

**CARL WHITEHEAD  
SPECIAL AGENT IN CHARGE,  
TAMPA DIVISION  
FEDERAL BUREAU OF INVESTIGATION  
Before the  
HOUSE COMMITTEE ON GOVERNMENT REFORM  
SUBCOMMITTEE ON GOVERNMENT EFFICIENCY and FINANCIAL MANAGEMENT and  
SUBCOMMITTEE ON TECHNOLOGY and INFORMATION POLICY and the CENSUS**

**December 15, 2003**

---

Good morning Mr. Chairmen and members of both the Subcommittee on Government Efficiency and Financial Management and the Subcommittee on Technology and Information Policy and the Census. On behalf of the Federal Bureau of Investigation (FBI), I would like to express my gratitude to both Subcommittees for affording us the opportunity to participate in this forum and to provide comments on the FBI's achievements, together with our partners in the war on terror, in the effort to identify, dismantle and disrupt sources of terrorist financing. I also appreciate the opportunity to highlight the FBI's use of information technology to better identify and isolate suspicious transactions related to terrorist financing, as well as the continuing enhancement of interagency cooperation in the battle against terrorist financing.

Since September 11, 2001, the FBI has reallocated substantial resources to protect the American people from another terrorist attack. The FBI's Counterterrorism Division has been reorganized to provide a more centralized, comprehensive and proactive approach to investigating terrorism-related matters to effectively disrupt and dismantle terrorist organizations before they are able to conduct attacks against citizens of the United States. And, given the changing nature of terrorism and the pace of technological innovations, the FBI has consistently been called upon to devise and implement new methods and techniques to identify, prosecute and, most importantly, prevent future crimes and attacks.

The fight against terrorist financing is a major front in our war on terror. We recognize that terrorists, their networks and support structures require funding in some form to exist and operate. Whether the funding and financial support is minimal or substantial, it leaves a financial trail that can be traced, tracked, and exploited for proactive and reactive purposes. Being able to identify and track financial transactions and links *after* a terrorist act has occurred or a terrorist activity has been identified is only a small part of the mission; the key lies in exploiting financial information to identify previously unknown terrorist cells, recognize potential terrorist activity or planning, and predict and prevent potential terrorist acts. To this end, the FBI has bolstered its ability to effectively combat terrorism through the formation of the Terrorist Financing Operations Section (TFOS).

TFOS was created to combine the FBI's traditional expertise in conducting complex criminal financial investigations with advanced technologies and the powerful legislative tools provided in the USA PATRIOT Act. TFOS has built upon these established mechanisms by developing a strong support network within the private financial sector, as well as furthering cooperation and coordination among law enforcement and intelligence agencies, both domestic and foreign, to form the preeminent terrorist financing investigative operation. In the past several months, TFOS has

demonstrated its capabilities by conducting near real-time financial tracking of a terrorist cell and providing specific and identifiable information to a foreign intelligence agency, which resulted in the prevention of six, potential deadly terrorist attacks.

The TFOS mission includes: conducting full financial analysis of terrorist suspects and their financial support structures in the US and abroad; coordinating joint participation, liaison, and outreach efforts to exploit financial resources of private, government, and foreign entities; utilizing FBI and Legal Attaché expertise and relationships to fully develop financial information from foreign law enforcement and private agencies, including the deployment of TFOS personnel abroad; working jointly with the intelligence community to fully exploit intelligence information to further terrorist investigations; working jointly with the law enforcement and regulatory communities; developing predictive models and conducting data analysis to facilitate the identification of previously unknown or “sleeper” terrorist suspects; and providing the financial component to classified counterterrorism investigations in support of the FBI’s counterterrorism responsibilities.

### **1. Achievements towards the identification, dismantlement and disruption of sources of terrorist financing:**

Before addressing some specific, investigative accomplishments in the fight against terrorist financing since 9/11/01, it is important to mention our progress in broad areas. For instance, international awareness and cooperation on the problem of terrorist financing has reached unparalleled levels. Outreach with, and cooperation from, the private sector has been outstanding and continues to develop--particularly the level of two-way interaction between law enforcement and the private sector. The resulting ability to access and obtain information in a timely fashion has significantly enhanced the FBI’s ability to identify, investigate, and resolve immediate threat situations involving potential terrorist activity. Moreover, the ability to conduct near real-time monitoring of specifically identified financial activity has been invaluable not only to investigations ongoing in the US, but to foreign law enforcement and intelligence agencies in related investigations.

As an example of our liaison and outreach efforts, extensive training and support of international investigations by TFOS has resulted in Agent visits, exchanges and training programs involving countries in Europe, Southeast Asia, the Middle East and South America. In support of specific high profile joint terrorist financial investigative matters, a number of countries and agencies, including the United Kingdom, Switzerland, Canada and Europol, have detailed investigators to TFOS on a temporary duty basis. TFOS has engaged in extensive coordination with authorities of numerous foreign governments in terrorist financing matters, leading to joint investigative efforts throughout the world. These joint investigations have successfully targeted the financing of several overseas al-Qa’ida cells. Furthermore, with the assistance of relationships established with the central banks of several strategic countries, successful disruptions of al-Qa’ida financing have been accomplished in counties such as the UAE, Pakistan, Afghanistan, and Indonesia.

As part of its outreach effort, TFOS has developed a specific terrorist financing and money laundering crimes curriculum for international training that includes topics such as: acquiring and handling evidence in document intensive financial investigations, major case management techniques, forensic examination tools, and methods of terrorist financing. At the request of the US Department of State, TFOS has led an interagency team to provide this curriculum to a number of countries (and is scheduled to provide it to approximately 38 countries) identified as needing law enforcement training on conducting terrorist financing investigations.

Needless to say, access to foreign banking records is often critical to effectively following the money. Through these training and outreach initiatives, TFOS has been able to obtain direct access to records provided by foreign central banks in numerous countries. In return, TFOS has also been able to assist these and other countries with the reciprocal sharing of financial information.

TFOS has cultivated and maintains a contact database of private industry and government sources and persons who can provide financial data, including near real-time monitoring of financial transactions. Many of these contacts can be reached or accessed on a 24 hour/7 days a week basis, allowing TFOS to respond rapidly to critical incidents.

Through these contacts and with appropriate legal process, TFOS has access to data and information from a variety of entities including: Banking Institutions, the Credit/Debit Card Sector, Money Services Businesses, the Securities/Brokerages Sector, Insurance Companies, Travel Agencies, Internet Service Providers, the Telecommunications Industry, Law Enforcement, State/Federal Regulatory Agencies, Public and Open Source Data Providers, the Intelligence Community, and International Law Enforcement and Intelligence Contacts. The timeliness and accessibility of the data from these sources is contingent on a variety of factors, including whether the acquisition of the information requires legal process, the search capabilities of the data provider, and the size and depth of the data request. Nevertheless, as I've noted, the ability to access and obtain this type of information in a time sensitive and urgent manner has significantly enhanced the FBI's ability to identify, investigate and resolve immediate threat situations involving potential terrorist activity.

In addition to these developments, the FBI, working in coordination with other entities of the US government, has participated in the following successes pertaining to terrorist financing:

- An FBI Joint Terrorism Task Force in Charlotte, North Carolina, utilized racketeering statutes to obtain criminal convictions and, thus, disrupt and dismantle a Hizballah procurement and fundraising cell. Twenty-six individuals were arrested for crimes including immigration fraud, visa fraud, cigarette smuggling, interstate transportation of stolen property, fraud, bank fraud, bribery, money laundering, racketeering, and providing material support to a terrorist organization.
- The FBI coordinated with the Treasury Department's Office of Foreign Asset Control (OFAC) to justify the blocking of Holy Land Foundation for Relief and Development (HLF) assets and the closing of its US offices, shutting down Hamas' largest fund-raising entity in the US. The HLF had been linked to the funding of Hamas terrorist activities, and in 2000, raised \$13 million.

- Offices of the Benevolence International Foundation (BIF), a US based charity, were shut down and its assets and records blocked following an OFAC and FBI investigation which determined the charity was being used to funnel money to al Qa'ida. In February 2003, Enaam Arnaout, the head of BIF, pleaded guilty to racketeering conspiracy, admitting he fraudulently obtained charitable donations in order to provide financial assistance to persons engaged in violent activities overseas.
- A criminal case against Sami Al Arian, the alleged US leader of the Palestinian Islamic Jihad (PIJ), and the World Islamic Studies Enterprise forced the closure of several front companies suspected of funneling money to support PIJ operations against Israel. In August 2002, the investigation led to the deportation of Mazen Al-Najjar, the brother-in-law of Sami Al Arian and a known PIJ member. In February, following a 50-count indictment for RICO and Material Support of Terrorism violations, the FBI arrested Al-Arian and three other US-based members of the Palestinian Islamic Jihad, including Sameeh Hammoudeh, Hatim Naji Fariz, and Ghassan Ballout. The FBI also executed seven search warrants associated with this action.
- TFOS has provided operational support to FBI Field Divisions across the United States to enhance their intelligence/criminal investigations of individuals and groups associated with, or providing material support to, terrorist organizations and activities. This assistance is provided in the form of conducting intelligence/criminal financial investigations, financial analytical support, major case management, financial link analysis, and the deployment of teams of experts to develop investigative plans to analyze large volumes of documents and data. TFOS has provided this type of operational support in the Al Qa'ida sleeper cell cases in Buffalo and Portland, as well as in the Richard Reid, John Walker Lindh, Al Haramain, PIJ, and Mohamed Almoayad cases, among many others. This type of operational support has also been provided to Divisions investigating non-governmental organizations (NGOs), such as the Holy Land Foundation for Relief and Development, Benevolence International Foundation and the Global Relief Foundation.
- The FBI conducted a detailed financial investigation/analysis of the 19 hijackers and their support network, following the September 11<sup>th</sup> attacks. This investigation initially identified the Al Qa'ida funding sources of the 19 hijackers in the UAE and Germany. The financial investigation also provided the first links between Ramzi Binalshibh and the 9/11/01 terrorist attacks. A continuing investigation, in coordination with the PENTTBOMB Team, has traced the origin of the funding of September 11<sup>th</sup> back to financial accounts in Pakistan, where high-ranking and well-known Al Qa'ida operatives played a major role in moving the money forward, eventually into the hands of the hijackers located in the US. As part of the 9/11/01 financial investigation, thousands of individuals and organizations were investigated in the US and abroad to determine whether they played any part in supporting the hijackers or the operation. Although the vast majority of these individuals and organizations were cleared, this process of elimination resulted in numerous other quality terrorism investigations being initiated, as well as criminal charges against hundreds of individuals for fraud and other criminal activity.

- Since 9/11, the Treasury Department has frozen \$36.3 million in terrorist assets, while the international community has frozen over \$136 million, for a total of over \$172 million.
- The Treasury Department has issued blocking orders on the assets of more than 340 terrorists, terrorist organizations, and terrorist supporters, effectively denying them access to the US financial system.
- Federal law enforcement officials have arrested over 61 individuals, indicted 43 and convicted 12 in connection with terrorist financing investigations.
- US Government agencies, to include the FBI's TFOS, deployed trainers and advisers on missions to countries around the world to assist with the drafting of legislation to combat terrorist financing, strengthen bank supervision in identifying suspicious transactions, and address other financial crimes and corruption. Since 9/11/01, over 80 countries have introduced new terrorist-related legislation and approximately 84 countries established Financial Investigation Units.
- As previously noted, TFOS has conducted near real-time financial tracking of a terrorist cell and provided specific and identifiable information to a foreign intelligence agency, which resulted in the prevention of six, potential deadly terrorist attacks.
- In January 2003, the FBI, working in conjunction with German law enforcement, arrested Mohammed Al Hasan Al-Moayad, a Yemeni national, on charges of conspiring to provide material support to Al Qa'ida and Hamas. Al-Moayad was a significant financial contributor to Al Qa'ida and Hamas, and boasted he had provided over \$20 million dollars to Usama Bin Laden. Al-Moayad participated in several fund-raising events at the Al Farouq Mosque in Brooklyn, NY. Al-Moayad was arrested during an undercover operation where he believed that he was to receive a large financial contribution, which he advised a source would be used to support mujahideen fighters of Al Qa'ida and Hamas. Along with Al-Moayad, several of his associates in New York were arrested for violating banking reporting requirements by structuring over \$300,000 in several bank accounts in the United States.
- In December 2002, a federal grand jury in Dallas returned an indictment against a senior leader of Hamas, Mousa Abu Marzouk, for conspiring to violate US laws that prohibit dealing in terrorist funds. Also charged and arrested by the FBI were Ghassan Elashi, the chairman of the Holy Land Foundation for Relief and Development, a charitable organization designated as a terrorist organization by the US Treasury Department's Office of Foreign Asset Control because of its fundraising activities on behalf of Hamas. Elashi and four of his brothers, all of whom are employees of the Richardson, Texas-based InfoCom Corporation, were charged with selling computers and computer parts to Libya and Syria, both designated state sponsors of terrorism. The indictment alleged that the Elashi brothers disguised capital investment from Marzouk, a specially designated terrorist for his admitted leadership role with Hamas,

for their telecommunications company, InfoCom. The indictment and subsequent arrests have disrupted a US-based business, which was conducting its activities with a known Hamas leader and state sponsors of terrorism.

- In October 2002, the FBI and other US government agencies assisted German authorities in identifying and taking legal action against Hamas in Germany. Through the efforts of the FBI, including TFOS, exchanges with Germany led to the closure of the Al-Aqsa Foundation in Germany, a suspected Hamas fundraising organization.

## **2. The use of information technology to better identify and isolate suspicious transactions related to terrorist financing**

The FBI has a responsibility to be not only reactive but proactive as well, and to think strategically about potential threats and future case development. Accordingly, TFOS, together with the Counter-Terrorism Section, Criminal Division of the Department of Justice, has begun a number of proactive initiatives to identify potential terrorists and terrorist related financing activities.

The overriding goal of these projects is to proactively identify potential terrorists and terrorist related individuals, entities, mechanisms or schemes through the digital exploitation of data. To accomplish this, TFOS seeks to 1) identify potential electronic data sources within domestic and foreign government and private industry providers; 2) create pathways and protocols to legally acquire and analyze the data; and 3) provide both reactive and proactive operational, predictive and educational support to investigators and prosecutors.

Utilizing the latest computer technology available to the Counterterrorism Division, the Proactive Exploits Group (PEG) within TFOS serves as a proactive, financial intelligence investigative management and support team. PEG generates leads for TFOS and other FBI components. PEG also proposes and conducts proactive financial intelligence initiatives and projects. PEG works closely with TFOS operational units and document exploitation initiatives to ensure financial intelligence is being fully exploited and disseminated.

PEG has conducted an extensive review of data mining software and link analysis tools currently utilized by other governmental and private industries for consideration of use by the FBI. PEG also participates in the FBI's SCOPE Intelligence Data Warehouse (IDW) User Management Group and has been involved in the development and planning for future enhancements to the IDW. PEG has created an interactive, computer playbook generator that can assist investigators in determining data sources to be queried, based upon the quantity and quality of their investigative data.

PEG has initiated several projects to integrate data from TFOS' internal financial database, open/public source data and FBI and other government data sources onto a central query platform. Through this process, and in concert with contract vendors working for the SCOPE IDW Project, PEG has developed a process whereby the Financial Intelligence Analysis Unit (FIAU) within TFOS can batch query multiple databases for potential matches by names, telephone numbers, e-mails, etc. This batch process has the potential to save FIAU and the FBI hundreds, if not thousands, of hours of data input and query time on each occasion it is utilized. Furthermore, it facilitates rapid acquisition and sharing of information with other agencies. Through the sophisticated tools being utilized, and the matching protocols developed, FIAU can insure each query is properly conducted and done to a best practices query standard.

Recently, PEG utilized the batch process it developed to exploit over three thousand individual names, addresses, telephone numbers and e-mail addresses. The batch process accomplished in hours what would have taken TFOS personnel and FBI Field Offices over 4,300 man hours to conduct, potentially saving the FBI almost \$70,000. Furthermore, because PEG conducted the queries in batch form, and has global access to all of the search results, previously unidentified links, patterns and associates among the data can now be extracted. Absent the batch process, this would have been extremely difficult, if not impossible, to accomplish.

PEG has initiated a variety of proactive data mining projects to identify potential terrorists and terrorist financing. The projects were conceived in 2002 and now, with the advent of certain software tools and data access, are either being implemented or will shortly begin. Some of the projects include the:

- Social Security Number (SSN) Project

The SSN project is a multi-phase project that seeks to identify potential terrorist related individuals through SSN misuse analysis. SSNs identified as a result of terrorist related investigations are first provided to the Social Security Administration (SSA) for authentication. Once the validity or non-validity of the number has been established, investigators look for misuse of the SSNs by checking immigration records, Department of Motor Vehicle (DMV) records, and other military, government and fee-based data sources. Incidents of suspected SSN misuse are then separated according to type. Predicated investigative packages are then forwarded to the appropriate investigative and prosecutive entity for follow-up.

- Suspicious Activity Report (SAR) Project

The SAR Project seeks to identify potential terrorists through the mining of the SAR database for key words, patterns, individuals, entities, accounts and specific numeric identifiers (i.e., Social Security; driver's license, passport, telephone and Immigration and Naturalization Service (INS) A numbers, etc. ) The SAR Project looks for terrorist related activity among previously reported suspicious activity, regardless of whether it was identified with terrorism at the time of reporting. Incidents of suspected terrorist involvement are separated and, thereafter, forwarded to the appropriate investigative and prosecutive entity for follow-up. It is not always immediately apparent whether the reported SAR has a terrorism nexus. However, if the review is begun with predicated terrorism names and identifiers associated with terrorist investigations, the probability increases. PEG has assisted several individual FBI field offices in initiating their own versions of the SAR Project. Initial batch querying of the SAR database recently began, and analyses of the results are pending.

- Terrorist Risk Assessment Model (TRAM)

TRAM seeks to identify potential terrorist and terrorism financing activity through the use of targeted, predictive pattern recognition algorithms. The project entails the compilation of past and current known data regarding individual and group terrorist activity, methodologies,

demographics, financial patterns, etc., to form a predictive pattern recognition program. This risk assessment program could then be deployed against financial and other data to identify those pieces of information or persons that most closely resemble the pattern being sought after. The PEG will shortly begin a pilot testing of this capability to include the utilization of artificial intelligence and robotic searching models based on the patterns developed by TFOS.

➤ Automatic/Robotic Playbook Generator

PEG has developed a computer database program that reviews Requests For Information (RFIs), determines what is requested and which FIAU contacts can provide potential answers to those questions. The computerized program then returns a “playbook”, or set of instructions, the user can follow to gather the necessary information. Plans are underway to integrate this playbook generator with the batch process developed to automate much of TFOS’ collection mechanisms. This will allow RFI’s to be automatically processed, and the appropriate databases queried robotically.

It is important to understand that these projects and similar initiatives by TFOS seek only to more fully exploit information *already obtained* by the FBI in the course of its investigations or through the appropriate legal process, and where there is an articulated law enforcement need. TFOS does not seek access to personal or financial information outside these constraints.

**3. 2003 National Money Laundering Strategy (with an emphasis on agency coordination)**

With respect to the *2003 National Money Laundering Strategy*, I concur with the statements this morning of my colleagues as they relate to the strategy’s goals and objectives. The blocking of terrorist assets worldwide, establishing and promoting of international standards for adoption by other countries to safeguard their financial infrastructures from abuse and facilitating international information are several key objectives which must be achieved if law enforcement and regulatory agencies are to have any success in stemming the flow of illegal funds throughout the world. Within the FBI, the investigation of illicit money flows crosses all investigative program lines. I would like to use my final moments with the Committees to share some examples of the Bureau’s efforts towards coordination with other agencies so important to us in the fight against terrorism, recognizing that throughout my comments thus far this morning, our understanding and recognition of the need for the continued sharing of information, cooperation and outreach efforts are clearly noted.

Information sharing is critical to all of our efforts. The intelligence community, including the FBI, produces and obtains tremendous amounts of classified intelligence information. While much of the information can be of significant value in terrorist finance investigations, the value will not be realized or maximized absent the ability to filter the information, analyze it, and disseminate it in an appropriate manner to those who can make the best use of the information. Toward this end, TFOS participates in joint endeavors with the Treasury Department, the Department of Justice, and the Department of Homeland Security involving potential terrorist related financial transactions. TFOS also has personnel detailed to the CIA’s Counter Terrorism Center, and personnel from there work directly with TFOS on financial intelligence matters.



In addition, the National Security Council formalized the Policy Coordinating Committee (PCC) on Terrorist Financing at the end of 2001. Treasury chairs the PCC, which generally meets at least once a month to coordinate the United States government's campaign against terrorist financing. The meeting generally focuses on ensuring that all relevant components of the federal government are acting in a coordinated and effective manner to combat terrorist financing.

The Departments of State, the Treasury, and Justice also established an interagency Terrorist Financing Working Group, chaired by the State Department, to coordinate government efforts to identify, prioritize and assess those countries that are vulnerable to terrorist exploitation. Groups of experts, including DOJ money laundering prosecutors, interagency law enforcement and regulatory members, have provided extensive on-the-ground assessments of such countries' vulnerabilities in an effort to develop and provide targeted training and technical assistance to those countries identified as most vulnerable.

Organizational changes have also taken place within the Executive Branch with respect to the investigation of terrorism financing, including the execution of a Memorandum of Agreement (MOA) between the Department of Justice (DOJ) and the Department of Homeland Security (DHS) concerning terrorist financing investigations. The MOA addressed the importance of waging a seamless, coordinated law enforcement campaign against terrorist sources of financing. Signed by Attorney General Ashcroft and Homeland Security Secretary Ridge on May 13, 2003, the FBI was designated to lead terrorist financing investigations and operations, while DHS would focus its law enforcement activities on protecting the integrity of US financial systems. To this end, DHS implemented "Operation Cornerstone", led by Immigration and Customs Enforcement (ICE), to identify vulnerabilities in financial systems through which criminals launder their illicit proceeds, bring them to justice and work to eliminate financial infrastructure vulnerabilities. Former US Customs Service "Operation Green Quest" criminal cases having no nexus to terrorism were converted to "Operation Cornerstone", while those cases having a nexus to terrorism were transitioned to the appropriate FBI Joint Terrorism Task Force (JTTF) having ICE participation. Ongoing and future "Operation Cornerstone" investigations that develop links to terrorism will be referred to the FBI through TFOS. ICE and TFOS are coordinating investigative initiatives that will enable ICE to identify financial systemic vulnerabilities, and which will enable TFOS to identify ties to terrorism and terrorist financing. In addition, there is a liaison from ICE assigned to TFOS, and investigators from ICE will be represented on the JTTFs.

Our efforts to combat terrorism have been greatly aided by the provisions of the PATRIOT Act and, pursuant to the *2003 National Money Laundering Strategy*, the FBI is ensuring its vigorous and appropriate application. The success in preventing another catastrophic attack on the US homeland would have been much more difficult, if not impossible, without the Act. It has already proved extraordinarily beneficial in the war on terrorism. Most importantly, the PATRIOT Act has produced greater collection and sharing of information within the law enforcement and intelligence communities.

Title III of the Act, also known as the International Money Laundering Anti-Terrorist Financing Act of 2001, has armed us with a number of new weapons in our efforts to identify and track the financial structures supporting terrorist groups. Past terrorist financing methods have included the use of informal systems for transferring value in a manner that is difficult to detect and trace. The effectiveness of such methods should be significantly eroded by the Act, which establishes stricter rules for correspondent bank accounts, requires securities brokers and dealers to file Suspicious

Activity Reports or SARS, and money transmitting businesses, which include any person who engages as a business in the transmission of money, to register with FinCEN and file SARS.

There are other provisions of the Act that have considerably aided our efforts to address the terrorist threat including: strengthening the existing ban on providing material support to terrorists and terrorist organizations; the authority to seize terrorist assets; and the power to seize money subject to forfeiture in a foreign bank account by authorizing the seizure of a foreign bank's funds held in a US correspondent account.

The FBI has utilized the legislative tools provided in the USA PATRIOT Act to further its terrorist financing investigations. Some examples of how TFOS has used the provisions in the USA PATRIOT Act are: to obtain foreign bank account information by issuing administrative subpoenas on foreign banks' US correspondent banks; to corroborate financial data obtained through criminal investigative techniques with intelligence sources; and to provide grand jury material to a foreign intelligence agency. All of these techniques have significantly assisted ongoing terrorism investigations and would not have been possible, but for the enactment of the USA PATRIOT Act.

It is important for the Committee and the American people to know that the FBI is using the PATRIOT Act authorities in a responsible manner. We are making every effort to effectively balance our obligation to protect Americans from terrorism with our obligation to protect their civil liberties.

Terrorism represents a global problem. The solution is grounded in what would have been considered, prior to 9/11/01, unprecedented international cooperation and coordination. The threat it poses must always be considered imminent. In addition to considerable financial investigative expertise, addressing terrorism and the finances that support and propagate it requires the ability to both implement proactive and preventive approaches to disrupt and dismantle, as well as the ability to conduct highly reactive immediate response financial investigations to address potential imminent threats. As stated herein, and in conjunction with more and more of the international community and other aspects of the US Government, the FBI has made considerable progress toward achieving and implementing these abilities.

Again, I offer my gratitude and appreciation to you, Chairman Platts and Chairman Putnam, as well as the distinguished members of both Committees, for dedicating your time and effort to this issue, and I would be happy to respond to any questions you may have.