistent language also helps the authorities identify and shut down wider networks or spot patterns of related crimes. Standard key terms are provided in the FinCEN EFE advisory, and can be found on the FinCEN site at: https://www.fincen.gov/resources/suspicious-activity-report-sar-advisory-key-terms



Ensure your narrative can be clearly understood by someone who does not work at your institution. Avoiding relying on phrases, acronyms or other references that are specific to your bank. You may, however, incorporate these special phrases, acronyms or references in the narrative (for example, in parentheses) if they would help individuals at your bank understand the actions your bank has taken or departments or individuals who may be involved. Your bank-specific terms may serve as important shorthand to prompt the individuals at your bank to communicate valuable and relevant information to law enforcement officers or adult protective service officials who follow up on the narrative.

SUPPORTING MATERIALS

Supporting materials provide crucial evidence in building a case against the perpetrator; they should be referenced and described in the narrative portion. Do not attach the supporting material to a SAR or attempt to file a SAR with supporting material. When you file a SAR, you are deemed to have stored the supporting documentation. You must maintain both the SAR and supporting documentation for five years after you file.

Although SAR confidentiality requirements are important, they do not prevent you from making supporting documentation available to FinCEN or any federal, state or local law enforcement agency, as well as your federal and state regulators, upon request.

Examples of supporting materials include, but are not limited to:

- Account opening information
- Account statements for accounts involved in the suspicious activity (e.g., victim and subject accounts, if available)
- Wire transfer records
- Pertinent loan documents

CONFIDENTIALITY

SARs and any information that would reveal the existence of a SAR is confidential and cannot be disclosed, except under certain circumstances. This rule protects the integrity of the information, avoids tipping off perpetrators and protects the filers and banks where they work. Generally, neither the victims nor the subjects (i.e., bad actors or perpetrators) will know that you are filing a SAR. Make sure you know who has access to a SAR in your state before you share information with anyone outside of law enforcement. Follow your bank's procedures, and if you have questions about access to SARs, contact FinCEN. Some states may allow APS workers to access a SAR, while other states may not or may have other restrictions.

PROTECTION FOR FILERS

The Bank Secrecy Act and implementing regulations protect banks and their employees from civil liability for filing a SAR — both for mandatory SARs as well as voluntary SARs. This liability protection applies to both federal and state laws.

GOING BEYOND FILING A SAR

Filing an EFE SAR is an essential tool in combating elder financial exploitation, but it is only one step as part of a broader response. Educating customers, training staff to spot possible EFE and alerting law enforcement as well as APS as quickly as possible are keys to stopping exploitation.

To learn more about EFE, visit:

- ABA Foundation's Older Americans Resource Page aba.com/olderamericans
- Consumer Financial Protection Bureau consumerfinance.gov
- Department of Justice justice.gov/elderjustice/financial-exploitation
- Federal Bureau of Investigation fbi.gov/elderfraud
- Federal Trade Commission ftc.gov
- Financial Crimes Enforcement Network fincen.gov/news/news-releases/fincenissues-advisory-elder-financial-exploitation
- Internet Crime Complaint Center ic3.gov
- National Adult Protective Services Association napsa-now.org
- National Center on Elder Abuse ncea.acl.gov