



U.S. Immigration
and Customs
Enforcement

DEC 5 2008

MEMORANDUM FOR: Assistant Director
Special Agents in Charge
Deputy Assistant Directors
ICE Attaches

FROM: Marcy M. Forman 
Director, Office of Investigations

Raymond R. Parmer 
Director, Office of International Affairs

SUBJECT: Capabilities and Use of the ICE Trade Transparency Unit (TTU)

The U.S. Immigration and Customs Enforcement (ICE) Trade Transparency Unit (TTU) located within ICE Headquarters (HQ) Division II has a primary mission to aggressively target companies and individuals involved in trade-based money laundering. The core component of the TTU initiative is the exchange of trade data with foreign counterparts, which is facilitated by existing Customs Mutual Assistance Agreements. By combining international efforts, TTUs can identify and eliminate trade-based money laundering systems.

ICE initiated the TTU concept in Washington, D.C., in 2004 and subsequently reached out to key Latin American trading partners to successfully establish foreign TTUs in (b) (7)(E) (b) (7)(E). By developing relationships with counterpart agencies through TTUs, ICE is building the framework to successfully investigate and prosecute international trade and money laundering investigations. Through the TTU initiative, ICE is the only federal law enforcement agency exchanging trade data with foreign governments to investigate trade-based money laundering investigations.

On the domestic side, HQ TTU consists of a staff of National Program Managers and Criminal Research Specialists who both develop investigative leads for domestic and foreign offices, and provides analytical and investigative support to Trade Based Money Laundering (TBML) investigations. (b) (7)(E)

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(b) (7)(E)

The HQ TTU program managers and analysts are a valuable resource available to all domestic and international offices to enhance the investigative capabilities of the Office of Investigations. In addition, HQ TTU currently has an agreement with the Asset Forfeiture and Money Laundering Section (AFMLS) and the Narcotics and Dangerous Drugs Section (NDDS) of the Department of Justice to provide prosecutorial support to all TTU related investigations.

To request assistance, submit a completed referral form (attached to this memorandum in electronic format) to **(b) (7)(E)**@dhs.gov. The requests will then be prioritized and assigned to a National Program Manager and Criminal Research Specialist for development. Please direct any questions to Acting Unit Chief **(b) (6), (b) (7)(C)** at (202) 732-**(b) (6), (b) (7)(C)**, or by email at **(b) (6); (b) (7)(c)**@dhs.gov, or Section Chief **(b) (6), (b) (7)(C)**, at (202) 732-**(b) (6), (b) (7)(C)**, or by email at **(b) (6); (b) (7)(c)**@dhs.gov.

Tracking Number:

Trade Transparency Unit Referral

Requestor:

Requestor Location:

Request Date:

Request Status: Select One

Foreign TTU Request: Select One

ICE Office Request: Field Office:

Other Law Enforcement Agency Request:

Case Number:

Case Agent:

Case Agent Contact Numbers: Office Mobile

TDY TTU Agents assigned to foreign TTU's must include and confirm that foreign government is conducting official investigation, type of investigation, and include any US leads and interests in the investigation.

INVESTIGATIVE INFORMATION:

For additional subjects, please submit additional pages as needed.

Subjects Name:

Known Alias:

DOB:

SSN:

Other Identifiers:

A-Number Passport Number Driver License Other

Domestic Address:

Foreign Address:

Business Name:

Address:

Case Synopsis: *Please include the status of the investigation, if AUSA is on board, and any arrests, seizures or upcoming enforcement actions. If known, please include the type of scheme utilized (overvaluation, transshipment, etc.).*

Requested Research: Please include case specific requests i.e. financial, import/export, open source (Lexis/Nexis) and any additional requests.

TTU HQ (TTU HQ use only)

Analyst Assigned:

Date Assigned:

Date Completed:

Tracking Number:

Analytical Results: very brief synopsis of analytical results (attach information/HSIR developed from analysis and place in the shared drive)