

Identification of TBML Issues

TBML TYPOLOGIES

Black Market Peso Exchange (BMPE)	The exchange of dollars in the United States for foreign currency through brokers (Peso brokers) exporting goods to businessmen in other countries.
Hawala	The movement of funds through a network of brokers (hawaladars) without physically moving money.
Over/ Undervaluation	The movement of value between exporter and importer by disguising the cost or manipulating the quantity of the goods.
Carousel Schemes	Shipments of merchandise are continually imported and exported to create a paper trail to disguise illicit funds.
Mirror- Transfers	Two opposite transactions where trade is bought in one country and sold in another to disguise illicit finances.
Double Invoicing	Two different invoices are created for the same shipment but presented to two different parties in the trade transaction.

TBML RED FLAGS



Payments to vendor made in cash, wire transfer, or checks by unrelated third parties.



Different reported values for the same shipment and merchandise in the same or different countries.



Commodities being traded do not match the business involved.



Unusual shipping routes or transshipment points.



Packaging inconsistent with commodity or shipping method.



Using multiple invoices for one shipment to obscure true ownership and/or value.

TBML Trends

- Top Four Commodities In TBML Investigations:
 - Electronics (23%)

550 × 3.

- Vehicles and Parts (17%)
- Textiles and Apparel (15%)
- Precious Metals and Stones (11%)
- TBML supports items that can hold value or gain value and are quick to move and liquidate



Business

- Address
- Registered Owners
- Associated Companies



Person

- Criminal History
- Travel
- Associated Businesses
- Financial Activity
- Alerts



Trade Data

- Frequency
- Commodity
- Locations
- Additional Parties
- Seizures
- Alerts

Financial Activity

- Negative Reporting
- Movement
- Frequency
- Quantity



Cellular Telephone

- Communication
- Invoices
- Payment Methods



Email

- Communication
- Documents
- IP Address

Contact Information

Joseph Spielman Acting Section Chief, Trade Transparency Unit - Operations



Joseph.M.Spielman@ice.dhs.gov



HSI TIPLINE 1-866-347-2423 | Follow us on Twitter @HSI_HQ



Visit us at https://t.co/GEAF00ErKI?amp=1



U.S. Immigration and Customs Enforcement