



NAVAL POSTGRADUATE SCHOOL

MONTEREY, CALIFORNIA

THESIS

**INCREASED ANTI-MONEY LAUNDERING BANKING
REGULATIONS AND TERRORISM PROSECUTIONS**

by

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March 2013

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REPORT DOCUMENTATION PAGE			<i>Form Approved OMB No. 0704-0188</i>	
Public reporting burden for this collection of information is estimated to average 1 hour per response, including the time for reviewing instruction, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Washington headquarters Services, Directorate for Information Operations and Reports, 1215 Jefferson Davis Highway, Suite 1204, Arlington, VA 22202-4302, and to the Office of Management and Budget, Paperwork Reduction Project (0704-0188) Washington DC 20503.				
1. AGENCY USE ONLY (Leave blank)		2. REPORT DATE March 2013	3. REPORT TYPE AND DATES COVERED Master's Thesis	
4. TITLE AND SUBTITLE INCREASED ANTI-MONEY LAUNDERING BANKING REGULATIONS AND TERRORISM PROSECUTIONS			5. FUNDING NUMBERS	
6. AUTHOR(S) Albert L. Kao				
7. PERFORMING ORGANIZATION NAME(S) AND ADDRESS(ES) Naval Postgraduate School Monterey, CA 93943-5000			8. PERFORMING ORGANIZATION REPORT NUMBER	
9. SPONSORING /MONITORING AGENCY NAME(S) AND ADDRESS(ES) N/A			10. SPONSORING/MONITORING AGENCY REPORT NUMBER	
11. SUPPLEMENTARY NOTES The views expressed in this thesis are those of the author and do not reflect the official policy or position of the Department of Defense or the U.S. government. IRB Protocol number ____ N/A ____.				
12a. DISTRIBUTION / AVAILABILITY STATEMENT Approved for public release; distribution is unlimited			12b. DISTRIBUTION CODE A	
13. ABSTRACT (maximum 200 words) After 9/11, anti-money laundering banking regulations were increased to counter terrorism finance. This study attempts to identify whether increasing banking regulations has countered terrorism finance by reviewing terrorism prosecutions. This study looked at federal terrorism prosecutions from January 2004 through April 2009. The study reviewed court documents and case backgrounds for indicators that anti-money laundering banking regulations were useful to the terrorism prosecution by either detecting terrorism financing or by supporting other charges, such as money laundering. The study did not find that banking regulations detected terrorist financing. The avoidance of banking regulations was used to support money laundering charges in two cases; however, pre-9/11 regulations would have sufficed. The study found that increasing anti-money laundering banking regulations had limited effects on countering terrorism financing. How anti-money laundering banking regulations are implemented within a counter-terrorism finance regime should be reevaluated.				
14. SUBJECT TERMS anti-money laundering, banking regulations, cash transaction reports, money laundering, terrorism finance, USA PATRIOT Act, confidential informants, prosecutions, Financial Action Task Force (FATF), Financial Crimes Enforcement Network (FinCEN), U.S. Department of Treasury			15. NUMBER OF PAGES 109	
			16. PRICE CODE	
17. SECURITY CLASSIFICATION OF REPORT Unclassified	18. SECURITY CLASSIFICATION OF THIS PAGE Unclassified	19. SECURITY CLASSIFICATION OF ABSTRACT Unclassified	20. LIMITATION OF ABSTRACT UU	

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Submitted in partial fulfillment of the
requirements for the degree of

**MASTER OF ARTS IN SECURITY STUDIES
(HOMELAND SECURITY AND DEFENSE)**

from the

**NAVAL POSTGRADUATE SCHOOL
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ABSTRACT

After 9/11, anti-money laundering banking regulations were increased to counter terrorism finance. This study attempts to identify whether increasing banking regulations has countered terrorism finance by reviewing terrorism prosecutions. This study looked at federal terrorism prosecutions from January 2004 through April 2009. The study reviewed court documents and case backgrounds for indicators that anti-money laundering banking regulations were useful to the terrorism prosecution by either detecting terrorism financing or by supporting other charges, such as money laundering. The study did not find that banking regulations detected terrorist financing. The avoidance of banking regulations was used to support money laundering charges in two cases; however, pre-9/11 regulations would have sufficed. The study found that increasing anti-money laundering banking regulations had limited effects on countering terrorism financing. How anti-money laundering banking regulations are implemented within a counter-terrorism finance regime should be reevaluated.

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TABLE OF CONTENTS

I.	INTRODUCTION.....	1
A.	PROBLEM STATEMENT	1
B.	RESEARCH QUESTION	2
II.	LITERATURE REVIEW	3
A.	POLICY TIMELINE.....	4
B.	DENYING TERRORIST GROUPS OF FINANCIAL RESOURCES MAY DISRUPT THEIR OPERATIONS	5
C.	COMMONALITIES OF TERRORIST GROUPS AND CRIMINAL ORGANIZATIONS	5
D.	BANKING REGULATIONS.....	6
E.	DIFFERENCES BETWEEN MONEY LAUNDERING AND TERRORISM FINANCE.....	6
1.	Money Laundering.....	7
2.	History of Money Laundering Laws	8
3.	U.S. Anti-Money Laundering/Counter Terrorism Finance Regime.....	10
4.	Discussion of Anti-Money Laundering Regulations and Statutes.....	11
F.	EFFECTIVENESS OF INCREASED BANKING REGULATION QUESTIONED.....	12
G.	CONCLUSION	14
III.	HYPOTHESIS.....	15
IV.	SIGNIFICANCE OF RESEARCH.....	17
V.	METHOD	19
A.	SEARCH FOR PUBLICALLY AVAILABLE DATA ON FEDERAL TERRORISM PROSECUTION.....	19
1.	Transactional Records Access Clearinghouse (TRAC).....	19
2.	Global Terrorism Database (GTD)	20
3.	Lexis-Nexis.....	20
4.	Bureau of Justice Statistics (BJS).....	21
5.	Investigative Project on Terrorism (IPT).....	21
6.	Terrorism Network and Financial Intelligence (TFI) and Financial Enforcement Network (FinCEN).....	21
B.	SAMPLE OF TERRORISM PROSECUTION	22
C.	QUESTIONS ASKED FOR EACH TERRORISM PROSECUTION	23
VI.	OVERVIEW OF DATA FOUND.....	25
VII.	FINDINGS 27	
A.	QUESTION 1: WERE MONEY LAUNDERING VIOLATIONS CHARGED?	27

B.	QUESTION 2: WERE FINANCIAL ACCOUNTS WITH FALSE IDENTITIES USED?.....	28
C.	QUESTION 3: WAS A SUBSTANTIAL AMOUNT OF MONEY INVOLVED?	28
D.	QUESTION 4: WERE CASH TRANSACTION REPORTS FILED BY A FINANCIAL INSTITUTION?.....	30
E.	QUESTION 5: WERE SUSPICIOUS TRANSACTION REPORTS FILED BY A FINANCIAL INSTITUTION?	31
F.	QUESTION 6: WAS THERE USE OF FOREIGN SHELL BANKS?	31
G.	QUESTION 7: WAS THE CASE A “STING OPERATION,” THAT WAS DEVELOPED OR PROPOSED BY INFORMANTS OR UNDERCOVER AGENTS?	32
VIII.	ANALYSIS OF FINDINGS	33
IX.	LIMITATIONS IN IDENTIFYING THE USEFULNESS OF REGULATIONS IN THIS STUDY	37
X.	FUTURE RESEARCH.....	39
XI.	CONCLUSION	41
APPENDIX A.	ALL TERRORISM RELATED CASES AND DEFENDANTS....	45
APPENDIX B.	CASES WITH BACKGROUND INFORMATION FROM LEXIS-NEXIS	53
APPENDIX C.	CASES WITH BACKGROUND INFORMATION FROM IPT ..	57
APPENDIX D.	CASES WITH BACKGROUND INFORMATION FROM OPEN INTERNET SEARCHES	61
APPENDIX E.	CASES WITH NO BACKGROUND INFORMATION FOUND	63
APPENDIX F.	QUALITATIVE ANALYSIS RESULTS.....	67
	LIST OF REFERENCES	79
	INITIAL DISTRIBUTION LIST	85

LIST OF TABLES

Table 1.	Terrorism Related Statues, According to the Administrative Office of the United States Courts	22
Table 2.	All Terrorism Related Cases and Defendants	45
Table 3.	Cases w/Background Information from Lexis-Nexis	53
Table 4.	Cases w/Background Information from IPT	57
Table 5.	Cases with Background Information from Open Internet Searches	61
Table 6.	Cases with no Background Information Found	63
Table 7.	Qualitative Analysis Results	67

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LIST OF ACRONYMS AND ABBREVIATIONS

BJS	Bureau of Justice Statistics
CHDS	Center for Homeland Defense and Security
DHS	Department of Homeland Security
FATF	Financial Action Task Force
FinCEN	Financial Crimes Enforcement Network
GTD	Global Terrorism Database
IEEPA	International Economic Emergency Powers Act
IMF	International Monetary Fund
IPT	Investigative Project on Terrorism
IRS	Internal Revenue Service
NPS	Naval Postgraduate School
OFAC	Office of Foreign Assets Control
TFI	Terrorism Network and Financial Intelligence
TRAC	Transactional Records Access Clearinghouse
U.S.	United States of America
UK	United Kingdom
USA	United States of America
USA PATRIOT Act	Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act of 2001
USC	United States Code

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ACKNOWLEDGMENTS

I would like to extend my sincere thanks and appreciation to my advisor Lauren Fernandez. Without her feedback and inspiration, this thesis would not have been completed. I would also like to thank SAC Robert G. Bond (supervisor), who supported my effort to complete this opportunity with the CHDS program. A most hearty thanks and heartfelt appreciation goes to my wife, Becki S. Kao. Her support allowed me the time to complete the thesis. In addition, I would like to thank Veronica Epley, a CHDS classmate, who helped me carry on through the thesis process. Finally, I would like to extend my thanks to Catherine Grant, my editor, without whom this thesis literally would not have been completed.

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I. INTRODUCTION

A. PROBLEM STATEMENT

The United States increased banking regulations in response to the 9/11 attacks. The purpose was to combat terrorism financially by denying terrorists the use of U.S. financial institutions to fund and operate terror organizations. The United States adopted banking regulations recommended by the intergovernmental group, the Financial Action Task Force (FATF).¹ These banking regulations are essentially anti-money laundering regulations. Are the benefits of implementing increased anti-money laundering regulations greater than their costs? Has increasing anti-money laundering banking regulations detected terrorism finance and increased security?

One of the United States' first responses to the 9/11 attacks was to create its current counter terrorism finance regime. A large part of this regime was strengthening U.S. financial systems through legal and regulatory statutes. On October 26, 2001, the President signed into law the USA PATRIOT Act. Title III of the act expanded the government's anti-money laundering programs and increased anti-money laundering banking regulations. The act implemented regulations that the banking industry opposed and had successfully defeated prior to 9/11 because of implementation costs.

Terrorist organizations need finances to operate and conduct attacks so a reasonable counter terrorism strategy is to target terrorism financing. What is less clear is an understanding of terrorism financing and how to efficiently respond to it. Anti-money laundering banking regulations were designed to detect large cash transactions generated by criminal narcotics organizations. Are these regulations effective at detecting and deterring terrorism transactions? According to the *9/11 Commission Report*² and the

¹ Financial Action Task Force, "FATF Members and Observers," last modified 2009, http://www.fatf-gafi.org/pages/0,3417,en_32250379_32236869_1_1_1_1_00.html (accessed May 25, 2009).

² United States National Commission on Terrorist Attacks upon the United States [9/11 Commission]. *The 9/11 Commission Report: Final Report of the National Commission on Terrorist Attacks upon the United States* (New York: W. W. Norton & Company, 2004).

Monograph on Terrorist Financing,³ with the pre-9/11 anti-money laundering banking regulations, financial institutions did not suspect or report any criminal or terrorism activity regarding any of the financial transactions related to the 9/11 attack. No evidence was found of bank accounts opened with false identities. No cash transaction reports or suspicious activity reports were filed by any financial institutions.

It is worth noting that the goals and financial resources of criminal organizations are different than those of terrorists. The goal of criminal organizations is the accumulation of wealth. The goal of terrorists is political or ideological action or change. The sources of funds also differ. The source of criminal funds is usually cash derived from illicit sales or activities. The source of terrorist funds may be from legitimate activities, such as fund raising and donations from unwitting donors. Because terrorism financing is not necessarily cash intensive, it is questionable whether anti-money laundering banking regulations are useful in terrorism prosecutions or in detecting terrorist financing to counter terrorism finance

The assumption that increased anti-money laundering banking regulations are effective in countering terrorism financing should be evaluated. If the assumption is incorrect, increased banking regulations are not increasing security and are an inefficient use of U.S. resources.

B. RESEARCH QUESTION

Are anti-money laundering banking regulations useful in terrorism prosecutions?

³ John Roth, Douglas Greenburg, and Serena Wille, *Monograph on Terrorist Financing: National Commission on Terrorist Attacks upon the United States, Staff Report to the Commission* (Washington D.C.: United States National Commission on Terrorist Attacks upon the United States, 2004), 53.

II. LITERATURE REVIEW

The topic of counter terrorism finance inter-relates many well studied areas such as terrorism, money laundering, financial systems, and banking regulation. Because these areas are well studied, literature on the increase of anti-money laundering statutes following the 9/11 attacks is vast. Literature includes U.S. government reports, strategies, and testimony. It also includes scholarly and industry studies, articles, journals, books, foreign and intergovernmental, and non-governmental organization reports.

The U.S. government publishes volumes of reports, strategies, and testimony on this topic. Key reports include the *9/11 Commission Report*⁴ and the *Monograph on Terrorist Financing*.⁵ They provide an unclassified study of al Qaeda fund raising and the financial details of the 9/11 attack. They also provide a history of efforts to combat money-laundering and terrorism finance before and after the 9/11 attacks. The U.S. government publishes national strategies, such as the *National Money Laundering Treat Assessments and Strategies*,⁶ which discuss anti-money laundering policy and efforts and how they affect terrorism financing. Furthermore, the Government Accounting Office and the Congressional Research Services provide reports that analyze testimony,⁷ laws,⁸ and policies. Moreover, U.S. government agencies also individually publish reports and bulletins on counter terrorism finance, such as FinCEN Suspicious Activity Report Bulletins.⁹ These reports provide banking institutions with guidance on how to comply with banking regulations.

⁴ 9/11 Commission, *The 9/11 Commission Report*, 85.

⁵ Roth, Greenburg, and Wille, *Monograph of Terrorist Financing*.

⁶ U.S. Departments of Treasury, Justice and Homeland Security, *2007 National Money Laundering Strategy* (Washington, D.C.: U.S. Departments of Treasury, Justice and Homeland Security, 2007), http://www.fincen.gov/news_room/rp/nmls.html (accessed November 23, 2012).

⁷ U.S. Government Accountability Office, "Testimony before the Caucus on International Narcotics Control: U.S. Senate," in *Combating Terrorism: Federal Agencies Face Continuing Challenges in Addressing Terrorist Financing and Money Laundering* (Report 04-501T) (Washington, D.C.: Government Printing Office, 2004).

⁸ M. M. Murphy *International Money Laundering Abatement and Anti-Terrorist Financing Act of 2001, Title III of P.L. 107-56* (Washington, D.C.: Congressional Research Service, 2001).

⁹ *FinCEN SAR Bulletin*, no 4 (January 2002).

Scholarly and industry studies, articles, and reports have been written on the U.S. counter terrorism actions. Its actions affect many areas of study, such as terrorism, economics, financial systems, and the banking industry. Multiple journals on each of these subjects discuss and analyze the effect of U.S. actions on these subject areas. Many of the studies are published as books, such as *Terrorism Financing and State Responses*.¹⁰

Intergovernmental organizations such as the Financial Action Task Force (FATF), the Egmont Group, and the United Nations publish reports on counter terrorism efforts and actions. The FATF was created by the G7 in 1989 to financially combat organized crime by combating money-laundering. In 2001, it expanded its mission to include combating terrorist financing. The FATF recommends countering terrorism finance by implementing strategies and regulations used against money laundering.¹¹ The Egmont Group is an intergovernmental organization made up of financial intelligence units of participating nations. The units exchange intelligence in order to combat money-laundering and terrorist financing. The United Nations has adopted an International Convention for the Suppression of the Financing of Terrorism and created a working group in 2005 to tackle the finance of terrorism. These organizations publish reports on actions taken and recommendations on how to counter terrorist financing.

A. POLICY TIMELINE

Common to most of the literature is a timeline for anti-money laundering policy, which becomes understandably focused on counter-terrorism finance after 9/11.¹² Terrorism and terrorism finance were international topics before 9/11; however, linking anti-money laundering banking regulations to counter terrorism finance was not proposed until after 9/11. Before 9/11, the U.S. government had unsuccessfully pushed for

¹⁰ Jeanne Giraldo and Harold Trinkunas, *Terrorism Financing and State Responses* (Stanford, CA: Stanford University Press, 2007).

¹¹ Financial Action Task Force, “The 40 Recommendations,” October 2004, <http://www.fatf-gafi.org/topics/fatfrecommendations/documents/the40recommendationspublishedoctober2004.html> (accessed January 13, 2013).

¹² Donato Masciandaro, “Combating Black Money: Money Laundering and Terrorism Finance, International Cooperation and the G8 Role” (draft) (paper prepared for at Security, Prosperity and Freedom: Why America needs the G8, conference, Bloomington, IN, June 3–4, 2004).

stronger anti-money laundering banking regulations that would provide law enforcement with more access to financial records at financial institutions. After 9/11, with the desire for greater security, resistance to stronger banking regulations waned and previously defeated proposals to increase anti-money laundering regulations were passed as part of the USA PATRIOT Act.¹³

B. DENYING TERRORIST GROUPS OF FINANCIAL RESOURCES MAY DISRUPT THEIR OPERATIONS

The consensus is that terrorist groups, like any other organization, need finances to operate. Financing is a chokepoint that governments can target to counter terrorism in general.¹⁴ Treasury Secretary Matthew Levitt testified, “Terrorist networks need cash to train, equip, and pay operatives, to secure materials, and to promote their cause.”¹⁵ The intergovernmental group, FATF, recommend identifying and freezing the assets of terrorist organizations to suppress their activities.¹⁶

C. COMMONALITIES OF TERRORIST GROUPS AND CRIMINAL ORGANIZATIONS

Terrorist and criminal organizations are both illegal. Because of this, both also need to conceal the nature of their financial transactions to avoid government detection and scrutiny. After 9/11, anti-money laundering strategies and banking regulations were increased to counter terrorism finance because of these similarities. The USA PATRIOT Act is described as significant anti-money laundering legislation designed to prevent terrorist and others from anonymously using the U.S. financial system for illegal

¹³ Eleni Tsingou, “Global Governance and Transnational Financial Crime: Opportunities and Tensions in the Global Anti-Money Laundering Regime” (working paper no 161/05, Centre for the Study of Globalisation and Regionalisation, University of Warwick, Coventry, UK, 2005).

¹⁴ W. Rich, “Money Laundering and Terrorist Financing: The Buck Stops Where?” *Policy Matters Journal* (fall 2008).

¹⁵ Matthew Levitt, “Testimony before the House Armed Services Committee Subcommittee on Terrorism, Unconventional Threats and Capabilities,” in *Tracking and Disrupting Terrorist Financial Networks: A Potential Model for Interagency Success?* (H.A.S.C. No. 111–20), (Washington, D.C.: Government Printing Office, 2010), 29, http://www.fas.org/irp/congress/2009_hr/financial.pdf (accessed January 13, 2013).

¹⁶ Financial Action Task Force, *FATF IX Special Recommendations*, October 2001, <http://www.fatf-gafi.org/media/fatf/documents/reports/FATF%20Standards%20-%20IX%20Special%20Recommendations%20and%20IN%20rc.pdf> (accessed January 14, 2013).

activity.¹⁷ After 9/11, the terms anti-money laundering and counter terrorism finance became almost synonymous. The acronym AML/CTF (Anti-Money Laundering/Counter Terrorism Finance) is often now used to describe what was once described as only AML.

D. BANKING REGULATIONS

The USA PATRIOT Act increased record keeping and reporting requirements on financial institutions. It also expanded the types of financial institutions that the requirements applied to. For example, the act requires that financial institutions have AML policies, and controls, a designated AML compliance officer, on-going employee-training programs, and an independent audit function.¹⁸ Policies now include greater requirements for verifying customer identity, filing currency transaction and suspicious activity reports, and creating and maintaining reports requested by law enforcement. Programs include education and training for reporting requirements and detecting suspicious transactions.

E. DIFFERENCES BETWEEN MONEY LAUNDERING AND TERRORISM FINANCE

The literature acknowledges that money laundering and terrorism finance are different. The goal of most criminal groups is to acquire wealth. The goal of terrorist groups is to effect political or ideological action or change. Criminal groups accumulate large amounts of illicit funding, which is often cash and must be laundered to avoid detection. Terrorist groups accumulate large or small amounts funding, which may not be cash and can be from legitimate sources such as donations to charities. Terrorist financing has been described as reverse money laundering because in terrorism finance, money changes from legitimate to illicit as it is used for terrorism purposes.¹⁹ The *Monograph on Terrorism Financing* acknowledges that even if today's counter terrorism

¹⁷ Murphy, *International Money Laundering*.

¹⁸ Harvey Silets and Carol Van Cleef, "Compliance Issues in the Wake of the USA PATRIOT Act," *Journal of Financial Crime*, 10, no. 4: (2003).

¹⁹ Mariano-Florentino Cuéllar, "The Tenuous Relationship between the Fight against Money Laundering and the Disruption of Criminal Finance," *Journal of Criminal Law and Criminology* (1973-), 93, no. 2/3 (Winter-Spring 2003): 311–466.

banking regulations were in place before 9/11, the attackers would not have been detected by their financial transactions.²⁰ They did not provide false identification to open accounts and their transactions were not unusual.

1. Money Laundering

Anecdotally, money laundering is the “cleaning of dirty money.” Money is considered “dirty” when the money is the proceeds from criminal activity. Dirty money must be “cleaned” so that spending the proceeds does not draw the attention of law enforcement,²¹ which is interested in identifying and stopping criminal activity. Dirty money is cleaned by conducting financial transactions in a manner that makes the money appear to be from legitimate activity and/or in a manner that deflects the attention of law enforcement.²² The proceeds of criminal activity are often very large amounts of cash. Cash is the preferred method of payment for criminal activity because it is difficult to trace. Imagine instead if checks or credit cards were used as payment for criminal activities, such as corruption, prostitution, or illegal narcotics. The checks and electronic funds transfer data between accounts would permanently record the transaction, forever linking the parties, and it could potentially serve as evidence in a criminal trial.

The FINCEN²³ describes the process of money laundering as three steps: placement, layering, and integration. First, illegitimate funds are furtively introduced (placed) into the legitimate financial system. Then, the money is moved around (layered) to create confusion, sometimes by wiring or transferring through numerous accounts. Finally, it is integrated into the financial system through additional transactions until the dirty money appears clean.

²⁰ Roth, Greenburg, and Wille, *Monograph of Terrorist Financing*.

²¹ International Monetary Fund, “Anti-Money Laundering/Combating the Financing of Terrorism: Topics,” accessed November 10, 2012, <http://www.imf.org/external/np/leg/amlcft/eng/aml1.htm#moneylaundering> (accessed November 10, 2012).

²² Clarissa Rudinsky and Suzanne Fanelli, “What do the Bank Secrecy Act and Anti-Money-Laundering Have in Common with Small Business Lending?” *The RMA Journal* 88, no. 6 (2006): 46–48.

²³ FinCEN “History of Anti-Money Laundering Laws,” http://www.fincen.gov/news_room/aml_history.html (accessed May 28, 2012).

2. History of Money Laundering Laws

U.S. federal law defines money laundering as “the movement of illicit cash or cash equivalent proceeds into, out of, or through the United States, or into, out of, or through United States financial institutions.”²⁴

To prevent the use of United States financial institutions for money laundering, the United States has passed the following acts:²⁵

- Bank Secrecy Act (1970)
- Money Laundering Control Act (1986)
- Anti-Drug Abuse Act of 1988
- Annunzio-Wylie Anti-Money Laundering Act (1992)
- Money Laundering Suppression Act (1994)
- Money Laundering and Financial Crimes Strategy Act (1998)

In general, these acts created banking regulations requiring financial institutions to maintain record keeping of transactions, source of funds, and the identity of individuals making transactions.

Because criminal proceeds are often large amounts of cash, and, because the goal of money laundering is to disguise or conceal large amounts of cash, anti-money laundering banking regulations focus on identifying large amounts of cash. The Bank Secrecy Act (1970) introduced banking regulation to identify the movement of large amounts of cash in and out of financial institutions. The most well-known regulation requires banks and credit unions to report all cash transactions in an amount greater than \$10,000 to government authorities and regulators. Financial institutions are also required to report any suspicious activity to avoid the cash reporting requirement, such as making repeated transactions just under \$10,000 within a 24-hour period. The Anti-Drug Abuse Act of 1988 expanded the definition of financial institutions to include businesses where large amounts of criminal cash proceeds might be spent, such as car and boat dealerships, real estate brokers, and precious metals dealers.

²⁴ 31 U.S.C. § 5340(2).

²⁵ “History of Anti-Money Laundering Laws.”

The other acts regulations and statutes were designed to identify to cash proceeds moving through financial institutions as criminals attempt to deposit or spend the criminal cash proceeds.

These acts also made money laundering a United States federal crime. Money and financial instruments are fungible and not inherently illicit. To criminalize money laundering, the acts created statutes that define illegal sources and purposes of money. These are called specified unlawful activities. Conducting financial transactions with money from, or the “proceeds” of, specified unlawful activities is then defined as money laundering. In addition, conducting financial transactions for the purpose of or to “promote” specified unlawful activities is also defined as money laundering. The following U.S. federal laws are statutes that define; money laundering, specified unlawful activities, and financial institutions. They are also statutes used to prosecute money laundering violations:

- 18 USC § 1956: Laundering of Monetary Instruments²⁶
 - In general, this statute makes it illegal to conduct a financial transaction with proceeds of a specified unlawful activity at a financial institution with the purpose of promoting or carrying on the specified unlawful activity, evading taxes, or avoiding reporting requirements.
- 18 USC § 1957: Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity²⁷
 - In general, this statute makes it illegal to simply deposit proceeds of a specified unlawful activity into a financial institution.
- 18 USC § 1961: Definitions²⁸
 - Defines what activities are Specified Unlawful Activities.

²⁶ Cornell University Law School, “18 USC § 1956 Laundering of Monetary Instruments,” last modified 2012, <http://www.law.cornell.edu/uscode/text/18/1956> (accessed May 29, 2012).

²⁷ Cornell University Law School, “18 USC § 1957 Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity,” last modified 2012, <http://www.law.cornell.edu/uscode/text/18/1957> (accessed May 29, 2012).

²⁸ Cornell University Law School, “18 USC § 1961 Definitions,” last modified 2012, <http://www.law.cornell.edu/uscode/text/18/1961> (accessed May 29, 2012).

- 31 USC § 5312: Definition and Application²⁹
 - Defines financial institutions.
- 31 USC § 5340: Definition and Application³⁰
 - Defines money laundering.

The regulations and statutes work together to identify and prevent money laundering. For example, the regulations requiring financial institutions to report cash and suspicious activity to authorities enable the detection of possible money laundering activity. The statutes enable authorities to prosecute money laundering activity. In addition, thorough record keeping by financial institutions enables the investigation of current and past financial transactions once criminal activity of any kind is detected.

3. U.S. Anti-Money Laundering/Counter Terrorism Finance Regime

After the 9/11 attacks, the United States began a campaign to “Starve the Terrorist of Funding.”³¹ The United States sought to accomplish this by creating a financial regulatory regime that could detect, investigate, deter, and disrupt terrorist financing.³² The regime combined the efforts of multiple Department of Treasury agencies and initiatives.³³

- The Office of Foreign Assets Control (OFAC), which enforces international sanctions and has blocked assets of terrorist groups through application of the Executive Order 13224 issued under the International Economic Emergency Powers Act (IEEPA).
- The Financial Crimes Network (FinCEN), which enforces banking regulations.
- The Department of Treasury itself through international Initiatives with multi-national bodies:

²⁹Cornell University Law School, “31 USC § 5312 Definitions and Application,” last modified 2012, <http://www.law.cornell.edu/uscode/text/31/5312> (accessed May 29, 2012).

³⁰ Office of the Law Revision Counsel, “Office of the Law Revision Counsel, U.S. House of Representatives,” last modified January 2012, [http://law2.house.gov/uscode-cgi/fastweb.exe?getdoc+uscview+t29t32+2095+0++\(\)%20%20AND%20](http://law2.house.gov/uscode-cgi/fastweb.exe?getdoc+uscview+t29t32+2095+0++()%20%20AND%20) (accessed October 27, 2012).

³¹ Rensselaer Lee, *Terrorist Financing: The U.S. and International Response* (Washington, D.C.: Congressional Research Service, 2002), 1.

³² Roth, Greenburg and Wille, *Monograph of Terrorist Financing*.

³³ Stuart Levey, *Testimony before the House Financial Service Committee* (Washington, D.C.: Office of Public Affairs, U.S. Department of Treasury, 2004).

- The Financial Action Task Force (FATF), which creates international standards to combat money laundering and the financing of terrorism and proliferation,³⁴
- The International Monetary Fund (IMF),
- The World Bank, and
- The G7.
- The Bank Secrecy Act Advisory Group, which is a public-private outreach program.
- Internal Revenue Service Criminal Investigations, which investigates financial crimes.

After 09/11, the following two acts were passed enhancing money laundering regulations and statutes so that they may be used to detect and prosecute terrorism:³⁵

- Uniting and Strengthening America by Providing Appropriate Tools to Restrict, Intercept and Obstruct Terrorism Act of 2001 (USA PATRIOT Act).
- Intelligence Reform & Terrorism Prevention Act of 2004.

These acts made financing terrorism a federal crime.³⁶ They expanded existing money laundering regulations and added statutes making financial support of terrorism a specified unlawful activity. The acts expanded record keeping requirements by financial institutions. For example, institutions have increased customer identification requirements. Additionally, institutions must expand records access to regulators and must respond within 120 hours. The focus of regulations has also expanded to foreign banking. Institutions are prohibited from conducting business with foreign shell banks. The money laundering definition of financial institution was expanded to include foreign banks and money transmitting businesses.

4. Discussion of Anti-Money Laundering Regulations and Statutes

The goal of a counter terrorism finance regime is to starve terrorist organization of financing through detection, deterrence, and prosecution. The USA PATRIOT Act

³⁴ Financial Action Task Force, “Who Are We?” last modified 2012, <http://www.fatf-gafi.org/pages/aboutus/> (accessed January 13, 2013).

³⁵ “History of Anti-Money Laundering Laws.”

³⁶ FinCEN, “USA PATRIOT Act, http://www.fincen.gov/statutes_regs/patriot/ (accessed November 4, 2012).

and the FATF made anti-money laundering regulations and statutes a tool to be used toward achieving that goal by criminalizing terrorism finance and making the support of a terrorism organization a specified unlawful and prosecutable activity.

Anti-money laundering regulations and statutes were designed to detect, deter, and prosecute money laundering. Money laundering is the effort to disguise or conceal the proceeds of criminal activity, which are often large amounts of cash. Anti-money laundering banking regulations are designed to detect large amounts of cash. In contrast to criminal activity, large amounts of cash are not a characteristic of terrorism finance. Criminalizing terrorism finance is useful because it enables the government to use anti-money laundering statutes to charge money laundering violations in terrorism prosecutions. However, it is questionable whether increasing anti-money laundering banking regulations is useful to detecting or countering terrorism finance

F. EFFECTIVENESS OF INCREASED BANKING REGULATION QUESTIONED

The effectiveness of anti-money laundering regimes is not well studied.³⁷ Both the costs of implementing anti-money laundering banking regulations and the benefit of implementation are difficult to measure. Even so, attempts have been made to measure the cost. An Australian study estimates that in the years 2006 and 2007, Australian banks spent a total of 1.02 billion Australian dollars on compliance costs to implement new anti-money laundering regulations.³⁸ A U.S. study estimated that from 2005 to 2007, the cost of anti-money laundering compliance to North American banks increased by 71 percent.³⁹ What are difficult to measure are the opportunity costs for the banking industry and banking consumers. The benefits are more difficult to measure. The total amount of criminal and terrorism transactions existing within financial institutions is unknown. Accordingly, the increase in security is difficult to measure. Anti-money

³⁷ Peter Sproat, "The New Policing of Assets and the New Assets of Policing," *Journal of Money Laundering Control* 10, no. 3 (2007): 277–299, doi: 10.1108/13685200710763461.

³⁸ Milind Saythe, "Estimating the Cost of Compliance of AMLCTF for Financial Institutions in Australia," *Journal of Financial Crime* 15, no 4, 2008.

³⁹ KPMG, *Global Anti-Money Laundering Survey 2007: How Banks are Facing up to the Challenge*, last modified 2007, <http://us.kpmg.com/microsite/fslibrarydotcom/docs/AML2007FULL.pdf> (accessed January 12, 2013), 14.

laundering regulations target large cash transactions; however, large cash transactions are not typical for terrorism financing. The 9/11 attack was financed with wire transfers and travelers checks.

Passas challenges the view that the U.S. and international frameworks regulating terrorist finance and money laundering are productive and effective and describe the policy making as “fact-free.”⁴⁰ Similarly, Tsingou concludes that the inclusion of counter terrorism in an anti-money laundering regime is merely a cosmetic exercise to address the need for “public” action.⁴¹

The USA PATRIOT Act includes anti-money laundering banking regulations that the government attempted to enact before 9/11. The banking industry successfully defeated these regulations before 9/11 because they claimed that they were costly and burdensome to implement. The banking industry successfully argued that it was not clear if the benefits of the increased banking regulations were greater than their costs. The desire for increased national security following 9/11 enabled the government to pass the regulations.

The goals of the Title III of the USA PATRIOT Act are “to detect, prevent, deter, and punish money laundering and the financing of terrorist groups.”⁴² Studies should be conducted to evaluate whether banking regulations enacted are accomplishing any of those goals. It should be noted, however, that not all accomplishments are measurable. Deterrence cannot be measured since terrorists are unlikely to notify authorities of failed or aborted financing attempts. Furthermore, detection and prevention may be difficult to measure because banking regulation may have provided the U.S. government with intelligence enabling the disruption of groups or of specific attacks. Knowledge of such disruptions may be classified, which makes them difficult to measure. Detection leading

⁴⁰ Nikos Passas, “Fighting Terror with Error: The Counter-Productive Regulation of Informal Value Transfers,” *Crime Law Social Change* 45, no. 4 (2006).

⁴¹ Tsingou, *Global Governance and Transnational Financial Crime*.

⁴² U.S. Departments of Treasury, Justice, and Homeland Security, *2002 U.S. National Money Laundering Strategy* (Washington, D.C.: U.S. Departments of Treasury, Justice, and Homeland Security, 2002).

to criminal prosecutions is not classified and can be measured. Although this measure may not be representative of all accomplishments, its study will begin to provide some measure of the effectiveness of regulations.

G. CONCLUSION

The counter terrorism banking regulations enacted with the USA PATRIOT Act were based on theoretical and anecdotal reasons relating the crime of terrorism to the crime of money laundering. The regulations were not based on empirical findings or research because none existed at the time the USA PATRIOT Act was passed. Counter terrorism finance literature is conflicted as to whether or not the regulations are actually effective to counter terrorism finance. Without empirical findings or research, the effectiveness of counter terrorism banking regulations will not be known.

III. HYPOTHESIS

One of the purposes of the USA PATIOT Act was to increase “the strength of U.S. measures to prevent, detect, and prosecute international money laundering and the financing of terrorism”⁴³ using increased anti-money laundering banking regulations. If the increased banking regulations do not achieved this purpose, then the regulations are placing an unnecessary burden on the banking industry by adding cost with no benefit. Nine years have elapsed since financial institutions were required to implement the new banking regulations in 2003. Empirical evidence may now exist to indicate whether or not the banking regulations of the USA PATRIOT Act are preventing, detecting, or prosecuting international money laundering and the financing of terrorism.

The hypothesis of this thesis is that anti-money laundering regulations are not useful to terrorism prosecutions. Although terrorism organizations and criminal enterprises share the objective of obscuring financial transactions from government scrutiny, the nature of their financial activity are different. Anti-money laundering banking regulations are designed to detect large amounts of cash transactions derived from criminal activity. Because terrorism financial transactions are not necessarily large, cash, or derived from criminal activity, the banking regulations may not be able to detect terrorism financial transactions.

⁴³ Murphy, *International Money Laundering*, 2.

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IV. SIGNIFICANCE OF RESEARCH

The benefits of anti-money laundering banking regulations should be greater than their costs. The United States increased its anti-money laundering banking regulations to counter terrorism finance following the 9/11 without data indicating that the benefits of the increasing regulations would be greater than the costs. This research tests whether there was any benefit to increasing anti-money laundering banking regulations to counter terrorism finance by reviewing terrorism prosecutions for any use of banking regulations. If there are no benefits to be found then increasing banking regulations may be an unnecessary response to a terrorist attack. Governments must balance the benefits of national security against the costs. The costs of security include not only economic costs, but also privacy costs and the loss of freedom. A goal of terrorism is to illicit unsustainable security responses that will weaken the government.⁴⁴ If the regulation increase was an unnecessary reaction, then the 9/11 terrorist attacks will have succeeded in causing the United States to unnecessarily increase banking regulations, creating economic costs and decreasing freedom—without any increase to security.

Policymakers need information relating to the increase in anti-money laundering banking regulations to increases in security to conclude whether the increases were effective and whether the increases should remain in effect.

This study questions whether any anti-money laundering regulations or statutes have resulted in any counter-terrorism prosecutions and what role anti-money laundering banking regulations may have played in those prosecutions.

⁴⁴ Mike German, *Thinking like a Terrorist: Insights of a Former FBI Undercover Agent* (Dulles, VA: Potomac Books, 2007), 110.

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V. METHOD

This study is a qualitative data analysis of publically available federal terrorism prosecution data. The study examined the data for the possible use of anti-money laundering banking regulations in federal terrorism prosecutions. If court documents reveal that banking identification checks, cash transaction reports, or suspicious activity reports detected the terrorism activity or were used in the prosecution, then anti-money laundering banking regulations are useful to terrorism prosecutions and the countering of terrorism finance.

The study identified a sample of federal terrorism prosecutions. For each prosecution, publically available information was gathered and entered in a data abstraction form. The form included a set of questions about each case to evaluate the applicability of anti-money laundering banking regulations to the case and whether or not banking regulations were used to detect the terrorism finance. The study then analyzed the data collected for the usefulness of anti-money laundering banking regulations to federal terrorism prosecutions.

A. SEARCH FOR PUBLICALLY AVAILABLE DATA ON FEDERAL TERRORISM PROSECUTION

The below sources were reviewed for federal terrorism prosecution data. All of the sources were accessed by the Internet. The sources are maintained by the government, private companies, non-profit organizations, and universities. Some of the sources required a subscription for access. The name and description of the sources reviewed follow.

1. Transactional Records Access Clearinghouse (TRAC)⁴⁵

TRAC is maintained by Syracuse University, a private institution located in Syracuse, New York. TRAC gathers and researches data on staffing, spending, enforcement and regulatory activities of the United States government. To do this,

⁴⁵ Transactional Records Access Clearinghouse, "About Us," last modified 2011, <http://trac.syr.edu/aboutTRACgeneral.html> (accessed October 02, 2011).

TRAC systematically obtains data through Freedom of Information Act (FIOA) requests. In addition, TRAC provides data such as prosecution type, docket numbers, demographics of the defendants, jurisdiction, the names of counsel and the presiding judge, charges, status of the case, and sentencing information if any. TRAC also organizes the data into reports based on agency, charge, or category. Some access requires a subscription to obtain detailed information. The data within TRAC is more statistical in nature and does not provide case background information or discussions. Moreover, TRAC does not provide information that would identify whether or anti-money laundering banking regulations or statutes were related or useful to terrorism prosecutions.

2. Global Terrorism Database (GTD)⁴⁶

This database is maintained by the Study of Terrorism and Response to Terrorism Program (START) at the University of Maryland, a public institution located in College Park, Maryland. GTD compiles data on terrorist attacks both domestically and internationally. It provides data on the attack such as: date, location, duration, mode, and weapons used. In addition, GTD also provides the groups claiming responsibility, the type of group, and the number of injured and casualties. START compiles this information by analyzing open source information. Like TRAC, GTD does not provide case background information or discussions. Furthermore, GTD not provide information that would identify whether anti-money laundering banking regulations or statutes were related or useful to terrorism prosecutions.

3. Lexis-Nexis⁴⁷

This database is maintained by a private enterprise. Lexis-Nexis is a very large database of legal and public-records and has many product lines that provide access to legal documents as well as periodicals, magazines, and journals. Lexis-Nexis requires a subscription for access. It provides court filings and opinions for cases in federal court.

⁴⁶ National Consortium for the Study of Terrorism and Responses to Terrorism, “Overview of the GTD,” Global Terrorism Database [data file], last modified 2011, <http://www.start.umd.edu/gtd/about/> (accessed January 13, 2013).

⁴⁷ Lexis Nexis, “LexisNexis Academic,” <http://www.lexisnexis.com/en-us/products/lexisnexis-academic.page> (accessed January 14, 2013).

Court filings and opinions include case descriptions and background. Lexis-Nexis does provide information that can identify whether anti-money laundering banking regulations or statutes were related or useful to terrorism prosecutions.

4. Bureau of Justice Statistics (BJS)⁴⁸

This database is maintained by the Department of Justice (DOJ), a government agency. BJS is a clearing house of prosecution and investigation information. In addition, BJS is a data analysis tool that provides statistical and demographic data on crime. Unlike Lexis-Nexis, BJS does not provide case background information or discussions. Moreover, BJS does not provide information that can identify whether anti-money laundering banking regulations or statutes were related or useful to terrorism prosecutions.

5. Investigative Project on Terrorism (IPT)⁴⁹

This website is maintained by a nonprofit research group. IPT contains a library of court documents and Department of Justice public announcements for selected terrorism prosecutions. The group investigates the operation, funding, and activities of Islamic terrorist and extremist groups. Court documents included: affidavits, criminal complaints, motions, indictments, rulings, judgments, and Department of Justice press releases. IPT did not provide each type of document for each case; however, these documents contain case descriptions and background. IPT does provide information that can identify whether anti-money laundering banking regulations or statutes were related or useful to terrorism prosecutions.

6. Terrorism Network and Financial Intelligence (TFI) and Financial Enforcement Network (FinCEN)

Data available at Websites maintained by the office of Terrorism and Financial Intelligence (TFI)⁵⁰ and its subordinate bureau, the Financial Crimes Enforcement

⁴⁸ Bureau of Justice Statistics, "Office of Justice Programs," last modified 2013, <http://bjs.ojp.usdoj.gov/index.cfm?ty=tp&tid=62> (accessed January 14, 2013).

⁴⁹ Investigative Project on Terrorism, "About the Investigative Project on Terrorism," last modified 2010, <http://www.investigativeproject.org/about.php> (accessed January, 14, 2013).

Network (FinCEN),⁵¹ were also reviewed. This office and bureau are part of the Department of Treasury. TFI develops and implements strategies to combat criminal and terrorism finance domestically and internationally. FinCEN regulates financial institutions and enforces banking regulations. FinCEN also collects, analyzes, and disseminates regulatory data, such as cash reporting data to other federal, state, and local government agencies as well as to foreign governments to assist with the global detection and deterrence of financial crime. Both of the websites provide public and media announcements that sometimes contain federal prosecution information. Neither of the websites provides libraries or data on federal prosecutions that provide case background information or discussions, which could establish links between banking regulations and federal prosecutions.

B. SAMPLE OF TERRORISM PROSECUTION

The study began with a TRAC report on federal terrorism prosecutions from January 2004 through April 2009. TRAC provides a listing of terrorism cases in U.S. federal court based on the Administrative Office of the United States Courts' definition of a terrorism related prosecution. The Administrative Office of the United States Courts identifies a case as terrorism related if the defendant is charged with at least one of the terrorism related statutes in Table 1:

Table 1. Terrorism Related Statutes, According to the Administrative Office of the United States Courts⁵²

Statutory Charge	Description
18 U.S.C. 1038	False information and hoaxes.
18 U.S.C. 1993	Terrorist attacks and other acts of violence; terrorist attacks and other acts of violence against public transportation systems.

⁵⁰ U.S. Department of Treasury, "Terrorism and Financial Intelligence: About," <http://www.treasury.gov/about/organizational-structure/offices/Pages/Office-of-Terrorism-and-Financial-Intelligence.aspx> (accessed January 14, 2013).

⁵¹ FinCEN, "Welcome to FinCEN" <http://www.fincen.gov/> (accessed January 14, 2013).

⁵² Syracuse University, "Alternative Federal Definitions of Terrorism Criminal Cases," Transactional Records Access Clearinghouse, last modified 2009, <http://trac.syr.edu/tracreports/terrorism/215/include/definitions.html> (accessed December 06, 2012).

Statutory Charge	Description
18 U.S.C. 2332a-2332h	Criminal penalties for terrorism; Use of certain weapons of mass destruction; Acts of terrorism transcending nation boundaries; Financial transactions related to terrorism; Bombing of places of public use.
18 U.S.C. 2339A-2339D	Harboring or concealing terrorists; Providing material support to terrorists; Providing material support or resources to terrorists.

The study contained 203 federal cases with 300 defendants charged with at least one of the above terrorism related charges as defined by the Administrative Office of the United States Courts. TRAC provided the docket number, district name, filing date, city, case name, defendant, presiding judge, and a list of counts with descriptions of the charges.

A list of all 300 defendants in 203 cases identified by TRAC as terrorism related is included in Table 2 (see Appendix A).

C. QUESTIONS ASKED FOR EACH TERRORISM PROSECUTION

For each federal terrorism prosecution, the study reviewed publicly available data to answer the below seven questions related to anti-money laundering banking regulations and statutes. The questions and their relevance to this study follow:

1. Were money laundering violations charged?
Charges would indicate that anti-money laundering statutes were useful to terrorism prosecution cases.
2. Were financial accounts with false identities used?
The USA PATRIOT Act increased banking regulations by requiring additional identification to open accounts. The use of false identities would indicate that the additional “know your customer” regulations were useful to terrorism prosecution cases.
3. Was substantial amount of money involved?
Anti-money laundering banking regulations and statutes focus on large cash transactions. The existence of large amount of money in terrorism cases could make anti-money laundering regulations requiring the reporting of large cash transactions or suspicious transaction useful to the detection and prosecution of terrorism finance. Aggregate totals greater than \$10,000 were considered substantial.

4. Were cash transaction reports filed by a financial institution?
Financial institutions filing cash transaction reports would indicate that anti-money laundering regulations requiring the reports were useful to terrorism prosecution cases.
5. Were suspicious transaction reports filed by a financial institution?
Financial institutions filing suspicious transaction reports would indicate that anti-money laundering regulations requiring the reports were useful to terrorism prosecution cases.
6. Was there use of foreign shell banks?
The USA PATRIOT Act prohibits banks from engaging in business with foreign shell banks. The existence of foreign shell banks in terrorism cases would indicate the prohibition of foreign shell banks is relevant to countering terrorism finance.
7. Was the case a “sting operation,” that was developed or proposed by informants or undercover agents?
One goal of anti-money laundering banking regulations is to detect criminal activity. If an investigation was developed or proposed by government informants or undercover agents, the benefit of detection by banking regulations is diminished.

The potential answer to each question is either yes or no. To answer these questions, this study relied on data found in:

- TRAC
- Lexis-Nexis
- IPT
- Internet searches

When no information was found in the Lexis-Nexis database or the IPT Website, the study conducted Internet searches to find background information on the terrorism by entering case information into the search engine Google.

The study did not rely on data from BJS, GTD, FinCEN, or TFI to answer the questions. These sources did not provide case descriptions, background, or details that would assist with answering the questions.

VI. OVERVIEW OF DATA FOUND

Data for each case and defendant was searched in Lexis-Nexis and IPT. Searches were conducted by using docket numbers, case names, defendant names, jurisdictions and presiding judge names. More detailed descriptions on how Lexis-Nexis and IPT were searched are below. Not every case was found in both data sources. If data could not be found in Lexis-Nexis or IPT, this study conducted open Internet searches only if money laundering was a charge.

Of the 203 cases, Lexis-Nexis provided case descriptions, backgrounds, legal opinions on 62 cases and 142 defendants. Lexis-Nexis was searched by:

- Selecting the catalog: U.S. District Court Cases, Combined
- Entering a primary search for: Allcaps (United States of America) and terrorism.

The catalog was selected to constrain data to retrieve only cases in federal court and to eliminate cases from local and state courts. The primary search constrained data to U.S. government criminal prosecutions and eliminated civil court proceedings. The study reviewed all criminal case descriptions and legal opinions for the 62 cases and other related cases with links created by Lexis-Nexis.

A list of cases reviewed in Lexis-Nexis is included in Table 3 (see Appendix B).

Of the 203 cases, IPT provided court documents on 47 cases and 81 defendants. The IPT Website has a Research Center with a catalog of court cases.⁵³ Each court case between the U.S. Government and a defendant (e.g., “USA v. Abdi”) was compared to all cases provided by TRAC. For each case, indictments, criminal complaints, or affidavits were reviewed. These documents were targeted because they provide case data that support the charges brought against the defendants. If these documents were not available, Department of Justice press releases were reviewed for case descriptions.

A list of cases reviewed in IPT is included in Table 4 (see Appendix C).

⁵³ Investigative Project on Terrorism, “Court Cases,” last modified 2010, <http://www.investigativeproject.org/cases.php> (accessed August 8, 2012).

Lexis-Nexis and IPT provided background information on 30 of the same cases and 60 of the same defendants. As expected, each source corroborated the other. There were no cases where information from one source conflicted with information from another source. In addition, Lexis-Nexis provided background information on 32 cases and 82 defendants that IPT did not. Similarly, IPT provided background information on 17 cases and 21 defendants that Lexis-Nexis did not. Lexis-Nexis and IPT provided background information on a total of 79 (62+17) cases and 163 (142+21) defendants. Lexis-Nexis and IPT did not provide background information on 124 (203-79) cases and 137 (300-163) defendants.

Of the 124 cases where Lexis-Nexis and IPT did not provide background information, the study conducted open Internet searches for data using case and defendant names. The study only considered information found in court documents or DOJ press releases to answer the seven anti-money laundering banking regulations and statutes related questions. The study found data on three cases and seven defendants.

A list of cases reviewed using data from open Internet searches is included in Table 5 (see Appendix D).

Of the 121 cases and 130 defendants where no background information was found on Lexis-Nexis, IPT or on the Internet, this study relied on the case information provided by TRAC: docket number, district name, filing date, city, case name, defendant, presiding judge, and a list of counts with descriptions of the charges.

Approximately half of the terrorism cases included charges for 18 U.S.C. 1038 False Information and Hoaxes, which is included in the Administrative Office of the United States Courts' definition of a terrorism related case. These include cases in which a defendant was alleged to have called or mailed in a bomb threat. If these cases did not involve other terrorism charges or if they were not argued or appealed, no background information was found in Lexis-Nexis or IPT.

A list of cases with no Lexis-Nexis, IPT, or Open Internet background information is included in Table 6 (see Appendix E).

VII. FINDINGS

The study answered each question for each defendant of each case. The study asked each question for each defendant, instead of once for each case for two reasons. First, some cases had multiple defendants who were sometimes charged with different crimes. Second, although the background information for a case is similar for each of the defendants, which made it difficult to answer each question separately, each defendant had the opportunity to finance the alleged terrorist activity. The results of the study are listed in Table 7 (see Appendix F).

A. QUESTION 1: WERE MONEY LAUNDERING VIOLATIONS CHARGED?

The goals of using anti-money laundering banking regulations and statutes for countering terrorism finance are to detect, deter, and punish terrorist financing. If a terrorism prosecution case included money laundering charges, it indicates that statutes were useful to terrorism prosecutions. If money laundering is charged, then court documents and case background should reveal if banking regulations were used to support the statute that was charged. Money laundering charge information was taken directly from the list of charges provided by TRAC and corroborated with court documents in IPT. If a defendant was charged with money laundering, this question was coded yes. If the defendant was not charged with money laundering, the question was coded no.

Money laundering was charged against 21 defendants or 7.0 percent of the 300 terrorism defendants in the TRAC report. Money laundering was charged in 10 terrorism cases or 4.9 percent of the 203 terrorism cases in the report. Charging 21 of the 300 terrorism defendants with money laundering indicates that anti-money laundering statutes were useful to 10 terrorism cases and 21 terrorism prosecutions. The usefulness of anti-money laundering regulations in the terrorism cases depended on case background and will be discussed in the section analyzing whether sting operations were used.

B. QUESTION 2: WERE FINANCIAL ACCOUNTS WITH FALSE IDENTITIES USED?

The USA PATRIOT Act increased banking regulations by requiring additional identification to open accounts. These increased regulations are commonly known as “know your customer” regulations. A qualitative review of the available case backgrounds and court documents was conducted to answer this question. If there was any discussion of the use of financial accounts under false identities, this question was coded yes. If there was not a discussion of financial accounts opened with false identities, this question was coded no. If no case background or court documents were available, the question was coded no.

In one case, or 0.5 percent of the 203 terrorism cases, the use of financial accounts under false identities was implied. In *US v. Al Kassar*, which has two defendants, U.S. government agents (from the U.S. Drug Enforcement Agency [DEA]) posed as members of a terrorist organization (FARC) and negotiated the purchase of surface to air missiles (SAMs) from the defendants, who are illegal arms dealers. Payments were wired from the agents to an account “controlled by” the defendants. These transactions were the basis for money laundering charges against both defendants. It is unknown whether this account was opened with false identities because the case background does not provide enough detail. Because the account is described as “controlled by” the defendants, not “owned by” the defendants, the account may have been opened with a false identity. The location of the account was also unknown. The meetings between the DEA agents and the defendants were overseas. The defendants resided overseas. It is possible that the account was also overseas and not at a U.S. financial institution making U.S. banking regulations irrelevant. The lack of cases with accounts under false identities does not indicate that increased “know your customer” banking regulations were useful to these 203 terrorism cases and prosecutions.

C. QUESTION 3: WAS A SUBSTANTIAL AMOUNT OF MONEY INVOLVED?

The most well-known anti-money laundering banking regulations is the requirement for financial institutions to file cash transaction reports for any cash

transaction in an amount greater than \$10,000. This requirement serves a detection device. Criminal activities often generate tremendous amount of cash. Requiring financial institutions to report large cash transactions assists the government with detecting criminal activity. Transactions structured to avoid the requirement are illegal and can be the basis of money laundering charges. The existence of large cash transactions in terrorism cases would indicate that cash transaction reports would be useful for the detection of terrorist financing and to terrorism prosecutions.

A qualitative review of the available case backgrounds and court documents was conducted to answer this question. If there was any discussion of money in amounts greater than \$10,000, this question was coded yes. If there was not a discussion of large amounts of money, this question was coded no. If no case background or court documents were available, the question was coded no.

There were seven cases, or 3.4 percent of the 203 terrorism cases, that involved cash or money in other forms, in amounts greater than \$10,000. These seven cases involved 16 defendants or 5.3 percent of the 300 terrorism defendants. All of these defendants were also charged money laundering violations.

1. In *USA v. Holy Land Foundation for Relief and Development et al.*, the eight defendants were part of an organization alleged to have funded millions of dollars to terrorism.
2. In *USA v. Aref et al.*, the two defendants agreed to launder money through their restaurant for a government informant posing as an arms dealer. The informant alleged that he needed to launder \$50,000 in proceeds from the sale of a surface to air missile, which was going to be used in a terrorist attack in New York City. The informant gave the defendants \$10,000 in currency on two different occasions.
3. In *USA v. Lakhani*, the defendant agreed to sell a government informant posing as a terrorist a shoulder fired missile. Lakhani received a cash payment of \$30,000 and was wired \$56,500.
4. In *USA v. Alamoudi*, the defendant was illegally conducting business with Libya. The International Emergency Economic Powers Act made it illegal to conduct business with Libya because Libya was considered a state sponsor of terrorism. While transiting UK Heathrow airport, the defendant was discovered with \$340,000 in U.S. currency. The currency was the proceeds of business with Libya. The defendant was charged with attempting to deposit the currency overseas and wiring the funds into the U.S. to avoid the cash reporting requirement.

5. In USA v. Ranjha et al., the defendants operated a money transmitting business. A government informant moved a total of \$2,208,000 in U.S. currency through the defendants' money transmitting business. The government informant told the defendant that the money was from smuggling, narcotics and arms trafficking, and to fund a foreign terrorist organization.
6. In USA v. Al Kassar, the undercover agents wired 100,000 Euros and \$135,000 to purchase weapons for terrorism.
7. In USA v. Alishtari, the defendant agreed to wire \$152,000 to Pakistan and Afghanistan for a government informant posing as terrorist financier to help train terrorists.

The involvement of money in large amounts in terrorism cases makes cash reporting requirements by financial institutions relevant to countering terrorism finance. The reporting requirement assists with the government's detection of the terrorism finance. In three of the four cases, however, government informants were providing the money to further the conspiracy, making the any detection benefit of the cash reporting requirement unnecessary.

D. QUESTION 4: WERE CASH TRANSACTION REPORTS FILED BY A FINANCIAL INSTITUTION?

If financial institutions filed cash transaction reports in the 203 terrorism cases, the anti-money laundering regulations requiring them would be useful in the detection of the alleged terrorist activity and could be used as the basis for money laundering charges. A qualitative review of the available case backgrounds and court documents was conducted to answer this question. If there was any discussion of a cash transaction report filed by a financial institution, this question was coded yes. In contrast, if there was not a discussion of a cash transaction report filed by a financial institution, this question was coded no. If no case background or court documents were available, the question was also coded no.

None of the available case backgrounds or court documents discussed any financial institutions filing any cash transaction reports. However, in the Alamoudi and Ranjha cases, the defendants were charged with money laundering because they took actions to evade cash transaction reports. In the Alamoudi case, the defendant was attempting to evade the cash transaction report to conceal the funds by depositing the

funds overseas. In the Ranjha case, the defendant operated a financial institution and failed to file cash transaction reports to conceal the funds of the alleged financing of terrorism. Although the cash transaction requirement did not detect the alleged terrorist activity, in these two cases, the existence of anti-money laundering banking regulations that supported money laundering charges were useful to the terrorism prosecutions. Increasing banking regulations, however, were not useful because pre-9/11 banking regulations would have also supported the charges.

E. QUESTION 5: WERE SUSPICIOUS TRANSACTION REPORTS FILED BY A FINANCIAL INSTITUTION?

Financial institutions are required to file suspicious transaction reports if the financial institution suspects any financial transactions are related to criminal activity including terrorist financing. Suspicious transaction reports filed in these cases would indicate that the filing requirement was helpful in the detection of the financing of these terrorism cases. A qualitative review of the available case backgrounds and court documents was conducted to answer this question. If there was any discussion of a suspicious transaction report filed by a financial institution, this question was coded yes. On the other hand, if there was not a discussion of a suspicious transaction report filed by a financial institution, this question was coded no. Finally, if no case background or court documents were available, the question was coded no.

None of the available case backgrounds or court documents discussed any financial institutions filing any suspicious transaction reports. The absence of cases with suspicious transaction reports does not indicate that the anti-money laundering banking regulation requirement to file such reports was not useful to the 203 terrorism cases and prosecutions.

F. QUESTION 6: WAS THERE USE OF FOREIGN SHELL BANKS?

The USA PATRIOT Act prohibits banks from engaging in business with foreign shell banks. The existence of foreign shell banks in terrorism cases would indicate the prohibition of foreign shell banks is relevant to countering terrorism finance. A qualitative review of the available case backgrounds and court documents was conducted to answer this question. If there was any discussion of the use of a foreign shell bank,

this question was coded yes. Otherwise, if there was not a discussion of the use of a foreign shell bank, this question was coded no. If no case background or court documents were available, the question was coded no.

None of the available case backgrounds or court documents discussed the use of foreign shell banks. The absence of cases that mention the use of foreign shell banks in the available background information or court documents indicates that the anti-money laundering banking regulation prohibiting transactions with foreign shell accounts was not useful to the 203 terrorism cases and prosecutions.

G. QUESTION 7: WAS THE CASE A “STING OPERATION,” THAT WAS DEVELOPED OR PROPOSED BY INFORMANTS OR UNDERCOVER AGENTS?

One goal of anti-money laundering banking regulations is to detect criminal activity. If an investigation was developed or proposed by government informants or undercover agents, the benefit of detection by banking regulations is diminished. In a “sting operation,” the government proposes an illegal activity to see if a subject will follow through on the illegal activity. The government will not allow illegal activity to occur; however, the government can charge the subject with conspiracy to commit the illegal act if the subject commits overt acts to further the illegal act. A qualitative review of the available case backgrounds and court documents was conducted to answer this question. If there was any discussion of undercover agents, confidential informants, or cooperating witnesses, this question was coded yes. If there was not a discussion of undercover agents, confidential informants, or cooperating witnesses, this question was coded no. Likewise, if no case background or court documents were available, the question was coded no.

Ten cases, or 4.9 percent, of the 203 terrorism cases, were sting operations. These cases involved 20 defendants, or 6.7 percent, of the 300 terrorism defendants. The use of recording devices in sting operations provides audio and video evidence of overt acts committed by the subject. Sting operations are useful to terrorism prosecutions.

VIII. ANALYSIS OF FINDINGS

The most relevant finding of this study is comparison and correlation of the answers of each question for each case.

Questions 2, 4, 5, and 6 were found to be irrelevant. There was one account that possibly was opened under a false identity; however, there were no cash transaction reports found; no suspicious activity reports found; and no foreign shell banks involvement found. Virtually every terrorism case was coded no for these four questions. Increasing anti-money laundering banking regulations in these areas did not assist with any of the terrorism prosecutions reviewed in this study.

There was a connection between questions 1 and 3. For the seven terrorism cases where large amounts of money were involved, money laundering was charged in all. This, however, is not enlightening. If there large amounts of money involved, financial transactions at a financial institution are likely to occur. If a terrorism activity is connected to the financial transactions, which occurs by definition in this sample of 203 terrorism cases, there should be money laundering charged.

Of the 10 terrorism cases where money laundering was charged, three did not involve large amounts of cash. This, too, is not enlightening. Financial transactions to further terrorist activities do not have to be large to constitute money laundering.

The connection between questions 1 and 7 is more meaningful to the question about whether anti-money laundering banking regulations and statutes are useful to terrorism prosecutions. Of the 10 terrorism cases that included money laundering, six were sting operations. The anti-money laundering statutes that enable the money laundering charges are certainly useful to the prosecution in all 10 cases. However, with sting operations, banking regulations are not useful for detection. The undercover agents, confidential informants, or cooperating witnesses are aware of the activity as part of the sting operation. A review of the four non-sting operations follows.

In *USA v. Holy Land Foundation for Relief and Development et al.*, the defendants operated a large charity. The government alleged that some of the charitable

funds raised were going to an overseas terrorist group. Although no cash transaction reports were mentioned in the case background, with the large amounts of money raised by this charity, it would not be surprising if cash transaction reports were filed. The reports were probably not relevant to the charges because the charity was not concerned with concealing the source of the funds. The funds were charitable donations. A crime was committed if funds were ultimately transferred to a terrorist organization. Anti-money laundering banking regulations were not useful in this terrorism prosecution because the transfer to a terrorist organization would unlikely be in cash and would occur overseas.

In *USA v. Alamoudi*, the defendant was attempting to conceal his source of income by depositing \$340,000⁵⁴ in U.S. currency in banks overseas and wire the fund into the United States. Anti-money laundering banking regulations were useful in making it difficult for the defendant to deposit the ill-gotten funds into the U.S. financial system. In addition, the avoidance of the banking regulations served as a basis for money laundering charges. Increasing banking regulations, however, was not useful because pre-9/11 banking regulations would have supported the charges.

In *USA v. Ahmad et al.*, the defendant operated a website that encouraged terrorist acts and encouraged others through a form letter to donate currency to terrorist groups by hand carrying the currency overseas. The defendant was charged with money laundering for causing funds to be transferred, transmitted, and transported overseas by others for the purpose of supporting terrorism. The defendant also solicited money orders to help pay for the operations of the Website. It is unlikely that anti-money laundering banking regulations was helpful to this terrorism prosecution. Detection of the activity was from Internet exposure. The defendant was located in the UK and was not making cash deposits into a U.S. financial institution.

⁵⁴ Investigative Project on Terrorism, “*USA v. Alamoudi* (superseding indictment),” last modified 2004, http://www.investigativeproject.org/documents/case_docs/166.pdf (accessed December 16, 2012), 11.

In *USA v. Awan*, the defendant is an inmate and boasts to another inmate that he is a terrorist.⁵⁵ During telephone recordings while in prison, the defendant stated that he is recruiting more terrorists and has sent thousands of dollars to a terrorist organization in the past.⁵⁶ This case was developed within a prison. Anti-money laundering banking regulations were not useful in this terrorism prosecution.

In these four non-sting cases, new anti-money laundering statutes, which added terrorism finance as a specified unlawful activity, were useful to these terrorism prosecutions because they enabled money laundering charges. However, increased anti-money laundering banking regulations were not useful to these terrorism prosecutions. Increased record keeping and reporting regulations by financial institutions did not detect any of the terrorism finance in these cases. In the *Alamoudi* case, avoidance of reporting regulations was useful in support the money laundering charge; however, the regulations prior to 9/11 would have sufficed. The increased record keeping and reporting regulations were not needed to support the money laundering charge and this terrorism prosecution.

A review of the six sting operations follows.

1. In *USA v. Aref et al.*: the defendants entered a conspiracy with a confidential informant to launder money through the defendant's restaurant to facilitate the purchase of a surface to air missile for a terrorist group.
2. In *USA v. Lakhani*: the defendant entered a conspiracy with a confidential witness to purchase of surface to air missile for a terrorist group.
3. In *USA v. Salamanca et al.*: the defendant entered a conspiracy with confidential informants to launder drug proceeds of a terrorist organization and to smuggle terrorist operatives into the U.S.
4. In *USA v. Ranjha et al.*: the defendants operated a money transmitting business. A government informant moved a total of \$2,208,000 in U.S. currency through the defendants' money transmitting business. The government informant told the defendant that the money was from smuggling, narcotics, and arms trafficking, and to fund a foreign terrorist organization. After 9/11, money transmitting business became financial

⁵⁵ U.S. Attorney's Office, Eastern District of New York, "Khalid Awan Convicted of Providing Material Support and Resources to Indian Terrorist Organization" news release, December 20, 2006, <http://www.justice.gov/usao/nye/pr/2006/2006Dec20.html> (accessed on November 30, 2011).

⁵⁶ Eastern District of New York, "Khalid Awan."

institutions required to submit cash transaction and suspicious activity reports. The defendants failed to submit such cash transaction and suspicious activity reports required of money transmitting business.

5. In USA v. Alishtari, the defendant entered a conspiracy to transfer money from the US to Pakistan to support terrorist training camps in Afghanistan. Undercover officers provided Alishtari with \$152,000, which Alishtari wired to accounts that he was told belonged to terrorism financiers.
6. In USA v. Al Kassir et al.: the defendants entered a conspiracy to sell surface to air missiles to confidential sources to attack US helicopters in Columbia.

In these six sting cases, informants provided the defendants with funds for potential terror plots. New anti-money laundering statutes, which added terrorism finance as a specified unlawful activity, were useful to these terrorism prosecutions because they enabled money laundering charges. In USA v. Ranjha, et al., increased anti-money laundering banking regulations, which expanded the definition of financial institutions to include money transmitting businesses, were helpful in the terrorism prosecution.

IX. LIMITATIONS IN IDENTIFYING THE USEFULNESS OF REGULATIONS IN THIS STUDY

This study is limited by the Administrative Office of the United States Courts' definition of a terrorism related prosecution. There may be other terrorism related charges outside of this definition that provide better information on the usefulness of anti-money laundering banking regulations and statutes.

This study only involved public available court cases; some terrorism prosecutions are sealed. Anti-money laundering banking regulations and statutes may have been very useful to these terrorism prosecutions; however, their uses were not available to this study. Moreover, this study only reviewed cases from January 2004 through April of 2009. This sample may not be representative of all terrorism cases and prosecutions.

In addition, this study did not include the review of case investigative files. Case files could contain information that shows that anti-money laundering statutes were helpful for the development of the case but were not included in the court documents because they were not helpful to the charges. This is unlikely because if there was a nexus between financial transactions and alleged terrorist activity, the investigators could and would charge money laundering.

Anti-money laundering regulations could have detected terrorist activity that did not result in a terrorism prosecution. Detection information could have been used to disrupt a plot, which is useful, but does not result in a prosecution.

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X. FUTURE RESEARCH

This study recommends more research be conducted to overcome the discussed limitations of this study. Future studies should include an analysis the usefulness of anti-money laundering banking regulations in:

- Terrorism cases through the present,
- Terrorism cases that are sealed and not available to the public, and
- Terrorism investigations that do not result in prosecutions.

Future studies should also include review of investigative files in addition to court documents. All of the above can provide other indicators that anti-money laundering banking regulations are useful to counter finance of terrorism.

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XI. CONCLUSION

One facet of the effort of the United States to counter terrorism finance was to enact additional anti-money laundering banking regulations with the USA PATRIOT Act. This effort assumes that there is a link between banking and terrorism finance that can be exploited to counter terrorism finance through anti-money laundering regulations. The terms money laundering and terrorism finance are often used in the same sentence. Treasury Secretary David Cohen testified that, “the United States maintains one of the strongest and most effective anti-money laundering and counter-terrorist financing (AML/CFT) regimes in the world.”⁵⁷

This study tested whether or not anti-money laundering banking regulations were useful in terrorism prosecutions. This study was a qualitative analysis of available case summaries, affidavits, and indictments of federal terrorism prosecutions. The analysis searched for instances where anti-money laundering banking regulations were used in the terrorism prosecution. This study searched the court documents and case background, opinions, and summaries for the following items related to banking and banking regulations and statutes: money laundering charges, accounts opened with false identities, large amounts of money (>\$10,000), suspicious transaction reports, cash transaction reports, the use of foreign bank shell accounts, and whether the investigation was a sting operation. The study analyzed the 203 cases of 300 defendants who were charged with terrorism related violations in federal court between January 2004 and April of 2009.

Of the 203 terrorism cases, the study found 10 terrorism cases, which charged defendants with money laundering offenses. The study found one case that may have used an account under a false identity and seven cases involved large amounts of money and charged defendants with money laundering offenses. There were no cases found where U.S. financial institutions filed cash transaction reports or suspicious transaction

⁵⁷ U.S. Department of Treasury Press Center, “Testimony of Under Secretary for Terrorism and Illicit Finance David Cohen before the Senate Committee on Homeland Security and Governmental Affairs Permanent Subcommittee on Investigations on “U.S. Vulnerabilities to Money Laundering, Drugs, and Terrorists,” news release, July 17, 2012, <http://www.treasury.gov/press-center/press-releases/Pages/tg1640.aspx> (accessed January 14, 2013).

reports. In addition, no cases reported the use of foreign bank shell accounts. Finally, six cases were sting operations.

The study found that anti-money laundering banking regulations did not appear to detect any of the terrorism activity in the 203 prosecution cases. All of the terrorism prosecution cases involving finance appeared to be developed from other sources, such as by sting operations, prison telephone monitoring, an airport security search, and investigations of large donations and terrorism websites. None of the case background information cited evidence from cash transaction or suspicious activity reporting requirements. The study found that new anti-money laundering statutes, which added terrorism finance as a specified unlawful activity, were useful in the 10 terrorism prosecutions that charged money laundering. Increased anti-money laundering banking regulations, which expanded the definition of financial institution to include money transmitting businesses, was helpful in one terrorism prosecution. Pre-9/11 anti-money laundering banking regulations were helpful in another terrorism prosecution.

Anti-money laundering banking regulations do not appear to play a consistent role in the terrorism prosecutions analyzed. This observation mirrors the *9/11 Commission* and *Monograph on Terrorist Financing* in that no cash transaction reports were filed on any of the 9/11 attackers and none of the 9/11 attackers banking transactions were reported as suspicious.

The reason anti-money laundering banking regulations were not useful in these terrorism prosecutions is because these banking regulations are designed to identify the placement of large amounts of illicit cash proceeds into financial institutions. Banking regulations are unsuitable at identifying terrorism finance because terrorism funds can be legitimate and non-cash. Thus, the increase in anti-money laundering banking regulations in response to 9/11 does not appear to be useful to the detection of terrorism financing. The benefit to countering terrorism finance by post 9/11 legislation appears to be the criminalization of terrorism, adding terrorism finance as a specified unlawful activity to money laundering statutes, and expanding the definition of financial institution

to include money transmitting business. Increasing record keeping and reporting requirements by financial institutions appear to have been of very little help to terrorism prosecutions.

This study acknowledges that analyzing terrorism prosecutions may not identify all links between anti-money laundering banking regulations and terrorism finance. Banking regulations might have discovered terrorism financing that lead to the disruption of a terror organization without prosecution.

Increasing banking regulations has costs. Regulations decrease privacy and increase transaction costs to financial institutions. Studying whether banking regulations are successfully countering terrorism finance is an important national security question. Policies that decrease privacy should have corresponding increases in security. If the U.S. government enacts inefficient policies that decrease privacy and do not increase security, then terrorism has succeeded by causing the U.S. government to overreact to 9/11 by enacting increased banking regulations that do not increase security.

A more complete study needs to be conducted; one that encompasses additional cases and that analyzes case investigative files. This study only analyzed case summaries, affidavits, and indictments, which contain information related to the charged violations and do not contain all information useful in the investigation.

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APPENDIX A. ALL TERRORISM RELATED CASES AND DEFENDANTS

Table 2 is a list of prosecutions cases and defendants from January 2004 through April 2009 identified as terrorism by TRAC. For each of the 300 terrorism prosecutions, TRAC provided the docket number, charges, and name of defendant.

Table 2. All Terrorism Related Cases and Defendants

	<u>Year</u>	<u>Docket Number</u>	<u>Case</u>	<u>Defendant</u>
1	2004	1:04-cr-30023-AA	USA v. Wood	Jason Paul Wood
2	2004	9:04-cr-00030-DWM	USA v. Stoltenberg	William Jon Stoltenberg
3	2004	3:04-cr-01553-DB	USA v. Cottingham	Steven Earl Cottingham
4	2004	2:04-cr-00058-J	USA v. Thomas	Bryan Luther Thomas
5	2004	3:03-cr-00399-D	USA v. Keeble	Carlton D Keeble
6	2004	3:04-cr-00240-P	USA v. Holy Land Foundation for Relief and Development, et al	Holy Land Foundation For Relief and Development
7	2004	3:04-cr-00240-P	USA v. Holy Land Foundation for Relief and Development, et al	Shukri Abu Baker
8	2004	3:04-cr-00240-P	USA v. Holy Land Foundation for Relief and Development, et al	Muhammad El-Mezain
9	2004	3:04-cr-00240-P	USA v. Holy Land Foundation For Relief and Development, et al	Ghassan Elashi
10	2004	3:04-cr-00240-P	USA v. Holy Land Foundation for Relief and Development, et al	Haitham Maghawri
11	2004	3:04-cr-00240-P	USA v. Holy Land Foundation for Relief and Development, et al	Akram Mishal
12	2004	3:04-cr-00240-P	USA v. Holy Land Foundation for Relief and Development, et al	Mufid Abdulqader
13	2004	3:04-cr-00240-P	USA v. Holy Land Foundation For Relief and Development, et al	Abdulrahman Odeh
14	2004	8:04-cr-00349-JDW-EAJ	USA v. Gamarra-Murillo	Carols Gamarra-Murillo
15	2004	1:03-cr-20839-CMA	USA v. Hailey	Joseph Carlton Hailey
16	2004	0:04-cr-60001-MGC	USA v. Hassoun, et al	Adhan Amin Hassoun
17	2004	0:04-cr-60001-MGC	USA v. Hassoun, et al	Mohamed Hesham Youssef
18	2004	0:04-cr-60001-MGC	USA v. Hassoun, et al	Kifah Wael Jayyous
19	2004	0:04-cr-60001-MGC	USA v. Hassoun, et al	Kassem Daher
20	2004	0:04-cr-60001-MGC	USA v. Hassoun, et al	Jose Padilla
21	2004	4:04-cr-00171-WTM	USA v. Jenkins	David Lynn Jenkins, Jr.
22	2004	5:03-cr-00107-DF	USA v. Mason	Ricky Mason
23	2004	1:03-cr-00082-LHT	USA v. Rhonda Kay Smith	Rhonda Kay Smith
24	2004	1:03-cr-00080-DLH	USA v. McMorrow	Patrick Timothy McMorrow
25	2004	0:04-cr-00029-JRT-FLN	USA v. Warsame	Muhamed Abdullah Warsame

	<u>Year</u>	<u>Docket Number</u>	<u>Case</u>	<u>Defendant</u>
26	2004	1:03-cr-00978	USA v. Marzook, et al	Muhammad Hamid Khalil Salah
27	2004	1:04-cr-00699	USA v. Nettles	Gale Nettles
28	2004	2:03-cr-81030-RHC-RSW	USA v. Kourani	Mahmoud Youssef Kourani
29	2004	2:04-cr-00088-ALM	USA v. Abdi	Nuradin M Abdi
30	2004	1:04-cr-00402-TJM	USA v. Aref et al	Yassin Muhiddin Aref
31	2004	1:04-cr-00402-TJM	USA v. Aref et al	Muhammed Mosharref Hossain
32	2004	1:04-cr-10223-GAO	USA v. Badat	Saajid Mohammed Badat
33	2004	3:04-cr-00013-EMK	USA v. Seersma	Justin Seersma
34	2004	2:03-cr-00880-KSH	USA v. Lakhani	Hemant Lakhani
35	2004	1:03-cr-01197-SHS	USA v. Paracha	Uzair Paracha
36	2004	1:03-cr-01322-DLI	USA v. Al-Moayad et al	Mohammed Ali Al-Moayad
37	2004	1:03-cr-01322-DLI	USA v. Al-Moayad et al	Mohammed Mohsen Zayed
38	2004	1:04-cr-00356-JFK	USA v. Mustafa	Mustafa Kamel Mustafa
39	2004	1:04-cr-00356-JFK	USA v. Mustafa	Aswat Haroon Rashid
40	2004	1:04-cr-00356-JFK	USA v. Mustafa	Oussama Kassir
41	2004	1:04-cr-00356-JFK	USA v. Mustafa	Earnest James Ujaama
42	2004	1:04-cr-00528-VM	USA v. Babar	Mohammed Junaid Babar
43	2004	1:04-cr-00573-GBD	USA v. Khalil et al	Haji Antoine Abi Khalil
44	2004	2:04-cr-00619-JD	USA v. Lit	Preston Lit
45	2004	1:04-cr-00116-YK	USA v. Kemp	Stephen Kemp
46	2004	1:04-cr-00232-RCL	USA v. Fuerzas Armadas Revolucionarias de Columbia et al	Juvenal Ovidio Ricardo Palmera Pineda
47	2004	1:04-cr-00283	USA v. Wamang	Anthonius Wamang
48	2004	1:04-cr-00354	USA v. Torres	Arturo Montano Torres
49	2004	1:04-cr-00355	USA v. Torres	Adolfo Toledo Medina
50	2004	1:03-cr-00513-CMH	USA v. Alamoudi	Abdurahman M. Alamoudi
51	2004	3:04-cr-00010-nkm	USA v. Guyer	Jack Thomas Guyer
52	2005	3:05-cr-00128-KI	USA v. Wilson	Steven Robert Wilson
53	2005	3:05-c4-00142-BR	USA v. Nonneman	Kyle Gregory Nonneman
54	2005	3:05-c4-00179-MO	USA v. Hooley	Jakeob Zachary Hooley
55	2005	2:05-cr-00240-GEB	USA v. Hayat et al	Hamid Hayat
56	2005	2:05-cr-00519-DDP	USA v. Chhun	Yasith Chhun
57	2005	2:05-cr-00806-DSF	USA v. Wu, et al	Chao Tung Wu
58	2005	2:05-cr-00806-DSF	USA v. Wu, et al	Yi Qung Chen
59	2005	2:05-cr-00806-DSF	USA v. Wu, et al	Kevin LNU
60	2005	4:04-cr-02195-JMR-BPV	USA v. Schipke	Mary Elizabeth Schipke
61	2005	4:05-cr-00257	USA v. Grecula	Ronald Allen Grecula
62	2005	5:05-cr-50030-JLH	USA v. Jaber	Arwah J Jaber
63	2005	4:05-cr-00200-GH	USA v. Khalil	Naji Antoine Abi Khalil
64	2005	3:05-cr-00016-TSL-JCS	USA v. Ranson et al	Lamont Ranson
65	2005	3:05-cr-00016-TSL-JCS	USA v. Ranson et al	Cedric Carpenter

	<u>Year</u>	<u>Docket Number</u>	<u>Case</u>	<u>Defendant</u>
66	2005	1:04-cr-00226-LAC-C	USA v. Scott	Jessie Scott
67	2005	5:04-cr-00059-MCR	USA v. Evans	Roger V. Evans
68	2005	1:04-cr-20872_DLG	USA v. West	Kenneth R West
69	2005	1:05-cr-20443-PCH	USA v. Rodriguez-Acevedo	Hector Rodriguez-Acevedo
70	2005	1:05-cr-20443-PCH	USA v. Rodriguez-Acevedo	Jose Gelvez-Albarracin
71	2005	1:05-cr-00162-CC-AJB	USA v. Lofton	Salem Fard Lofton
72	2005	3:05-cr-00242-RJC-CH	USA v. Taylor	Jordan Eric Taylor
73	2005	7:04-cr-00129-F	USA v. Bell	Shajuana T. Bell
74	2005	1:04-cr-00421-JAB	USA v. Freimark	Robert J. Freimark
75	2005	5:05-cr-00058-JMH	USA v. O'Brien	Brien
76	2005	1:04-cr-00235-WCG	USA v. Parr	Steven J Parr
77	2005	1:05-cr-00639	USA v. Steward	Bilal Steward
78	2005	2:05-cr-00108-EAS	USA v. Ali	Khadrah Farah Ali
79	2005	3:05-cr-00376-TJM	USA v. Terzi	Danian M. Terzi
80	2005	3:04-cr-00301-MRK	USA v. Ahmad et al.	Babar Ahmad
81	2005	3:04-cr-00301-MRK	USA v. Ahmad et al.	Azzam Publications
82	2005	2:05-cr-00200-JCL	USA v. Banach	David Banach
83	2005	1:05-cr-00059-DC	USA v. Vincent	David B. Chalmers, Jr.
84	2005	1:05-cr-00059-DC	USA v. Vincent	John Irving
85	2005	1:05-cr-00059-DC	USA v. Vincent	Ludmil Dionissiev
86	2005	1:05-cr-00059-DC	USA v. Vincent	Bayoil (USA), Inc.
87	2005	1:05-cr-00059-DC	USA v. Vincent	Bayoil Supply & Trading Limited
88	2005	1:05-cr-00059-DC	USA v. Vincent	Oscar S. Wyatt, Jr.
89	2005	1:05-cr-00059-DC	USA v. Vincent	Catalina del Socorro Miguel Fuentes
90	2005	1:05-cr-00059-DC	USA v. Vincent	Mohammed Saidji
91	2005	1:05-cr-00059-DC	USA v. Vincent	Nafta Petroleum Company Limited
92	2005	1:05-cr-00059-DC	USA v. Vincent	Mednafta Trading Company Limited
93	2005	1:05-cr-00059-DC	USA v. Vincent	Sarenco, S. A.
94	2005	1:05-cr-00059-DC	USA v. Vincent	Ephraim Nadler
95	2005	1:05-cr-00104-NG	USA v. Siraj	Shahawar Matin Siraj
96	2005	1:05-cr-00311-MGC	USA v. Barot et al.	Dhiren Barot
97	2005	1:05-cr-00311-MGC	USA v. Barot et al.	Nadeem Tarmohamed
98	2005	1:05-cr-00311-MGC	USA v. Barot et al.	Qaisar Shaffi
99	2005	1:05-cr-00563-ERK	USA v. Abraham	Eduardo Abraham
100	2005	1:05-cr-00673-LAP	USA v. Shah et al.	Tarik Ibn Osman Shah
101	2005	1:05-cr-00673-LAP	USA v. Shah et al.	Rafiq Sabir
102	2005	1:05-cr-00673-LAP	USA v. Shah et al.	Mahmud Faruq Brent
103	2005	1:05-cr-00673-LAP	USA v. Shah et al.	Abdulrahman Farhane
104	2005	2:05-cr-00201-LS	USA v. Steidler	Blake Ryan Steidler
105	2005	1:05-cr-00336-BEL	USA v. Finch	Robert Darnell Finch

	<u>Year</u>	<u>Docket Number</u>	<u>Case</u>	<u>Defendant</u>
106	2005	1:05-cr-00237	USA v. Sales et al.	Rayfran Das Neves Sales
107	2005	1:05-cr-00238	USA v. Sales et al.	Clodoaldo Carlos Batista
108	2005	1:05-cr-00337-PLF	USA v. Delaema	Wesam al Delaema
109	2005	1:05-cr-00053-GBL	USA v. Abu Ali	Ahmen Omar Abu Ali
110	2005	1:05-cr-00401-CMH	USA v. Chandia et al.	Ali Asad Chandia
111	2005	1:05-cr-00401-CMH	USA v. Chandia et al.	Mohammed Ajmal Khan
112	2006	2:05-cr-00378-JLR	USA v. Sloan	Aaron Jermaine Sloan
113	2006	2:06-cr-00130-JCC	USA v. Baldwin	Steven Leroy Baldwin
114	2006	2:06-cr-00352-FCD	USA v. Verdone	Flint Michael Verdone
115	2006	4:06-cr-00549-MJJ	USA v. Steeves	Paul Charles Steeves
116	2006	2:06-cr-00175-JFW	USA v. Kabir	Khandaker Kabir
117	2006	2:06-cr-00175-JFW	USA v. Wells	Yechezkel Wells
118	2006	8:05-cr-00254-UA	USA v. Gadahn	Adam Gadahn
119	2006	2:06-cr-00508-DAK	USA v. Canaday	Tony M. Canaday
120	2006	2:05-cr-01191-FJM	USA v. Depledge	Matthew Richard Depledge
121	2006	3:05-cr-02641-DB	USA v. Cenicerros	Luis Omar Cenicerros
122	2006	7:06-cr-00115-RAJ	USA v. Guzman	Maria L. Guzman
123	2006	5:06-cr-00165-L	USA v. Hughes	Michael T Hughes
124	2006	3:05-cr-30157-MJR	USA v. Akumu	Micah A Akumu
125	2006	3:06-cr-00398-DAC	USA v. Matter	Leon Howard Matter
126	2006	3:06-cr-00719-JGC	USA v. Amawi et al.	Mohammad Zaki Amawi
127	2006	3:06-cr-00719-JGC	USA v. Amawi et al.	Marwan Othman El-Hindi
128	2006	3:06-cr-00719-JGC	USA v. Amawi et al.	Wassim I. Mazloum
129	2006	4:06-cr-00062-HLM	USA v. Shorbagi	Mohamed Shorbagi
130	2006	1:05-cr-00496-CAP-AJB	USA v. Goodrich	Kenneth Goodrich
131	2006	1:06-cr-00147-WSD-GGB	USA v. Ahmed	Syed Haris Ahmed
132	2006	1:06-cr-00147-WSD-GGB	USA v. Ahmed	Ehsanul Islam Sadequee
133	2006	3:06-cr-00098	USA v. Adamson	Richard Adamson
134	2006	1:06-cr-00009-SPM-AK	USA v. Workman	Miles L Workman
135	2006	6:06-cr-00057-GKS-GJK	USA v. Adamson	Richard Adamson
136	2006	9:06-cr-80051-KAM	USA v. Vassalotti	Anthony Vassalotti
137	2006	1:06-cr-20001-JAL	USA v. Salamanca, et al.	Victor Daniel Salamanca
138	2006	1:06-cr-20001-JAL	USA v. Salamanca, et al.	Julio Cesar Lopez
139	2006	1:06-cr-20001-JAL	USA v. Salamanca, et al	Jalal Saadat Moheisen
140	2006	1:06-cr-20001-JAL	USA v. Salamanca, et al.	Bernardo Valdes Londono
141	2006	1:06-cr-20001-JAL	USA v. Salamanca, et al.	Carmen Maria Ponton Caro
142	2006	1:06-cr-20001-JAL	USA v. Salamanca, et al.	Jose Tito Libio Uloa Melo
143	2006	1:06-cr-20001-JAL	USA v. Salamanca, et al.	Luis Alfredo Daza Morales
144	2006	1:06-cr-20373-JAL	USA v. Batiste et al.	Narseal Batiste

	<u>Year</u>	<u>Docket Number</u>	<u>Case</u>	<u>Defendant</u>
145	2006	1:06-cr-20373-JAL	USA v. Batiste et al.	Patrick Abraham
146	2006	1:06-cr-20373-JAL	USA v. Batiste et al.	Stanley Grant Phanor
147	2006	1:06-cr-20373-JAL	USA v. Batiste et al.	Naudimar Herrera
148	2006	1:06-cr-20373-JAL	USA v. Batiste et al.	Burson Augustin
149	2006	1:06-cr-20373-JAL	USA v. Batiste et al.	Lyglenson Lemorin
150	2006	1:06-cr-20373-JAL	USA v. Batiste et al.	Rotschild Augustine
151	2006	1:06-cr-10028-GAO	USA v. Khadr	Abdullah Ahmed Khadr
152	2006	1:06-cr-10240-GAO	USA v. Verdone	Flint Michael Verdone
153	2006	3:06-cr-00194-JCH	USA v. Ahsan	Syed Talha Ahsan
154	2006	3:05-cr-00493-EMK	USA v. Reynolds	Michael Curtis Reynolds
155	2006	1:06-cr-00108-CPS	USA v. Singh	Gurbax Singh
156	2006	1:06-cr-00154-CPS-WP	USA v. Awan	Khalid Awan
157	2006	1:06-cr-00442-LAP	USA v. Hashmi	Syed Hashmi
158	2006	1:06-cr-00615-RJD	USA v. Sarachandran et al.	Sathajhan Sarachandran
159	2006	1:06-cr-00615-RJD	USA v. Sarachandran et al.	Sahilal Sabaratnam
160	2006	1:06-cr-00615-RJD	USA v. Sarachandran et al.	Thiruthanikan Thanigasalam
161	2006	1:06-cr-00615-RJD	USA v. Sarachandran et al.	Nadarasa Yograrasa
162	2006	1:06-cr-00615-RJD	USA v. Sarachandran et al.	Piratheepan Nadarajah
163	2006	1:06-cr-00616-RJD-JO	USA v. Thavaraja et al.	Pratheepan Thavaraja
164	2006	1:06-cr-00616-RJD-JO	USA v. Thavaraja et al.	Murugesu Vinayagamoorthy
165	2006	1:06-cr-00616-RJD-JO	USA v. Thavaraja et al.	Vijayshanthar Patpanathan
166	2006	1:06-cr-00616-RJD-JO	USA v. Thavaraja et al.	Gaspar Raj Maria Paulian
167	2006	1:06-cr-00616-RJD-JO	USA v. Thavaraja et al.	Namasivaya Viswanathan
168	2006	1:06-cr-00616-RJD-JO	USA v. Thavaraja et al.	Nachimuthu Socrates
169	2006	1:06-cr-00616-RJD-JO	USA v. Thavaraja et al.	Karunakaran Kandasamy
170	2006	1:06-cr-00652-BMC	USA v. Taleb-Jedi	Zeinab Taleb-Jedi
171	2006	3:06-cr-00558-MLC	USA v. Bilby	Donald Bilby
172	2006	2:05-cr-00679-JD	USA v. Silvera	Michael Silvera
173	2006	1:06-cr-00178-CKK	USA v. Lowe	Chat Lowe
174	2007	3:07-cr-60009-KI	USA v. Slattery	Edward Thomas Slattery
175	2007	2:06-cr-00424-EJG	USA v. Braun	Michael Lee Braun
176	2007	2:07-cr-00266-FCD	USA v. Jack et al.	Harrison Ulrich Jack
177	2007	2:07-cr-00266-FCD	USA v. Jack et al.	Vang Pao
178	2007	2:07-cr-00266-FCD	USA v. Jack et al.	Lo Cha Thao
179	2007	2:07-cr-00266-FCD	USA v. Jack et al.	Lo Thao
180	2007	2:07-cr-00266-FCD	USA v. Jack et al.	Youa True Vang
181	2007	2:07-cr-00266-FCD	USA v. Jack et al.	Hue Vang
182	2007	2:07-cr-00266-FCD	USA v. Jack et al.	Chong Yang Thao
183	2007	2:07-cr-00266-FCD	USA v. Jack et al.	Nhia Kao Vang
184	2007	2:07-cr-00266-FCD	USA v. Jack et al.	Dang Vang

	<u>Year</u>	<u>Docket Number</u>	<u>Case</u>	<u>Defendant</u>
185	2007	5:07-cr-00501-JF	USA v. Abdhir et al.	Rahmat Abdhir
186	2007	5:07-cr-00501-JF	USA v. Abdhir et al.	Zulkifi Abdhir
187	2007	2:06-cr-00826-ABC	USA v. Morris	Jason Morris
188	2007	2:07-cr-00054-GHK	USA v. Kolupski	Dennis Leon Kolupski
189	2007	2:06-cr-00871-CW	USA v. Hale	Thomas Francis Hale
190	2007	2:07-cr-00340-DB	USA v. Laxson	Rachel Lauren Laxson
191	2007	3:07-cr-00382-SMM	USA v. Montoya	Rene Robert Montoya
192	2007	3:07-cr-00701-NVW	USA v. Rocha	Melena Angeline Rocha
193	2007	5:07-cr-00017-C-BG	USA v. Mason et al.	Paul Joseph Mason
194	2007	5:07-cr-00017-C-BG	USA v. Mason et al.	Janice Linn Mason
195	2007	5:07-cr-00035-C-BG	USA v. Guzman	Jesse Guzman
196	2007	5:07-cr-00195-L	USA v. Hardy	Roger Allen Hardy
197	2007	6:07-cr-00039-JHP	USA v. Kramer	William Scott Kramer
198	2007	4:06-cr-00384-JMM	USA v. Selsor	Leroy Shawn Selsor
199	2007	4:06-cr-00385-JLH	USA v. Silverman	Robert Roosevelt Silverman
200	2007	4:07-cr-00161-REL	USA v. Moore	Charles Wayne Moore
201	2007	5:07-cr-00533-OLG	USA v. Wormly	April Wormly
202	2007	1:07-cr-00098-SS	USA v. Evans	Paul Ross Evans
203	2007	4:07-cr-00124	USA v. Maldonado	Daniel Joseph Maldonado
204	2007	4:07-cr-00131	USA v. Christiansen	Patricia Norma Christiansen
205	2007	4:07-cr-00030-JAJ	USA v. Haileselassie	America Haileselassie
206	2007	1:06-cr-00919	USA v. Shareef	Derrick Shareef
207	2007	1:07-cr-20775-ASG	USA v. Guedes Sharif	Allan Guedes Sharif
208	2007	8:07-cr-00342-SDM-MAP	USA v. Sherif Mohamed et al.	Ahmed Abdellatif Sherif Mohamed
209	2007	1:06-cr-00491-JOF-AJB	USA v. Harper	Barron Hays Harper, Jr.
210	2007	4:07-cr-00893-RBH	USA v. Bailey	George Everette Bailey
211	2007	4:07-cr-01046-TLW	USA v. Hanna	Mark Hanna
212	2007	2:06-cr-20523-VAR-DAS	USA v. Odish	Natalia Odish
213	2007	2:07-cr-20442-MOB-PJK	USA v. Collins	Sandra Fujimoto Collins
214	2007	2:07-cr-00087-GLF	USA v. Paul	Christopher Paul
215	2007	3:07-cr-00147	USA v. Smith	Michael Thomas Smith
216	2007	3:06-cr-00510-HEH	USA v. Hamrick	Rodney Curtis Hamrick
217	2007	1:06-cr-00344-GK	USA v. Ibague et al.	Jose Maria Corredor Ibague
218	2007	1:06-cr-00344-GK	USA v. Ibague et al.	Edilma Morales Loaiza
219	2007	1:07-cr-00248-RCL	USA v. Aguilar Ramirez	Gerardo Antonio Aguilar Ramirez
220	2007	1:07-cr-00248-RCL	USA v. Aguilar Ramirez	Nancy Conde Rubio
221	2007	1:07-cr-00248-RCL	USA v. Aguilar Ramirez	Alexander Farfan Suarez
222	2007	1:07-cr-00248-RCL	USA v. Aguilar Ramirez	Ana Isabel Pena Arevalo
223	2007	1:07-cr-00248-RCL	USA v. Aguilar Ramirez	Luz Mery Gutierrez Vergara
224	2007	1:07-cr-00248-RCL	USA v. Aguilar Ramirez	Josue Cuesta Leon

	<u>Year</u>	<u>Docket Number</u>	<u>Case</u>	<u>Defendant</u>
225	2007	1:07-cr-00248-RCL	USA v. Aguilar Ramirez	Jose Fernando Romero Mejia
226	2007	1:07-cr-00248-RCL	USA v. Aguilar Ramirez	Maribel Gallego Rubio
227	2007	1:07-cr-00248-RCL	USA v. Aguilar Ramirez	Camilo Rueda Gil
228	2007	1:07-cr-00248-RCL	USA v. Aguilar Ramirez	Ana Leonor Torres
229	2007	1:07-cr-00248-RCL	USA v. Aguilar Ramirez	Bladimir Culma Sunz
230	2007	1:07-cr-00239-MJG	USA v. Ranjha et al.	Saifullah Anjum Ranjha
231	2007	2:07-cr-00167-JLL	USA v. Brahm	Jake J. Brahm
232	2007	2:07-cr-00361-WHW	USA v. Reyes	Miguel Luis Reyes
233	2007	1:06-cr-01054-RMB	USA v. Iqbal et al.	Javed Iqbal
234	2007	1:06-cr-01054-RMB	USA v. Iqbal et al.	Saleh Elahwal
235	2007	1:07-cr-00115-AKH	USA v. Alishtari	Abdul Tawala Ibn Ali Alishtari
236	2007	1:07-cr-00354-JSR	USA v. Al Kassar et al.	Monzer Al Kassar
237	2007	1:07-cr-00354-JSR	USA v. Al Kassar et al.	Tareq Mousa Al Ghazi
238	2007	1:07-cr-00354-JSR	USA v. Al Kassar et al.	Luis Felipe Moreno Godoy
239	2007	1:07-cr-00543-DLI	USA v. Defreitas et al.	Russell Defreitas
240	2007	1:07-cr-00543-DLI	USA v. Defreitas et al.	Kareem Ibrahim
241	2007	1:07-cr-00543-DLI	USA v. Defreitas et al.	Abdul Kadir
242	2007	1:07-cr-00543-DLI	USA v. Defreitas et al.	Abdel Nur
243	2007	3:06-cr-00496-TJM	USA v. Moultrie	Christopher A. Moultrie
244	2007	3:07-cr-00057-MRK	USA v. Abu-jihaad	Hassan Abu-jihaad
245	2008	2:08-cr-00237-EJG	USA v. Mahapatra	Apun Mahapatra
246	2008	2:08-cr-00238-LKK	USA v. Ramos	Carlos Ramos
247	2008	3:08-cr-00213-LAB	USA v. Sills	Richard Sills, Jr.
248	2008	3:08-cr-01895-MMM	USA v. Carlock	Rachelle Lynette Carlock
249	2008	3:08-cr-01895-MMM	USA v. Carlock	Ella Lousie Sanders
250	2008	3:08-cr-01895-MMM	USA v. Carlock	Eric Reginald Robinson
251	2008	2:07-cr-00708-TC	USA v. Dotson	Nicholas Glenn Dotson
252	2008	3:08-cr-00390-NVW	USA v. Pacheco	Alma de Paz Pacheco
253	2008	2:08-cr-00270-MHM	USA v. Carter	William Carter
254	2008	2:08-cr-01137-JAT	USA v. Schwab	Jack William Schwab
255	2008	1:08-cr-00179-JMS	USA v. Gutierrez	Jose Sergio Medrano Gutierrez
256	2008	2:08-mj-00052-LAM	USA v. Wormly	April Wormly
257	2008	5:08-cr-00040-C-BG	USA v. Dobbs	Carey Glynn Dobbs
258	2008	4:08-cr-00032-HFS	USA v. Joyner	Jonathan Kenneth Joyner
259	2008	5:08-cr-00118-M	USA v. Shandy	Jason Ray Shandy
260	2008	7:07-cr-01218	USA v. Rodriguez	Juan Rodrigo Rodriguez
261	2008	1:08-cr-00059-WHA-TFM	USA v. Vincze	Anthony Paul Vincze
262	2008	1:07-cr-21011-UU	USA v. Faison	Andrew Lee Faison
263	2008	1:08-cr-20410-PCH	USA v. Hupper	Richard David Hupper

	<u>Year</u>	<u>Docket Number</u>	<u>Case</u>	<u>Defendant</u>
264	2008	5:08-cr-00046-MMH-GRJ	USA v. Towns	Donald Clayton Towns
265	2008	3:08-cr-00320-MMH-JRK	USA v. Towns	Donald Clayton Towns
266	2008	5:08-cr-00107-BO	USA v. Fisher	Daniel Beamon Fisher
267	2008	7:07-cr-00033-GFVT	USA v. Rogers	Billy Joe Rogers
268	2008	1:07-cr-00647-JGC	USA v. Ahmed	Zubair Ahmed
269	2008	1:07-cr-00647-JGC	USA v. Ahmed	Khaleel Ahmed
270	2008	1:08-cr-00225-RJA	USA v. Demitro	Gino Demitro
271	2008	1:08-cr-00033-JGM	USA v. Jones et al	Samuel Jeffrey Jones
272	2008	3:06-cr-30038-MAP	USA v. Crooker	Michael A. Crooker
273	2008	1:08-cr-00038-LAK	USA v. Sharif	Allan Guedes Sharif
274	2008	1:08-cr-00365-SAS	USA v. Bout	Viktor Bout
275	2008	1:08-cr-00621-DLI	USA v. John Doe	John Doe
276	2008	1:08-cr-00621-NRB	USA v. Khan	Haji Juma Khan
277	2008	1:08-cr-00711-RJS	USA v. Smulian	Andrew Smulian
278	2008	1:08-cr-00826-RMB	USA v. Siddiqui	Aafia Siddiqui
279	2008	2:08-cr-00066-RK	USA v. King	William King
280	2008	2:08-cr-00562-JCJ	USA v. Gonzalez	Monica Gonzalez
281	2008	1:07-cr-00996-JEI	USA v. Brodie	Derek Brodie
282	2008	1:08-cr-00238	USA v. Mendoza	Hely Mejia Mendoza
283	2009	2:08-cr-00538-FCD	USA v. Keyser	Marc McMain Keyser
284	2009	3:09-cr-00605-H	USA v. Garibay	Alejandro Murillo Garibay
285	2009	2:09-cr-00011-J-BB	USA v. Goyette	Richard Leon Goyette
286	2009	6:08-cr-00042-C-BG	USA v. Walker	Jason Renard Walker
287	2009	0:09-cr-00050-JMR-SRN	USA v. Isse et al	Abdifatah Yusuf Isse
288	2009	0:09-cr-00050-JMR-SRN	USA v. Isse et al	Salah Osman Ahmed
289	2009	1:08-cr-00795	USA v. Akumu	Micah Akumu
290	2009	1:09-cr-10030-MMM-JAG	USA v. Al-Marri	Ali Saleh Kahlah Al-Marri
291	2009	4:09-cr-00069-JLH	USA v. Sanders	Terry L Sanders
292	2009	6:09-cr-00032-BAE-GRS	USA v. Holt	Jeremi Holt
293	2009	6:09-cr-00041-BAE-GRS	USA v. Rountree et al.	Inez Meyon Rountree
294	2009	6:09-cr-00041-BAE-GRS	USA v. Rountree et al.	Kennedy Leroy Scott, Jr.
295	2009	5:09-cr-00059-LDD	USA v. Paplosky	Tina Paplosky
296	2009	2:09-cr-00090-FSH	USA v. Yousuf	Hawa Yousuf
297	2009	1:04-cr-00962-LAP	USA v. Rendon-Herrera et al.	Daniel Rendon-Herrera
298	2009	1:09-cr-01290-DC	USA v. Cordoba-Bemudez	Juanito Cordoba-Bermudez
299	2009	3:08-cr-00240-PCD	USA v. Sastrom	Roy Sastrom
300	2009	3:09-cr-00061-SRU	USA v. Sharkany	Glen Sharkany

APPENDIX B. CASES WITH BACKGROUND INFORMATION FROM LEXIS-NEXIS

Table 3 is a list of cases where background information was found in Lexis-Nexis. The list contains links to the case summary that best answered the seven anti-money laundering banking regulations and statutes related questions.

Table 3. Cases w/Background Information from Lexis-Nexis

<u>Cases</u>	<u>Year</u>	<u>Docket Number</u>	<u>Case Name</u>	<u>Lexis-Nexis Link (Subscription Required)</u>	<u>Accessed</u>
1	2004	3:03-cr-00399-D	USA v. Keeble	United States v. Keeble	Nov-11
2	2004	3:04-cr-00240-P	USA v. Holy Land Foundation for Relief and Development et al.	United States v. Holy Land Found. for Relief & Dev.	Nov-11
3	2004	0:04-cr-60001-MGC	USA v. Hassoun et al.	United States v. Hassoun, 477 F. Supp. 2d 1210, 2007 U.S. Dist. LEXIS 17508 (S.D. Fla., Mar. 12, 2007)	Nov-11
4	2004	1:03-cr-00080-DLH	USA v. McMorrow	United States v. McMorrow	Nov-11
5	2004	0:04-cr-00029-JRT-FLN	USA v. Warsame	United States v. Warsame, 488 F. Supp. 2d 846, 2007 U.S. Dist. LEXIS 39818 (D. Minn., May 31, 2007)	Nov-11
6	2004	1:03-cr-00978	USA v. Marzook et al.	United States v. Marzook, 426 F. Supp. 2d 820, 2006 U.S. Dist. LEXIS 15823 (N.D. Ill., 2006)	Nov-11
7	2004	1:04-cr-00699	USA v. Nettles	United States v. Nettles, 2007 U.S. App. LEXIS 3104 (7th Cir. Ill., Feb. 12, 2007)	Nov-11
8	2004	2:04-cr-00088-ALM	USA v. Abdi	United States v. Abdi, 2005 U.S. Dist. LEXIS 47514 (S.D. Ohio, Sept. 12, 2005)	Nov-11
9	2004	1:04-cr-00402-TJM	USA v. Aref et al.	United States v. Aref	Nov-11
10	2004	2:03-cr-00880-KSH	USA v. Lakhani	United States v. Lakhani	Nov-11
11	2004	1:03-cr-01197-SHS	USA v. Paracha	United States v. Paracha	Nov-11
12	2004	1:03-cr-01322-DLI	USA v. Al-Moayad et al.	United States v. Al-Moayad	Nov-11
13	2004	1:04-cr-00356-JFK	USA v. Mustafa	United States v. Kassir, No. S2 04 Cr. 356 (JFK), 2008 U.S. Dist. LEXIS 51256, 2008 WL 2653952 (S.D.N.Y. July 3, 2008)	Nov-11
14	2004	2:04-cr-00619-JD	USA v. Lit	United States v. Lit	Nov-11
15	2004	1:04-cr-00232-RCL	USA v. Fuerzas Armadas Revolucionarias de Columbia et al.	United States v. Pineda	Nov-11
16	2004	1:03-cr-00513-CMH	USA v. Alamoudi	United States v. Alamoudi, 452 F.3d 310, 2006 U.S. App. LEXIS 16004 (4th Cir. Va., 2006)	Nov-11

<u>Cases</u>	<u>Year</u>	<u>Docket Number</u>	<u>Case Name</u>	<u>Lexis-Nexis Link (Subscription Required)</u>	<u>Accessed</u>
17	2005	2:05-cr-00240-GEB	USA v. Hayat et al.	United States v. Hayat, 2007 U.S. Dist. LEXIS 40157 (E.D. Cal., May 17, 2007)	Nov-11
18	2005	2:05-cr-00519-DDP	USA v. Chhun	United States v. Chhun, 513 F. Supp. 2d 1179, 2007 U.S. Dist. LEXIS 73683 (C.D. Cal., 2007)	Nov-11
19	2005	4:04-cr-02195-JMR-BPV	USA v. Schipke	United States v. Schipke	Nov-11
20	2005	5:05-cr-50030-JLH	USA v. Jaber	United States v. Jaber	Nov-11
21	2005	1:04-cr-00226-LAC-C	USA v. Scott	United States v. Scott	Nov-11
22	2005	5:04-cr-00059-MCR	USA v. Evans	United States v. Evans, 478 F.3d 1332, 2007 U.S. App. LEXIS 3480 (11th Cir. Fla., 2007)	Nov-11
23	2005	1:04-cr-00235-WCG	USA v. Parr	United States v. Parr	Nov-11
24	2005	1:05-cr-00059-DC	USA v. Vincent	United States v. Chalmers, 410 F. Supp. 2d 278 (S.D.N.Y. 2006)	Nov-11
25	2005	1:05-cr-00104-NG	USA v. Siraj	United States v. Siraj, 468 F. Supp. 2d 408, 2007 U.S. Dist. LEXIS 306 (E.D.N.Y., 2007)	Nov-11
26	2005	1:05-cr-00673-LAP	USA v. Shah et al.	United States v. Shah	Nov-11
27	2005	1:05-cr-00337-PLF	USA v. Delaema	United States v. Delaema	Nov-11
28	2005	1:05-cr-00053-GBL	USA v. Abu Ali	United States v. Abu Ali, 395 F. Supp. 2d 338, 2005 U.S. Dist. LEXIS 25552 (2005)	Nov-11
29	2005	1:05-cr-00401-CMH	USA v. Chandia et al.	United States v. Chandia	Nov-11
30	2006	2:05-cr-00378-JLR	USA v. Sloan	United States v. Sloan	Nov-11
31	2006	4:06-cr-00549-MJJ	USA v. Steeves	United States v. Steeves	Nov-11
32	2006	3:05-cr-30157-MJR	USA v. Akumu	United States v. Akumu	Nov-11
33	2006	3:06-cr-00719-JGC	USA v. Amawi et al.	United States v. Amawi, 552 F. Supp. 2d 669, 2008 U.S. Dist. LEXIS 38287 (N.D. Ohio, May 2, 2008)	Nov-11
34	2006	1:06-cr-00147-WSD-GGB	USA v. Ahmed	United States v. Ahmed	Nov-11
35	2006	1:06-cr-20001-JAL	USA v. Salamanca et al.	Jalal Saadat Moheisen v. United States, 2010 U.S. Dist. LEXIS 102984 (S.D. Fla., Aug. 4, 2010)	Nov-11
36	2006	1:06-cr-20373-JAL	USA v. Batiste et al.	United States v. Batiste, 2007 U.S. Dist. LEXIS 61186 (S.D. Fla., Aug. 21, 2007)	Nov-11
37	2006	3:06-cr-00194-JCH	USA v. Ahsan	United States v. Hassan Abu-Jihaad, 600 F. Supp. 2d 362, 2009 U.S. Dist. LEXIS 19111 (D. Conn., 2009)	Nov-11
38	2006	3:05-cr-00493-EMK	USA v. Reynolds	United States v. Reynolds	Nov-11
39	2006	1:06-cr-00108-CPS	USA v. Singh	United States v. Awan	Nov-11
40	2006	1:06-cr-00154-CPS-WP	USA v. Awan	United States v. Awan, 2006 U.S. Dist. LEXIS 81289 (E.D.N.Y., Nov. 6, 2006)	Nov-11

<u>Cases</u>	<u>Year</u>	<u>Docket Number</u>	<u>Case Name</u>	<u>Lexis-Nexis Link (Subscription Required)</u>	<u>Accessed</u>
41	2006	1:06-cr-00442-LAP	USA v. Hashmi	United States v. Hashmi	Nov-11
42	2006	1:06-cr-00616-RJD-JO	USA v. Thavaraja et al.	United States v. Thavaraja	11/25/2011
43	2006	1:06-cr-00652-BMC	USA v. Taleb-Jedi	United States v. Taleb-Jedi	Nov-11
44	2007	2:07-cr-00266-FCD	USA v. Jack et al.	United States v. Jack, 257 F.R.D. 221, 2009 U.S. Dist. LEXIS 43120 (E.D. Cal., May 9, 2009)	Nov-11
45	2007	5:07-cr-00501-JF	USA v. Abdhir et al.	United States v. Hir	11/25/2011
46	2007	4:07-cr-00161-REL	USA v. Moore	United States v. Moore	Nov-11
47	2007	5:07-cr-00533-OLG	USA v. Wormly	United States v. Wormly	Nov-11
48	2007	8:07-cr-00342-SDM-MAP	USA v. Sherif Mohamed et al.	United States v. Ahmed Abdellatif Sherif Mohamed, 546 F. Supp. 2d 1324, 2008 U.S. Dist. LEXIS 15416 (M.D. Fla., Feb. 28, 2008)	Nov-11
49	2007	1:06-cr-00344-GK	USA v. Ibague et al.	United States v. Mendes-Mesquita	Nov-11
50	2007	1:07-cr-00248-RCL	USA v. Aguilar Ramirez	United States v. Vergara	Nov-11
51	2007	2:07-cr-00167-JLL	USA v. Brahm	United States v. Brahm	Nov-11
52	2007	1:07-cr-00354-JSR	USA v. Al Kassar et al.	United States v. Al Kassar, 582 F. Supp. 2d 488, 2008 U.S. Dist. LEXIS 81605 (S.D.N.Y., 2008)	Nov-11
53	2007	1:07-cr-00543-DLI	USA v. Defreitas et al.	United States v. Defreitas, 701 F. Supp. 2d 309, 2010 U.S. Dist. LEXIS 44334 (E.D.N.Y., May 6, 2010)	Nov-11
54	2007	3:07-cr-00057-MRK	USA v. Abu-jihaad	United States v. Abu-Jihaad, 531 F. Supp. 2d 299, 2008 U.S. Dist. LEXIS 4652 (D. Conn., 2008)	Nov-11
55	2008	3:08-cr-01895-MMM	USA v. Carlock	United States v. Love	Nov-11
56	2008	1:07-cr-00647-JGC	USA v. Ahmed	United States v. Zubair Ahmed, 587 F. Supp. 2d 853, 2008 U.S. Dist. LEXIS 106840 (N.D. Ohio, Nov. 25, 2008)	Nov-11
57	2008	1:08-cr-00033-JGM	USA v. Jones et al.	United States v. Jones	Nov-11
58	2008	1:08-cr-00365-SAS	USA v. Bout	United States v. Bout, 2011 U.S. Dist. LEXIS 94810 (S.D.N.Y., Aug. 24, 2011)	Nov-11
59	2008	1:08-cr-00621-NRB	USA v. Khan	United States v. Haji Juma Khan	Nov-11
60	2008	1:08-cr-00711-RJS	USA v. Smulian	United States v. Bout, 2011 U.S. Dist. LEXIS 74318 (S.D.N.Y., July 11, 2011)	Nov-11
61	2009	1:09-cr-10030-MMM-JAG	USA v. Al-Marri	United States v. Al-Marri	Nov-11
62	2009	2:09-cr-00090-FSH	USA v. Yousuf	United States v. Yousuf, 2009 U.S. Dist. LEXIS 13095 (D.N.J., Feb. 13, 2009)	Nov-11

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APPENDIX C. CASES WITH BACKGROUND INFORMATION FROM IPT

Table 4 is a list of cases where background information was found in the Investigative Project on Terrorism Research Center of Court Cases. The list contains links to the court document that best answered the seven anti-money laundering banking regulations and statutes related questions.

Table 4. Cases w/Background Information from IPT

<u>Case s</u>	<u>Yea r</u>	<u>Docket Numbe r</u>	<u>Case Name</u>	<u>IPT Link (No Subscription Required)</u>	<u>Accessed</u>
1	2004	3:04-cr-00240-P	USA v. Holy Land Foundation for Relief and Development et al.	http://www.investigativeproject.org/documents/case_docs/79.pdf	12/8/2012
2	2004	0:04-cr-00029-JRT-FLN	USA v. Warsame	http://www.investigativeproject.org/documents/case_docs/548.pdf	12/8/2012
3	2004	1:03-cr-00978	USA v. Marzook, et al	http://www.investigativeproject.org/documents/case_docs/80.pdf	12/8/2012
4	2004	2:03-cr-81030-RHC-RSW	USA v. Kourani	http://www.investigativeproject.org/documents/case_docs/153.pdf	12/8/2012
5	2004	2:04-cr-00088-ALM	USA v. Abdi	http://www.investigativeproject.org/documents/case_docs/85.pdf	12/8/2012
6	2004	1:04-cr-00402-TJM	USA v. Aref et al.	http://www.investigativeproject.org/documents/case_docs/181.pdf	12/8/2012
7	2004	1:04-cr-10223-GAO	USA v. Badat	http://www.investigativeproject.org/documents/case_docs/868.pdf	12/8/2012
8	2004	2:03-cr-00880-KSH	USA v. Lakhani	http://www.investigativeproject.org/documents/case_docs/1633.pdf	12/8/2012
9	2004	1:03-cr-01322-DLI	USA v. Al-Moayad et al.	http://www.investigativeproject.org/documents/case_docs/91.pdf	12/8/2012

<u>Case s</u>	<u>Yea r</u>	<u>Docket Numbe r</u>	<u>Case Name</u>	<u>IPT Link (No Subscription Required)</u>	<u>Accessed</u>
10	2004	1:04-cr-00356-JFK	USA v. Mustafa	http://www.investigativeproject.org/documents/case_docs/507.pdf	12/8/2012
11	2004	1:04-cr-00528-VM	USA v. Babar	http://www.investigativeproject.org/documents/case_docs/97.pdf	12/8/2012
12	2004	1:04-cr-00573-GBD	USA v. Khalil et al.	http://www.investigativeproject.org/documents/case_docs/234.pdf	12/8/2012
13	2004	1:03-cr-00513-CMH	USA v. Alamoudi	http://www.investigativeproject.org/documents/case_docs/166.pdf	12/9/2012
14	2005	2:05-cr-00240-GEB	USA v. Hayat et al.	http://www.investigativeproject.org/documents/case_docs/176.pdf	12/8/2012
15	2005	5:05-cr-50030-JLH	USA v. Jaber	http://www.investigativeproject.org/documents/case_docs/125.pdf	12/8/2012
16	2005	3:05-cr-00016-TSL-JCS	USA v. Ranson et al.	http://www.investigativeproject.org/documents/case_docs/1232.pdf	12/8/2012
17	2005	3:04-cr-00301-MRK	USA v. Ahmad et al.	http://www.investigativeproject.org/documents/case_docs/96.pdf	12/8/2012
18	2005	1:05-cr-00104-NG	USA v. Siraj	http://www.investigativeproject.org/documents/case_docs/210.pdf	12/8/2012
19	2005	1:05-cr-00673-LAP	USA v. Shah et al.	http://www.investigativeproject.org/documents/case_docs/1086.pdf	12/8/2012
20	2005	1:05-cr-00337-PLF	USA v. Delaema	http://www.investigativeproject.org/documents/case_docs/379.pdf	12/8/2012
21	2005	1:05-cr-00053-GBL	USA v. Abu Ali	http://www.investigativeproject.org/documents/case_docs/1485.pdf	12/9/2012
22	2005	1:05-cr-00401-CMH	USA v. Chandia et al.	http://www.investigativeproject.org/documents/case_docs/1087.pdf	12/8/2012
23	2006	3:06-cr-00719-JGC	USA v. Amawi et al.	http://www.investigativeproject.org/documents/case_docs/448.pdf	12/8/2012

<u>Case s</u>	<u>Yea r</u>	<u>Docket Numbe r</u>	<u>Case Name</u>	<u>IPT Link (No Subscription Required)</u>	<u>Accessed</u>
24	2006	4:06-cr-00062-HLM	USA v. Shorbagi	http://www.investigativeproject.org/documents/case_docs/351.pdf	12/8/2012
25	2006	1:06-cr-00147-WSD-GGB	USA v. Ahmed	http://www.investigativeproject.org/documents/case_docs/750.pdf	12/8/2012
26	2006	1:06-cr-20373-JAL	USA v. Batiste et al.	http://www.investigativeproject.org/documents/case_docs/1738.pdf	12/8/2012
27	2006	3:06-cr-00194-JCH	USA v. Ahsan	http://www.investigativeproject.org/documents/case_docs/203.pdf	12/9/2012
28	2006	1:06-cr-00442-LAP	USA v. Hashmi	http://www.investigativeproject.org/documents/case_docs/421.pdf	12/8/2012
29	2006	1:06-cr-00652-BMC	USA v. Taleb-Jedi	http://www.investigativeproject.org/documents/case_docs/353.pdf	12/8/2012
30	2007	5:07-cr-00501-JF	USA v. Abdhir et al.	http://www.investigativeproject.org/documents/case_docs/431.pdf	12/8/2012
31	2007	4:07-cr-00124	USA v. Maldonado	http://www.investigativeproject.org/documents/case_docs/390.pdf	12/8/2012
32	2007	1:06-cr-00919	USA v. Shareef	http://www.investigativeproject.org/documents/case_docs/347.pdf	12/8/2012
33	2007	8:07-cr-00342-SDM-MAP	USA v. Sherif Mohamed et al.	http://www.investigativeproject.org/documents/case_docs/570.pdf	12/8/2012
34	2007	2:07-cr-00087-GLF	USA v. Paul	http://www.investigativeproject.org/documents/case_docs/586.pdf	12/8/2012
35	2007	1:07-cr-00239-MJG	USA v. Ranjha et al.	http://www.investigativeproject.org/documents/case_docs/502.pdf	12/8/2012
36	2007	1:06-cr-01054-RMB	USA v. Iqbal et al.	http://www.investigativeproject.org/documents/case_docs/339.pdf	12/8/2012
37	2007	1:07-cr-00115-AKH	USA v. Alishtari	http://www.investigativeproject.org/documents/case_docs/364.pdf	12/8/2012

<u>Case s</u>	<u>Yea r</u>	<u>Docket Numbe r</u>	<u>Case Name</u>	<u>IPT Link (No Subscription Required)</u>	<u>Accessed</u>
38	2007	1:07-cr-00543-DLI	USA v. Defreitas et al	http://www.investigativeproject.org/documents/case_docs/419.pdf	12/8/2012
39	2007	3:07-cr-00057-MRK	USA v. Abujihaad	http://www.investigativeproject.org/documents/case_docs/358.pdf	12/9/2012
40	2008	1:08-cr-20410-PCH	USA v. Hupper	http://www.investigativeproject.org/documents/case_docs/652.pdf	12/8/2012
41	2008	1:07-cr-00647-JGC	USA v. Ahmed	http://www.investigativeproject.org/documents/case_docs/760.pdf	12/8/2012
42	2008	1:08-cr-00365-SAS	USA v. Bout	http://www.investigativeproject.org/documents/case_docs/1182.pdf	12/8/2012
43	2008	1:08-cr-00621-NRB	USA v. Khan	http://www.investigativeproject.org/documents/case_docs/713.pdf	12/8/2012
44	2008	1:08-cr-00826-RMB	USA v. Siddiqui	http://www.investigativeproject.org/documents/case_docs/654.pdf	12/8/2012
45	2009	0:09-cr-00050-JMR-SRN	USA v. Isse et al.	http://www.investigativeproject.org/documents/case_docs/1020.pdf	12/8/2012
46	2009	1:09-cr-10030-MMM-JAG	USA v. Al-Marri	http://www.investigativeproject.org/documents/case_docs/845.pdf	12/8/2012
47	2009	1:04-cr-00962-LAP	USA v. Rendon-Herrera et al.	http://www.investigativeproject.org/documents/case_docs/1012.pdf	12/8/2012

APPENDIX D. CASES WITH BACKGROUND INFORMATION FROM OPEN INTERNET SEARCHES

Table 5 is a list of cases where background information was found in open Internet searches. The study only considered information found in court documents or DOJ press releases to answer the seven anti-money laundering banking regulations and statutes related questions.

Table 5. Cases with Background Information from Open Internet Searches

Case	Year	Docket Number	Case Name	Open Internet Search	Accessed
1	2005	1:05-cr-00639	USA v. Steward	http://www.courthousenews.com/2009/07/15/CTAGuy.pdf	12/13/2011
2	2006	1:06-cr-10028-GAO	USA v. Khadr	http://news.findlaw.com/cnn/docs/terrorism/uskhadr20706ind.html	12/9/2012
3	2006	1:06-cr-00615-RJD	USA v. Sarachandran et al.	http://www.justice.gov/usao/briefing_room/ns/mca_terrorism.html	11/25/2011

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APPENDIX E. CASES WITH NO BACKGROUND INFORMATION FOUND

Table 6 is a list of cases where data from only TRAC Reports was used to answer the seven anti-money laundering banking regulations and statutes related questions. No background information was found in Lexis-Nexis, IPT, and open Internet searches.

Table 6. Cases with no Background Information Found

<u>Cases</u>	<u>Year</u>	<u>Docket Number</u>	<u>Case Name</u>
1	2004	1:04-cr-30023-AA	USA v. Wood
2	2004	9:04-cr-00030-DWM	USA v. Stoltenberg
3	2004	3:04-cr-01553-DB	USA v. Cottingham
4	2004	2:04-cr-00058-J	USA v. Thomas
5	2004	8:04-cr-00349-JDW-EAJ	USA v. Gamarra-Murillo
6	2004	1:03-cr-20839-CMA	USA v. Hailey
7	2004	4:04-cr-00171-WTM	USA v. Jenkins
8	2004	5:03-cr-00107-DF	USA v. Mason
9	2004	1:03-cr-00082-LHT	USA v. Rhonda Kay Smith
10	2004	3:04-cr-00013-EMK	USA v. Seersma
11	2004	1:04-cr-00116-YK	USA v. Kemp
12	2004	1:04-cr-00283	USA v. Wamang
13	2004	1:04-cr-00354	USA v. Torres
14	2004	3:04-cr-00010-nkm	USA v. Guyer
15	2005	3:05-cr-00128-KI	USA v. Wilson
16	2005	3:05-c4-00142-BR	USA v. Nonneman
17	2005	3:05-c4-00179-MO	USA v. Hooley
18	2005	2:05-cr-00806-DSF	USA v. Wu, et al
19	2005	4:05-cr-00257	USA v. Grecula
20	2005	4:05-cr-00200-GH	USA v. Khalil
21	2005	1:04-cr-20872_DLG	USA v. West
22	2005	1:05-cr-20443-PCH	USA v. Rodriguez-Acevedo
23	2005	1:05-cr-00162-CC-AJB	USA v. Lofton
24	2005	3:05-cr-00242-RJC-CH	USA v. Taylor
25	2005	7:04-cr-00129-F	USA v. Bell
26	2005	1:04-cr-00421-JAB	USA v. Freimark
27	2005	5:05-cr-00058-JMH	USA v. O'Brien
28	2005	2:05-cr-00108-EAS	USA v. Ali
29	2005	3:05-cr-00376-TJM	USA v. Terzi
30	2005	2:05-cr-00200-JCL	USA v. Banach

<u>Cases</u>	<u>Year</u>	<u>Docket Number</u>	<u>Case Name</u>
31	2005	1:05-cr-00311-MGC	USA v. Barot et al.
32	2005	1:05-cr-00563-ERK	USA v. Abraham
33	2005	2:05-cr-00201-LS	USA v. Steidler
34	2005	1:05-cr-00336-BEL	USA v. Finch
35	2005	1:05-cr-00237	USA v. Sales et al.
36	2006	2:06-cr-00130-JCC	USA v. Baldwin
37	2006	2:06-cr-00352-FCD	USA v. Verdone
38	2006	2:06-cr-00175-JFW	USA v. Kabir
39	2006	2:06-cr-00676-FMC	USA v. Wells
40	2006	8:05-cr-00254-UA	USA v. Gadahn
41	2006	2:06-cr-00508-DAK	USA v. Canaday
42	2006	2:05-cr-01191-FJM	USA v. Depledge
43	2006	3:05-cr-02641-DB	USA v. Cenicerros
44	2006	7:06-cr-00115-RAJ	USA v. Guzman
45	2006	5:06-cr-00165-L	USA v. Hughes
46	2006	3:06-cr-00398-DAC	USA v. Matter
47	2006	1:05-cr-00496-CAP-AJB	USA v. Goodrich
48	2006	3:06-cr-00098	USA v. Adamson
49	2006	1:06-cr-00009-SPM-AK	USA v. Workman
50	2006	6:06-cr-00057-GKS-GJK	USA v. Adamson
51	2006	9:06-cr-80051-KAM	USA v. Vassalotti
52	2006	1:06-cr-10240-GAO	USA v. Verdone
53	2006	3:06-cr-00558-MLC	USA v. Bilby
54	2006	2:05-cr-00679-JD	USA v. Silvera
55	2006	1:06-cr-00178-CKK	USA v. Lowe
56	2007	3:07-cr-60009-KI	USA v. Slattery
57	2007	2:06-cr-00424-EJG	USA v. Braun
58	2007	2:06-cr-00826-ABC	USA v. Morris
59	2007	2:07-cr-00054-GHK	USA v. Kolupski
60	2007	2:06-cr-00871-CW	USA v. Hale
61	2007	2:07-cr-00340-DB	USA v. Laxson
62	2007	3:07-cr-00382-SMM	USA v. Montoya
63	2007	3:07-cr-00701-NVW	USA v. Rocha
64	2007	5:07-cr-00017-C-BG	USA v. Mason et al
65	2007	5:07-cr-00035-C-BG	USA v. Guzman
66	2007	5:07-cr-00195-L	USA v. Hardy
67	2007	6:07-cr-00039-JHP	USA v. Kramer
68	2007	4:06-cr-00384-JMM	USA v. Selsor
69	2007	4:06-cr-00385-JLH	USA v. Silverman
70	2007	1:07-cr-00098-SS	USA v. Evans

<u>Cases</u>	<u>Year</u>	<u>Docket Number</u>	<u>Case Name</u>
71	2007	4:07-cr-00131	USA v. Cristiansen
72	2007	4:07-cr-00030-JAJ	USA v. Haileselassie
73	2007	1:07-cr-20775-ASG	USA v. Guedes Sharif
74	2007	1:06-cr-00491-JOF-AJB	USA v. Harper
75	2007	4:07-cr-00893-RBH	USA v. Bailey
76	2007	4:07-cr-01046-TLW	USA v. Hanna
77	2007	2:06-cr-20523-VAR-DAS	USA v. Odish
78	2007	2:07-cr-20442-MOB-PJK	USA v. Collins
79	2007	3:07-cr-00147	USA v. Smith
80	2007	3:06-cr-00510-HEH	USA v. Hamrick
81	2007	2:07-cr-00361-WHW	USA v. Reyes
82	2007	3:06-cr-00496-TJM	USA v. Moultrie
83	2008	2:08-cr-00237-EJG	USA v. Mahapatra
84	2008	2:08-cr-00238-LKK	USA v. Ramos
85	2008	3:08-cr-00213-LAB	USA v. Sills
86	2008	2:07-cr-00708-TC	USA v. Dotson
87	2008	3:08-cr-00390-NVW	USA v. Pacheco
88	2008	2:08-cr-00270-MHM	USA v. Carter
89	2008	2:08-cr-01137-JAT	USA v. Schwab
90	2008	1:08-cr-00179-JMS	USA v. Gutierrez
91	2008	2:08-mj-00052-LAM	USA v. Wormly
92	2008	5:08-cr-00040-C-BG	USA v. Dobbs
93	2008	4:08-cr-00032-HFS	USA v. Joyner
94	2008	5:08-cr-00118-M	USA v. Shandy
95	2008	7:07-cr-01218	USA v. Rodriguez
96	2008	1:08-cr-00059-WHA-TFM	USA v. Vincze
97	2008	1:07-cr-21011-UU	USA v. Faison
98	2008	5:08-cr-00046-MMH-GRJ	USA v. Towns
99	2008	3:08-cr-00320-MMH-JRK	USA v. Towns
100	2008	5:08-cr-00107-BO	USA v. Fisher
101	2008	7:07-cr-00033-GFVT	USA v. Rogers
102	2008	1:08-cr-00225-RJA	USA v. Demitro
103	2008	3:06-cr-30038-MAP	USA v. Crooker
104	2008	1:08-cr-00038-LAK	USA v. Sharif
105	2008	1:08-cr-00621-DLI	USA v. John Doe
106	2008	2:08-cr-00066-RK	USA v. King
107	2008	2:08-cr-00562-JCJ	USA v. Gonzalez
108	2008	1:07-cr-00996-JEI	USA v. Brodie
109	2008	1:08-cr-00238	USA v. Mendoza
110	2009	2:08-cr-00538-FCD	USA v. Keyser

<u>Cases</u>	<u>Year</u>	<u>Docket Number</u>	<u>Case Name</u>
111	2009	3:09-cr-00605-H	USA v. Garibay
112	2009	2:09-cr-00011-J-BB	USA v. Goyette
113	2009	6:08-cr-00042-C-BG	USA v. Walker
114	2009	1:08-cr-00795	USA v. Akumu
115	2009	4:09-cr-00069-JLH	USA v. Sanders
116	2009	6:09-cr-00032-BAE-GRS	USA v. Holt
117	2009	6:09-cr-00041-BAE-GRS	USA v. Rountree et al.
118	2009	5:09-cr-00059-LDD	USA v. Paplosky
119	2009	1:09-cr-01290-DC	USA v. Cordoba-Bemudez
120	2009	3:08-cr-00240-PCD	USA v. Sastrom
121	2009	3:09-cr-00061-SRU	USA v. Sharkany

APPENDIX F. QUALITATIVE ANALYSIS RESULTS

Table 7 contains the answers to the seven anti-money laundering banking regulations and statutes related questions for each case and defendant.

Table 7. Qualitative Analysis Results

<u>Docket Number</u>	<u>Case</u>	<u>Defendant</u>	<u>Money Laundering Charges?</u>	<u>Accounts with False Identities?</u>	<u>Substantial Amount of Money?</u>	<u>Cash Transactions Reports filed?</u>	<u>Suspicious Activity Reports filed?</u>	<u>Foreign Shell Banks?</u>	<u>Sting Operation</u>
1:04-cr-30023-AA	USA v. Wood	Jason Paul Wood	No	No	No	No	No	No	No
9:04-cr-00030-DWM	USA v. Stoltenberg	William Jon Stoltenberg	No	No	No	No	No	No	No
3:04-cr-01553-DB	USA v. Cottingham	Steven Earl Cottingham	No	No	No	No	No	No	No
2:04-cr-00058-J	USA v. Thomas	Bryan Luther Thomas	No	No	No	No	No	No	No
3:03-cr-00399-D	USA v. Keeble	Carlton D. Keeble	No	No	No	No	No	No	No
3:04-cr-00240-P	USA v. Holy Land Foundation for Relief and Development et al.	Holy Land Foundation for Relief and Development	Yes	No	Yes	No	No	No	No
3:04-cr-00240-P	USA v. Holy Land Foundation for Relief and Development et al.	Shukri Abu Baker	Yes	No	Yes	No	No	No	No
3:04-cr-00240-P	USA v. Holy Land Foundation for Relief and Development et al.	Muhammad El-Mezain	Yes	No	Yes	No	No	No	No

<u>Docket Number</u>	<u>Case</u>	<u>Defendant</u>	<u>Money Laundering Charges?</u>	<u>Accounts with False Identities?</u>	<u>Substantial Amount of Money?</u>	<u>Cash Transactions Reports filed?</u>	<u>Suspicious Activity Reports filed?</u>	<u>Foreign Shell Banks?</u>	<u>Sting Operation</u>
3:04-cr-00240-P	USA v. Holy Land Foundation for Relief and Development et al.	Ghassan Elashi	Yes	No	Yes	No	No	No	No
3:04-cr-00240-P	USA v. Holy Land Foundation for Relief and Development et al.	Haitham Maghawri	Yes	No	Yes	No	No	No	No
3:04-cr-00240-P	USA v. Holy Land Foundation for Relief and Development et al.	Akram Mishal	Yes	No	Yes	No	No	No	No
3:04-cr-00240-P	USA v. Holy Land Foundation for Relief and Development et al.	Mufid Abdulqader	Yes	No	Yes	No	No	No	No
3:04-cr-00240-P	USA v. Holy Land Foundation for Relief and Development et al.	Abdulrahman Odeh	Yes	No	Yes	No	No	No	No
8:04-cr-00349-JDW-EAJ	USA v. Gamarra-Murillo	Carols Gamarra-Murillo	No	No	No	No	No	No	No
1:03-cr-20839-CMA	USA v. Hailey	Joseph Carlton Hailey	No	No	No	No	No	No	No
0:04-cr-60001-MGC	USA v. Hassoun et al.	Adhan Amin Hassoun	No	No	No	No	No	No	No
0:04-cr-60001-MGC	USA v. Hassoun et al.	Mohamed Hesham Youssef	No	No	No	No	No	No	No
0:04-cr-60001-MGC	USA v. Hassoun et al.	Kifah Wael Jayyous	No	No	No	No	No	No	No
0:04-cr-60001-MGC	USA v. Hassoun et al.	Kassem Daher	No	No	No	No	No	No	No
0:04-cr-60001-MGC	USA v. Hassoun et al.	Jose Padilla	No	No	No	No	No	No	No
4:04-cr-00171-WTM	USA v. Jenkins	David Lynn Jenkins, Jr.	No	No	No	No	No	No	No

<u>Docket Number</u>	<u>Case</u>	<u>Defendant</u>	<u>Money Laundering Charges?</u>	<u>Accounts with False Identities?</u>	<u>Substantial Amount of Money?</u>	<u>Cash Transactions Reports filed?</u>	<u>Suspicious Activity Reports filed?</u>	<u>Foreign Shell Banks?</u>	<u>Sting Operation</u>
5:03-cr-00107-DF	USA v. Mason	Ricky Mason	No	No	No	No	No	No	No
1:03-cr-00082-LHT	USA v. Rhonda Kay Smith	Rhonda Kay Smith	No	No	No	No	No	No	No
1:03-cr-00080-DLH	USA v. McMorrow	Patrick Timothy McMorrow	No	No	No	No	No	No	No
0:04-cr-00029-JRT-FLN	USA v. Warsame	Muhamed Abdullah Warsame	No	No	No	No	No	No	No
1:03-cr-00978	USA v. Marzook et al.	Muhammad Hamid Khalil Salah	No	No	No	No	No	No	No
1:04-cr-00699	USA v. Nettles	Gale Nettles	No	No	No	No	No	No	No
2:03-cr-81030-RHC-RSW	USA v. Kourani	Mahmoud Youssef Kourani	No	No	No	No	No	No	No
2:04-cr-00088-ALM	USA v. Abdi	Nuradin M Abdi	No	No	No	No	No	No	No
1:04-cr-00402-TJM	USA v. Aref et al.	Yassin Muhiddin Aref	Yes	No	Yes	No	No	No	Yes
1:04-cr-00402-TJM	USA v. Aref et al.	Muhammed Mosharref Hossain	Yes	No	Yes	No	No	No	Yes
1:04-cr-10223-GAO	USA v. Badat	Saajid Mohammed Badat	No	No	No	No	No	No	No
3:04-cr-00013-EMK	USA v. Seersma	Justin Seersma	No	No	No	No	No	No	No
2:03-cr-00880-KSH	USA v. Lakhani	Hemant Lakhani	Yes	No	Yes	No	No	No	Yes
1:03-cr-01197-SHS	USA v. Paracha	Uzair Paracha	No	No	No	No	No	No	No
1:03-cr-01322-DLI	USA v. Al-Moayad et al.	Mohammed Ali Al-Moayad	No	No	No	No	No	No	No

<u>Docket Number</u>	<u>Case</u>	<u>Defendant</u>	<u>Money Laundering Charges?</u>	<u>Accounts with False Identities?</u>	<u>Substantial Amount of Money?</u>	<u>Cash Transactions Reports filed?</u>	<u>Suspicious Activity Reports filed?</u>	<u>Foreign Shell Banks?</u>	<u>Sting Operation</u>
1:03-cr-01322-DLI	USA v. Al-Moayad et al.	Mohammed Mohsen Zayed	No	No	No	No	No	No	No
1:04-cr-00356-JFK	USA v. Mustafa	Mustafa Kamel Mustafa	No	No	No	No	No	No	No
1:04-cr-00356-JFK	USA v. Mustafa	Aswat Haroon Rashid	No	No	No	No	No	No	No
1:04-cr-00356-JFK	USA v. Mustafa	Oussama Kassir	No	No	No	No	No	No	No
1:04-cr-00356-JFK	USA v. Mustafa	Earnest James Ujaama	No	No	No	No	No	No	No
1:04-cr-00528-VM	USA v. Babar	Mohammed Junaid Babar	No	No	No	No	No	No	No
1:04-cr-00573-GBD	USA v. Khalil et al.	Naji Antoine Abi Khalil	No	No	No	No	No	No	Yes
2:04-cr-00619-JD	USA v. Lit	Preston Lit	No	No	No	No	No	No	No
1:04-cr-00116-YK	USA v. Kemp	Stephen Kemp	No	No	No	No	No	No	No
1:04-cr-00232-RCL	USA v. Fuerzas Armadas Revolucionarias de Columbia et al.	Juvenal Ovidio Ricardo Palmera Pineda	No	No	No	No	No	No	No
1:04-cr-00283	USA v. Wamang	Anthonius Wamang	No	No	No	No	No	No	No
1:04-cr-00354	USA v. Torres	Arturo Montano Torres	No	No	No	No	No	No	No
1:04-cr-00354	USA v. Torres	Adolfo Toledo Medina	No	No	No	No	No	No	No
1:03-cr-00513-CMH	USA v. Alamoudi	Abdurahman M. Alamoudi	Yes	No	Yes	No	No	No	No
3:04-cr-00010-nkm	USA v. Guyer	Jack Thomas Guyer	No	No	No	No	No	No	No

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3:05-cr-00128-KI	USA v. Wilson	Steven Robert Wilson	No	No	No	No	No	No	No
3:05-c4-00142-BR	USA v. Nonneman	Kyle Gregory Nonneman	No	No	No	No	No	No	No
3:05-c4-00179-MO	USA v. Hooley	Jakeob Zachary Hooley	No	No	No	No	No	No	No
2:05-cr-00240-GEB	USA v. Hayat et al.	Hamid Hayat	No	No	No	No	No	No	No
2:05-cr-00519-DDP	USA v. Chhun	Yasith Chhun	No	No	No	No	No	No	No
2:05-cr-00806-DSF	USA v. Wu et al.	Chao Tung Wu	No	No	No	No	No	No	No
2:05-cr-00806-DSF	USA v. Wu et al.	Yi Qung Chen	No	No	No	No	No	No	No
2:05-cr-00806-DSF	USA v. Wu et al.	Kevin LNU	No	No	No	No	No	No	No
4:04-cr-02195-JMR-BPV	USA v. Schipke	Mary Elizabeth Schipke	No	No	No	No	No	No	No
4:05-cr-00257	USA v. Grecula	Ronald Allen Grecula	No	No	No	No	No	No	No
5:05-cr-50030-JLH	USA v. Jaber	Arwah J Jaber	No	No	No	No	No	No	No
4:05-cr-00200-GH	USA v. Khalil	Naji Antoine Abi Khalil	No	No	No	No	No	No	No
3:05-cr-00016-TSL-JCS	USA v. Ranson et al.	Lamont Ranson	No	No	No	No	No	No	Yes
3:05-cr-00016-TSL-JCS	USA v. Ranson et al.	Cedric Carpenter	No	No	No	No	No	No	Yes
1:04-cr-00226-LAC-C	USA v. Scott	Jessie Scott	No	No	No	No	No	No	No
5:04-cr-00059-MCR	USA v. Evans	Roger V. Evans	No	No	No	No	No	No	No

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1:04-cr-20872-DLG	USA v. West	Kenneth R West	No	No	No	No	No	No	No
1:05-cr-20443-PCH	USA v. Rodriguez-Acevedo	Hector Rodriguez-Acevedo	No	No	No	No	No	No	No
1:05-cr-20443-PCH	USA v. Rodriguez-Acevedo	Jose Gelvez-Albarracin	No	No	No	No	No	No	No
1:05-cr-00162-CC-AJB	USA v. Lofton	Salem Fard Lofton	No	No	No	No	No	No	No
3:05-cr-00242-RJC-CH	USA v. Taylor	Jordan Eric Taylor	No	No	No	No	No	No	No
7:04-cr-00129-F	USA v. Bell	Shajuana T. Bell	No	No	No	No	No	No	No
1:04-cr-00421-JAB	USA v. Freimark	Robert J. Freimark	No	No	No	No	No	No	No
5:05-cr-00058-JMH	USA v. O'Brien	Brien	No	No	No	No	No	No	No
1:04-cr-00235-WCG	USA v. Parr	Steven J Parr	No	No	No	No	No	No	No
1:05-cr-00639	USA v. Steward	Bilal Steward	No	No	No	No	No	No	No
2:05-cr-00108-EAS	USA v. Ali	Khadrah Farah Ali	No	No	No	No	No	No	No
3:05-cr-00376-TJM	USA v. Terzi	Danian M. Terzi	No	No	No	No	No	No	No
3:04-cr-00301-MRK	USA v. Ahmad et al.	Babar Ahmad	Yes	No	No	No	No	No	No
3:04-cr-00301-MRK	USA v. Ahmad et al.	Azzam Publications	Yes	No	No	No	No	No	No
2:05-cr-00200-JCL	USA v. Banach	David Banach	No	No	No	No	No	No	No
1:05-cr-00059-DC	USA v. Vincent	David B. Chalmers, Jr.	No	No	No	No	No	No	No
1:05-cr-00059-DC	USA v. Vincent	John Irving	No	No	No	No	No	No	No

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1:05-cr-00059-DC	USA v. Vincent	Ludmil Dionissiev	No	No	No	No	No	No	No
1:05-cr-00059-DC	USA v. Vincent	Bayoil (USA), Inc.	No	No	No	No	No	No	No
1:05-cr-00059-DC	USA v. Vincent	Bayoil Supply & Trading Limited	No	No	No	No	No	No	No
1:05-cr-00059-DC	USA v. Vincent	Oscar S. Wyatt, Jr.	No	No	No	No	No	No	No
1:05-cr-00059-DC	USA v. Vincent	Catalina del Socorro Miguel Fuentes	No	No	No	No	No	No	No
1:05-cr-00059-DC	USA v. Vincent	Mohammed Saidji	No	No	No	No	No	No	No
1:05-cr-00059-DC	USA v. Vincent	Nafta Petroleum Company Limited	No	No	No	No	No	No	No
1:05-cr-00059-DC	USA v. Vincent	Mednafta Trading Company Limited	No	No	No	No	No	No	No
1:05-cr-00059-DC	USA v. Vincent	Sarenco, S. A.	No	No	No	No	No	No	No
1:05-cr-00059-DC	USA v. Vincent	Ephraim Nadler	No	No	No	No	No	No	No
1:05-cr-00104-NG	USA v. Siraj	Shahawar Matin Siraj	No	No	No	No	No	No	Yes
1:05-cr-00311-MGC	USA v. Barot et al.	Dhiren Barot	No	No	No	No	No	No	No
1:05-cr-00311-MGC	USA v. Barot et al.	Nadeem Tarmohamed	No	No	No	No	No	No	No
1:05-cr-00311-MGC	USA v. Barot et al.	Qaisar Shaffi	No	No	No	No	No	No	No
1:05-cr-00563-ERK	USA v. Abraham	Eduardo Abraham	No	No	No	No	No	No	No

<u>Docket Number</u>	<u>Case</u>	<u>Defendant</u>	<u>Money Laundering Charges?</u>	<u>Accounts with False Identities?</u>	<u>Substantial Amount of Money?</u>	<u>Cash Transactions Reports filed?</u>	<u>Suspicious Activity Reports filed?</u>	<u>Foreign Shell Banks?</u>	<u>Sting Operation</u>
1:05-cr-00673-LAP	USA v. Shah et al.	Tarik Ibn Osman Shah	No	No	No	No	No	No	No
1:05-cr-00673-LAP	USA v. Shah et al.	Rafiq Sabir	No	No	No	No	No	No	No
1:05-cr-00673-LAP	USA v. Shah et al.	Mahmud Faruq Brent	No	No	No	No	No	No	No
1:05-cr-00673-LAP	USA v. Shah et al.	Abdulrahman Farhane	No	No	No	No	No	No	No
2:05-cr-00201-LS	USA v. Steidler	Blake Ryan Steidler	No	No	No	No	No	No	No
1:05-cr-00336-BEL	USA v. Finch	Robert Darnell Finch	No	No	No	No	No	No	No
1:05-cr-00237	USA v. Sales et al.	Rayfran Das Neves Sales	No	No	No	No	No	No	No
1:05-cr-00237	USA v. Sales et al.	Clodoaldo Carlos Batista	No	No	No	No	No	No	No
1:05-cr-00337-PLF	USA v. Delaema	Wesam al Delaema	No	No	No	No	No	No	No
1:05-cr-00053-GBL	USA v. Abu Ali	Ahmen Omar Abu Ali	No	No	No	No	No	No	No
1:05-cr-00401-CMH	USA v. Chandia et al.	Ali Asad Chandia	No	No	No	No	No	No	No
1:05-cr-00401-CMH	USA v. Chandia et al.	Mohammed Ajmal Khan	No	No	No	No	No	No	No
2:05-cr-00378-JLR	USA v. Sloan	Aaron Jermaine Sloan	No	No	No	No	No	No	No
2:06-cr-00130-JCC	USA v. Baldwin	Steven Leroy Baldwin	No	No	No	No	No	No	No
2:06-cr-00352-FCD	USA v. Verdone	Flint Michael Verdone	No	No	No	No	No	No	No
4:06-cr-00549-MJJ	USA v. Steeves	Paul Charles Steeves	No	No	No	No	No	No	No
2:06-cr-00175-JFW	USA v. Kabir	Khandaker Kabir	No	No	No	No	No	No	No

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2:06-cr-00676-FMC	USA v. Wells	Yechezkel Wells	No	No	No	No	No	No	No
8:05-cr-00254-UA	USA v. Gadahn	Adam Gadahn	No	No	No	No	No	No	No
2:06-cr-00508-DAK	USA v. Canaday	Tony M. Canaday	No	No	No	No	No	No	No
2:05-cr-01191-FJM	USA v. Depledge	Matthew Richard Depledge	No	No	No	No	No	No	No
3:05-cr-02641-DB	USA v. Cenicerros	Luis Omar Cenicerros	No	No	No	No	No	No	No
7:06-cr-00115-RAJ	USA v. Guzman	Maria L. Guzman	No	No	No	No	No	No	No
5:06-cr-00165-L	USA v. Hughes	Michael T Hughes	No	No	No	No	No	No	No
3:05-cr-30157-MJR	USA v. Akumu	Micah A Akumu	No	No	No	No	No	No	No
3:06-cr-00398-DAC	USA v. Matter	Leon Howard Matter	No	No	No	No	No	No	No
3:06-cr-00719-JGC	USA v. Amawi et al.	Mohammad Zaki Amawi	No	No	No	No	No	No	No
3:06-cr-00719-JGC	USA v. Amawi et al.	Marwan Othman El-Hindi	No	No	No	No	No	No	No
3:06-cr-00719-JGC	USA v. Amawi et al.	Wassim I. Mazloum	No	No	No	No	No	No	No
4:06-cr-00062-HLM	USA v. Shorbagi	Mohamed Shorbagi	No	No	No	No	No	No	No
1:05-cr-00496-CAP-AJB	USA v. Goodrich	Kenneth Goodrich	No	No	No	No	No	No	No
1:06-cr-00147-WSD-GGB	USA v. Ahmed	Syed Haris Ahmed	No	No	No	No	No	No	No
1:06-cr-00147-WSD-GGB	USA v. Ahmed	Ehsanul Islam Sadequee	No	No	No	No	No	No	No
3:06-cr-00098	USA v. Adamson	Richard Adamson	No	No	No	No	No	No	No

<u>Docket Number</u>	<u>Case</u>	<u>Defendant</u>	<u>Money Laundering Charges?</u>	<u>Accounts with False Identities?</u>	<u>Substantial Amount of Money?</u>	<u>Cash Transactions Reports filed?</u>	<u>Suspicious Activity Reports filed?</u>	<u>Foreign Shell Banks?</u>	<u>Sting Operation</u>
1:06-cr-00009-SPM-AK	USA v. Workman	Miles L Workman	No	No	No	No	No	No	No
6:06-cr-00057-GKS-GJK	USA v. Adamson	Richard Adamson	No	No	No	No	No	No	No
9:06-cr-80051-KAM	USA v. Vassalotti	Anthony Vassalotti	No	No	No	No	No	No	No
1:06-cr-20001-JAL	USA v. Salamanca et al.	Victor Daniel Salamanca	Yes	No	No	No	No	No	Yes
1:06-cr-20001-JAL	USA v. Salamanca et al.	Julio Cesar Lopez	Yes	No	No	No	No	No	Yes
1:06-cr-20001-JAL	USA v. Salamanca et al.	Jalal Saadat Moheisen	No	No	No	No	No	No	Yes
1:06-cr-20001-JAL	USA v. Salamanca et al.	Bernardo Valdes Londono	No	No	No	No	No	No	Yes
1:06-cr-20001-JAL	USA v. Salamanca et al.	Carmen Maria Ponton Caro	No	No	No	No	No	No	Yes
1:06-cr-20001-JAL	USA v. Salamanca et al.	Jose Tito Libio Uloa Melo	No	No	No	No	No	No	Yes
1:06-cr-20001-JAL	USA v. Salamanca et al.	Luis Alfredo Daza Morales	No	No	No	No	No	No	Yes
1:06-cr-20373-JAL	USA v. Batiste et al.	Narseal Batiste	No	No	No	No	No	No	No
1:06-cr-20373-JAL	USA v. Batiste et al.	Patrick Abraham	No	No	No	No	No	No	No
1:06-cr-20373-JAL	USA v. Batiste et al.	Stanley Grant Phanor	No	No	No	No	No	No	No
1:06-cr-20373-JAL	USA v. Batiste et al.	Naudimar Herrera	No	No	No	No	No	No	No
1:06-cr-20373-JAL	USA v. Batiste et al.	Burson Augustin	No	No	No	No	No	No	No
1:06-cr-20373-JAL	USA v. Batiste et al.	Lyglenson Lemorin	No	No	No	No	No	No	No

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1:06-cr-20373-JAL	USA v. Batiste et al.	Rotschild Augustine	No	No	No	No	No	No	No
1:06-cr-10028-GAO	USA v. Khadr	Abdullah Ahmed Khadr	No	No	No	No	No	No	No
1:06-cr-10240-GAO	USA v. Verdone	Flint Michael Verdone	No	No	No	No	No	No	No
3:06-cr-00194-JCH	USA v. Ahsan	Syed Talha Ahsan	No	No	No	No	No	No	No
3:05-cr-00493-EMK	USA v. Reynolds	Michael Curtis Reynolds	No	No	No	No	No	No	No
1:06-cr-00108-CPS	USA v. Singh	Gurbax Singh	No	No	No	No	No	No	No
1:06-cr-00154-CPS-WP	USA v. Awan	Khalid Awan	Yes	No	No	No	No	No	No
1:06-cr-00442-LAP	USA v. Hashmi	Syed Hashmi	No	No	No	No	No	No	No
1:06-cr-00615-RJD	USA v. Sarachandran et al.	Sathajhan Sarachandran	No	No	No	No	No	No	No
1:06-cr-00615-RJD	USA v. Sarachandran et al.	Sahilal Sabaratnam	No	No	No	No	No	No	No
1:06-cr-00615-RJD	USA v. Sarachandran et al.	Thiruthanika n Thanigasalam	No	No	No	No	No	No	No
1:06-cr-00615-RJD	USA v. Sarachandran et al.	Nadarasa Yogarasasa	No	No	No	No	No	No	No
1:06-cr-00615-RJD	USA v. Sarachandran et al.	Piratheepan Nadarajah	No	No	No	No	No	No	No
1:06-cr-00616-RJD-JO	USA v. Thavaraja et al.	Pratheepan Thavaraja	No	No	No	No	No	No	No
1:06-cr-00616-RJD-JO	USA v. Thavaraja et al.	Murugesu Vinayagamorthy	No	No	No	No	No	No	No

<u>Docket Number</u>	<u>Case</u>	<u>Defendant</u>	<u>Money Laundering Charges?</u>	<u>Accounts with False Identities?</u>	<u>Substantial Amount of Money?</u>	<u>Cash Transactions Reports filed?</u>	<u>Suspicious Activity Reports filed?</u>	<u>Foreign Shell Banks?</u>	<u>Sting Operation</u>
1:06-cr-00616-RJD-JO	USA v. Thavaraja et al.	Vijayshanthar Patpanathan	No	No	No	No	No	No	No
1:06-cr-00616-RJD-JO	USA v. Thavaraja et al.	Gaspar Raj Maria Paulian	No	No	No	No	No	No	No
1:06-cr-00616-RJD-JO	USA v. Thavaraja et al.	Namasivaya Viswanathan	No	No	No	No	No	No	No
1:06-cr-00616-RJD-JO	USA v. Thavaraja et al.	Nachimuthu Socrates	No	No	No	No	No	No	No
1:06-cr-00616-RJD-JO	USA v. Thavaraja et al.	Karunakaran Kandasamy	No	No	No	No	No	No	No
1:06-cr-00652-BMC	USA v. Taleb-Jedi	Zeinab Taleb-Jedi	No	No	No	No	No	No	No
3:06-cr-00558-MLC	USA v. Bilby	Donald Bilby	No	No	No	No	No	No	No
2:05-cr-00679-JD	USA v. Silvera	Michael Silvera	No	No	No	No	No	No	No
1:06-cr-00178-CKK	USA v. Lowe	Chat Lowe	No	No	No	No	No	No	No
3:07-cr-60009-KI	USA v. Slattery	Edward Thomas Slattery	No	No	No	No	No	No	No
2:06-cr-00424-EJG	USA v. Braun	Michael Lee Braun	No	No	No	No	No	No	No
2:07-cr-00266-FCD	USA v. Jack et al.	Harrison Ulrich Jack	No	No	No	No	No	No	No
2:07-cr-00266-FCD	USA v. Jack et al.	Vang Pao	No	No	No	No	No	No	No
2:07-cr-00266-FCD	USA v. Jack et al.	Lo Cha Thao	No	No	No	No	No	No	No
2:07-cr-00266-FCD	USA v. Jack et al.	Lo Thao	No	No	No	No	No	No	No
2:07-cr-00266-FCD	USA v. Jack et al.	Youa True Vang	No	No	No	No	No	No	No
2:07-cr-00266-FCD	USA v. Jack et al.	Hue Vang	No	No	No	No	No	No	No

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2:07-cr-00266-FCD	USA v. Jack et al.	Chong Yang Thao	No	No	No	No	No	No	No
2:07-cr-00266-FCD	USA v. Jack et al.	Nhia Kao Vang	No	No	No	No	No	No	No
2:07-cr-00266-FCD	USA v. Jack et al.	Dang Vang	No	No	No	No	No	No	No
5:07-cr-00501-JF	USA v. Abdhir et al.	Rahmat Abdhir	No	No	No	No	No	No	No
5:07-cr-00501-JF	USA v. Abdhir et al.	Zulkifi Abdhir	No	No	No	No	No	No	No
2:06-cr-00826-ABC	USA v. Morris	Jason Morris	No	No	No	No	No	No	No
2:07-cr-00054-GHK	USA v. Kolupski	Dennis Leon Kolupski	No	No	No	No	No	No	No
2:06-cr-00871-CW	USA v. Hale	Thomas Francis Hale	No	No	No	No	No	No	No
2:07-cr-00340-DB	USA v. Laxson	Rachel Lauren Laxon	No	No	No	No	No	No	No
3:07-cr-00382-SMM	USA v. Montoya	Rene Robert Montoya	No	No	No	No	No	No	No
3:07-cr-00701-NVW	USA v. Rocha	Melena Angeline Rocha	No	No	No	No	No	No	No
5:07-cr-00017-C-BG	USA v. Mason et al.	Paul Joseph Mason	No	No	No	No	No	No	No
5:07-cr-00017-C-BG	USA v. Mason et al.	Janice Linn Mason	No	No	No	No	No	No	No
5:07-cr-00035-C-BG	USA v. Guzman	Jesse Guzman	No	No	No	No	No	No	No
5:07-cr-00195-L	USA v. Hardy	Roger Allen Hardy	No	No	No	No	No	No	No
6:07-cr-00039-JHP	USA v. Kramer	William Scott Kramer	No	No	No	No	No	No	No
4:06-cr-00384-JMM	USA v. Selsor	Leroy Shawn Selsor	No	No	No	No	No	No	No

<u>Docket Number</u>	<u>Case</u>	<u>Defendant</u>	<u>Money Laundering Charges?</u>	<u>Accounts with False Identities?</u>	<u>Substantial Amount of Money?</u>	<u>Cash Transactions Reports filed?</u>	<u>Suspicious Activity Reports filed?</u>	<u>Foreign Shell Banks?</u>	<u>Sting Operation</u>
4:06-cr-00385-JLH	USA v. Silverman	Robert Roosevelt Silverman	No	No	No	No	No	No	No
4:07-cr-00161-REL	USA v. Moore	Charles Wayne Moore	No	No	No	No	No	No	No
5:07-cr-00533-OLG	USA v. Wormly	April Wormly	No	No	No	No	No	No	No
1:07-cr-00098-SS	USA v. Evans	Paul Ross Evans	No	No	No	No	No	No	No
4:07-cr-00124	USA v. Maldonado	Daniel Joseph Maldonado	No	No	No	No	No	No	No
4:07-cr-00131	USA v. Christiansen	Patricia Norma Christiansen	No	No	No	No	No	No	No
4:07-cr-00030-JAJ	USA v. Haileselassie	America Haileselassie	No	No	No	No	No	No	No
1:06-cr-00919	USA v. Shareef	Derrick Shareef	No	No	No	No	No	No	Yes
1:07-cr-20775-ASG	USA v. Guedes Sharif	Allan Guedes Sharif	No	No	No	No	No	No	No
8:07-cr-00342-SDM-MAP	USA v. Sherif Mohamed et al.	Ahmed Abdellatif Sherif Mohamed	No	No	No	No	No	No	No
1:06-cr-00491-JOF-AJB	USA v. Harper	Barron Hays Harper, Jr.	No	No	No	No	No	No	No
4:07-cr-00893-RBH	USA v. Bailey	George Everette Bailey	No	No	No	No	No	No	No
4:07-cr-01046-TLW	USA v. Hanna	Mark Hanna	No	No	No	No	No	No	No
2:06-cr-20523-VAR-DAS	USA v. Odish	Natalia Odish	No	No	No	No	No	No	No

<u>Docket Number</u>	<u>Case</u>	<u>Defendant</u>	<u>Money Laundering Charges?</u>	<u>Accounts with False Identities?</u>	<u>Substantial Amount of Money?</u>	<u>Cash Transactions Reports filed?</u>	<u>Suspicious Activity Reports filed?</u>	<u>Foreign Shell Banks?</u>	<u>Sting Operation</u>
2:07-cr-20442-MOB-PJK	USA v. Collins	Sandra Fujimoto Collins	No	No	No	No	No	No	No
2:07-cr-00087-GLF	USA v. Paul	Christopher Paul	No	No	No	No	No	No	No
3:07-cr-00147	USA v. Smith	Michael Thomas Smith	No	No	No	No	No	No	No
3:06-cr-00510-HEH	USA v. Hamrick	Rodney Curtis Hamrick	No	No	No	No	No	No	No
1:06-cr-00344-GK	USA v. Ibague et al.	Jose Maria Corredor Ibague	No	No	No	No	No	No	No
1:06-cr-00344-GK	USA v. Ibague et al.	Edilma Morales Loaiza	No	No	No	No	No	No	No
1:07-cr-00248-RCL	USA v. Aguilar Ramirez	Gerardo Antonio Aguilar Ramirez	No	No	No	No	No	No	No
1:07-cr-00248-RCL	USA v. Aguilar Ramirez	Nancy Conde Rubio	No	No	No	No	No	No	No
1:07-cr-00248-RCL	USA v. Aguilar Ramirez	Alexander Farfan Suarez	No	No	No	No	No	No	No
1:07-cr-00248-RCL	USA v. Aguilar Ramirez	Ana Isabel Pena Arevalo	No	No	No	No	No	No	No
1:07-cr-00248-RCL	USA v. Aguilar Ramirez	Luz Mery Gutierrez Vergara	No	No	No	No	No	No	No
1:07-cr-00248-RCL	USA v. Aguilar Ramirez	Josue Cuesta Leon	No	No	No	No	No	No	No
1:07-cr-00248-RCL	USA v. Aguilar Ramirez	Jose Fernando Romero Mejia	No	No	No	No	No	No	No

<u>Docket Number</u>	<u>Case</u>	<u>Defendant</u>	<u>Money Laundering Charges?</u>	<u>Accounts with False Identities?</u>	<u>Substantial Amount of Money?</u>	<u>Cash Transactions Reports filed?</u>	<u>Suspicious Activity Reports filed?</u>	<u>Foreign Shell Banks?</u>	<u>Sting Operation</u>
1:07-cr-00248-RCL	USA v. Aguilar Ramirez	Maribel Gallego Rubio	No	No	No	No	No	No	No
1:07-cr-00248-RCL	USA v. Aguilar Ramirez	Camilo Rueda Gil	No	No	No	No	No	No	No
1:07-cr-00248-RCL	USA v. Aguilar Ramirez	Ana Leonor Torres	No	No	No	No	No	No	No
1:07-cr-00248-RCL	USA v. Aguilar Ramirez	Bladimir Culma Sunz	No	No	No	No	No	No	No
1:07-cr-00239-MJG	USA v. Ranjha et al.	Saifullah Anjum Ranjha	Yes	No	Yes	No	No	No	Yes
2:07-cr-00167-JLL	USA v. Brahm	Jake J. Brahm	No	No	No	No	No	No	No
2:07-cr-00361-WHW	USA v. Reyes	Miguel Luis Reyes	No	No	No	No	No	No	No
1:06-cr-01054-RMB	USA v. Iqbal et al.	Javed Iqbal	No	No	No	No	No	No	No
1:06-cr-01054-RMB	USA v. Iqbal et al.	Saleh Elahwal	No	No	No	No	No	No	No
1:07-cr-00115-AKH	USA v. Alishtari	Abdul Tawala Ibn Ali Alishtari	Yes	No	Yes	No	No	No	Yes
1:07-cr-00354-JSR	USA v. Al Kassar et al.	Monzer Al Kassar	Yes	Yes	Yes	No	No	No	Yes
1:07-cr-00354-JSR	USA v. Al Kassar et al.	Tareq Mousa Al Ghazi	No	No	No	No	No	No	Yes
1:07-cr-00354-JSR	USA v. Al Kassar et al.	Luis Felipe Moreno Godoy	Yes	Yes	Yes	No	No	No	Yes
1:07-cr-00543-DLI	USA v. Defreitas et al.	Russell Defreitas	No	No	No	No	No	No	No
1:07-cr-00543-DLI	USA v. Defreitas et al.	Kareem Ibrahim	No	No	No	No	No	No	No
1:07-cr-00543-DLI	USA v. Defreitas et al.	Abdul Kadir	No	No	No	No	No	No	No
1:07-cr-00543-DLI	USA v. Defreitas et al.	Abdel Nur	No	No	No	No	No	No	No

<u>Docket Number</u>	<u>Case</u>	<u>Defendant</u>	<u>Money Laundering Charges?</u>	<u>Accounts with False Identities?</u>	<u>Substantial Amount of Money?</u>	<u>Cash Transactions Reports filed?</u>	<u>Suspicious Activity Reports filed?</u>	<u>Foreign Shell Banks?</u>	<u>Sting Operation</u>
3:06-cr-00496-TJM	USA v. Moultrie	Christopher A. Moultrie	No	No	No	No	No	No	No
3:07-cr-00057-MRK	USA v. Abu-jihaad	Hassan Abu-jihaad	No	No	No	No	No	No	No
2:08-cr-00237-EJG	USA v. Mahapatra	Apun Mahapatra	No	No	No	No	No	No	No
2:08-cr-00238-LKK	USA v. Ramos	Carlos Ramos	No	No	No	No	No	No	No
3:08-cr-00213-LAB	USA v. Sills	Richard Sills, Jr.	No	No	No	No	No	No	No
3:08-cr-01895-MMM	USA v. Carlock	Rachelle Lynette Carlock	No	No	No	No	No	No	No
3:08-cr-01895-MMM	USA v. Carlock	Ella Lousie Sanders	No	No	No	No	No	No	No
3:08-cr-01895-MMM	USA v. Carlock	Eric Reginald Robinson	No	No	No	No	No	No	No
2:07-cr-00708-TC	USA v. Dotson	Nicholas Glenn Dotson	No	No	No	No	No	No	No
3:08-cr-00390-NVW	USA v. Pacheco	Alma de Paz Pacheco	No	No	No	No	No	No	No
2:08-cr-00270-MHM	USA v. Carter	William Carter	No	No	No	No	No	No	No
2:08-cr-01137-JAT	USA v. Schwab	Jack William Schwab	No	No	No	No	No	No	No
1:08-cr-00179-JMS	USA v. Gutierrez	Jose Sergio Medrano Gutierrez	No	No	No	No	No	No	No
2:08-mj-00052-LAM	USA v. Wormly	April Wormly	No	No	No	No	No	No	No
5:08-cr-00040-C-BG	USA v. Dobbs	Carey Glynn Dobbs	No	No	No	No	No	No	No
4:08-cr-00032-HFS	USA v. Joyner	Jonathan Kenneth Joyner	No	No	No	No	No	No	No

<u>Docket Number</u>	<u>Case</u>	<u>Defendant</u>	<u>Money Laundering Charges?</u>	<u>Accounts with False Identities?</u>	<u>Substantial Amount of Money?</u>	<u>Cash Transactions Reports filed?</u>	<u>Suspicious Activity Reports filed?</u>	<u>Foreign Shell Banks?</u>	<u>Sting Operation</u>
5:08-cr-00118-M	USA v. Shandy	Jason Ray Shandy	No	No	No	No	No	No	No
7:07-cr-01218	USA v. Rodriguez	Juan Rodrigo Rodriguez	No	No	No	No	No	No	No
1:08-cr-00059-WHA-TFM	USA v. Vincze	Anthony Paul Vincze	No	No	No	No	No	No	No
1:07-cr-21011-UU	USA v. Faison	Andrew Lee Faison	No	No	No	No	No	No	No
1:08-cr-20410-PCH	USA v. Hupper	Richard David Hupper	No	No	No	No	No	No	No
5:08-cr-00046-MMH-GRJ	USA v. Towns	Donald Clayton Towns	No	No	No	No	No	No	No
3:08-cr-00320-MMH-JRK	USA v. Towns	Donald Clayton Towns	No	No	No	No	No	No	No
5:08-cr-00107-BO	USA v. Fisher	Daniel Beamon Fisher	No	No	No	No	No	No	No
7:07-cr-00033-GFVT	USA v. Rogers	Billy Joe Rogers	No	No	No	No	No	No	No
1:07-cr-00647-JGC	USA v. Ahmed	Zubair Ahmed	No	No	No	No	No	No	No
1:07-cr-00647-JGC	USA v. Ahmed	Khaleel Ahmed	No	No	No	No	No	No	No
1:08-cr-00225-RJA	USA v. Demitro	Gino Demitro	No	No	No	No	No	No	No
1:08-cr-00033-JGM	USA v. Jones et al.	Samuel Jeffrey Jones	No	No	No	No	No	No	No
3:06-cr-30038-MAP	USA v. Crooker	Michael A. Crooker	No	No	No	No	No	No	No
1:08-cr-00038-LAK	USA v. Sharif	Allan Guedes Sharif	No	No	No	No	No	No	No
1:08-cr-00365-SAS	USA v. Bout	Viktor Bout	No	No	No	No	No	No	No

<u>Docket Number</u>	<u>Case</u>	<u>Defendant</u>	<u>Money Laundering Charges?</u>	<u>Accounts with False Identities?</u>	<u>Substantial Amount of Money?</u>	<u>Cash Transactions Reports filed?</u>	<u>Suspicious Activity Reports filed?</u>	<u>Foreign Shell Banks?</u>	<u>Sting Operation</u>
1:08-cr-00621-DLI	USA v. John Doe	John Doe	No	No	No	No	No	No	No
1:08-cr-00621-NRB	USA v. Khan	Haji Juma Khan	No	No	No	No	No	No	No
1:08-cr-00711-RJS	USA v. Smulian	Andrew Smulian	No	No	No	No	No	No	No
1:08-cr-00826-RMB	USA v. Siddiqui	Aafia Siddiqui	No	No	No	No	No	No	No
2:08-cr-00066-RK	USA v. King	William King	No	No	No	No	No	No	No
2:08-cr-00562-JCJ	USA v. Gonzalez	Monica Gonzalez	No	No	No	No	No	No	No
1:07-cr-00996-JEI	USA v. Brodie	Derek Brodie	No	No	No	No	No	No	No
1:08-cr-00238	USA v. Mendoza	Hely Mejia Mendoza	No	No	No	No	No	No	No
2:08-cr-00538-FCD	USA v. Keyser	Marc McMain Keyser	No	No	No	No	No	No	No
3:09-cr-00605-H	USA v. Garibay	Alejandro Murillo Garibay	No	No	No	No	No	No	No
2:09-cr-00011-J-BB	USA v. Goyette	Richard Leon Goyette	No	No	No	No	No	No	No
6:08-cr-00042-C-BG	USA v. Walker	Jason Renard Walker	No	No	No	No	No	No	No
0:09-cr-00050-JMR-SRN	USA v. Isse et al.	Abdifatah Yusuf Isse	No	No	No	No	No	No	No
0:09-cr-00050-JMR-SRN	USA v. Isse et al.	Salah Osman Ahmed	No	No	No	No	No	No	No
1:08-cr-00795	USA v. Akumu	Micah Akumu	No	No	No	No	No	No	No
1:09-cr-10030-MMM-JAG	USA v. Al-Marri	Ali Saleh Kahliah Al-Marri	No	No	No	No	No	No	No

<u>Docket Number</u>	<u>Case</u>	<u>Defendant</u>	<u>Money Laundering Charges?</u>	<u>Accounts with False Identities?</u>	<u>Substantial Amount of Money?</u>	<u>Cash Transactions Reports filed?</u>	<u>Suspicious Activity Reports filed?</u>	<u>Foreign Shell Banks?</u>	<u>Sting Operation</u>
4:09-cr-00069-JLH	USA v. Sanders	Terry L Sanders	No	No	No	No	No	No	No
6:09-cr-00032-BAE-GRS	USA v. Holt	Jeremi Holt	No	No	No	No	No	No	No
6:09-cr-00041-BAE-GRS	USA v. Rountree et al.	Inez Meyon Rountree	No	No	No	No	No	No	No
6:09-cr-00041-BAE-GRS	USA v. Rountree et al.	Kennedy Leroy Scott, Jr.	No	No	No	No	No	No	No
5:09-cr-00059-LDD	USA v. Paplosky	Tina Paplosky	No	No	No	No	No	No	No
2:09-cr-00090-FSH	USA v. Yousuf	Hawa Yousuf	No	No	No	No	No	No	No
1:04-cr-00962-LAP	USA v. Rendon-Herrera et al.	Daniel Rendon-Herrera	No	No	No	No	No	No	No
1:09-cr-01290-DC	USA v. Cordoba-Bemudez	Juanito Cordoba-Bermudez	No	No	No	No	No	No	No
3:08-cr-00240-PCD	USA v. Sastrom	Roy Sastrom	No	No	No	No	No	No	No
3:09-cr-00061-SRU	USA v. Sharkany	Glen Sharkany	No	No	No	No	No	No	No
			Yes	21	2	16	0	0	14
			No	279	298	284	300	300	286
				300	300	300	300	300	300

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