FREE REFERENCE GUIDE — NO COST, NO CATCH

25 AML Red Flags Every Real Estate Agent Should Know

A quick reference for spotting the transaction patterns that most often draw regulatory scrutiny — built for agents, brokers, and office managers who want a clear standard, not a stack of legal text. Keep this on hand for any deal that feels slightly unusual.

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1. THE BUYER OR PARTY

- Buyer is a legal entity or trust with unclear or hard-to-verify beneficial ownership
- Buyer is unwilling to provide identification or basic business documentation
- Buyer has no discernible connection to the property's location or local market
- Multiple properties purchased in a short period by related or unrelated entities sharing an address
- Buyer resists reasonable, routine questions about the source of funds

2. TRANSACTION STRUCTURE

- Property purchased significantly above or below market value with no clear explanation
- Rapid resale of the property shortly after purchase, with no improvements made
- Transaction appears structured to stay just under reporting or recordkeeping thresholds
- Use of shell companies, layered LLCs, or nominee owners to obscure true ownership
- Property titled in the name of a third party unrelated to the actual buyer

3. PAYMENT METHOD

- All-cash purchase with no financing, particularly for a high-value property
- Payment made via multiple smaller transfers instead of one larger payment
- Funds wired from or routed through a jurisdiction known for weak AML controls
- Down payment or deposit paid by a party who is not the buyer of record
- Use of cryptocurrency or other non-traditional payment methods without clear documentation

4. DOCUMENTATION

- Inconsistent, incomplete, or apparently altered documents (ID, proof of funds, formation papers)
- Buyer provides documentation that appears to have been created solely for this transaction
- Refusal or reluctance to provide a source-of-funds letter or bank reference
- Power of attorney used to complete the transaction without the buyer ever present
- Notarized documents from a jurisdiction with no logical connection to the buyer

5. BEHAVIOR DURING THE DEAL

- Buyer or their representative pressures for an unusually fast closing
- Communication happens only through intermediaries — the beneficial owner is never directly involved
- Buyer requests unusual or unnecessary confidentiality provisions
- Agent is offered an unusually high commission or an off-the-books incentive
- Buyer shows limited interest in the physical property itself relative to the speed of the transaction

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