



# SOUTHWEST BORDER ANTI-MONEY LAUNDERING ALLIANCE

## COMPETITIVE GRANT ANNOUNCEMENT

### Eligibility Notice

Federal, state, county, local, tribal, and Mexican criminal justice agencies that meet the qualifications are eligible to apply.

#### **ABOUT THE SOUTHWEST BORDER ANTI-MONEY LAUNDERING ALLIANCE PROGRAM**

The purposes of the Southwest Border Anti-Money Laundering Alliance (“Alliance”) Program are to: enhance and better coordinate investigations and prosecutions of money laundering in the Southwest Border Area (that area within 200 miles of the United States/Mexico border on either side of the border and including all of Arizona) (“SWBA”) and other areas affected by money laundering in the SWBA, with the goal of reducing money laundering and thereby reducing violence associated with smuggling organizations operating in the SWBA and in other areas affected by money laundering in the SWBA; enhance coordination of the Alliance states’ anti-money laundering (“AML”) efforts; and fund related training, information sharing, and related expenses in the Alliance states and in Mexico (collectively, the “SWBA AML Purposes”).

Alliance funds are available for federal, state, county, local, tribal, and Mexican Initiatives, including technical assistance, training, personnel, supplies, and contractual support to accomplish any one or more of the Goals of the Alliance Strategy, which are listed below:

1. Disrupt criminal organizations that engage in cross border violence.
2. Disrupt the movement of weapons that flow across the southwest border into Mexico.
3. Develop a Southwest Border Area information sharing network.
4. Provide training for law enforcement, prosecutors, and private sector partners regarding money laundering.
5. Support multi-jurisdictional domestic and international money laundering investigations.

## **INTRODUCTION**

The Southwest Border Anti-Money Laundering Alliance (“Alliance”) is governed through an Executive Board consisting of the Arizona Attorney General, the California Attorney General, the New Mexico Attorney General, the Texas Attorney General, the Director of the Arizona Department of Public Safety, the Superintendent of the Arizona Department of Financial Institutions, and the Chief of the Police Department of Phoenix, Arizona (the “Board”), for a total of seven voting members. It is publishing this notice to announce the availability of funds for the Southwest Border Anti-Money Laundering Alliance Program. Grants not made during this calendar year will be considered in the following year or years as long as funds in the \$50 million Alliance Fund remain unspent.

The Alliance will prioritize Initiatives that involve multi-state and international money laundering mechanisms, that involve the movement of money to smuggling organizations with a record of violence, that involve the movement of weapons from the United States into Mexico or the use of such weapons in Mexico, that involve multi-state information or data sharing or analysis, or that involve training or coordination conferences relating to money laundering and related criminal activity. The Board will only recommend funding of Initiatives that have potential to further the Alliance Strategy, which concentrates on a high-level financial Anti-Money Laundering (“AML”) approach, or that directly impact substantial smuggling organizations or ongoing facilitators of such organizations.

The core vision of the Alliance is to create a network of people, agencies, task forces, and programs actively engaged in anti-money laundering enforcement in the SWBA. The Alliance plans to: 1) build an internal network of analysts, including analysts in each border state and federal analysts; 2) task its staff investigators in each state with forming a network of money laundering, financial investigation, and asset forfeiture experts and making them available to SWBA investigators and prosecutors to assist in their money laundering cases; 3) develop people and resources to train investigators and prosecutors; and 4) bring these networks together in periodic conferences to continually improve the level of effectiveness

of collaborative enforcement efforts. The Alliance intends to foster cases and programs that directly address the growing power of criminal groups in the SWBA and to leave a legacy network of collaborating individuals, agencies, and efforts that includes all related disciplines and all levels of government and spans the entire SWBA, including its Mexican dimension and related industries. The Alliance will evaluate all proposed Initiatives for their potential contribution to this overall vision.

The Alliance plans to further implement this vision by allocating funds throughout the SWBA to Initiatives that foster such cases and programs and the creation of this anti-money laundering network and collaboration among the grantees. These efforts must go beyond the investigative resources of individual agencies. They must cross jurisdictional boundaries and lead to the arrest and criminal and civil prosecution of money laundering violators. Although an application by a single agency may be eligible, it will not be considered if its stated Goals are best accomplished by a multi-agency, multi-jurisdictional task force.<sup>1</sup> For the same reasons, Initiatives that coordinate efforts with related Initiatives and with other initiatives such as the Border Enforcement Security Taskforce (“BEST”) teams of the Department of Homeland Security, High Intensity Drug Trafficking Area (“HIDTA”) initiatives, OCDETF training resources, and federal, state and local multi-agency, multi-jurisdictional task forces are most consistent with the Alliance vision.

The Southwest Border Anti-Money Laundering Alliance formative Settlement Agreement focuses on the investigation and prosecution of money laundering. The Alliance recognizes that law enforcement attention directed at any crime committed for financial gain may reduce money laundering in some degree. Nevertheless, the Alliance mandate and its limited funding require it to approve only those proposed initiatives whose core purpose is the investigation and prosecution of money laundering in the Southwest Border Area, or that promise to lead directly to the illumination of a money laundering methodology or the disruption of a money laundering operation.

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<sup>1</sup> A multi-agency, multi-jurisdictional task force is defined as a formal arrangement involving three or more law enforcement agencies along with at least one prosecutorial agency to work, investigate, interdict, and collaboratively prosecute drug, human, or weapons smuggling, and related violent crime activities. Cross jurisdictional boundary initiatives are encouraged, including intrastate, interstate, and international.

The critical components that ensure successful multi-agency, multi-jurisdictional task forces are:

Written interagency agreements establishing guidelines;

Prosecutor involvement;

Computerized information/intelligence sharing;

Communication among task force members;

Coordination of effort;

Experienced leadership;

Effective asset seizure and forfeiture activities;

Commitment to long-term funding;

Clearly formulated Goals, Objectives, and Performance Measures;

Collection of data, monitoring, and evaluation; and

Technical assistance and training programs that draw on the experiences of more seasoned task force participants’ and supervisors’ expertise.

Of these components, open and clear communication with task force participants and outside agencies, such as prosecutorial agencies, particularly encourages success through dissemination of key information and knowledge.

This focus requires the Alliance to avoid staffing general investigative units or equipment, while freeing the Alliance to rely as much as possible on projects and programs generated through the Alliance analytical group using the transaction data to its best advantage and using other intelligence-driven guidance gleaned from our federal partners. For proposed Initiatives that combine anti-money laundering activities with more general law enforcement activities, the Alliance plans to insist on objective goals that emphasize the anti-money laundering aspect of the project, get firm commitment from applicants in advance to focus Alliance funding on these aspects, and hold the applicant to their commitments. This focus is not intended to unduly cut off intelligence opportunities or case-centered initiatives that have promise of having significant money laundering impact, or to require Alliance evaluators to insist on existing anti-money laundering expertise in each applicant, so the Alliance will entertain opportunities to engender interest and expertise in anti-money laundering approaches.

To assure adequate minimum distributions of funds to each of the four member States of the Alliance, the Board will issue grants totaling a minimum of \$7 million to law enforcement organizations in each of the four member States of the Alliance, so that under no circumstances will the Alliance Fund be depleted without law enforcement in every Alliance member state receiving at least \$7 million in aggregate grants from the Alliance Fund.

## **PROGRAM STRATEGY**

This Program will implement the Alliance Strategy (“Strategy”) by addressing the Goals and Objectives identified in the Strategy, as listed below.

## **INITIATIVES**

The Board has approved the allocation of Alliance funding to Initiatives that will further the Goals and Objectives presented below. Progress toward the accomplishment of these Objectives, and the Objectives’ respective Goals, will be tracked by consideration of the Performance Measures associated with each Objective. Appendix A to the Application Instructions, which are part of this Grant Award Package, presents those Performance Measures. The Alliance will use the Performance Measures to gauge progress toward achieving an Objective. The Goals toward which the Alliance will fund Initiatives and the Objectives associated with each Goal are:

### **GOAL 1:**

#### **DISRUPT CRIMINAL ORGANIZATIONS THAT ENGAGE IN CROSS BORDER VIOLENCE**

Objective 1.1: The Alliance will support the investigation and prosecution of organizations that engage in cross border violence.

Objective 1.2: The Alliance will support the investigation and prosecution of individuals who provide material support for or otherwise facilitate organizations that engage in cross border violence.

Objective 1.3: The Alliance will promote the increased use of civil and criminal asset seizures and forfeitures from individuals/organizations that engage in or facilitate cross border violence.

Objective 1.4: The Alliance will foster international collaboration to identify, investigate, and disrupt the financial activities used to facilitate cross border violence.

Objective 1.5: The Alliance will foster multi-jurisdictional collaboration to identify, investigate, and disrupt financial activities that facilitate cross border violence.

## **GOAL 2:**

### **DISRUPT THE MOVEMENT OF WEAPONS THAT FLOW ACROSS THE SOUTHWEST BORDER INTO MEXICO**

Objective 2.1: The Alliance will increase the use of financial intelligence and information to proactively investigate persons engaged in weapons smuggling.

Objective 2.2: The Alliance will increase the collection, analysis, and dissemination of financial information acquired during weapons smuggling investigations.

Objective 2.3: The Alliance will establish objectively-verified empirical measurements of the amount and methods of U.S. weapon movement from the United States into Mexico.

Objective 2.4: The Alliance will foster increased use of civil and criminal asset seizures and forfeitures in prosecutions of weapons smuggling.

Objective 2.5: The Alliance will assist in increasing the number of state and federal criminal and civil prosecutions relating to weapons destined for Mexico.

## **GOAL 3:**

### **DEVELOP A SWBA INFORMATION SHARING NETWORK**

Objective 3.1: The Alliance will develop effective methods to collect, analyze, and disseminate financial information.

Objective 3.2: The Alliance will develop and implement dissemination of financial information through user-friendly web-based access, whether through existing mechanisms such as Gateway or otherwise, and will provide manuals and video/web training on access and use of this resource.

Objective 3.3: The Alliance will disseminate analytical products to include information consisting of threat assessments, strategic analysis, trend analysis, and target development.

Objective 3.4: The Alliance will foster the sharing of investigative information among U.S. law enforcement agencies and between Alliance participants and their counterparts in Mexico.

Objective: 3.5: The Alliance will enhance collaboration and communication between the law enforcement community and its private sector partners, to include money services businesses, informal value transfer systems, and traditional financial institutions.

Objective 3.6: The Alliance will fully integrate its data analysis with Mexican analytical operations.

Objective 3.7: The Alliance will effectively monitor the use of new payment methods in SWBA money laundering, including stored value devices, electronic payment devices, and online services.

**GOAL 4:**

**PROVIDE TRAINING FOR LAW ENFORCEMENT, PROSECUTORS, AND PRIVATE SECTOR PARTNERS REGARDING MONEY LAUNDERING**

Objective 4.1: The Alliance will sponsor educational forums providing private sector partners with guidance to avoid their facilitating money laundering in the Border States.

Objective: 4.2: The Alliance will provide training on key subjects including money laundering, bulk cash interdiction, weapons smuggling, money transmitter operations, emerging payment methods, and human trafficking/smuggling on both sides of the border in close coordination with other available training and resources.

Objective: 4.3: The Alliance will assemble expert immediate investigative and prosecutive assistance resources in all states to provide investigators and prosecutors in the field an immediate point of contact for advice and assistance in money laundering and related cases.

**GOAL 5:**

**SUPPORT MULTI-JURISDICTIONAL DOMESTIC AND INTERNATIONAL MONEY LAUNDERING INVESTIGATIONS**

Objective 5.1: The Alliance will foster collaboration in the SWBA to develop and enhance intelligence-driven investigations and prosecutions of money laundering and the related crimes of smuggling humans, currency, drugs, weapons, and human trafficking.

Objective 5.2: The Alliance will promote the use of civil and criminal asset seizures and forfeitures in prosecutions of money laundering operations and the related crimes of smuggling humans, currency, drugs, weapons, and human trafficking.

Objective 5.3: The Alliance will increase the use of bulk cash interdiction activities in order to disrupt the placement of illicit proceeds into United States and Mexican bank or non-bank financial institutions, in coordination with OCDETF, HIDTA, BEST, and other operations.

Objective: 5.4: The Alliance will support the Financial Crime Enforcement Network's mission to deter and detect criminal activity and safeguard United States financial systems and the FATF's Recommendations, fostering transparency in financial transactions throughout the SWBA.

Objective: 5.5: The Alliance will support the Office of Foreign Asset Control's mission of imposing sanctions against international criminal organizations.

Objective 5.6: The Alliance will support the Department of Treasury and federal law enforcement agencies in determining whether the use of Geographic Targeting Orders or Section 311 of the USA PATRIOT Act are effective tools in disrupting money laundering networks in the SWBA.

Objective 5.7: The Alliance will establish objectively-verified empirical measurements of the amounts and methods by which proceeds of crime move from the United States into Mexico.

Objective 5.8: The Alliance will support risk-based compliance examinations of SWBA MSBs by state and federal examiners based on comprehensive and objective analysis of transaction data.

Objective 5.9: The Alliance will identify and prosecute illegal MSBs in the SWBA.

Objective 5.10: The Alliance will conduct successful intelligence-driven undercover operations focusing on businesses that facilitate criminal activity in the SWBA.

Objective 5.11: The Alliance will assist with coordination of Article 4 prosecutions in Alliance states.

Objective 5.12: The Alliance will expand the use of Article 4 investigations in Alliance states.

Objective 5.13: The Alliance will coordinate its Initiatives' program income to extend the scope and time frame of Alliance operations.

## **FUNDING**

The Alliance is presently making funds available for multiple grants to be allocated directly to federal, state, county, local, tribal, and Mexican criminal justice agencies for Initiatives that will achieve the Goals of the Alliance Program within the five (5) areas listed above.

All applicants requesting funds for personnel other than overtime, or otherwise budgeting substantial ongoing expenses, must certify that matching funds in the amount of 25 percent of the requested budget are dedicated and encumbered at the time of the application.

The Alliance may renew a grant for up to three years if the funds are available.

The Alliance strongly favors multi-agency, multi-jurisdictional task forces, but will consider applications from single agencies if its Goals are not consistent with a task force approach but strongly support the overall Alliance vision. Applicants may submit multiple applications regardless of the purpose area and may submit applications under multiple purpose areas. The Alliance strongly recommends that agencies submitting multiple applications prioritize Initiatives for their agency.

Funding for Initiatives to be conducted primarily in Mexico by one or more Mexican agencies or on tribal land by one or more tribal agencies will require a U.S. federal agency

to be the applicant and contracting agency. In such applications, the application must state that the applicant agency or another U.S. federal agency has undertaken to conduct the necessary financial audits of the Initiative and include verification from the designated agency.

## **RESTRICTIONS ON USE OF FUNDS**

Alliance Program funds cannot be granted directly or indirectly to nongovernmental entities not engaged in criminal justice or public safety.

The Alliance will not allocate funds for indirect costs, including but not limited to expenses of personnel for accounting, payroll, non-investigative data processing, or purchasing, or expenses for the use of buildings other than leases of dedicated task force space. In addition, the following items will not be funded:

- Vessels or aircraft;
- Luxury items;
- Real estate; and
- Construction.

Vehicles may not be purchased, but vehicle leases are permitted for a term of up to 24 months, ending before the end of the Alliance Program. Funding may not be used to request positions for federal participating agencies. Funding may be used for undercover operations, but will not be approved for informant payments due to the additional difficulty of auditing such expenses.

**Non-Supplanting: Grant funds must not be used to supplant existing federal, state, or local funds for Initiative activities and must not replace those funds that have been appropriated for the same purpose.**

### **Budget Worksheet:**

You must upload your budget, including all other funding sources that you will use to enhance your Initiative. You must identify the sources and amount of funds and provide a statement of how the funds will enhance your Initiative in the Initiative Narrative – Initiative Summary section. A sample budget template is available on page 33 of the Grant Management Resource Manual.

### **Sustainability Plan:**

Funds under this grant program will not be available after the \$50 million Alliance Fund is depleted, including any program income that it may have received. Therefore, if your request includes personnel or other ongoing activities or costs, you must identify future potential funding sources. In addition, such applicants should have a sustainability plan to ensure their Initiative will continue beyond this Program's funding availability. Such applicants are strongly encouraged to identify future potential funding sources. You must upload this document with your application.

## **Audit or Single Audit:**

One copy of the most recently completed financial audit must be attached (uploaded) at the time of your application. If your agency does not have a current audit completed for a period ending in 2009 or 2010, your application must provide similar assurances of financial stability.

You should first organize your proposed Initiative among its potential participants and refine its goals, objectives and Performance Measures using the other documents in this five-document grand announcement package. If you need help please read through the instructions in the package first. If your question still has not been answered, contact the Alliance Staff Training Coordinator, Carol Keppler, at [carol.keppler@azag.gov](mailto:carol.keppler@azag.gov) or the Director, Cameron Holmes, at [cameron.holmes@azag.gov](mailto:cameron.holmes@azag.gov).

Revised 01/10/11



**Southwest Border  
Anti-Money  
Laundering Alliance  
Strategy**

# *Southwest Border Anti-Money Laundering Alliance Strategy*

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## **SUMMARY**

The United States/Mexico border is the epicenter for smuggling humans, narcotics, weapons, and currency. These crime problems disrupt the quality of life and economies of the Southwest Border States and our neighbors in Mexico. The United States and Mexico are responding to unprecedented levels of violence that plague Mexico and threaten the United States. The violence is of utmost concern to officials along the SWBA. As a major world consumer of illegal drugs, the United States is the destination point for the narcotics produced in or shipped through Mexico.

The drug cartels in Mexico generate an estimated \$35 to \$40 billion from narcotics trafficking each year. Most of this currency moves through the SWBA on its way back to the cartels. The cartels use a variety of methods to process or “launder” profits that are earned in the United States. The most common include bulk cash transportation, money transmitters, U.S. banking systems, the “Black Market Peso Exchange,” and other trade-based methods.

In response to the alarming increase in border crime, the Attorneys General of Arizona, California, New Mexico, and Texas formed a unique alliance with the Superintendent of the Arizona Department of Financial Institutions, the Director of the Arizona Department of Public Safety, and the Chief of the Phoenix Police Department. This alliance was achieved through the efforts of the Arizona Attorney General and was memorialized in the February 2010, *Settlement Agreement* entered into by the State of Arizona and Western Union Financial Services. The *Settlement Agreement* provides for the creation of the Southwest Border Anti-Money Laundering Alliance (“Alliance”), further described in the *Southwest Border Anti-Money Laundering Alliance Governing Agreement*. The same seven partners comprise an Executive Board (“Board”) that manages the Alliance.

The Alliance will have access to resources to support enforcement and prosecution efforts throughout the Southwest Border Area (“SWBA”), which includes the area near both sides of the entire border. These resources will fund SWBA investigations, initiatives, and programs that meet criteria established by the Board. The Board will award funding based on a Strategy focused on civil enforcement, criminal investigations, prosecutions, and money laundering training and education in the SWBA.

## **PROBLEM STATEMENT**

Law enforcement officers and prosecutors frequently lack specialized expertise and resources to effectively deal with money laundering and the criminal activity that drives it. Money laundering crimes are complex, dynamic, and often multi-jurisdictional. Narcotic, human, and weapons traffickers routinely move the proceeds of their criminal activity from one location to another by electronically transferring funds through money transmitters. Beginning in 2001, the Arizona Attorney General’s Office began analyzing transaction data generated by Western Union and other money transmitters. This analysis and ensuing investigations reflected that this method of money laundering is not limited to Arizona, but is regional in scope. It was apparent that anti-money laundering efforts could never fully succeed without addressing the problem along the entire border between the U.S. and Mexico, including into Mexico. Based upon this, it was determined that the Alliance should bring to the SWBA intelligence-driven investigations and prosecutions that had previously either gone undetected or were obfuscated by the difficulties authorities encountered in financial investigations.

## GOAL STATEMENT

The goal of the Alliance is to provide law enforcement with resources to effectively investigate and prosecute organizations using all criminal and civil remedies to impact the profit-motivated component of narcotics, weapons, and human traffickers or smugglers.

The Alliance will provide assistance to investigators, analysts and prosecutors in their efforts to disrupt criminal organizations and dismantle their operations by providing resources, expertise, meaningful data analysis, training, and organizational collaboration.

The Alliance will leverage the resources of this project with those of federal law enforcement agencies, the Financial Crime Enforcement Network, High Intensity Drug Trafficking Area initiatives, other task forces such as BEST task forces, and counterpart agencies in Mexico. It will provide law enforcement, prosecutors, and the private sector community with training regarding money laundering, asset forfeiture, financial investigations, and the importance of Bank Secrecy Act compliance.

## MANAGEMENT PLAN

The Alliance intends to operate through Alliance-Appointed Staff (“Staff”), which will provide three core activities: First, it will collect intelligence from analysts in each of the Alliance States, and from federal agencies, and gather money transmitter and other data to better identify and respond to money laundering risks in the SWBA. Second, it will assist grant applicants in preparing grant applications, provide the Board with information it can use to evaluate applications, and, after grant applications are approved, will assist the grantees in executing approved initiatives, including by providing an audit function. Third, it will provide anti-money laundering and related training in all Alliance States and in Mexico and will organize annual Alliance conferences.

It will conduct five types of activity:

1) Analysis-The Alliance Staff will include two or more Analysts in the central office and an additional Analyst (two in Texas) appointed by the Attorney General of each Alliance State and stationed either at the central office or in the appointing State, at the election of the appointing Attorney General. This group will welcome additional analysts from federal agencies that choose to participate, such as FinCEN and DEA. The Analysts will collect financial intelligence, including the full-SWBA money transmitter data provided for in the Settlement Agreement, and BSA data, particularly SARs, and provide law enforcement in the entire SWBA with specific reactive, investigation-driven analysis and with proactive risk, pattern, and target analysis. They will build a better understanding of the channels, amounts, and vulnerabilities of the flow of illicit money from source/consolidation areas to the SWBA and across the U.S./Mexico border.

2) Investigation-The Alliance Staff will include an Investigative Supervisor hired by the Alliance Board and a Field Investigator (two in Texas) appointed by the Attorney General of each Alliance State and stationed in the appointing State. The Investigators will assist the Executive Board in evaluating grant applications and, after grants have been awarded, will assist the grant awardees in accomplishing their goals. They will assist in communications between their state’s grantees and their state’s Attorney General and among other states’ Field Investigators, law enforcement, and all of the SWBA Initiatives, to better coordinate and effectuate the Alliance mission. They will also work with the Auditor to perform program audits to assure fiscal responsibility and appropriate record-keeping and to promote Initiative success. Field Investigators will become familiar with money laundering, financial investigation, asset forfeiture, and prosecution resources and experts in their respective areas and throughout the SWBA and serve as points of contact to get officers in the field immediate advice

and hands-on in-the-field assistance on money laundering cases at Alliance expense.

3) Training and conference organization-The Alliance will hire or contract with a Training Coordinator. The Staff will arrange anti-money laundering, racketeering, asset forfeiture, and financial investigation training in all Alliance States and in Mexico. It will create written, video, and web-based training materials, including state-specific manuals, condensed courses for roll call training, and separate short courses for outside audiences such as judges, legislators, and businesses. It will also organize two conferences each year. One annual conference will be an Alliance organization conference to keep Alliance-affiliated investigators, prosecutors, and analysts in touch with each other and with the changing money laundering challenges in the SWBA and to knit the Alliance Initiatives into a cohesive SWBA operation. The other will be a Southwest Border Money Laundering Conference addressing the issues and challenges of money laundering enforcement in the SWBA in conjunction with our industry partners and the court-appointed Western Union Monitor. The Training Coordinator will act as a clearinghouse for experienced trainers in the SWBA and coordinate Alliance training with OCDETF, HIDTA, and other training resources.

4) Auditing-The Alliance will hire or contract with an Auditor working with and through the Field Investigators. The Auditor will perform both program and fiscal audits to promote the success of all Initiatives and to assure fiscal responsibility in the use of Alliance Funds.

5) Administration-The Alliance will engage a Director, an Administrative Assistant and a secretary. These positions will oversee the Staff and provide support for their activities. The Director will assure that the Staff carries out the Board's directions and communicate the Staff's work, progress, ideas, and concerns to the Board. The Director will also coordinate Alliance activities with SWBA law enforcement such as HIDTA, BEST, OCDETF, and other task forces and agencies, including funding and asset sharing. The Director will oversee the training and conferences.

## **STRATEGY REVIEW PROCESS**

The annual Alliance organization conference will include open forum policy and planning review of the Strategy as an agenda item. All grant recipients may submit Strategy recommendations to the Board. All Alliance participants are invited to contribute recommendations to the review process.

## **ANNUAL PERFORMANCE REPORT**

The annual Alliance review will include an Annual Performance Report featuring a plan for the improvement of performance in the coming year.

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