

Bank Secrecy Act Data Is an Integral Component of the FBI's Geographic Information Mapping Technology

U.S. law enforcement and regulatory agencies give priority to detecting terrorist financing. In particular, they seek to identify individuals or businesses used as fundraising vehicles and to detail the movement of financial assets. Effectively implementing strategies that prevent, disrupt and stop the ability of terrorist financing operations requires the coordination and organizational analysis of both financial data and intelligence gathered by law enforcement. Maximizing the types of financial data available to law enforcement significantly enhances the value of law enforcement investigations and assessments. While each individual financial record provides relevant information, examining numerous records over a period of time gives law enforcement a better understanding of possible violations and investigative opportunities.

BSA data filed everyday by depository institutions, casinos, insurance companies, and MSBs accounts for a tremendous amount of financial information that is essential to tracing and identifying potential avenues of terrorist financing. The data extracted from BSA filings is extremely useful in identifying and linking investigative information and intelligence with ongoing investigations, as well as in identifying leads for new investigations. Although data from a single report often has minimal investigative value, when examined and compared with other BSA data and other intelligence, the significance of a report, or a single element of that report, is often greatly increased.

Currently, FinCEN provides the FBI with access to electronic copies of BSA filings to be imported into an FBI data warehouse. This platform allows specific data fields to be extracted and compared against investigative information and intelligence collected by the FBI and other agencies. Some of the information that is compared and examined includes names, Social Security numbers, dates of birth, passport numbers, addresses, business names and account numbers. A recent examination of millions of BSA documents revealed over 80,000 specific filings with some relationship to subjects of terrorism investigations.

The FBI has developed several technologies enabling them to exploit extracted BSA data by using computer software that presents visual patterns of various entities or groups involved in potential criminal activities through link analysis charts, graphs, and other customized technologies. One such technology allows the FBI to display certain characteristics of BSA data on generated maps, which can be zoomed in as far as the street level. The users of this technology specify the characteristics of BSA data that they want represented, such as suspect name, suspect address and bank address. They may choose to incorporate other internal information that is available to complete the search query. The users then map the compiled data.

This type of mapping technology allows for common tasks as well as complex operations. It also permits previously mapped and analyzed datasets to be merged and updated. Geographic information mapping technology is evolving and provides the FBI with better methods of analysis by identifying trends and patterns and managing and organizing the data. The benefits of providing a visual geographic summary of the captured data are numerous and allow the FBI to communicate important and viable data to their respective audiences.

With the continuing advances in technology, the FBI and other law enforcement agencies are better equipped to review and analyze BSA data. To date, the results of these analyses continue to underscore the tremendous value of BSA data as a significant source of financial intelligence.

[Published in The SAR Activity Review – Trends, Tips & Issues, Issue 10, May 2006]