



**SOUTHWEST BORDER
ANTI-MONEY
LAUNDERING
ALLIANCE**

**APPLICATION INSTRUCTIONS
FOR THE**

**Southwest Border
Anti-Money
Laundering Program**

INTRODUCTION

The Southwest Border Anti-Money Laundering Alliance (“Alliance”) has developed a set of specific guidelines to assist with application submissions for the Southwest Border Anti-Money Laundering Alliance Program.

This document is part of a five-document grant announcement package: 1) the Southwest Border Anti-Money Laundering Alliance Competitive Grant Announcement; 2) the Alliance Strategy, which is also incorporated within Appendix A of this document; 3) this Application Instructions document, which provides application content guidance; 4) the Alliance Grant Management System (GMS) Guidance, which describes the mechanics of the entry of your application into the automated Grant Management System; and 5) the Alliance Grant Management Resource Manual, which provides background for program managers. You may also find the Grant Writing Training Manual useful. It is available on the web site of the Alliance’s administrator of the grant application process, the Arizona Criminal Justice Commission (“ACJC”), <http://www.azcjc.gov>.

Use this document and the Alliance Grant Management System (GMS) Guidance simultaneously as you make your application. They compliment each other. Applications that do not meet the eligibility requirements, budget guidelines, scoring criteria, and Initiative administration requirements will not be successful. The only way to make applications is through the web-based application process. That process allows multiple evaluators in each of the Alliance States to participate simultaneously in application evaluations. This will enable the Alliance to benefit from the experience and perspective of local evaluators in addition to the Alliance-Appointed Staff without requiring the time or expense of having these additional evaluators convene in a central location. The scoring of all applications by each evaluator will be available to the Alliance Executive Board, making the evaluation process open and transparent to each Executive Board member.

APPLICATION CONTENT

General Information

Here are some helpful general guides:

- Write your responses in a Word document, then copy and paste it into the web-based application.
- Use spelling and grammar checks on each response.
- Always save your application periodically and after entering individual line entries for the budget and Goal-specific data.

Please include as much information as is useful for each field in the application. Fields in the Grant Management System (“GMS”) with a red flag next to them are required for successful submission of the application.

The automated application uses the term “project” to mean the same thing as the Alliance term “Initiative.” It also refers to “ACJC Funds” which means “Alliance Funds”. In all areas on the automated application, “ACJC” means “Alliance”.

The automated program contains restrictions on the length of the Applicant’s responses. It will not accept longer submissions. Using the Microsoft Word feature found in “tools”/“word count”/“characters with spaces” will give you the precise character count so you won’t try to paste more characters into a field than it will hold.

Please follow these Alliance Application Instructions. The automated program instructions do not apply in most areas.

The overall Alliance vision is the creation of an active network of anti-money laundering efforts—investigators, analysts, prosecutors, agencies, and programs—throughout the Southwest Border Area (“SWBA”). Accordingly, the Alliance encourages multi-agency, multi-jurisdictional Initiatives. The lead agency in such a coalition is the applicant agency, which becomes the point of contact with the Alliance. Because the applicant agency assumes substantial administrative responsibilities on behalf of the Initiative’s participants, its application should show that the applicant is willing and able to do so.

• **Initiative Title**

The applicant must provide an Initiative title, such as a task force name.

• **Purpose Areas**

The applicant must select from the drop-down menu the appropriate purpose area. The approved purpose areas are the Goals listed in the Alliance Strategy. They are:

1. Disrupt criminal organizations that engage in cross border violence.
2. Disrupt the movement of weapons that flow across the southwest border into Mexico.
3. Develop a southwest border area information sharing network.
4. Provide training for law enforcement, prosecutors, and private sector partners regarding money laundering.
5. Support multi-jurisdictional domestic and international money laundering investigations.

Your purpose area may cover more than one goal. However, the system only allows you to pick one purpose area here. This is a system artifact; just pick the purpose area that best fits your goal.

- **Continuation Grant**

The “radio button” is automatically selected to “No” because this is the first cycle in the Alliance Program. Leave this setting as it is.

- **Applicant Agency**

This information pulls directly from the user’s profile. A new agency or a new department must be added through the “Edit Profile” function.

- **DUNS Number and Central Contractor Registry**

These fields are mandatory for all applicants. Enter the numeric DUNS Number and select the appropriate “Yes”/”No” response for the Central Contractor Registry (“CCR”). A DUNS number is a unique nine-digit sequence recognized as the universal standard for identifying and keeping track of entities receiving Federal funds. The identifier is used for tracking purposes and to validate address and point of contact information for federal assistance applicants, recipients, and sub-recipients. The Alliance will use it for similar reasons, throughout the grant life cycle. Your agency probably has a DUNS number. If not, obtaining a DUNS number is a free, simple, one-time activity. To learn your agency’s DUNS number or to obtain one, you may call 1-866-705-5711 or apply online at:

<http://fedgov.dnb.com/webform/displayHomePage.do>.

- **Participating Agencies**

The applicant must complete the list of participating agencies or you must type “not applicable” if other agencies are not involved with the Initiative. Every Initiative that is to take place in Mexico or on tribal land and involves conduct by one or more Mexican or tribal agencies must have a U.S. federal agency applicant that certifies that it will be responsible for the Initiative, and the application must specify either that agency or another U.S. federal agency that has agreed to conduct the financial audits relating to the Initiative. This configuration is required of such Initiatives because it is preferable that the Alliance enter into contracts with U.S. agencies to avoid difficulties of auditing agencies in Mexico or on tribal land.

- **Authorized Official**

This must be a person in the applicant agency who is authorized to sign grant agreements. This person may or may not be the Initiative Official.

- **Initiative Official**

This is the person who is responsible for the oversight of the Initiative.

INITIATIVE NARRATIVE

- **Initiative Mission Statement** (Response limitation is 1,500 characters including spaces.)

The applicant must provide a mission statement that describes the focus or direction the agency (i.e. task force, prosecutorial agency, etc.) will apply to address the problems, and the activities it proposes to undertake to promote the listed Alliance Goals.

- **Problem Statement** (Response limitation is 7,000 characters including spaces.) (Maximum score: 15 points)

The applicant must demonstrate a compelling need for the Initiative in order to achieve the Alliance Goals. To substantiate the need for the Initiative:

- 1) Describe the problem and issues that require your agency's/coalition's involvement to promote the Goals and Objectives in the Alliance Strategy. Remember, the lack of staff does not qualify as a "problem" in this context.
- 2) Show the impact of the problems/issues using verifiable statistical data:
 - a. Use data that reflects the scope of the problem of money laundering and related criminal conduct. Include how this may impact and create related problems in your jurisdiction (local threat assessment).
 - b. Use data that reflects the absence or inadequacy of law enforcement and/or prosecution relating to investigating and prosecuting targeted multi-jurisdictional cases.
 - c. Use qualitative information such as interviews or other key information about the eligible jurisdictions to explain quantitative data that substantiate the need for the Initiative. For example, if you had 12 cases that went through court, and you include one participant's experience and success, you are giving human value to statistical numbers. However, such qualitative data should not be the sole justification for the proposal.

Remember, in this section, DO NOT DESCRIBE SOLUTIONS TO THE PROBLEMS IDENTIFIED.

- **Initiative Summary** (Response limitation is 7,000 characters including spaces.) (Maximum score: 25 points)

Describe the Initiative in a way that helps stakeholders (Board members, Alliance-Appointed Staff, evaluators, citizens, and elected officials) understand and communicate about the proposed Initiative and how it seeks to solve the problem described.

Clearly explain, in detail, planned activities, including day-to-day operations such as investigations, communications, presentations to be conducted, and staff organization. Describe the professional preparation and experience of staff in relation to the knowledge and skills needed to manage and operate the proposed Initiative.

Remember to write simply. Do not use acronyms unless you identify what they are or they are universally known (such as “MSB” or “DoJ”).

The Initiative must address how and the extent to which the proposed activities will meet the Goals of the Strategy. Highlight the specific activities that are to be implemented using grant funds and how the Initiative will alleviate or solve the problem. If it is innovative, explain how.

Applicants with relevant experience should briefly describe their experience and any administrative or participatory role played by the applicant in similar activities. This should include how the applicant’s involvement in some similar endeavor accomplished Alliance Goals in the past.

• **Initiative Collaboration** (Response limitation is 4,000 characters including spaces.) (Maximum score: 10 points)

There are two parts to the Initiative Collaboration section:

- 1) List of collaborative agencies. The term “collaborative agencies” does not include the participating agencies listed in the General Information section “Participating Agencies,” and
- 2) Provide a recent detailed example of a collaboration involving the applicant.

This Alliance plans to build a network of collaborating people, agencies, and task forces. The application must therefore address the extent to which the Initiative emphasizes collaborative strategies. If there are participating agencies associated with the Initiative, identify them, including resources to be dedicated by each participating agency, such as funding, staff, time, space, equipment, vehicles, intelligence support systems, etc. Collaboration is a key factor in planning and implementing a successful Initiative, so applicants should describe the nature and extent of this collaborative planning. In addition, if any other funding sources will be used to enhance your Initiative, identify the sources and amounts of funds and state how the funds will enhance your Initiative.

Task Force Applications must also upload Participation/Collaboration Letters or documents signed by the Authorized Official of the participating agencies indicating their intent to **participate fully** (staff assignment, office space, etc.) in the Initiative.

- **Evaluation Plan (Performance Monitoring)** (4,000 characters including spaces.) (Maximum score: 10 points)

The evaluation plan should be designed to determine whether the Initiative is making progress and to enable objective documentation of its progress toward achieving its stated Goals and Objectives, as reflected in Performance Measures (such as case filings, seizures, convictions, and other results of Initiative activities). Because the Alliance is obtaining money transmitter transaction data and has access to other objective data, if it would be reasonable to expect the effects of your Initiative to be reflected in such data, explain how you expect the data to reflect your Initiative's activities and why. Briefly describe how you plan to track statistical data for the funded Initiative. Methods may include a tracking database, an Excel spreadsheet, or a hand-counted tally. Also include how the applicant agency is or will be held accountable for achieving success, such as by having to present the data to an agency board, to a director, etc. Remember, the evaluation of the Initiative is ongoing and ideally is scheduled on a monthly and/or quarterly basis.

GOALS AND OBJECTIVES (Maximum score: 15 points)

The Alliance will use the Goals, Objectives, and Performance Measures to review and verify the achievements of the Initiatives. The Alliance will also use the specific information about the activities conducted with Alliance funds and their effects on the problems the SWBA faces in making other grants.

Appendix A provides Goals, Objectives, and Performance Measures that have been developed to tie Alliance funds directly to the Alliance Strategy and to allow the Alliance's Alliance-Appointed Staff to better understand the Initiative. The automated grant application program requires the applicant to copy and paste into the application one or more of these Goals, Objectives, and Performance Measures that are associated with whatever Goal or Goals you select as an area that your proposed Initiative will address. Be sure to hit the "add" button where indicated, as well as the "save" button on each page of the application. The Alliance-Appointed Staff will work with the applicant agencies to refine the applicants' Goals, Objectives, and Performance Measures to capture the data correctly in order to report accomplishment.

Please refer to the Grants Management System ("GMS") Manual if problems occur when copying and pasting the identified Goals, Objectives, and Performance Measures located in Appendix A into the application. An applicant must include at

least one Goal, Objective, and Performance Measure based on the application's content. The Alliance will review and possibly refine or even redirect them throughout the grant period to meet changing needs or circumstances.

The application uses the following definitions of Goals, Objectives, and Performance Measures:

• Goals

In broad terms, a Goal describes something the particular Initiative is intended to accomplish as an overarching statement. Except for alternative Objectives or Performance Measures, as described below, each Goal you select must be one of the Goals listed in the Alliance Strategy.

• Objectives

The Objective(s) selected from the Strategy list must be specific, measurable, attainable, realistic, and be accomplishable within the timeline of the grant program (forty-one months). The Objective must have a direct correlation to the Initiative and to the Goal selected. Remember, Objectives require you to demonstrate that your actions/activities are accomplished as you stated in your application. Therefore, it is important to select a few powerful Objectives that truly demonstrate your Initiative's accomplishments rather than many Objectives, some of which may only provide a simple overview. The more Objectives you identify, the more time you will spend tallying the numbers to ensure you are accomplishing the Objective. You need not select all of the Objectives listed in the Strategy under any particular Goal.

• Performance Measures

For each Objective you select, you must also select at least one of the Performance Measures provided under that Objective. Each Performance Measure you select must align with and measure one of your Objectives. The Alliance will use the Performance Measures selected to monitor the performance of the Initiative activities. Therefore, you will need to be sure to collect the necessary data to support your Initiative's accomplishment of the Objective, especially when comparing one year to another and verifying a percentage or trend. The Alliance-Appointed Staff will use data and other information gathered to formulate Program improvements and for reporting on progress to the Executive Board during the grant period. The Performance Measures are subject to change depending on the unique nature of each different Initiative and the need to be responsive to evolving circumstances.

• Alternative Objectives or Performance Measures

The advantage of requiring some uniformity in the selection of Goals, Objectives, and Performance Measures is that it makes border-wide trends and

accomplishments easier to recognize and respond to with Strategy changes and grant awards. However, creativity and flexibility are also very beneficial. In fact, they are core characteristics of successful networkers, and building a border-wide network is the Alliance's primary vision. They are therefore essential to the success of the Alliance's anti-money laundering efforts in the SWBA.

If your proposed Initiative just does not fit into any of these Objectives, or you have an idea for a Performance Measure that is objective and captures the essence of your proposed Initiative better than any of the ones provided, you may suggest them as alternatives and/or as substitutes for the existing formulations. The entire Program will benefit from improvements in the formulation of the ways by which it will accomplish the Goals of its Strategy, and from improvements in the Strategy itself.

BUDGET (Maximum score: 15 points)

To simplify the application budget, please follow the following process steps:

- **Salary and Employee Related Expense (“ERE”)**

In the budget table provide the position title, what portion of the position will be funded with grant money (e.g., 1.0 or .5), the total annual salary for the position, and what portion of the ERE dollar amount is being requested. If requesting funding for more than one position please prioritize the positions from top to bottom and explain your prioritization.

Multi-agency, multi-jurisdictional Initiatives may request state, county, and local personnel, ERE, and overtime to encourage the collaborative concept.

There must be a commitment by each participating agency to provide the personnel. Funding may not be used to request positions for federal participating agencies. Use the “Personnel” text box above the table to provide a very brief description of each position (detailed job descriptions should be included as an attachment if the job is central or unusual). Please explain why each position is critical to the Initiative.

In the “ERE Breakdown” text box below the Overtime table, list all the expenses included in fringe benefits: i.e., health insurance, workers' compensation, FICA, etc. Include a total ERE percentage for each position.

Internal Controls (Maximum score: 5 points)

Definitions:

Non-Supplanting: Grant Funds must not be used to supplant existing federal, state, or local funds for Initiative activities and must not replace those funds that have

been appropriated for the same purpose. See the Office of Justice Programs Financial Guide (Part II, Chapter 3).

Please remember to save after entering individual line entries when entering budget data.

- **Overtime**

Enter the request for overtime in the table provided.

- **Consultant/Contractual Services**

In the text box, provide detailed vendor information for each vendor, including the name and a description of the services to be provided to the Initiative.

In the table, provide the type of service, approximate number of hours, and hourly rate for each vendor.

Examples of Consultant/Contractual Service types are contractual accounting, computer installation, and data processing services.

- **In-State Travel**

In the text box, provide a detailed description of the purpose of the travel and how it supports the work of the Initiative.

In the table, provide a description of the travel type, rate per mile, and number of miles using your organization's established mileage rate, airline ticket policy, etc.

- **Out-of-State Travel**

In the text box, provide a detailed description of the purpose of the travel and how it supports the work of the Initiative.

In the table provide a description of the travel type and the rate per mile or per trip, using your organization's established travel and airline ticket policy.

- **Other Operating Expenses**

In the text box, provide a detailed description of the expense and in the table provide information on the amount requested. The category "Other Operating Expenses" includes pagers, cell phones, training fees, etc. Other operating expenses must be in direct support of the Initiative.

- **Equipment**

In the text box, provide a description of the item, quantity, purchase price, or monthly lease rate for each kind of equipment item requested. Note: Pagers and cell phones should be reported under Other Operating Expenses. Complete the table to request equipment funding.

- **Matching Funds**

In answering whether matching funds are secured for this grant Initiative provide one of the following descriptions: General Fund; Forfeitures; HIDTA; Byrne/JAG; OCDETF; Other: (list the source)

Please remember to save after entering individual line entries when entering budget data.

A-133 Audit or Single Audit:

To meet Alliance audit requirements, the jurisdiction's most recently completed financial audit must be attached (uploaded) at the time of the application. If your agency does not have a current audit completed for a period ending in 2009 or 2010, the application must provide similar assurance of the applicant's fiscal soundness.

Budget Worksheet:

Please upload a complete and accurate budget including all other funding sources (General Fund, Forfeitures, HIDTA, Byrne/JAG grant funds, OCDETF, etc.) that will be used to enhance your Initiative, the sources and amounts of funds must be identified and a statement of how the funds will enhance your Initiative must be included in the Initiative Summary section. Budget categories are listed on page 22 of the Grant Management Resource Manual.

Administrative Strength (Maximum score: 5 points)

Sustainability Plan:

A sustainability plan is required of Initiatives seeking personnel other than overtime or that have other ongoing expenses to ensure the Initiative will continue beyond the availability of Alliance funding. Please upload this document with the application.

You must review your application before validating it. Once your application is successfully validated, you must hit the "Submit Application" button.

If you have difficulties with the grant management system, contact: Carol
Keppler, Alliance Staff Training Coordinator at carol.keppler@azag.gov.

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APPENDIX A

Goals, Objectives, and Performance Measures

GOAL 1: DISRUPT CRIMINAL ORGANIZATIONS THAT ENGAGE IN CROSS BORDER VIOLENCE

Objective 1.1: The Alliance will support the investigation and prosecution of organizations that engage in cross border violence.

Performance Measure: Number of Article 4 prosecutions relating to violent SWBA crimes or related crimes presented.

Performance Measure: Number of Article 4 prosecutions relating to violent SWBA crimes or related crimes accepted.

Performance Measure: Percentage of cases relating to prosecution of organizations that engage in cross border violence.

Objective 1.2: The Alliance will support the investigation and prosecution of individuals who provide material support for or otherwise facilitate organizations that engage in cross border violence.

Performance Measure: Number of such cases in the SWBA supported.

Performance Measure: Percentage of such cases in the SWBA.

Objective 1.3: The Alliance will promote the increased use of civil and criminal asset seizures and forfeitures from individuals/organizations that engage in or facilitate cross border violence.

Performance Measure: Number of such cases in the SWBA supported.

Performance Measure: Percentage of such cases in the SWBA.

Objective 1.4: The Alliance will foster international collaboration to identify, investigate, and disrupt the financial activities used to facilitate cross border violence.

Performance Measure: Number of complex cross-border organized crime prosecution of organizations that engage in cross border violence brought in SWBA.

Objective 1.5: The Alliance will foster multi-jurisdictional collaboration to identify,

investigate, and disrupt financial activities that facilitate cross border violence.

Performance Measure: Number of cases involving cross border violence in the SWBA that involve substantial information exchange between the primary agency and an agency from another state, country, or level of government.

Performance Measure: Percentage of cases involving cross border violence in the SWBA that involve substantial information exchange between the primary agency and an agency from another state, country, or level of government.

GOAL 2: DISRUPT THE MOVEMENT OF WEAPONS THAT FLOW ACROSS THE SOUTHWEST BORDER INTO MEXICO

Objective 2.1: The Alliance will increase the use of financial intelligence and information to proactively investigate persons engaged in weapons smuggling.

Performance Measure: Number of such cases in which financial intelligence substantially assisted.

Performance Measure: Percentage of such cases in which financial intelligence substantially assisted.

Performance Measure: Number of deconfliction/coordination inquiries responded to regarding weapons smuggling.

Objective 2.2: The Alliance will increase the collection, analysis, and dissemination of financial information acquired during weapons smuggling investigations.

Performance Measure: Number of cases involving weapons smuggling in the SWBA that involve substantial information exchange between the primary agency and an agency from another state, country, or level of government.

Performance Measure: Percentage of cases involving weapons smuggling in the SWBA that involve substantial information exchange between the primary agency and an agency from another state, country, or level of government.

Performance Measure: Number of cases involving weapons smuggling in the SWBA that involve substantial information exchange between an agency in the United States and an agency in Mexico.

Performance Measure: Percentage of cases involving weapons smuggling in the SWBA that involve substantial information exchange between an agency in the United States and an agency in Mexico.

Objective 2.3: The Alliance will establish objectively-verified empirical measurements of the amount and methods of U.S. weapon movement from the United States into Mexico.

Performance Measure: Number of methods of movement of weapons identified.

Performance Measure: Number of methods of movement of weapons confirmed.

Performance Measure: Identification of reliable empirical methods of aggregation of weapons flow figures.

Performance Measure: Verification of methods of aggregation of weapons flows.

Objective 2.4: The Alliance will foster increased use of civil and criminal asset seizures and forfeitures in prosecutions of weapons smuggling.

Performance Measure: Number of civil asset forfeiture/civil racketeering cases filed involving weapons smuggling in the SWBA.

Performance Measure: Percentage of cases filed involving weapons smuggling in the SWBA that employ civil asset forfeiture/civil racketeering.

Performance Measure: Total forfeitures/judgments, in dollars, in civil asset forfeiture/civil racketeering cases involving money laundering operations related to weapons smuggling in the SWBA.

Objective 2.5: The Alliance will assist in increasing the number of state and federal criminal and civil prosecutions relating to weapons destined for Mexico.

Performance Measure: Number of cross-border training and coordination conferences held relating to money laundering and firearms interdiction.

Performance Measure: Number of weapons smuggling prosecutions brought in SWBA.

GOAL 3: DEVELOP A SOUTHWEST BORDER AREA INFORMATION SHARING NETWORK

Objective 3.1: The Alliance will develop effective methods to collect, analyze, and disseminate financial information.

Performance Measure: Number of experienced analysts assigned to the Alliance-Appointed Staff joint analysis team.

Performance Measure: Number of hours spent in joint analysis.

Performance Measure: Number of cases prosecuted based on or materially assisted by Alliance-Appointed Staff joint analysis team products.

Objective 3.2: The Alliance will develop and implement dissemination of financial information through user-friendly web-based access, whether through existing mechanisms or otherwise, and will provide manuals and video/web training on access and use of this resource.

Performance Measure: Number of cases involving money laundering operations related to human, money, drug, and weapons smuggling, or associated violent crime in the SWBA that involve substantial information exchange between the primary agency and an agency from another state, country, or level of government, including task forces that include members from multiple states, countries, or levels of government.

Performance Measure: Percentage of cases involving money laundering operations related to human, money, drug, and weapons smuggling, or associated violent crime in the SWBA that involve substantial information exchange between the primary agency and an agency from another state, country, or level of government, including task forces that include members from multiple states, countries, or levels of government.

Performance Measure: Number of cases involving money laundering operations related to human, money, drug, and weapons smuggling, or associated violent crime in the SWBA that involve substantial information exchange between the primary agency and the Mexico BEST, the Mexican Office of the Attorney General (“PGR”), the Secretariat of Public Security (SSP), the National Center for Planning and Analysis of Information (“CENAPI”), the PGR Special Investigative Unit for Organized Crime (“SIEDO”), the Mexican Ministry of Defense (“SEDENA”); or the Ministry of Finance (“SAT”) Financial Investigations Unit (“UIF”).

Performance Measure: Percentage of cases involving money laundering operations related to human, money, drug, and weapons smuggling, or associated violent crime, in the SWBA that involve substantial information exchange between the primary agency and the Mexico BEST, the Mexican Office of the Attorney General (“PGR”), the Secretariat of Public Security (SSP), the National Center for Planning and Analysis of Information (“CENAPI”), the PGR Special Investigative Unit for Organized Crime (“SIEDO”), the Mexican Ministry of Defense (“SEDENA”); or the Ministry of Finance (“SAT”) Financial Investigations Unit (“UIF”).

Objective 3.3: The Alliance will disseminate analytical products to include information consisting of threat assessments, strategic analysis, trend analysis, and target development.

Performance Measure: Number of requests for information responded to.

Performance Measure: Number of analytical products produced.

Performance Measure: Operation of automated tracking of information sharing in the SWBA.

Performance Measure: Number of joint intelligence-sharing meetings held.

Performance Measure: Number of cases filed based on shared intelligence.

Performance Measure: Percentage of cases filed based on shared intelligence.

Objective 3.5: The Alliance will enhance collaboration and communication between the law enforcement community and its private sector partners, to include money services businesses, informal value transfer systems, and traditional financial institutions.

Performance Measure: Number and content of regional conferences with MSB and financial institution executives and company compliance managers who possess the relevant decision-making authority to effectively inform the attendees of the Alliance's purposes and the benefits, responsibilities, and commitments attendant to Alliance participation.

Performance Measure: Number of SWBA MSBs that have committed their company to active collaboration with Alliance members.

Objective 3.6: The Alliance will fully integrate its data analysis with Mexican analytical operations.

Performance Measure: Number of money laundering cases initiated in the Mexican portion of the SWBA based on or materially assisted by Alliance data-driven analysis.

Performance Measure: Percentage of money laundering cases initiated in the Mexican portion of the SWBA based on or materially assisted by Alliance data-driven analysis.

Objective 3.7: The Alliance will effectively monitor the use of new payment methods in SWBA money laundering, including stored value devices, electronic payment

devices, and online services.

Performance Measure: Development and employment of accurate objective measures in the use of these methods and their use in illicit transactions in the SWBA.

GOAL 4: PROVIDE TRAINING FOR LAW ENFORCEMENT, PROSECUTORS, AND PRIVATE SECTOR PARTNERS REGARDING MONEY LAUNDERING

Objective 4.1: The Alliance will sponsor educational forums providing private sector partners with guidance to avoid their facilitating money laundering in the Border States.

Performance Measure: Completion of a list of at-risk businesses by category in the SWBA, particularly licensed and unlicensed money transmitters and facilitators of bulk cash and weapons smuggling.

Performance Measure: Number of contacts with representatives of at-risk businesses.

Performance Measure: Number of public information documents or communications disseminated.

Performance Measure: Number of trainings conducted.

Performance Measure: Number of attendees at trainings.

Objective 4.2: The Alliance will provide training on key subjects including money laundering, bulk cash interdiction, weapons smuggling, money transmitter operations, emerging payment methods, and human trafficking/smuggling on both sides of the border in close coordination with other available training and resources.

Performance Measure: Number of multi-state anti-money laundering trainings, including trainings at which Alliance-Appointed Staff make presentations.

Performance Measure: Number of multi-state anti-money laundering conferences.

Performance Measure: Number of agents, officers, and prosecutors trained at multi-state anti-money laundering trainings.

Performance Measure: Number of agents, officers, and prosecutors trained at multi-state anti-money laundering conferences.

Performance Measure: Number of multi-state coordination conferences relating to the SWBA.

Performance Measure: Number of multi-state anti-money laundering training and conferences featuring focused training in these particular SWBA money laundering subjects.

Performance Measure: Number of agents, officers, and prosecutors trained at multi-state anti-money laundering training and conferences in the focus subjects.

Objective 4.3: The Alliance will assemble expert investigative and prosecutive immediate assistance resources in all states to provide investigators and prosecutors in the field an immediate point of contact for advice and assistance in money laundering and related cases.

Performance Measure: Number of expert investigative and prosecutive immediate assistance resources assembled in all states.

Performance Measure: Number of cases based on or materially assisted by expert investigative and prosecutive immediate assistance resources assembled by Alliance participants.

GOAL 5: SUPPORT MULTI-JURISDICTIONAL DOMESTIC AND INTERNATIONAL MONEY LAUNDERING INVESTIGATIONS

Objective 5.1: The Alliance will foster collaboration in the SWBA to develop and enhance intelligence-driven investigations and prosecutions of money laundering and the related crimes of smuggling humans, currency, drugs, weapons, and human trafficking.

Performance Measure: Number of such cases in which three or more agencies substantially collaborated.

Performance Measure: Percentage of such cases in which three or more agencies substantially collaborated.

Performance Measure: Number of such cases in which agencies from more than one state, country, or level of government substantially collaborated.

Performance Measure: Percentage of such cases in which agencies from more than one state, country, or level of government substantially collaborated.

Performance Measure: Number of significant money laundering and

human, money, drug, and weapons smuggling/trafficking cases successfully prosecuted in the SWBA.

Objective 5.2: The Alliance will promote the use of civil and criminal asset seizures and forfeitures in prosecutions of money laundering operations and the related crimes of smuggling humans, currency, drugs, weapons, and human trafficking.

Performance Measure: Number of civil asset forfeiture/civil racketeering cases filed involving money laundering operations related to human, money, drug, and weapons smuggling, or associated violent crime, in the SWBA.

Performance Measure: Percentage of cases filed involving money laundering operations related to human, money, drug, and weapons smuggling, or associated violent crime in the SWBA that employ civil asset forfeiture/civil racketeering.

Performance Measure: Total forfeitures/judgments, in dollars, in civil asset forfeiture/civil racketeering cases involving money laundering operations related to human, money, drug, and weapons smuggling, or associated violent crime in the SWBA.

Objective 5.3: The Alliance will increase the use of bulk cash interdiction activities in order to disrupt the placement of illicit proceeds into United States and Mexican bank or non-bank financial institutions, in coordination with OCDETF, HIDTA, BEST, and other operations.

Performance Measure: Number of agencies actively involved in bulk cash interdiction, including in areas of origin and transit as well as in the SWBA.

Performance Measure: Number of multi-agency, multi-jurisdictional task forces relating to bulk cash smuggling operating in the SWBA or in origin areas operating in close coordination with a task force in the SWBA.

Performance Measure: Number of major organization prosecutions derived from bulk cash smuggling leads.

Performance Measure: Number of state prosecutions derived from bulk cash smuggling leads that cover circumstances in which federal statutes have been interpreted too narrowly to be the most effective option.

Performance Measure: Number of bulk cash dollars interdicted.

Performance Measure: Number of bulk cash firewall operations conducted with Mexican authorities.

Performance Measure: Reduction in average time between bulk cash smuggling incidents and the availability of actionable intelligence derived from that incident to all relevant law enforcement agents.

Objective 5.4: The Alliance will support the Financial Crime Enforcement Network’s mission to deter and detect criminal activity and safeguard United States financial systems and the FATF’s Recommendations, fostering transparency in financial transactions throughout the SWBA.

Performance Measure: Number of requests for information responded to through FinCEN.

Performance Measure: Number of cases using BSA data.

Performance Measure: Percentage of cases using BSA data.

Objective 5.5: The Alliance will support the Office of Foreign Asset Control’s mission of imposing sanctions against international criminal organizations.

Performance Measure: Number of additions to OFAC listings relating to the SWBA.

Objective 5.6: The Alliance will support the Department of Treasury and federal law enforcement agencies in determining whether the use of Geographic Targeting Orders or Section 311 of the USA PATRIOT Act are effective tools in disrupting money laundering networks in the SWBA.

Performance Measure: Completeness of Alliance analyses on these subjects.

Objective 5.7: The Alliance will establish objectively-verified empirical measurements of the amounts and methods by which proceeds of crime move from the United States into Mexico.

Performance Measure: Number of methods of movement of illicit funds identified.

Performance Measure: Number of methods of movement of illicit funds examined and confirmed.

Performance Measure: Identification of reliable methods of aggregation of illicit money flow figures.

Performance Measure: Verification of methods of aggregation of illicit money flows.

Performance Measure: Number of records reviewed.

Performance Measure: Number of reports produced.

Objective 5.8: The Alliance will support risk-based compliance examinations of SWBA MSBs by state and federal examiners based on comprehensive and objective analysis of transaction data.

Performance Measure: Number of compliance examinations initiated in the SWBA on data-driven risk-based analysis.

Performance Measure: Percentage of compliance examinations initiated in the SWBA on data-driven risk-based analysis.

Objective 5.9: The Alliance will identify and prosecute illegal MSBs in the SWBA.

Performance Measure: Number of illicit MSBs identified in the SWBA.

Performance Measure: Number of investigations of illicit MSBs initiated in the SWBA.

Performance Measure: Number of filed criminal prosecutions of illicit MSBs initiated in the SWBA.

Performance Measure: Number of filed civil prosecutions of illicit MSBs initiated in the SWBA.

Objective 5.10: The Alliance will conduct successful intelligence-driven undercover operations focusing on businesses that facilitate criminal activity in the SWBA.

Performance Measure: Number such intelligence-driven undercover operations relating to facilitating businesses successfully prosecuted.

Performance Measure: Percentage of successfully prosecuted criminal or civil cases in the SWBA that involve charges of facilitation of money laundering or weapons, drug, or human smuggling.

Objective 5.11: The Alliance will assist with coordination of Article 4 prosecutions in Alliance states.

Performance Measure: Number of Article 4 prosecutions relating to SWBA presented.

Performance Measure: Number of Article 4 prosecutions relating to SWBA accepted.

Performance Measure: Percentage of Article 4 cases relating to SWBA involving human, money, drug, or weapons smuggling as the crime.

Objective 5.12: The Alliance will expand the use of Article 4 investigations in Alliance states.

Performance Measure: Number of Article 4 investigations conducted in all states in the SWBA.

Performance Measure: Number of Article 4 investigations that result in prosecution in all states in the SWBA.

Performance Measure: Number of Article 4 investigations that result in prosecution in Mexico.

Objective 5.13: The Alliance will coordinate its Initiatives' program income to extend the scope and time frame of Alliance operations.

Performance Measure: Funds deposited to the Alliance Fund pursuant to asset sharing arrangements.