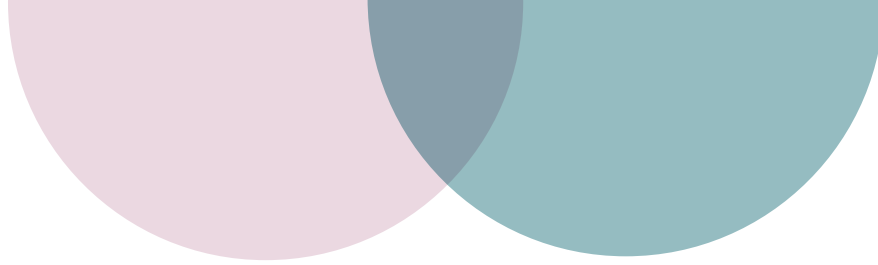




# Coordinating responses to human trafficking

A visualization of the partnership  
between Liberty Global | Asia and the  
Transaction Record Analysis Center



TRAC is an industry leader in training law enforcement and the financial community on how to conduct AML investigations. Created in 2014 through the support of the Arizona Financial Crimes Task Force (AZFCTF), TRAC is a centralized searchable database of the financial transactions of global money services businesses (MSBs). The Center supports investigations of money laundering activities of organized crime by providing data, data analysis, collaboration and training to investigators, analysts and prosecutors in the U.S. who are working to disrupt and dismantle criminal operations.

Liberty Global | Asia's aim is to create an environment safe from modern slavery through legal advocacy, technological interventions, and strategic collaborations with NGOs, corporations, and financial institutions. Comprised of former corporate professionals from banking, legal, technology and NGO sectors, Liberty Global | Asia believes in the need for a more effective and coordinated approach to tackling slavery.

# Liberty Global | Asia partners with TRAC

## *Introduction: Success of cross-sector collaboration*

In May 2018, Liberty Global | Asia entered into a strategic partnership with the Transaction Record Analysis Center (TRAC), in efforts to support anti-money laundering (AML) investigations related to human trafficking. Within just a few months, this partnership has begun to demonstrate how cross-sector collaboration can draw on the technical strengths and networks of multiple institutions to more effectively address complex crimes like human trafficking.

While there are a number of NGOs throughout the world that address the global issues presented by human trafficking, many are focused on providing victim recovery and rehabilitation services. These are extremely worthy and necessary endeavors, but they do not necessarily play to the strengths of TRAC, which identifies human trafficking networks through analysis of financial records.

The Liberty Global | Asia / TRAC collaboration is one that places human traffickers and their organizations at TRAC's doorstep. Liberty Global | Asia's reporting model provides TRAC a "one stop shop" to identify human trafficking investigations around the United States in a timely manner. Once these cases are identified, TRAC analysts can work to their strengths and "peel back" the financial layers of these organizations and co-conspirators, thus providing law enforcement and prosecutors with other avenues to explore in dismantling and successfully prosecuting these organizations and/or individuals.

## *Structured communication from NGOs throughout the financial industry*

Liberty Global | Asia is a Hong-Kong registered anti-trafficking NGO that aims to prevent human trafficking through legal advocacy, technological interventions and strategic collaboration. In 2014, Liberty Global | Asia and its Melbourne based developers SEED IM<sup>1</sup> began the development of a platform that started to serve as a conduit for the flow of information from in-field anti-trafficking NGOs directly to the financial industry. During the last four years, the platform has developed from the early beta testing to a network of more than 35 NGO partners trained by Liberty Global | Asia to monitor and collate local media for reports on individuals and entities in criminal justice systems around the world for human trafficking crimes and other forms of exploitation. They submit this information through the platform, and it is then shared with the world's leading third party database providers, whose research teams verify the information and, if their profiling criteria is met, create risk profiles for these individuals and entities. Through inclusion in these databases, this information is made available to thousands of financial institutions in their Due Diligence and Know Your Customer processes, helping them identify, prevent and interrupt transactions connected to human trafficking, a predicate offence to money laundering.

---

1 <https://www.seedim.com.au/>

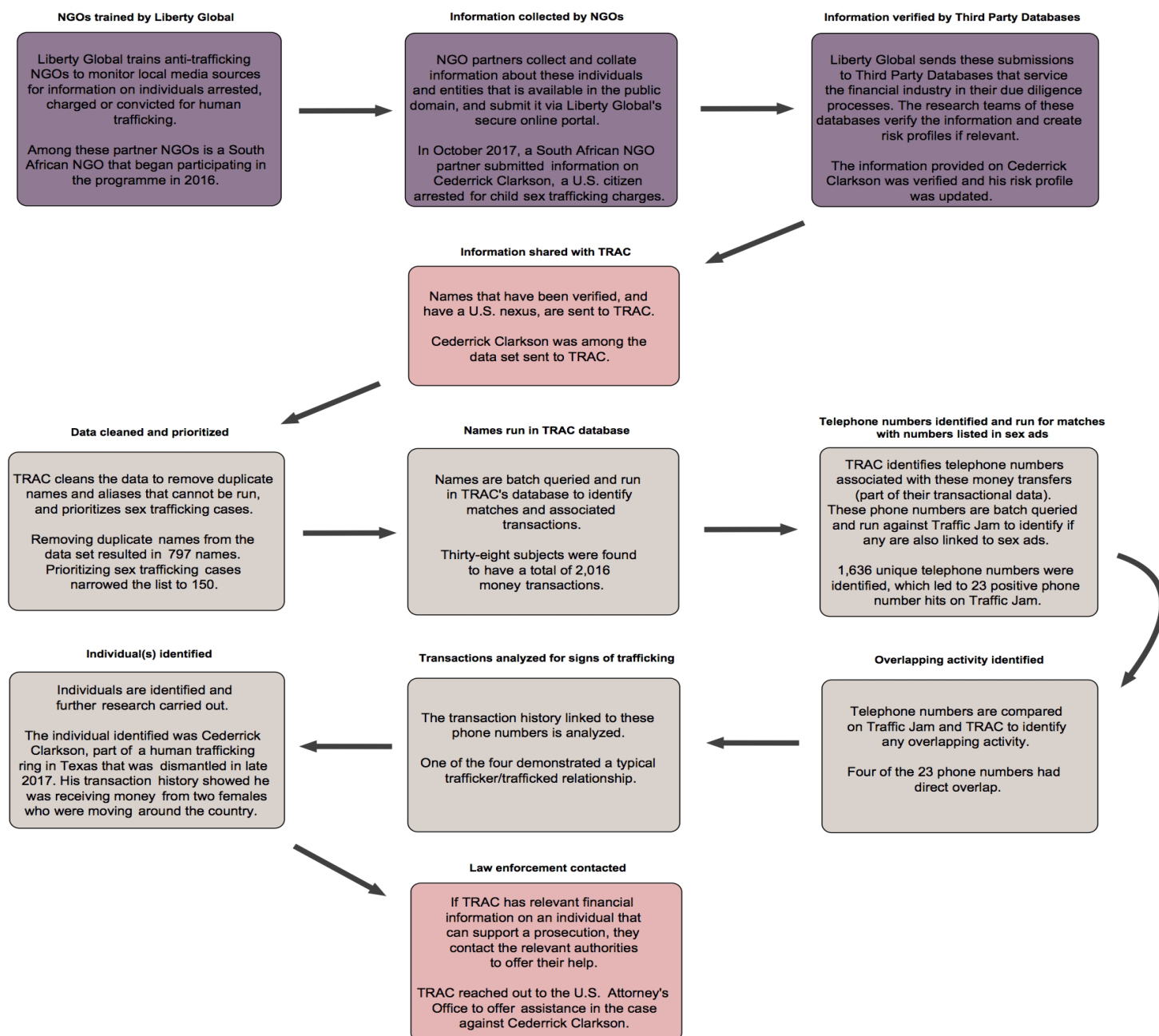
## *Beyond industry: Sharing with key global stakeholders*

In addition to working directly with the financial industry, Liberty Global | Asia shares this data with government agencies and NGOs, such as TRAC, who can utilize it in preventing and addressing exploitation. TRAC is a Phoenix-based non-profit known as an industry leader in training law enforcement and the financial community on how to conduct AML investigations. TRAC is a centralized, searchable database of financial transactions of global money services businesses (MSBs). Created in 2014 through the support of the Arizona Financial Crimes Task Force, TRAC's database contains over 50 million transaction records across 12 MSBs, with much of their transaction data concentrated in Southwest border states and Mexico. TRAC supports investigations of organized crime by providing data and data analysis, collaboration and training to law enforcement and prosecutors who are working to dismantle criminal operations. Their efforts focus on supporting AML investigations in the U.S.

To demonstrate how this partnership works, and how it is helping coordinate responses to human trafficking and opening further investigative opportunities for law enforcement, we present a recent case study. The following diagram explains the steps that TRAC and Liberty Global | Asia take to identify individuals linked to human trafficking and to uncover information about their financial footprint, and shows how each step figured into this specific case.

## Partnership visualization: A case study

This case arose from the data set Liberty Global | Asia shared with TRAC in May 2018, which included all our past human trafficking submissions with a U.S. nexus, through either citizenship or where the country of offence had been identified as the U.S.



## *Partnership impact: Supporting prosecutions and highlighting investigative opportunities*

An NGO in South Africa, Liberty Global | Asia, Third Party Databases serving the financial industry, TRAC, and a law enforcement agency; each of these actors played a role in facilitating information about this perpetrator and eventually led to a call to the U.S. Attorney's Office - a call that could lead to sharing of transaction data that would play a crucial role in that individuals' prosecution and the potential identification of a network of criminals and potential victims.

In the case of Cederrick Clarkson, when TRAC contacted the U.S. Attorney's Office they were informed that he had just plead guilty to one count of facility of interstate commerce in aid of a racketeering enterprise and one count of conspiracy to commit sex trafficking, and was sentenced to 11 years in a federal prison. Although his case was already closed, this example demonstrates the potential impact of this partnership, and shows how collaboration and information-sharing amongst institutions and across sectors can play a pivotal role in similar cases.

The suspicious transactions that TRAC can identify when it cross-checks the names of known perpetrators collected by Liberty Global | Asia against its database can result in financial evidence that contributes to the investigation and prosecution of individuals linked to human trafficking offences. Human trafficking prosecutions often face challenges related to victim testimony. Victims have undergone significant trauma, and are often reluctant to testify due to fear of reprisal or because they don't self-identify as victims, among other reasons. Where physical evidence or victim testimony fall short, by "following the money", or for forced labor "following the product," investigators can gather evidence that proves relationships between the traffickers and the trafficked, and amongst multiple perpetrators.

In addition to the ability to support the prosecution of specific individuals identified through this process, such as Cederrick Clarkson, this data-sharing also opens additional investigative opportunities for law enforcement. Clarkson, for example, was part of a group of eight men arrested as part of a child sex trafficking organization. Transactional data may provide evidence that identifies additional victims, "Johns," or other individuals linked to this criminal organization, perhaps further up the chain. This information allows prosecutors to expand the network they are investigating, and may even provide reason to expand their investigation across borders, if transactions indicate international movement and money flows.

### *Playing on strengths*

This partnership is proving to be a successful information-sharing model because through it, two organizations with shared aims, but with different networks and expertise, can capitalize on their respective strengths and use them in complementary ways.

Liberty Global | Asia has been building relationships with NGOs in Southeast Asia and globally since 2015, with more than 35 partner NGOs who contribute relevant media stories to our platform daily. These partnerships allow for the collection of relevant media stories that cover a wide range of countries and languages. The current extent of our media monitoring and collation could not be achieved without the participation of our NGO partners whose organization and entry of the material into the platform allows for it to be easily shared with partners like TRAC. Furthermore, Liberty Global | Asia's partnerships with third-party databases like Thomson Reuters World-Check help confirm the validity of the information that is included in the data sets shared with TRAC.

Through this partnership TRAC also builds on its strengths, utilizing its extensive database and the AML expertise of its analysts to identify which individuals are linked to suspicious transactions. They can take full advantage of their network of local and federal law enforcement professionals, which includes over 200 agencies and 4,200 individual TRAC users, to help ensure that the financial information linked to those involved in human trafficking makes its way into the hands of those investigating and prosecuting the case.

## *Information needs & ongoing partnership*

Timeliness is central to ensuring that the information collected and identified by Liberty Global | Asia and TRAC proves valuable in impacting real cases. The quicker a case is reported by the media, collected by Liberty Global | Asia and its partners, and consequently analyzed by TRAC, the quicker relevant transaction information will reach investigators and prosecutors working on cases connected to these individuals.

Also, important to consider is the media's role in reporting on human trafficking. As seen in the diagram, in this partnership model, media reports are a helpful link in a chain of events that identify individuals and transactions associated with human trafficking offences. The degree to which journalists investigate these individuals and include identifying information such as age, location and aliases in their reports, plays a role in TRAC's ability to identify these same individuals and corresponding transaction reports in their database. Furthermore, the earlier in the legal process that the media reports on these cases (i.e. at the time of arrest, or when individuals are initially charged), the more likely that Liberty Global | Asia and TRAC will be able to identify financial evidence in a timely manner that can help build the strength of the case.

Liberty Global | Asia continues to share data with TRAC monthly. Again, in June, this partnership led to contacting local law enforcement, as an individual picked up on through Liberty Global | Asia's media monitoring was found to have a notable footprint within the TRAC database. We hope that this partnership, and others like it that reach across sectors to share expertise and data, will continue to grow, addressing information gaps and making a real difference in the lives of those who have been exploited.

"Human traffickers are no different than perpetrators of virtually every other criminal activity committed around the world – they're in it for the purposes of economic profit. Unfortunately, dismantling criminal organizations through financial investigative methods is all too often overlooked by law enforcement around the world, either because of the lack of know-how, or because of the complexities those methods present and the elusiveness of immediate gratification. Is it a one size fits all approach? Absolutely not, but at TRAC, it's our bailiwick, and our collaboration with Liberty Global | Asia provides us with unique opportunities to support law enforcement around the United States and give hope to those who have been exploited."

Rich Lebel – Director - TRAC

"Trafficking is often perceived by perpetrators as a low-risk, high-reward crime. By facilitating the flow of information about these individuals to TRAC, and therefore increasing the opportunity to identify a financial footprint related to the trafficking crime, Liberty Global | Asia and TRAC are helping to create an environment safe from slavery."

Leighton Joyce – Director – Information and Data Collaboration - Liberty Global | Asia.

