

Understanding Money Laundering: A Crime Script Approach

Original article

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Abstract: The opportunities through which the cleansing of illicit funds can take place presents a number of challenges for local, national, and international bodies and organisations tasked with preventing and detecting money laundering. Drawing upon the crime script approach as a means to understand procedural aspects and requirements of a specific crime type, this article discusses the suitability of crime scripts for improving understanding in relation to two specific methods of money laundering: (1) money laundering through cash intensive businesses and (2) money laundering through the purchasing of high value portable commodities. Taking advantage of primary research data, the article presents two separate crime scripts and identifies how the criminal or money launderer moves through a sequence of (bounded) rational decision making steps that provide insight into the role of third parties and the opportunities many “non criminals” overlook.

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Introduction

Knowledge regarding the complexities of money laundering has improved owing to activities by local, national, and international bodies and organisations focussed on limiting the opportunities through which the cleansing of illicit funds can take place. Yet, the range of possible options now available through which to facilitate money laundering is vast, changing regularly to support criminal activities, technological advancements, and preventative practices seeking to cause permanent disablement of money laundering.

This article discusses the suitability of crime scripts as a method for improving overall

understanding of the money laundering process. By highlighting various issues that surround the detection of money laundering, as well as the complexities involved in tackling a clandestine activity in which the end goal is to achieve full benefit from illicitly derived funds, the article demonstrates how crime scripts can facilitate the exposure of the underlying criminal process. This exposure of facilitating circumstances is shown using two specific methods of money laundering: (1) money laundering through cash intensive businesses and (2) money laundering through the purchasing of high value portable commodities.

Money laundering

Despite a range of deterrents initiated through an ever-increasing scope of anti-money laundering (AML) policies, procedures and legislative influences, money laundering has continued to evolve. Based on the crime commission process of placement, layering and integration in which funds enter the global legitimate financial system and are interwoven with legitimate funds to provide a plausible scenario for the final beneficiary (Schneider, 2007), money laundering remains a problem for which there is no foreseeable solution. While suggestions indicate money laundering equals US\$1.6 trillion (UNODC, 2011) or 2.7% of the annual global GDP, difficulties remain in declaring its true scale, as initial methods of statistical collection were never formally created to determine the true size of money laundering.

Technological enhancements such as mobile internet access and virtual private networks (VPN's) have increased opportunities through which to exploit existing and novel vulnerabilities (Hutchings, 2014). With an ever-increasing variety of locations from which to perform money laundering, law enforcement and governments are now overwhelmed by enhanced access to the internet. Money launderers have grasped advances in technology, making money laundering less complicated and quicker to facilitate, but significantly harder to detect and prosecute. As diminishing financial budgets challenge business and financial sectors, particularly those with responsibility for the prevention of money laundering, the innovative capacity to guarantee systems capable of effectively preventing or identifying money laundering activities may no longer fully exist.

Presenting an on-going obligation among financial institutions, AML activities provide a unique set of challenges. In turn, these have created substantial implementation issues across the scope of possible money laundering options available as well as the need for ongoing financial outlay imposed characteristically through risk and the fear of reputational damage. Ideally, AML efforts require processes sufficiently flexible at dealing with all money laundering methods, including new opportunities as offenders react to overcome regulations, compliance and targeted law enforcement activities. Furthermore, money laundering remains an obscure process in which methods, tools, and rationale are defined at the time the offence is committed. Prevention and detection of money laundering therefore no longer conclude exclusively in the detention of criminals and their subsequent incarceration. Instead, a holistic approach capable of adding new

knowledge to current risk management strategies has become the new focus of enquiry that provides financial benefits resulting from the recovery of criminal assets.

With few alternatives available in which to convert illicitly gained funds into a usable commodity, money laundering by virtue of what it achieves is in effect the pinnacle of all organised crimes and almost certainly, the "Achilles heel" of criminal activity (FATF, 2012). Distinct from many other forms of crime, money laundering portrays a silent act with techniques having become increasingly more difficult to interpret and prevent (Arnone and Borlini, 2010). Despite the global adoption of a three-stage process of money laundering (placement, layering and integration), opportunities to understand the (bounded) rational decision-making process and extract crime specific details (Cornish, 1994) have remained constrained because of the holistically clandestine nature of organised criminal activities. In the past, attempts to define processes of money laundering have been relatively superficial, failing in most part to discuss in detail the "actors, financial flows and behaviours involved in carrying out these activities" (Irwin et al., 2012: 86). As current methods typically remain "limited only by the imagination of the criminal enterprise" (Arnone and Borlini, 2010: 236), facilitated through one or more aspects associated with the internet (Grabosky and Graycar, 1996; Nair and Vaithilingam, 2007), the complexities for those involved in detecting and preventing money laundering have become all too common.

With opportunities increasing outside of the once preferred financial sector (Masciandaro, 1998; Unger and den Hertog, 2012), the effect of inadequate understanding of current methods of money laundering presents numerous on-going challenges. While regulation and regulatory guidelines remain somewhat successful, the continuing requirement for the money launderer is to "defeat the changing capacity of financial investigation skills and the burden of proof in any of the jurisdictions along its economic path" (Levi, 2002: 184). Furthermore, with methods varying from the most basic (van Duyne et al., 2005; van Duyne and Levi, 2005) to the highly sophisticated (Merlonghi, 2010), criminals are likely to utilise a variety of strengths and methods to achieve success.

Crime scripts

Crime scripts are used in the situational crime prevention approach to preventing crime (Cornish, 1994; Cornish and Clarke, 2002). By supporting the capture of individual components surrounding intricate forms of crime (Brantingham and Brantingham 1984; Levi and Maguire, 2004), crime scripts build upon a methodological approach originally developed within cognitive psychology (Cornish, 1994). With crime scripts, knowledge is ascertained about specific procedural aspects and procedural requirements of a crime by overcoming presumed routinisation around certain criminal acts (Bullock et al., 2010). By determining functional, spatial, and temporal defined events in sequential order, crime scripts can be used to present evidence identifying "webs of interconnected criminal events" (Cornish and Clarke, 2002: 51) and dependencies that exist between sequences of events (Lavorigna, 2014).

Likewise, crime scripts offer a useful method for working out ways to reduce crime. Templates and processes developed since their introduction now offer various ways to understand specific crime events that coincide with precise preventative measures. An example of a crime script for shoplifting is shown in Figure 1.

Figure 1 – Crime script for shoplifting. Modified from Cornish, 1994.

A later script approach proposed by Sacco and Kennedy (2008) that attempted to break down criminal events into a three-stage sequence included the need to identify precursors, transactions, and aftermaths. In doing so, this method determined structural factors and a consideration of how the interaction of groups (or individuals) leads or does not lead to violence. Script determination on the other hand (Hancock and Laycock, 2010) illustrates a slightly different, but still distinct model involving three parallel processes that analyse the crime process relating to more serious crime types.

Despite no overarching consensus on functionality, this process of crime script assessment illustrates interaction between *players* within the crime commission process.

With criminals remaining flexible in the way they undertake criminal activities (Lavorigna, 2014), crime scripts suffer from fragmented information and an impermanency of many activities. As argued by Leclerc (2013), crime script analysis may also lack distinction between an offender, a victim, or any person capable of intervening during the commission of a crime. Conversely, analysis of a crime using crime scripts is considered problematic when the script narrates organised crimes due to the habitual difficulty in reducing organised crimes to a particular point in time and space (Morselli and Roy, 2008). The principal reason behind this issue is the need to identify tactical or ground level activities. By doing so, it allows individual events to be sequentially determined as well as identifying immediate and causal preconditions considered necessary from the criminal's perspective before a criminal event can occur.

By extending analysis opportunities, crime scripts empower the identification of a broad range of conceivable intervention points (Ekblom, 1997), helping to capture the routine, yet also flexible nature of criminal decision-making (Cornish, 1994). Developed as a "hypothesized knowledge structure", in which "individuals are guided in routinised, yet inherently flexible goal-oriented behaviour through a sequence of steps or subgoals" (Cornish, 1994: 157), crime scripts offer opportunities for "breaking down a criminal endeavour into functionally, spatially and temporally defined events, which may or may not follow a strict sequential order" (Levi, 2008: 390). Initially developed to understand low-level crime, recent expansion of the scope of crime scripts has included profiling illegal waste activity (Tompson and Chainey, 2011) and drug manufacturing in clandestine laboratories (Chiu et al., 2011). The concern, however, with adopting crime scripts to more technical forms of crime is the over simplification of the crime commission process and the generalisation of various aspects of a collective process which may invariably differ due to location, time, and the people involved.

Method

This study is the result of a two-year study that set out to test the applicability of situational crime prevention against money laundering in the United Kingdom. Using the directional hypothesis "if appropriate for tackling other forms of specific crimes, then situational crime prevention can be used to reduce specific methods of money laundering", the study applied an action research methodology. The action research approach allowed the researcher to work closely with practitioners to identify problems and validate potential solutions (Clarke, 1995) in a relatively controlled environment of the United Kingdom and an arena in which the researcher was positioned. Furthermore, the action research methodology is also commonly associated with experimental research (Clarke, 1997) in which participant input can sustain practical and applicable outcomes. Even though the directional hypothesis identified the intentions of the research by aligning them with the action research methodology, it was also possible to adopt a number of key research questions, finally identified as:

1. How is money laundering through cash intensive businesses and the purchasing of high value portable commodities undertaken?
2. What situational and environmental factors exist to facilitate money laundering through cash intensive businesses and the purchasing of high value portable commodities?
3. What tools or resources exist to facilitate money laundering through cash intensive businesses and the purchasing of high value portable commodities?
4. What crime prevention techniques already exist to overcome these factors?
5. How can techniques for situational prevention invigorate or enhance current preventive methods against these two methods of money laundering?

The action research approach, developed by Clarke (1997) in relation to studies associated with

situational crime prevention comprises of a five-stage process encompassing collection of data, analysis, study of preventative opportunities, implementation of feasible and economic preventative measures, and the monitoring of implemented measures. Through direct alignment with this approach, crime scripts were created from the research data collected to offer an interpretation of the activities forming the process of money laundering via two specific methods: cash intensive businesses, and the purchasing of high value portable commodities. These two specific methods of money laundering had been selected for this study following a pilot survey that had identified them as a danger to UK economic stability, profitable for organised criminal groups, and easy to undertake.

Acknowledged from the outset as a difficult task to conclude because of the very nature surrounding organised crime and money laundering, the crime scripts presented in this article result from an analysis of 170 questionnaire responses and 12 in-depth interviews with AML experts and practitioners from across 11 professional AML backgrounds. In addition, detailed assessment of several open source case studies also took place. Nevertheless, the crime commission processes outlined as the procedure through which to facilitate money laundering through cash intensive businesses and the purchasing of high value portable commodities in this article provides only a “snap shot” and may not necessarily reflect current practices. Despite this, these two specific money laundering methods identified various vulnerabilities likely to exist in many other comparable countries, not just the United Kingdom.

Findings

Purchasing of high value portable commodities

The purchasing of high value portable commodities as a method through which to launder illicit funds is perhaps centuries old, based upon the historic movement of populations seeking to protect individual wealth and avoid taxes. Despite also representing an option through which to transfer wealth (informal value transfer) when utilised for the purposes of money laundering, the research identified that this method characteristically involves, and benefits from, high value goods such as gems, gold, jewels, artwork, and antiques. Furthermore, the research identified the re-sale of commodities may take place local to the initial purchase or alternatively, commodities may be shipped overseas to meet the demands of a particular market. Sales will ideally be in exchange for payment in a form capable of establishing a distinguishable aura of legitimacy. The overall susceptibility and avid keenness of criminals to conduct money laundering through the purchasing of high value portable commodities became apparent through several responses in the questionnaire data and subsequent interviews:

“There is no control of cash purchasing of high value portable commodities, so it is an absolute vulnerability” (Questionnaire 36) “No one can see this happening so it is perfect for the criminal”

(Questionnaire 55) “It’s small and easily concealable and can be got rid of” (Interview 3) “I think it is. One, its portable and two, it's a tangible asset... and potentially it accrues value depending on the asset.They are capable of being subsequently resold for particular markets so there is an opportunity to get an additional return.... They are easy to use as a currency. They are untraceable from a financial services industry point of view... they basically exist in that state wherever they go” (Interviewee 9) “More intelligent criminals will invest in low volume high value easily transportable stuff such as high value commodities, but I don’t mean cars” (Interviewee 10)

Various features identified by the research and included in the crime script indicate how a specific (bounded) rational decision-making process occurs several times during the laundering of illicit funds through this method of money laundering. While the process crudely correlates with the commonly depicted three stages of money laundering—placement, layering, and integration—, it is necessary to recognise that these stages are not completely separate and again do not always need to follow the exact sequence set out below because of the choices available within the overall process. For money laundering through the purchasing of high value portable commodities the five stages as defined by crime script analysis are as shown in Figure 2:

Figure 2 – crime script: money laundering through the purchasing of high value portable commodities

By reviewing the research data collected and analysing the crime script (Figure 2) it is possible to identify how each stage holds specific importance to the overall success of the entire process, whether committed as a single event or as a series of regular money laundering transactions. For example:

Stage 1: represents the identification of a suitable business from which to purchase the high value portable commodity or commodities. This is a simple activity but one which if carefully undertaken can more appropriately facilitate future purchases.

Stage 2: defines the placement stage within which the commodity or commodities are purchased using illicit cash. This stage can be as simple as purchasing a diamond engagement ring or a Rolex watch as a special gift using cash – as described by the purchaser so as not to raise suspicion of the recipient.

Stage 3: represents further preparatory work that although not necessary in every circumstance can facilitate a more effective process, particularly on occasions involving large items shipped overseas. However, this stage is not compulsory.

Stage 4: is the layering stage in which the illicit commodity or commodities sell legitimately, in for example a business transaction in which a receipt is provided or the commodity is sold secretly in which there are no records but that still facilitate a legitimate financial transaction capable of impeding suspicion.

Stage 5: represents the integration stage when money (which can legitimately be accounted for) is used to make purchases.

It is therefore feasible to use the crime script to recognise how the laundering of illicit funds through the purchasing of high value commodities represents a sequence of events, which once complete ceases. Nevertheless, preparatory work to facilitate the reducing of risk and effort, and the increasing of rewards suggests these activities facilitate further opportunities should the money laundering process need to be repeated. This includes purchasing a particular type of cash intensive business, recognising a willing seller, and identifying a suitable market in which to sell previously purchased high value commodities. In the same way, depending upon the circumstances present, a number of practices (such as obtaining purchase and sales receipts in anticipation of the illicit behaviour being the subject of an investigative challenge) were identified from the feedback to the questionnaire as assisting in the elimination of unwanted attention capable of increasing risk surrounding the process.

Cash Intensive Businesses

Money laundered through cash intensive businesses seizes upon an opportunity to utilise inconspicuous business types. The United Kingdom Government highlighted this in a 2011 report

in which it stated that, in order to launder money, “organised criminals often turn to cash rich businesses, like pubs and car washes, competing unfairly against those legitimately running such businesses.”(HM Govt, 2011: 10)

The unassuming process behind this method of money laundering involves the exploitation of a cash intensive business —i.e., a business specifically capable of facilitating with ease the introduction of illicit funds in the form of cash into the legitimate financial sector. In certain circumstances, the research identified how exploited businesses may have no legitimate activity, instead existing solely to provide cover for the deposit of illicit cash. As expressed in the following comments, money laundering through this method:

“Disguises the real purpose of transactions and assist criminality” (Questionnaire 144)

“These businesses, cash type businesses are everywhere in the UK, and I mean everywhere. Why would you not if you were a criminal decide not to use this option” (Interviewee 2)

“It’s the flexibility it offers” (Interviewee 11)

Once illicit funds have been co-deposited, banks inadvertently facilitate a more efficient money laundering process by assisting in the layering of the illicitly derived funds. Hence, this method of money laundering prompts many challenges for investigators seeking to unpick legitimate appearing cash intensive businesses and money laundering functions (Levi, 2002). The following case study demonstrates how this method of money laundering is achievable:

At the order of the owners of a garage, a bookkeeper regularly deposits large amounts of money at the local bank. The bank reports this activity to the Financial Intelligence Unit, and the bookkeeper comes into view as a possible financial facilitator. He turns out to run a small bookkeeping business with no employee other than himself. The garage belongs to two men involved in the wholesale cocaine business. They launder their cocaine proceeds by mixing them in with the revenues of their struggling garage. The bookkeeper made extensive statements, but says he did nothing wrong. He does not consider it his responsibility to notice discrepancies. One of the discrepancies he turned a blind eye to was that the garage would have had to be open 6 days a week and operating at full capacity to even begin to approach the sales volume reported. (Soudijn, 2012: 154)

From the research data, it is possible to illustrate how, across the United Kingdom, cash intensive businesses offer a simple way to deposit illicit cash directly into the banking system. This approach to money laundering provides evidence indicating how the process can equally coincide with a determined (bounded) rational decision making approach, with rational decisions focusing on, for example, the suitability of the exploited cash intensive business. Questioning whether the perceived turnover allows for the deposit of illicit funds without causing unnecessary suspicion or whether the turnover in the area where the business is located justifies its existence in spite of economic change. Bounded, rational decisions are also likely to extend to determining

opportunities for criminal ownership or third party control, supporting the establishment of greater protection and increasing the distance back to criminally associated origins. The appropriateness of this method was clearly recognised through the following quotes taken from questionnaire responses and interviews:

“Cash intensive businesses are certainly the flavour of the month in terms of depositing criminal cash into the banking sector. It’s always been flavour of the month as they are just extraordinary difficult businesses to audit” (Interview 2)

“We have seen and there is experience of as you say cash intensive businesses and you will have seen previous research around things like nail bars and that kind of thing where you have essentially got a front company or a company, well for two reasons either a company with a direct purpose of money laundering or a business which is subsequently suborned or utilised for that purpose with or without the ultimate beneficiary’s knowing” (Interviewee 9)

“The cash intensive business side is in a sense as a result of the evolutionary pressure and they have had to move to other instruments because of the cash which is sizable under POCA” (Interviewee 11)

While the customary crime script for money laundering inherently encompasses only three stages (placement, layering and integration), here the script defined using the research data collected from a United Kingdom assessment identified money laundering through cash intensive businesses as having five definable stages. It is necessary, however, to recognise that these stages are not completely separate and again do not always need to follow the order set out below because of the choices available across the variety of options this process can very easily incorporate.

Figure 3 – crime script: money laundering through cash intensive businesses

Using the research data collected and an analysis of the five stages identified in Figure 1 it is possible to define the five individual stages as:

Stage 1: represents the identification of a suitable business and optional preparatory work to facilitate the introduction of illicit funds into the selected cash intensive business.

Stage 2: is the placement stage in which illicit money enters the business and is recorded within the businesses financial accounts. In certain circumstances, and depending on the type of business, financial accounts may exist in an inadequate form to hamper subsequent financial investigation.

Stage 3: defines extra preparatory work aligned to establishing the business as a longterm option for the depositing of illicit money. This stage is not compulsory nor a particular step in the money laundering process. Typically, according to the research data, it involves practices and relationships associated with the cash intensive business facilitating the money laundering process.

Stage 4: is the layering stage in which the illicit money is concealed by the legitimate deposit of justifiable cash. While this process is standard practice in the money laundering process, the cash intensive business that facilitated the initial deposit can utilise existing business interests and practices to ensure that this stage does not attract unwanted attention.

Stage 5: represents the integration stage when the once illicit money is used to make purchases with what are considered legitimate funds. Such purchases do not necessarily need to be related to the cash intensive business. Any link between the business and subsequent purchases is dependent on the process used to layer the funds.

From the crime script identified in Figure 3, we can recognise the criminal decisionmaking process that corresponds with the actions taken. For instance, in terms of the overall process taken, there are two definitive options open to the money launderer: long-term and short-term. Depending on the decisions made, a series of proceeding choices are likely, most of which according to the crime script represent decisions demonstrating rationality directly related with achieving the greatest level of reward from the least amount of effort. These circumstances are supported by the following interview comment:

“The thing we look at, at the moment is tanning salons. Tanning salons you would traditionally go in and lie on the thing for 20 minutes, quarter of an hour or however long, but we dealt with one only recently one of these businesses which has vertical tanning booths where its ten pounds for three minutes. So all you need to do there is have ten booths, you’re opening 8 hours a day so you work out how many minutes that is and divide it by ten and then divide by 3 and that’s how much money you can deposit into the banking sector legitimately without having a single customer through the door. So let us look at how we can exploit that further. I go to Lloyds bank and say I have ‘happy tanning studio’ and I have ten tanning booths and I intend to bank this amount of money and they say right, we will enter into a banking arrangement with you. I then go across the road and have the same conversations with HSBC, Nationwide and of course I can open as many

accounts as what people will let me and they all think they are receiving the genuine proceeds of my business” (Interviewee 8)

Level-headedness is particularly visible here in this method of money laundering. Data analysis indicates how money laundering does not characteristically encompass acts that are spontaneous, random, or performed without forethought due to the likelihood of detection and subsequent confiscation if illicit funds. Instead, based primarily on the consequences of failure, money laundering appears driven by a rational decision making process that enables money laundering to be planned, coordinated and conducted in a logical and systematic way. By forming the crime script for money laundering through cash intensive businesses (Figure 3) it is possible to demonstrate how (bounded) rational actors are also utilised through a cost benefit analysis. Furthermore, in reviewing the details behind the crime script for money laundering through cash intensive businesses it was possible to recognise how difference perspectives in long and short-term options depict the necessity for activities to be carried out in stage three of the process.

In defining a crime script that cautiously represents money laundering through cash intensive businesses, it is possible to identify several options within stages one and two in which to introduce “actors” capable of facilitating or enabling a more effective process capable of diverting unwanted enquiries. Nevertheless, as the research was able to highlight, actors such as ghost business owners or people willing to provide false invoices for services not delivered identified in stage two may only be necessary where it is decided to utilise a cash intensive business for depositing illicit funds over an extended period of time, rather than a single event. Where this method of money laundering offers even a greater opportunity is in the scope of possible options that remain within the United Kingdom, options specifically recognised by the following questionnaire and interviewee comments:

“It doesn’t take a lot of effort to start a simple cash business and unless you cause trouble, it’s unlikely anyone will come asking questions. There’s just too many of them popping up everywhere” (Questionnaire 75) “There are too many variables in the scope of cash intensive businesses” (Questionnaire 149) “If you put a nominee up for the front for these businesses, the true, the bodies if you like, those with a criminal agenda could control the process” (Interviewee 1) “You don’t need to get your return back in cash, you can get it back in kind, such as through a car hire company when you get to drive around in a Range Rover. If you are stopped it’s not your car.” (Interviewee 11)

Using crime script to support crime prevention

Drawing upon the routine activity theory, and capturing the routine, yet flexible, and responsive nature of criminal decision-making (Brantingham and Brantingham, 1984; Clarke and Cornish, 1985), scholars have begun to complete script analysis for its primary purpose. In doing so,

scholars are now frequently designing situational prevention measures against a number of specific crime offences based upon greater understanding of the circumstances underpinning the criminal activities owing to the creation of crime scripts (Clarke and Newman, 2006; Smith and Cornish, 2006; Savona, 2010; Brayley et al. 2011; Chiu et al., 2011; Leclerc et al., 2011; Hiropoulos et al., 2013; Savona et al., 2013).

As shown, crime scripts identify points in which crime prevention or crime reduction techniques can be introduced to ideally prevent, but also increase the level of risk and effort to inhibit the criminal or money launderer from moving through the crime commission process. In applying the 5-I model by Ekblom (2011) it is possible to show how crime scripts can be effectively used against, for example, money laundering through the purchasing of high value portable commodities. Ekblom's 5-I model is a knowledge management framework that by assessing the needs and circumstances of practitioners can help to select and define the correct good practice in relation to crime prevention. Using a five-tiered approach of intelligence, intervention, implementation, involvement and impact the model supports innovation in new circumstances in which there is no existing knowledge as well as fostering communication and collaboration between practitioners.

Assuming significant information has been collected to enable the careful alignment of crime script, stage 2 (intervention) of the 5-I model presents an opportunity to align crime preventative techniques against a range of principles that focus on either the offender or the situational circumstances surrounding the activity. In Table 1, we can see how stage 2 of the 5-I model can be applied directly alongside a criminal opportunity framework helping to align the 5-I model to either intervention or situational preventative principles.

Table 1 – Application of prevention techniques to money laundering through the purchasing of high value portable commodities

Conclusion

The diversification of methods used to launder illicit money makes prevention appreciably problematic. As pointed out by Savona et al. (2013) (see also Moreto and Clarke, 2013), organised crimes are a challenge to investigate from a script approach because they can encompass complex networks, often international in nature, and implicate individuals from the legal economy and criminal organisations. While the logic behind the need to fight money laundering remains plausible, current preventive methods seem inappropriate at sufficiently reducing money laundering, based partially on the cost of implementing many of the ideal preventative measures available. Likewise, the increasing scope of methods and an ability by organised criminals to continue developing imaginative practices reduces very quickly many of the properties of current AML efforts. Furthermore, while the (bounded) rationale behind current AML efforts is concentrated at preventing the financial system from facilitating the laundering of illicit funds (Levi and Reuter, 2006), such processes inadvertently force money laundering further into practices which regulatory authorities have no apparent oversight.

The objective of this paper has been to discuss the suitability of crime scripts to provide detailed understanding of the criminal processes facilitating money laundering through cash intensive businesses and the purchasing of high value portable commodities. From the analysis of primary research data collected for both types of money laundering, it is possible to recognise how crime script analysis not only enables investigators to gain a greater understanding of the criminal processes used, but also provides a holistic understanding of the interconnected money laundering environment. Crime scripts highlight opportunities that many “non criminals” do not see, indicating how an open window is not necessarily an invitation to everyone to commit burglary, in the same way the availability of high value portable commodities do not represent a holistic invitation to launder illicit funds. This development in the use of crime scripts towards assisting in the prevention and detection of money laundering, a form of crime more complicated than those from which crime scripts were initially developed alongside is important. Not only has this study shown how the process can account for third parties who may be present during crime events but were previously unrecognised, it also builds upon the three stage money laundering process by adding depth and scope to demonstrate the cross over between various methods of money laundering and criminal behaviours.

As organised crime and money launderers continue to survive quite healthily amidst current preventive models, the identification of new realistic approaches remains a necessity, given that “successful crime control methods eventually weaken as offenders learn to circumvent them” (Ekblom, 2003: 241). Furthermore, crime scripts have the option to be utilised to identify decision points and support prevention practices against—for example those discussed within Ekblom’s 5-I framework—, thus allowing preventative measures to be carefully aligned with generic crime prevention practices.

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