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### The Evolution of Prepaid Instruments from Giftcards to Virtual Money Laundering in a Global Theatre and its Implications for Financial Inclusion **Programming**

Susan Lea Smith **U.S. Department of Justice** 



T. Jack Williams Paymentcard Services, Inc.







# Maria Stephens USAID

Maria Stephens is a Senior Technical Adviser with USAID and subject matter expert in emerging payment systems risk and regulatory issues with over 18 years' experience in microfinance and financial economics. While a Financial Economist at the U.S. Treasury Department, Ms. Stephens was selected to participate in the development of policy and regulatory position papers focusing on derivatives and other related financial products and services. She is a primary author of the USAID-Booz Allen Hamilton Mobile Financial Services Matrix and related mobile financial services risk mitigation tools and documents, and continues to lead in the development of USAID's emerging payment systems policy and regulatory agenda.





#### **Susan Lea Smith**

U.S. Department of Justice

Susan Lea Smith is a Senior Trial Attorney with the Asset Forfeiture and Money Laundering Section, Criminal Division, U.S. Department of Justice. Ms. Smith began in the original Money Laundering Section in November 1991 and was primarily a litigator, investigating and prosecuting money laundering. Ms. Smith prosecuted and investigated cases involving attorneys, accountants, and businessmen who had laundered money derived from drugs and various white collar crimes. In July 2000, Ms. Smith was awarded The John Marshall Award for her work on "Operation Casablanca," the largest drug money laundering operation investigation conducted by the United States.





#### T. Jack Williams

Paymentcard Services, Inc.

Jack Williams brings over 24 years of experience in credit and debit cards arena. As president of Paymentcard Services, Inc. he has designed and implemented fully operational credit, debit and prepaid card and mobile commerce programs for clients throughout the world, including state and federal law enforcement. As a global payments subject matter expert, Mr. Williams has worked with domestic and international companies to provide payments programs and his list of clients ranges from financial institutions to major retailers looking to solve payments questions. He delivers a broad array of knowledge in all areas of the payments industry, from credit to prepaid as well as mobile and virtual account processing.



# **Emerging Payments System**

The Evolution of Prepaid Instruments from Giftcards to Virtual Money Laundering in a Global Theatre and its Implications for Financial Inclusion Programming

EPS Seminar, October 18, 2012

Maria Stephens

Senior Technical Advisor

USAID



#### **Development Rationale for Promoting Prepaid Cards**

- Increase in MMT → increase in FT → decrease in C: Test this through cases presented.
- Can be utilized by unbanked on both ends of transaction (sending and receiving)
- No need for computer or Internet if carrying physical cards across borders (ease in transport)
- Little, if any, restriction in amount that can be carried across borders (currently not subject to \$10,000 declaration requirement)
- Easy loading and cash-out options via ATMs accepting V, MC logos. (While networks have regulations preventing high value cards, reality is the limit can be in excess of network rules in place)
- Minimal identification requirement eases use on both ends of transaction; makes it easier for those lacking traditional forms of ID
- Can be used to open on-line accounts for use in sending funds virtually and linking with virtual MMOs
- Complements development community's interest in promoting 'Diaspora-based' remittance flows from US-based communities to countries of sender's origin.



#### Contextual Issues with Promoting Prepaid Cards within Development Agenda

- No effective consumer and deposit insurance protection mechanisms in place to protect prepaid cards' underlying assets.
- 'High-tech' and 'low-tech' hybrid EPS models → challenges in tracing funds' source and flows
- Companies are currently providing global remittance products and services tied to prepaid cards. (Examples: Mobile Clearinghouse Network, <a href="http://www.mchn.com">http://www.emida.net</a> are global remittance companies that tie a prepaid card to a mobile phone for access.
- Limited or absent emerging market and fragile state legal, regulatory, and enforcement capacity for oversight of 'lightly regulated' EPS. Problem further exacerbated by donor push for such programming (see Donor Support list).
- Currently 92% of countries on list (24/26) rank as medium- to high-risk per Basel rating and current FATF status: Context matters.



# Donor Support for Emerging Payments Chart

### Prepaid Access Cards and Mobile Commerce...

An Operational Overview of Prepaid Access

Susan Lea Smith

**U.S.** Department of Justice

T. Jack Williams

Paymentcard Services, Inc.

18 October 2012

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### Remember the Brick?



Introduced in 1984

Weighed over 2 pounds

30 minute talk time

10 years, \$100m to develop

\$3,995.00 to buy

"Current analysis of trends analyzed for Law Enforcement has revealed that drug seizures increased (120%) while cash seizures declined (45%) when comparing the first six months of 2009 to the first six months of 2011.

In addition reporting from federal and local agencies indicates the increased likelihood of criminal organizations utilizing prepaid cards for money laundering purposes has increased as Drug Trafficking Organizations find prepaid cards an easy alternative for concealing and transporting funds."

Washington State Law Enforcement 2012

# Money movement today

- Annually, about \$120 billion dollars is moved globally as a result of illicit activity in the US.
- Bulk cash smuggling of funds in overseas shipping containers continues to be the primary means of money movement.
- Prepaid debit cards are becoming the preferred process to move funds for pick up in these countries and through out the United States as a replacement for cash movement.
- About \$36b was loaded on cards thru identity theft on illicit tax returns.



# Today, you face a new challenge...

- The world of payments five years ago is nothing like it is today.
- Prepaid cards were used very little as part of any unlawful activity.
- If anything, prepaid was another word for single merchant giftcard.
- Mobile technology with universal SMS began to be used as a payment enabler, Kenya's M-Pesa was one of the first.

• Global remittances became important. The high cost of moving money was being replaced by electronic remittance.

Money Remittance in rural Kenya.



# A little debit history...

- The first ATM (also called Anytime Money Machines) machine opened for business in Upper Arlington, Ohio in 1959.
- DDA debit cards used then were called "online debit" due to each ATM being hard wired to a switch and was online 24/7. A Personal Identification Number (PIN) was required and access to actual funds was provided to cardholder.



# A little more history.

- The first signature DDA debit card was issued in 1978 by Seattle First National Bank, in Seattle WA. These products ran on the traditional credit processing infrastructure and were referred to as "offline debit". As such, access to a predetermined open to buy, not actual funds in DDA account.
- First giftcard was issued by Blockbuster Entertainment in fall of 1993 in Salt Lake City, UT. The first image was a scene from the Paramount movie, *The Indian in the Cupboard*.



# Some Prepaid Industry Terms:

- **Issuer:** Financial Institution that is the network member, holds the funds, maintains regulatory compliance.
- **Acquirer:** The liaison between the merchant and networks to provide authorization routing, clearing and settlement of transactions, chargeback processing, and merchant terminals.
- **Switch:** A point of aggregation from a merchant terminal to a network cloud for routing and reporting of transactional activity, sometimes called a gateway.
- **Program Manager:** Is responsible for the sales, marketing, some program enhancements, and some regulatory oversight.
- **Processor:** Is the holder of the transaction database for transaction review, provides clearing and settlement files and reporting to networks.

# A few more industry terms...

- **BIN**: Bank Identification Number. The first six numbers of a branded card number. All "4" are Visa, most "5" are MasterCard, 6011 is Discover and "37" is Amex.
- IIN: Issuer Identification Number. Allows for card transactions on global networks outside the view of networks. Only requires sponsorship within one PIN network such as NYCE or STAR. Most start with "6" and some with "5". Maintained by American Bankers Association (ABA).
- **Networks:** Signature such as MC and V, or PIN such as NYCE.
- Point of Sale (POS): Merchant transaction terminal. Many hardware versions and many more software versions deployed over the years.

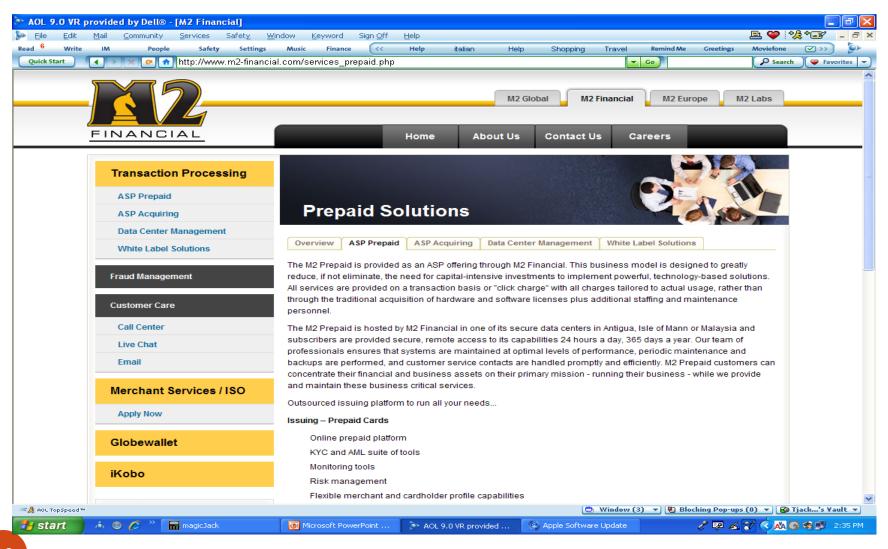
# How Prepaid is Different

- A prepaid card represents a virtual account whereby money is held on deposit with the issuing financial institution.
- Prepaid cards have a unique range of Bank Identification Numbers (BIN) or (IIN) to designate prepaid from credit/DDA debit from cards. Platforms are also different.
- Prepaid Cards can have a wide range of attributes
  - Open Loop Universal acceptance; network branded, global access
  - Closed Loop Merchant specific
  - Anonymous
  - Personalized, reloadable, Know Your Customer (KYC) is required

# The processor is the key to how funds are used

Here is an example of a processor for prepaid physical and virtual accounts

### www.m2-financial.com



# Program managers provide the marketing and sales of cards

The program manager works with the sponsoring institution and processor to deliver a program to the market.

# www.loadngoeasypay.com







- 1 Load Cash to MoneyPak Go to the register and add any amount from \$20 to \$1,100. A service fee of \$4.95 will be added to your total. Keep your receipt.
- 2 Use it Visit www.moneypak.com or call (800) 473-3636 to apply your money using the MoneyPak Number below.

FRAUD ALERT: Guard the MoneyPak Number like cash. Never give it to a private party. To verify that the recipient is a participating partner, visit www.moneypak.com. Green Dot is not responsible once the number is used and funds are applied.



USE OF THIS PRODUCT IS TRACKED. Verification of your identity may be required. Transaction information and store surveillance images are used to help law enforcement solve crimes and make arrests.

A \$4.95 monthly fee will be applied beginning 91 days after purchase, unless prohibited by law.

Scratch off for MoneyPak Numbe

DO NOT BUY IF THE SCRATCH OFF STRIP HAS BEEN TAMPERED WITH.

00.000.MAY10

## Sallie Wamsley-Saxon



- Sallie Wamsley-Saxon ran Charlotte, NC-based prostitution ring with her husband
  - Charged up to \$700/hour
- Sallie and her husband took 30%
- Each had 5 prepaid cards in their names with a \$2500 load limit, so they could load \$25,000 at a time without a CTR being filed



# **RBS WorldPay**



- RBS WorldPay U.S. payment processing arm of The Royal Bank of Scotland announced in Dec '08 that its systems had been hacked.
  - 1.5 million prepaid cardholders' info stolen.
  - Withdrawal limits reset on  $\sim$ 100 payroll cards.
- Gang of hackers 5 Estonians, 1 Russian, 1 Moldovan

# **RBS WorldPay**

• Network of cashers supplied with 44 counterfeit payroll prepaid cards

• 2100+ ATMs in 280 cities ~\$9 million withdrawn in less than 12 hours

Money moved from cards to WebMoney , a digital currency

# Two kinds of mobile remittance programs...

There are many more in operation

# Google Wallet



# www.smartcashglobal.com



### Virtual Accounts, the Threat of the Future

- Virtual payment accounts allow for multiple loading and disbursement options, all done in seconds. Global movement of funds to anywhere from anywhere.
- Issued instantly and can be used in seconds. Can disburse funds at ATM without a card.
- Lower costs no plastic card, fulfillment expenses, or packaging costs.
- Global access via mobile, internet, or IVR
- Processor can be located anywhere in world, routers can move traffic from any country to any country via fiber optic cable, thus only taking a few seconds to complete the transaction.





### Discover Card

# Square





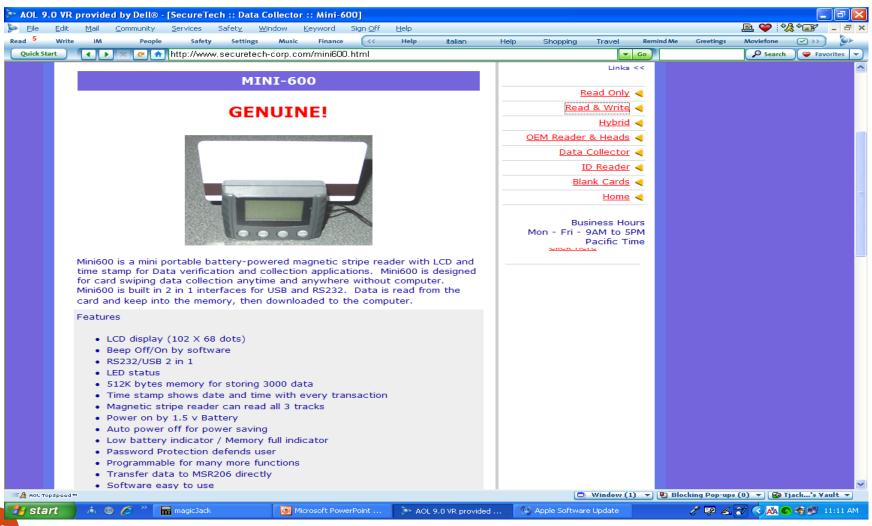


Cards in Case

# Instant Money Laundering

- Square and soon Sail will open up a new level and access to plastic payments.
- For only 2.75%, you will be able to accept prepaid debit cards for payments, with a deposit into the checking account set up for this purpose.
- Payment is made next day to the account.
- Ease of use, fast acceptance and mobility will drive money launderers to this process of smartphone card acceptance.

## www.securetech-corp.com





welcome

sign up get

add money send money my account get help



Introducing Obopay.

Go mobile with your money"!

- Get, send, and spend money from your phone in real time
- Shop anywhere including ATM's using your Obopay PrePaid MasterCard® \*
- Obopay is safer than cash, secure, and is always on your phone – always with you
- Download the <u>Obopay application</u> on your mobile phone OR use <u>text messaging</u>

sign up

Obopay demo

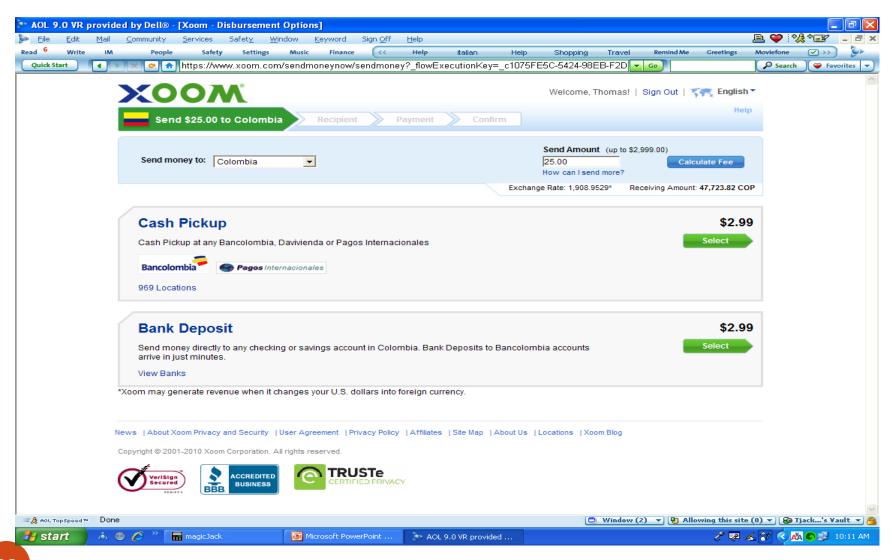
Get \$10 in credit when you sign up



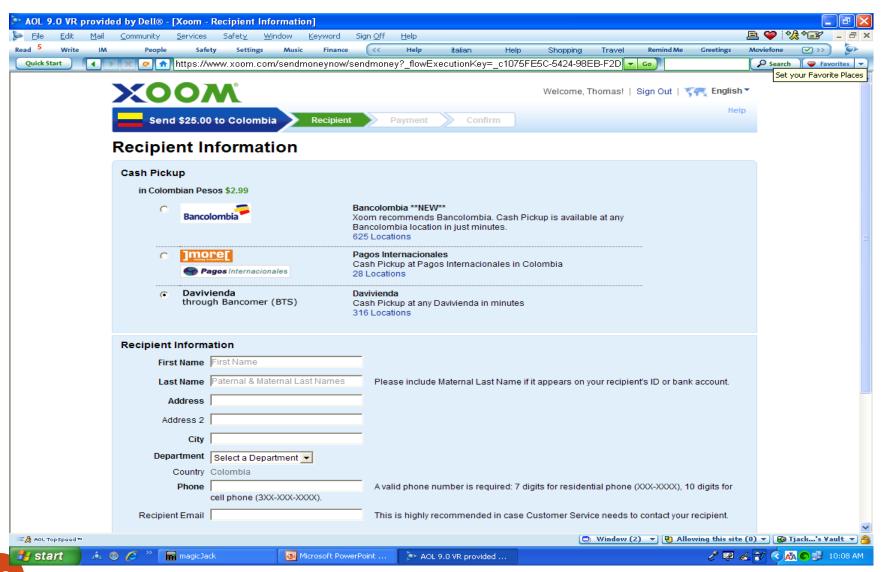
# The beginning of non-bank banking...

Vendors shown are examples only.

### www.xoom.com



#### www.xoom.com



# New currencies are emerging, networks too:

A new meaning to foreign exchange

# Virtual Gaming Currencies



- Massive Multiplayer Online Role-Playing Game (MMORPG)
  - Entropia PEDs
  - Q coins
  - Linden dollars (Second Life)

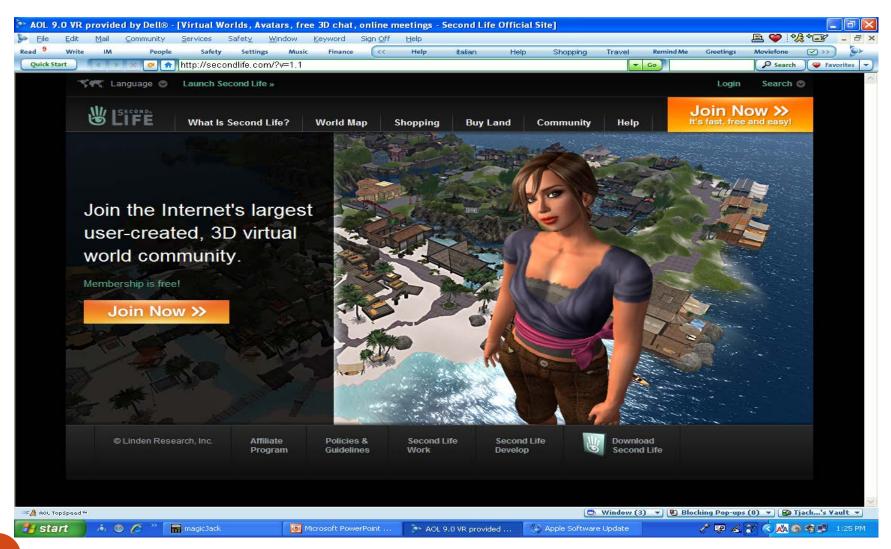








## www.secondlife.com





# Second Life

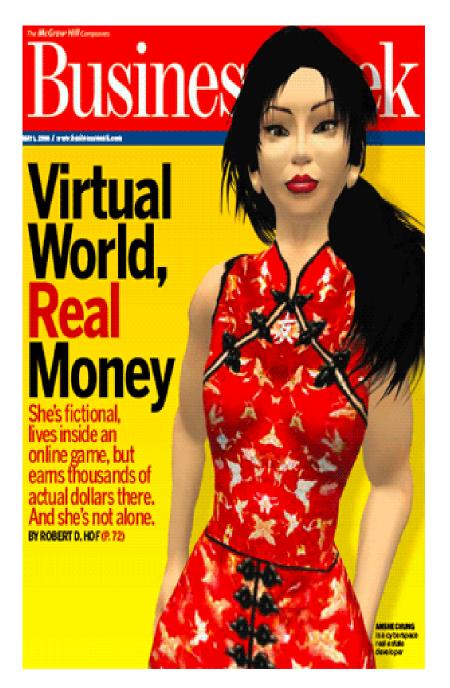






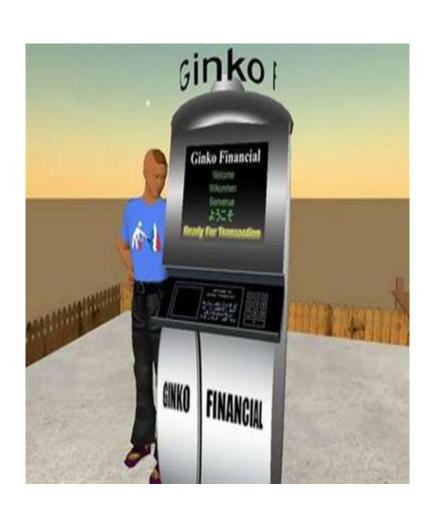






- First Person to make \$1 millionUSD in Second Life
- Purchased and developed real estate
- Sells own line of clothing

# Virtual-bank scam leaves depositors with real loss



#### **LA Times 1/28/2008**

"The 33-year-old from Chicago, who played the game as a ravenhaired Vixen called ZaniaTurner, deposited \$140 in Ginko Financial and waited for the money to grow. Instead, it vanished five months ago when Ginko, perhaps the first Ponzi scheme in history perpetrated by three-dimensional online avatars, left Second Life."

# Virtual Currencies











### Virtual Currencies



### Bitcoin P2P Digital Currency

### .onion

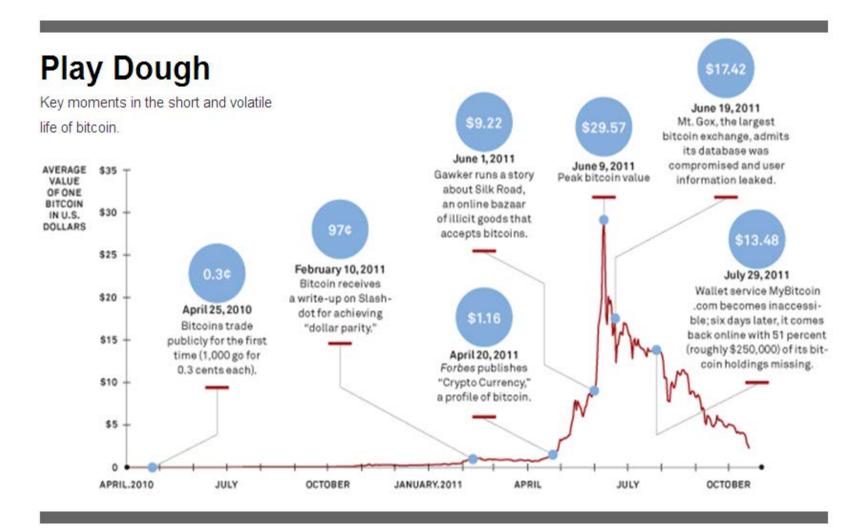
**POIU**, "The Country of POiU Initiative is a movement to create the world's 1st country organized online where you build and belong while making money and making a difference.







### Bitcoin Market



# THREAT LEVEL



PRIVACY, CRIME AND SECURITY ONLINE

PREVIOUS POST NEXT POST

#### Underground Website Lets You Buy Any Drug Imaginable

By Adrian Chen, Gawker ☑ June 1, 2011 | 2:25 pm | Categories: drugs





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Lab Supplies(2)
Digital goods(12)
Services(19)

sort by seller feedback (go)

title	price	seller	ship to	ship from	
Early Outdoor x Congolese Sativa (Cannabis Seeds)	<b>\$</b> 2.18	P4r4b0l4(98)	International	Canada	add to car
Early Male x Chunky Monkey Cut (Cannabis Seeds)	₿2.18	P4r4b0l4(98)	International	Canada	to car
Early Nepalese Sativa (cannabis seeds)	₿7.78	P4r4b0l4(98)	International	Canada	to car
1/8oz (3.5g) of Sour 13	<b>\$</b> 7.63	1UP of Canada(97)	Worldwide	Canada	to car
1/8oz (3.5g) of the infamous Jack Herer	₿8.72	1UP of Canada(97)	Worldwide	Canada	to car
1/8oz of dark Afghan hash M.T.V. stamp 4 rockstars	<b>\$</b> 11.99	1UP of Canada(97)	Worldwide	Canada	to car

# The Armory



Glock 19 (G19) Gen 4 FS 9mm Semi-Automatic...

**B132.31** 



Bushmaster M4A3 "Patrolman"...

**B223.3**4



Walther PPK/S Pistol .380 ACP....

**B**135.84



Remington Model 870 Express Magnum...

**B125.14** 



MATECH Rear Iron Sight AR-15

**B**4.95

"We are professionals that understand the needs of real shooters."

# The Armory



FREE Glock 19 (G19) Gen 4 FS 9mm...

**B1.05** 



Walther PPK/S Pistol .380 ACP,...

**B**156.14



Glock 19 (G19) Gen 4 FS 9mm Semi-Automatic...

**B**151.54



Beretta gardone m35

**B134.22** 



Bushmaster M4A3 "Patrolman"...

**B275.38** 

#### News:

The Armory opens for business!

Remington Model 870 Express Magnum...

**B142.70** 

# Bitcoin Exchangers













## BitInstant











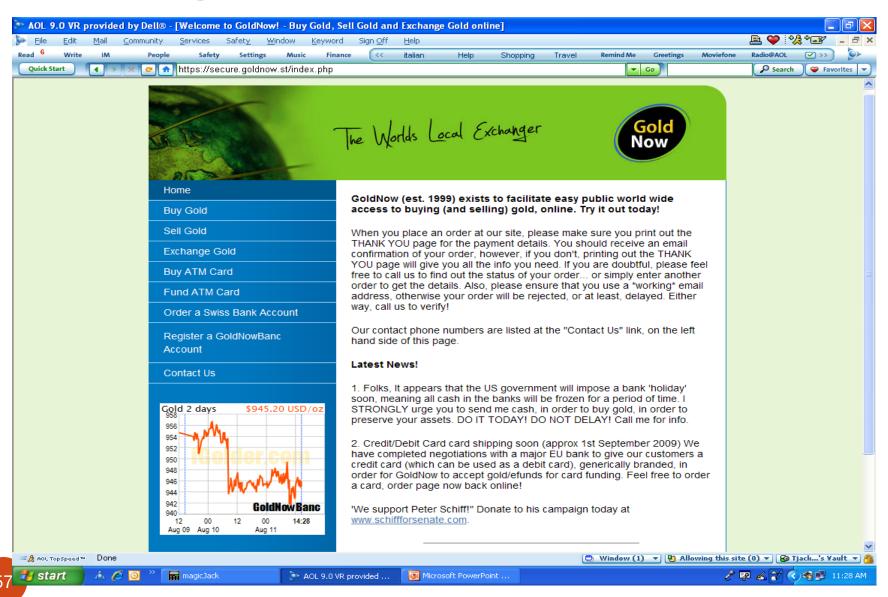


# New MSB Regulations

- Issued July 21<sup>st</sup>, 2011, effective September 19<sup>th</sup>
- New registration requirements 6 months from July 21st
- Prior to this rulemaking, the regulatory definition of MSB covered "[e]ach agent, agency, branch or office within the United States of any person doing business, whether or not on a regular basis or as an organized business concern
- New Rule: "A person wherever located doing business, whether or not on a regular basis or as an organized or licensed business concern, wholly or in substantial part within the United States"

31 CRF 1010.100 (ff)

# www.goldnow.st



### What ERAD-Prepaid™ brings to law enforcement

- Balance inquiry at point of arrest. With proper legal authority, cards are swiped and processed to present the balance of the card account. The process is able to reach globally to most processors, domestic or international.
- Upon receipt of balance, agent will either disregard with zero balance or:
- Freeze funds on card for up to 96 hours to allow time to obtain court authority to Seize funds.
- Seize funds on card in real time and prevent movement to another account.
- Federal Law Enforcement transactions are cleared and settled by Vantiv into an account as directed by FMS Treasury.
- Reporting available to confirm deposit of funds anticipated.
- Fee for services will be charged and billed law enforcement agency, plus network mandated interchange and network transaction fees.

## **ERAD Card Reader**

Able to process magnetic stripe, Chip-N-PIN, and NFC prepaid card transactions.

Wireless with printer will allow for access anywhere there is active cell tower coverage.

Patent pending applications unique to ERAD that is a very reliable platform. ERAD is able to provide application updates and enhancements as new technology and threats are uncovered.

Unconditional 24 hour replacement warranty to ensure minimum down time.



### Conclusion:

- International money remittance using prepaid and mobile technology is rapidly growing and here to stay
- Virtual accounts that are accessible globally will become more difficult to track
- Innovation is erasing borders globally, funds from anywhere to anywhere in seconds is now the standard
- Our best defense is a good offense know the industry, the processes and the players
- Use technology to your advantage we must find ways to get ahead of the curve
- Questions?





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