Investigations / FinCEN Files

DATA

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To extract as much information as possible from the files, dozens of reporters collaborated to manually collate data on thousands of transactions.

By Emilia Díaz-Struck, Antonio Cucho and Agustin Armendariz

September 20, 2020

from the FinCEN Files data on correspondent services provided by U.S.based banks that facilitated transactions with financial institutions in more than 150 countries.

ICIJ is not publishing the totality of the leak, and will not divulge raw documents or personal information en masse.

ICIJ is publishing this portion of the data in the public interest. While the transactions do not necessarily establish any criminal misconduct or other wrongdoing, the data offers an unprecedented overview of how money - flagged as suspicious, and in some cases linked to corruption, fraud, sanctions evasion or other crimes - flows around the globe via networks of correspondent banks.

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The data in the <u>FinCEN Files</u> transactions map contains information on more





flows from country to country around the world, via U.S.-based banks. The data in this map represents a fraction of the more than \$2 trillion worth of transactions found in the FinCEN Files.

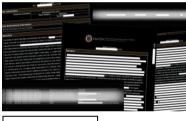
This map also provides information about the U.S.-based "correspondent" banks that allow financial institutions in more than 150 countries and territories to process payments in U.S. dollars.

The FinCEN Files is a cache of financial intelligence reports that reveals the role of global banks in industrial-scale money laundering – and the bloodshed and suffering that flow in its wake.

The records include more than 2,100 <u>suspicious activity reports</u> filed by nearly 90 financial institutions to the United States' <u>Financial Crimes Enforcement</u> <u>Network</u>, known as FinCEN. The documents were shared by <u>BuzzFeed News</u> with ICIJ and 108 media partners in 88 countries and include information on more than \$2 trillion in transactions dated from 1999-2017 that had been flagged by the banks as suspicious.

The reports reflect the private concerns of global bank money-laundering compliance officers. The SARs include a narrative along with attached spreadsheets of sometimes hundreds of lines of raw transaction data.

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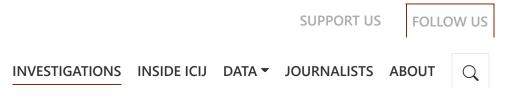
<u>crackdowns by serving</u> <u>oligarchs, criminals and</u> <u>terrorists</u>

Each report provides a summary of the total amount in suspicious transactions and the time range in which they occurred, but didn't always come with comprehensive details about each transaction.

To extract as much information as possible from the narratives of the suspicious activity reports in FinCEN Files, ICIJ, BuzzFeed News and media partners collaborated to manually collate data on transactions and correspondent connections from each report. The team working on this data extraction involved more than 85 journalists in 30 countries, who collectively were able to record details on more than 200,000 transactions and more than 6,900 correspondent connections.

The data in this map only includes cases where sufficient details about both the originator and beneficiary banks were available in the FinCEN Files, amounting to more than \$35 billion in transactions dated from 2000-2017.





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The map also includes information extracted from the FinCEN Files data on correspondent services provided by U.S.-based banks that facilitated transactions with financial institutions in more than 150 countries.

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An ICIJ analysis found that suspicion of money laundering operations was the most common reason given for filing a report in the FinCEN Files.

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