
TABLE OF CONTENTS

Chapter 1: The Next Frontier	1
The Magnitude of the Problem	2
How Are We Doing?	6
Chapter 1: Test Your Knowledge	9
Chapter 1: Solutions and Suggested Responses	11
Chapter 2: Trade-Based Money Laundering Techniques: Invoice Fraud	13
How Does TBML Work?	14
Invoice Fraud	15
Case Examples: Invoice Fraud and Manipulation	19
Cheat Sheet	24
Chapter 2: Test Your Knowledge	27
Chapter 2: Solutions and Suggested Responses	29
Chapter 3: Black Market Peso Exchange	31
Background of the BMPE	32
A Typical BMPE Value Transfer Scheme	33
Expansion of the BMPE to Mexico and Venezuela	35
The China Connection	39
Cheat Sheet	40
Chapter 3: Test Your Knowledge	43
Chapter 3: Solutions and Suggested Responses	45
Chapter 4: Hawala: An Alternative Remittance System	47
Definition of Hawala	48
The Hawala Transaction	49
How Do Hawaladars Make a Profit?	52
Countervaluation and Trade	53
An Abused Financial System	55
How to Recognize Hawala	56
Countermeasures	58
Case Examples: Hawala	59
Cheat Sheet	62
Chapter 4: Test Your Knowledge	63
Chapter 4: Solutions and Suggested Responses	65
Chapter 5: Chinese Flying Money	67
An Ancient System	67
The Modern Era	69
How Does It Work?	70
Chinese Presence in Africa	73
Case Examples	74
Cheat Sheet	76

Chapter 5: Test Your Knowledge	79
Chapter 5: Solutions and Suggested Responses	81
Chapter 6: Misuse of the International Gold Trade	83
Why Gold Is so Popular with Money Launderers	83
How Is Gold Manipulated to Launder Money and Transfer Value?	87
Possible Questions for Gold Dealers	91
Case Examples	92
Examples of Gold and Terrorism Financing	94
Cheat Sheet	95
Chapter 6: Test Your Knowledge	97
Chapter 6: Solutions and Suggested Responses	99
Chapter 7: Commercial TBML	101
Trade Diversion	101
Trade Misinvoicing	104
Transfer Pricing	106
Cheat Sheet	109
Chapter 7: Test Your Knowledge	111
Chapter 7: Solutions and Suggested Responses	113
Chapter 8: More Schemes and Facilitators	115
Barter Trade	115
Service-Based Laundering	116
Free Trade Zones	117
The Afghan Transit Trade	118
Latin America’s Tri-Border Area	121
Carousel Fraud	123
Case Studies	125
Chapter 8: Test Your Knowledge	127
Chapter 8: Solutions and Suggested Responses	129
Chapter 9: Monitoring Trade	131
Steps in the International Trade Process	131
Information Sources	133
What about Weight Analysis?	137
Pioneering Analysis in TBML	139
Trade Transparency Units (TTUs)	140
The Application of Big Data and Analytics	143
Case Example: Operation Deluge	145
Chapter 9: Test Your Knowledge	147
Chapter 9: Solutions and Suggested Responses	149
Chapter 10: Red-Flag Indicators	151
Possible Red-Flag Indicators of TBML	152
Prudent Steps	154
Guidance	155

Chapter 10: Test Your Knowledge	157
Chapter 10: Solution and Suggested Responses	159
Chapter 11: Conclusions and Recommendations	161
Get Serious about TBML	161
Define the Magnitude of the Problem	162
Focus from the Top	162
A FATF Recommendation	163
Curtail the Commercial Misuse of Trade	164
Enhance Wire Transfer Reporting	164
TBML Analytics	165
Expand the International TTU Network	166
Reempower Treasury Enforcement	167
The Misuse of Trade Is a Law Enforcement Issue—Not Just a Customs Issue	169
National Task Forces on Underground Finance	170
Chapter 11: Test Your Knowledge	173
Chapter 11: Solutions and Suggested Responses	175
Appendix A: Money-Laundering Primer	177
Financial Intelligence	178
How Is Financial Intelligence Used?	180
Availability of Financial Intelligence	181
Legislation	181
Investigating Money Laundering	182
Money-Laundering Methodologies	183
Appendix B: Original Trade Transparency Unit (TTU) Proposal	185
May 2003 Proposal: Trade Transparency Units	185
Glossary	191
Index	195
Final Exam Copy	201