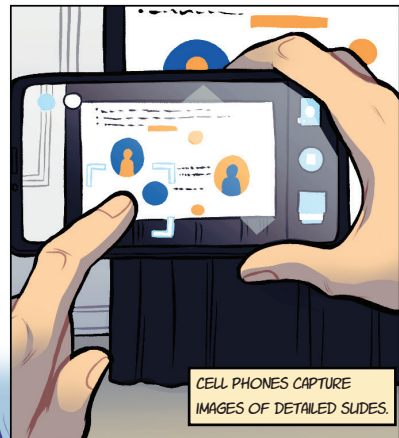
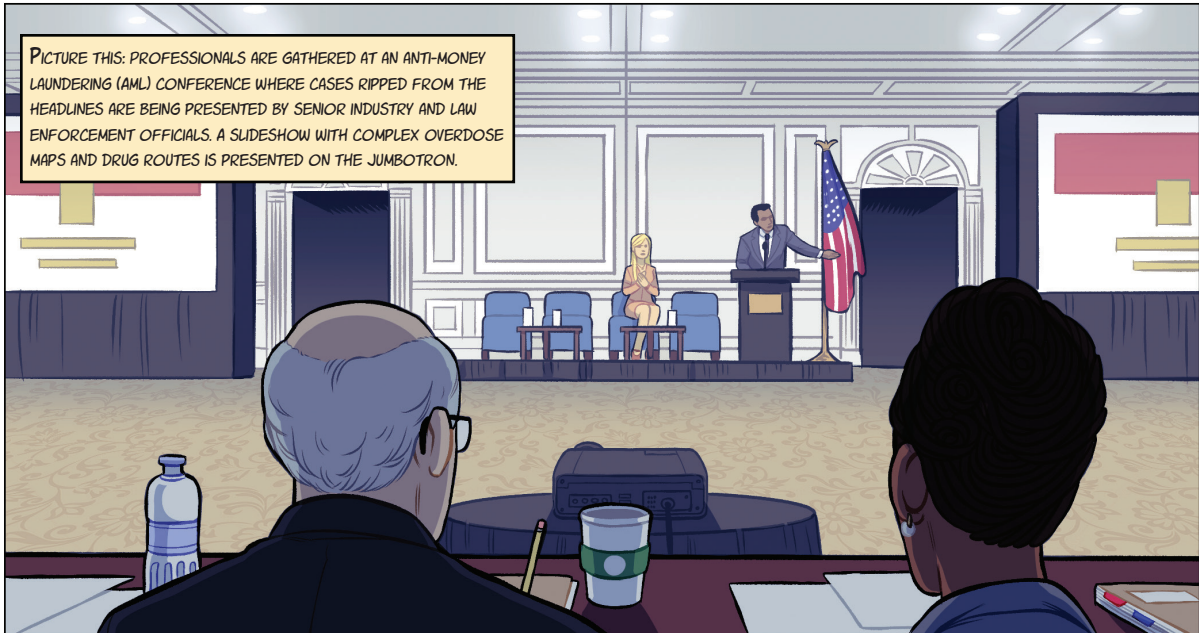


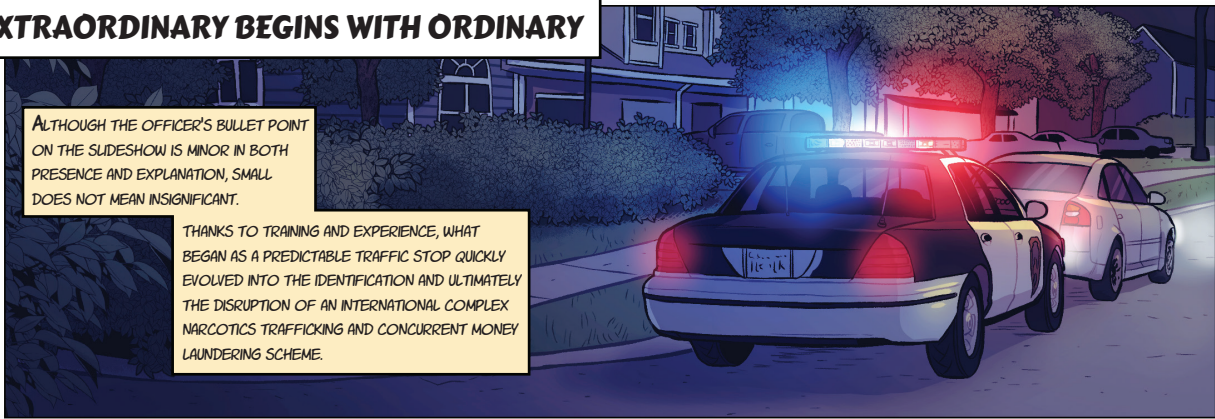
ORIGINS OF AN INVESTIGATION



ILLUSTRATION BY: MILOS HALL



EXTRAORDINARY BEGINS WITH ORDINARY



ALTHOUGH THE OFFICER'S BULLET POINT ON THE SIDESHOW IS MINOR IN BOTH PRESENCE AND EXPLANATION, SMALL DOES NOT MEAN INSIGNIFICANT.

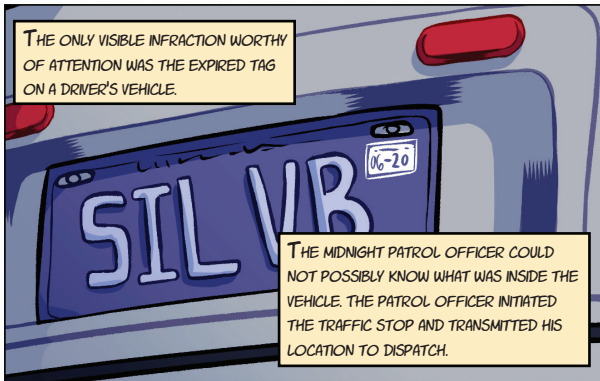
THANKS TO TRAINING AND EXPERIENCE, WHAT BEGAN AS A PREDICTABLE TRAFFIC STOP QUICKLY EVOLVED INTO THE IDENTIFICATION AND ULTIMATELY THE DISRUPTION OF AN INTERNATIONAL COMPLEX NARCOTICS TRAFFICKING AND CONCURRENT MONEY LAUNDERING SCHEME.



AT THE POINT OF DETECTION, THERE WERE NO MEN IN BLACK FROM A THREE-LETTER AGENCY EXECUTING A HIGH-RISK TAKEDOWN.

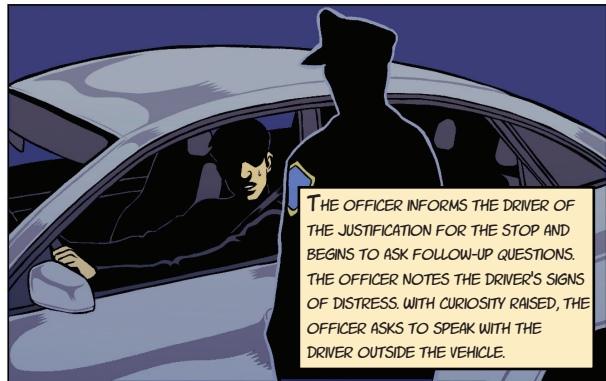


THERE WAS NO MEDIA HOVERING IN THE SKY CAPTURING THE DARING MOMENTS ON FILM.

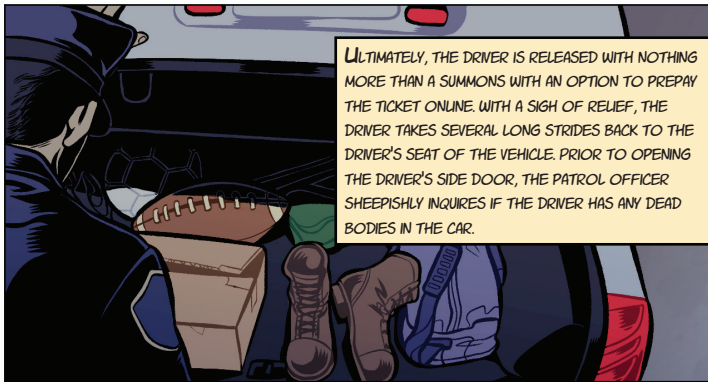


THE ONLY VISIBLE INFRACTION WORTHY OF ATTENTION WAS THE EXPIRED TAG ON A DRIVER'S VEHICLE.

THE MIDNIGHT PATROL OFFICER COULD NOT POSSIBLY KNOW WHAT WAS INSIDE THE VEHICLE. THE PATROL OFFICER INITIATED THE TRAFFIC STOP AND TRANSMITTED HIS LOCATION TO DISPATCH.



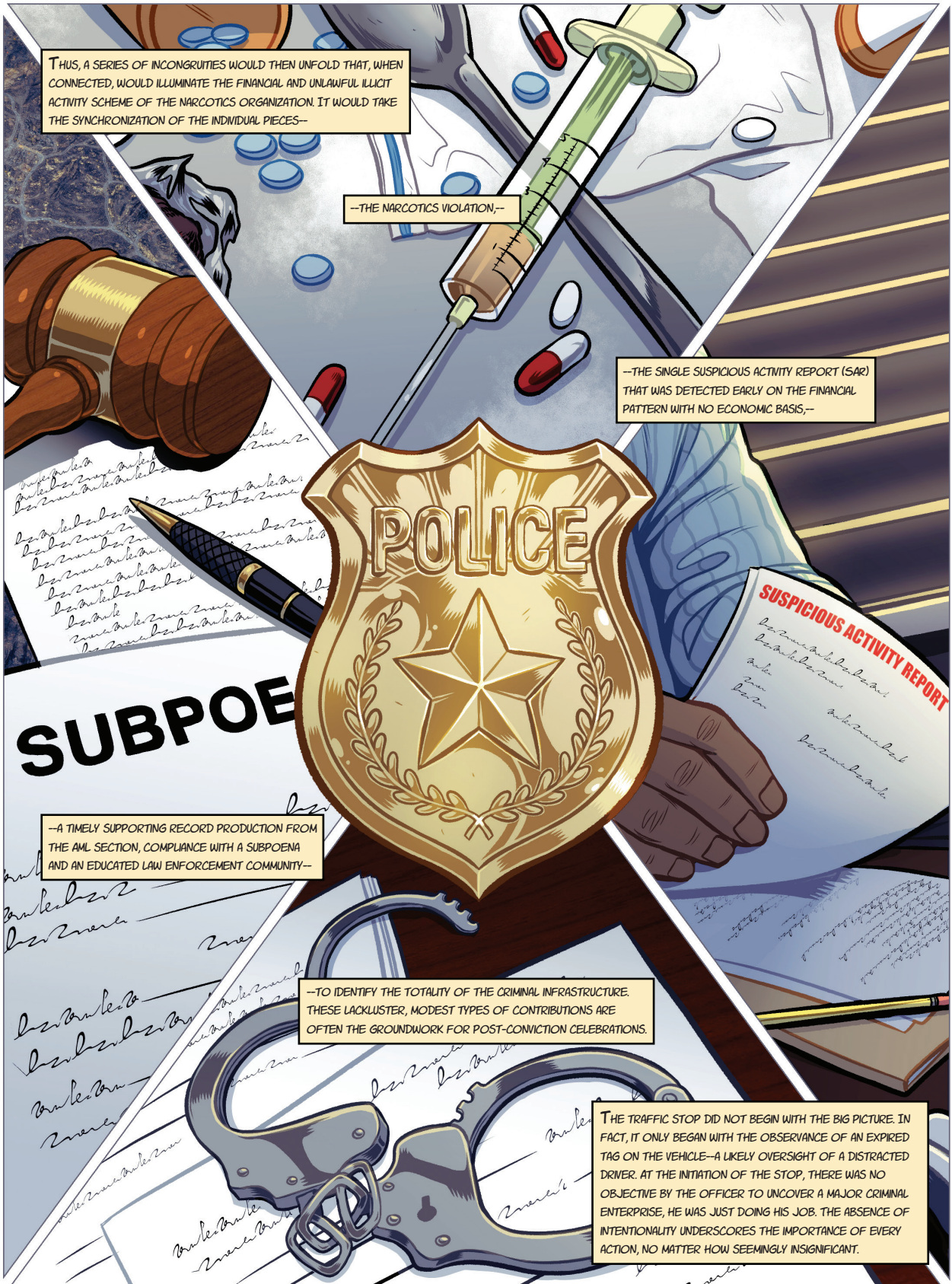
THE OFFICER INFORMS THE DRIVER OF THE JUSTIFICATION FOR THE STOP AND BEGINS TO ASK FOLLOW-UP QUESTIONS. THE OFFICER NOTES THE DRIVER'S SIGNS OF DISTRESS. WITH CURIOSITY RAISED, THE OFFICER ASKS TO SPEAK WITH THE DRIVER OUTSIDE THE VEHICLE.



ULTIMATELY, THE DRIVER IS RELEASED WITH NOTHING MORE THAN A SUMMONS WITH AN OPTION TO PREPAY THE TICKET ONLINE. WITH A SIGH OF RELIEF, THE DRIVER TAKES SEVERAL LONG STRIDES BACK TO THE DRIVER'S SEAT OF THE VEHICLE. PRIOR TO OPENING THE DRIVER'S SIDE DOOR, THE PATROL OFFICER SHEEPSHLY INQUIRES IF THE DRIVER HAS ANY DEAD BODIES IN THE CAR.

DEAD BODIES? THE QUESTION IS SO ABSURD THE OVERCONFIDENT DRIVER HAPPILY ENTERTAINS THE QUESTION WITH A ROBUST "NO." BOTH LAUGHING, THE OFFICER CASUALLY ASKS THE DRIVER FOR PERMISSION TO SEARCH THE VEHICLE.

THE DRIVER IS KEENLY AWARE THERE ARE NO BODIES, DEAD OR ALIVE, IN THE VEHICLE. WITH PERMISSION GRANTED, THE DRIVER PATIENTLY WAITS FOR THE OFFICER TO RETURN RED-FACED WITH EMBARRASSMENT AS THE SEARCH FOR A DEAD BODY WILL HIT A DEAD END. YET, WHAT WAS HIDDEN IN PLAIN SIGHT WAS A NARCOTICS VIOLATION AND THE PROBABLE CAUSE FOR AN ARREST.



THUS, A SERIES OF INCONGRUITIES WOULD THEN UNFOLD THAT, WHEN CONNECTED, WOULD ILLUMINATE THE FINANCIAL AND UNLAWFUL ILLICIT ACTIVITY SCHEME OF THE NARCOTICS ORGANIZATION. IT WOULD TAKE THE SYNCHRONIZATION OF THE INDIVIDUAL PIECES--

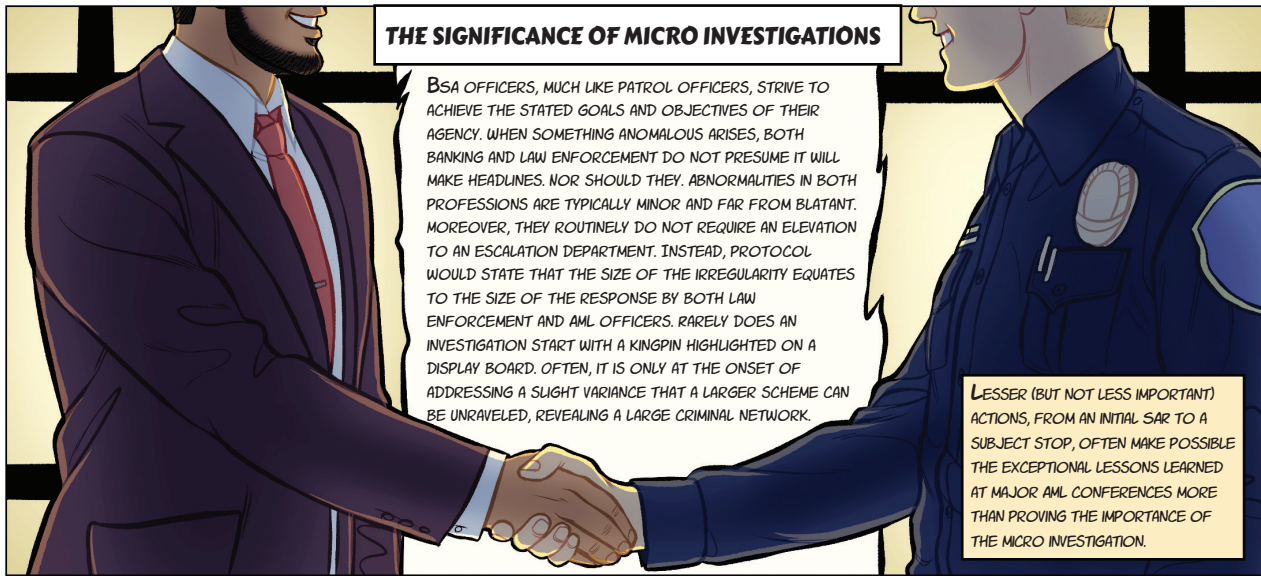
--THE NARCOTICS VIOLATION,--

--THE SINGLE SUSPICIOUS ACTIVITY REPORT (SAR) THAT WAS DETECTED EARLY ON THE FINANCIAL PATTERN WITH NO ECONOMIC BASIS,--

--A TIMELY SUPPORTING RECORD PRODUCTION FROM THE AML SECTION, COMPLIANCE WITH A SUBPOENA AND AN EDUCATED LAW ENFORCEMENT COMMUNITY--

--TO IDENTIFY THE TOTALITY OF THE CRIMINAL INFRASTRUCTURE. THESE LACKLUSTER, MODEST TYPES OF CONTRIBUTIONS ARE OFTEN THE GROUNDWORK FOR POST-CONVICTION CELEBRATIONS.

THE TRAFFIC STOP DID NOT BEGIN WITH THE BIG PICTURE. IN FACT, IT ONLY BEGAN WITH THE OBSERVANCE OF AN EXPIRED TAG ON THE VEHICLE--A LIKELY OVERSIGHT OF A DISTRACTED DRIVER. AT THE INITIATION OF THE STOP, THERE WAS NO OBJECTIVE BY THE OFFICER TO UNCOVER A MAJOR CRIMINAL ENTERPRISE, HE WAS JUST DOING HIS JOB. THE ABSENCE OF INTENTIONALITY UNDERSCORES THE IMPORTANCE OF EVERY ACTION, NO MATTER HOW SEEMINGLY INSIGNIFICANT.



THE SIGNIFICANCE OF MICRO INVESTIGATIONS

BSA OFFICERS, MUCH LIKE PATROL OFFICERS, STRIVE TO ACHIEVE THE STATED GOALS AND OBJECTIVES OF THEIR AGENCY. WHEN SOMETHING ANOMALOUS ARISES, BOTH BANKING AND LAW ENFORCEMENT DO NOT PRESUME IT WILL MAKE HEADLINES. NOR SHOULD THEY. ABNORMALITIES IN BOTH PROFESSIONS ARE TYPICALLY MINOR AND FAR FROM BLATANT. MOREOVER, THEY ROUTINELY DO NOT REQUIRE AN ELEVATION TO AN ESCALATION DEPARTMENT. INSTEAD, PROTOCOL WOULD STATE THAT THE SIZE OF THE IRREGULARITY EQUATES TO THE SIZE OF THE RESPONSE BY BOTH LAW ENFORCEMENT AND AML OFFICERS. RARELY DOES AN INVESTIGATION START WITH A KINGPIN HIGHLIGHTED ON A DISPLAY BOARD. OFTEN, IT IS ONLY AT THE ONSET OF ADDRESSING A SLIGHT VARIANCE THAT A LARGER SCHEME CAN BE UNRAVELED, REVEALING A LARGE CRIMINAL NETWORK.

LESSER (BUT NOT LESS IMPORTANT) ACTIONS, FROM AN INITIAL SAR TO A SUBJECT STOP, OFTEN MAKE POSSIBLE THE EXCEPTIONAL LESSONS LEARNED AT MAJOR AML CONFERENCES MORE THAN PROVING THE IMPORTANCE OF THE MICRO INVESTIGATION.

UNCOMMON BEGINS WITH ROUTINE

WHILE THE SIZE OF THE INVESTIGATION CATALYST IS INCONSEQUENTIAL, THE SIZE OF ONE'S EFFORT IS CRUCIAL. IT IS IRRELEVANT IF THE PROBING MIND IS THAT OF A PATROL OFFICER OR A BSA OFFICER.


WHAT IS RELEVANT IS THE INITIATIVE, THE WILLINGNESS TO ASK QUESTIONS BY ANYONE AND EVERYONE, THE SUBMISSION OF REQUESTS FOR FURTHER INFORMATION AND THE EXERCISING OF RESOURCES TO CHANNEL ROUTINE INQUIRIES INTO PROACTIVE INVESTIGATIONS.



THIS IS THE EQUIVALENT OF FOLLOWING THROUGH ON AN INCIDENT, REGARDLESS OF ITS INITIAL APPEARANCE. IT IS THE PERPETUAL FIGHT TO SEEK KNOWLEDGE AND TO HOLD OFFENDERS ACCOUNTABLE THAT RESULTS IN A SUCCESSFUL CRIMINAL/AML INVESTIGATION AND SUBSEQUENT PROSECUTION.



SO, WHETHER A NOTIFICATION IS GENERATED BY AN AML MONITORING SYSTEM OR AN ANONYMOUS TIP, BOTH LAW ENFORCEMENT AND AML PROFESSIONALS SHOULD DELIVER AN ACADEMY AWARD-WORTHY PERFORMANCE FOR EVERY INVESTIGATION. IN HOLLYWOOD, THERE CAN ONLY BE A FEW ACADEMY AWARD NOMINATIONS AND ONE OSCAR WINNER IN EACH CATEGORY. THE SUM LIKELIHOOD OF WINNING DOES NOT STOP DIRECTORS FROM AN AWARD-WINNING EFFORT. THE SAME SITUATION SHOULD EXIST IN THE AML INDUSTRY. THE ODDS ARE NOT PROBABLE THAT EVERY SUSPICIOUS ACTIVITY NOTIFICATION WILL RESULT IN AN ACAMS PLENARY SESSION HEADLINE. HOWEVER, A COMPREHENSIVE PERFORMANCE BY WAY OF A THOROUGH INVESTIGATION IN BOTH THE LAW ENFORCEMENT AND PRIVATE SECTORS WILL ALWAYS BE WORTHY OF AT LEAST AN HONORABLE MENTION.

SO, THE NEXT TIME A STACK OF COMPLAINTS SEEMS OVERWHELMING, DO NOT CUT CORNERS, INCREASE EFFORT. EXCEPTIONAL MERIT WILL ALWAYS BE WORTHY OF COMMENDATION. 

LAW ENFORCEMENT PROFESSIONAL, VA, USA,
EDITOR@ACAMS.ORG