

# Dirty Money and the Destruction of the Amazon

Uncovering the U.S. Role in Illicit Financial Flows from Environmental Crimes in Peru and Colombia



**FACTCOALITION**  
Financial Accountability & Corporate Transparency



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**The FACT Coalition would also like to thank the following persons and organizations for their helpful review and comments:**

- **Ben Batros**, Director of Legal Strategy for the Center for Climate Crime Analysis
- **Dalila Seoane**, Program Director for the Center for Climate Crime Analysis
- **Susanne Breittkopf**, Deputy Director, Forest Campaign for the Environmental Investigation Agency
- **Julia Yansura**, Program Director for Latin America & the Caribbean at Global Financial Integrity
- **Carlos Monje Salgado**, former Latin American Regional Director for the Natural Resource Governance Institute
- **César Ipenza**, Professor at the Universidad del Pacífico

The recommendations and views expressed in this report are strictly those of the FACT Coalition and do not necessarily reflect the views of our funders or those who provided review.

Founded in 2011, the Financial Accountability and Corporate Transparency (FACT) Coalition is a non-partisan alliance of more than 100 state, national, and international organizations working toward a fair tax system that addresses the challenges of a global economy and promotes policies to combat the harmful impacts of corrupt financial practices. More information about the Coalition can be found at the back of this report or on the FACT Coalition website at [www.thefactcoalition.org](http://www.thefactcoalition.org).

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Cover and report image sources: Pexels (unless otherwise specified)

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The U.S.-based Financial Accountability and Corporate Transparency (FACT) Coalition is proud to present its report, ***Dirty Money and the Destruction of the Amazon: Uncovering the U.S. Role in Illicit Financial Flows from Environmental Crimes in the Amazon Basin.***

Environmental crimes are the world's third-largest criminal activity by value annually, demonstrating that this is a global problem that requires global solutions. As the world's largest economy and reserve currency, the U.S. must play a part in mitigating its own role in enabling these crimes. Per the 2022 Financial Secrecy Index, the United States is the world's top supplier of financial secrecy. The U.S. Treasury Department estimates that illicit financial flows equaling 2% of U.S. gross domestic product (GDP), or approximately \$466 billion, move through the U.S. financial system each year. In 2021, U.S. Treasury Secretary Janet Yellen admitted that, "There's a good argument that right now, the best place to hide and launder ill-gotten gains is actually the United States."

Whether they derive from the proceeds of corruption or other crimes, illicit financial flows – and the secrecy that drives them – make our world less safe. Financial secrecy threatens U.S. national security, jeopardizes public safety, empowers authoritarians to the detriment of global democracy, and undermines progress toward a more just and sustainable global economy. As this report demonstrates, illicit financial flows are also an obstacle to global efforts to combat the climate crisis.

U.S. actions to curb climate change have included domestic environmental reforms, investments in the energy transition, and foreign aid (albeit insufficient) to support climate adaptation and mitigation in developing countries. There has been less focus on what structural financial transparency reforms the U.S. should advance domestically to curb its role in hiding and moving the illicit proceeds of global environmental crimes, some of which contribute to the climate crisis. The U.S. must investigate and take steps to address the role of its financial secrecy system in helping to perpetuate the climate crisis and enable environmental crimes.

With this report, FACT, on behalf of its 100-plus members including several environment and conservation organizations, joins experts and advocates who focus on other important dimensions of addressing the climate crisis and rampant environmental destruction. In raising these examples of environmental crimes in the Amazon – and, in some cases, the links to illicit financial flows into the U.S. – we invite a conversation about the role that U.S. financial secrecy reforms should play in the broader climate and environmental justice movements.

Sincerely,

**Ian Gary**  
Executive Director

# EXECUTIVE SUMMARY

Environmental crimes are the third largest type of criminal activity in the world: according to Interpol, yielding as much as \$281 billion in proceeds every year. In addition to driving environmental degradation and climate change, nature crimes pose a tangible national security danger, as they have become an increasingly important part of the criminal and money laundering operations of illicit networks and armed groups. Nature crimes also fuel – and are fueled by – petty and grand corruption. Environmental crimes and their associated, “convergent” crimes feed off one another, creating economies of scale for destruction. It is clear that environmental crimes need to be a stronger part of the global policy conversations around climate change, national security, and domestic governance.

Deforestation of the Amazon poses a major climate risk for the world as a whole. Illegal mining and forestry crimes are two drivers of illegal deforestation in the Amazon, where the United Nations Office on Drugs and Crime (UNODC) has said there has recently been a “veritable gold rush” and “explosion” of forestry crimes. In Peru and Colombia, these environmental crimes have cleared swaths of the Amazon forest, poisoned local communities and indigenous groups with mercury, and made these countries less safe: fueling narco trafficking, violence, and corruption.

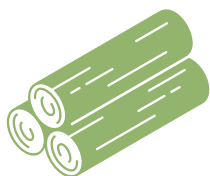
There is a pervasive perception that environmental crimes are “low-risk, high-reward” offenses. The Financial Action Task Force as well as experts in the U.S. and Latin America have asserted that there exist serious legal, information sharing, and capacity challenges that make it difficult to investigate and prosecute these offenses. Financial secrecy – which environmental criminals use to obscure their identity, facilitate their operations, and launder the proceeds of crime – is no small part of that equation.

The United States, as the world’s largest economy and premier supplier of financial secrecy, has a crucial role to play in denying financial safe haven to criminals that would degrade the Amazon.

While the U.S. has a strong anti-money laundering (AML) framework, critical gaps – like the prevalent use of anonymous entities and the failure to bring certain professional gatekeepers, like real estate agents, under AML rules – make the country susceptible to an influx of illicit financial flows from nature crimes.

In addition to closing these gaps, new tools, like adding foreign environmental crimes as a predicate offense for money laundering, may further help U.S. investigators crack down on these crimes. The U.S. must also be a good partner in sharing information with and contributing to the capacity of law enforcement authorities in the region.

To illustrate the challenges that financial secrecy poses to domestic and international environmental crime investigations, consider these select cases from the report. (See endnotes on back cover.)



- **A Nevada LLC pleaded guilty to purchasing more than 1,000 cubic meters of wood that was purportedly sourced illegally from the Loreto region of the Peruvian Amazon; the company's true owners declared bankruptcy and dissolved the company, while it was under investigation, and before the court could order a compliance plan.**



- **Colombia's second largest gold export company allegedly employed a chain of anonymous companies to launder more than \$1 billion and obscure the origin of their gold, which was illegally mined in Colombia. The exported gold was almost exclusively exported to just two U.S. refineries in Miami, which apparently failed to conduct appropriate due diligence checks on the source of the gold.**



- **Former Peruvian president Alejandro Toledo bought U.S. real estate in Maryland, reportedly to hide and launder approximately \$1.2 million of bribes received as part of the Odebrecht scandal, in which the Brazilian firm admitted to paying hundreds of millions of dollars in bribes to facilitate projects like an interoceanic highway that contributed to the deforestation of the Amazon forest.**

# RECOMMENDATIONS FOR U.S. POLICYMAKERS

The U.S. already has a host of anti-money laundering policies and initiatives to curb illegal financial activities globally and sever associated financial streams in the U.S. The U.S. also plays an influential role in combating international financial crime.

Yet, unless the U.S. implements comprehensive reforms, it will continue to provide an avenue for criminal actors wanting to abuse our financial systems and launder environmental crime proceeds.

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To protect U.S. national security, combat transnational organized crime, and protect the environment and indigenous communities, the FACT Coalition offers the following timely recommendations.

## THE U.S. ADMINISTRATION

### Executive Branch

#### » **Develop an interagency strategy to tackle illicit financial flows from environmental crimes -**

The U.S. government sought to advance the global fight against corruption when it released the first-ever U.S. government strategy to counter corruption in December 2021. The strategy plans on addressing corruption through its five pillars, including by curbing illicit finance through the U.S., but does not specifically draw the link to environmental crimes. To complement the anti-corruption strategy and

better tackle the financial aspects of environmental crimes, the administration should mobilize relevant agencies, including Treasury, Justice, and State Departments, pursuant to an interagency strategy to address illicit financial flows from environmental crimes.

## Treasury Department

### »» **Implementation of the Corporate Transparency Act (CTA) should facilitate access for trusted foreign law enforcement agencies -**

Treasury's FinCEN is developing rules to implement the bipartisan Corporate Transparency Act (CTA), which will establish a non-public directory of the true, "beneficial" owners of certain entities - including LLCs, corporations, and other similar entities - formed or registered in the U.S. The landmark CTA is the most important U.S. anti-money laundering reform in the past 20 years and must be faithfully implemented in a timely manner. Of particular importance to deterring illicit financial flows from Amazon deforestation, FinCEN must make important changes to allow for less complicated access to information in the directory by domestic and foreign authorized users. Foreign authorities, by law, must make a request for information through the U.S. government; still, the current implementing rules set up unnecessary hurdles for foreign law enforcement access and use of the information for investigations and prosecutions, a critical issue for international environmental crime enforcement.

### »» **Complete AML regulations for real estate -**

Lack of U.S. AML regulations for the \$50 trillion real estate industry is a major money laundering loophole that is exploited by criminals, including those involved in environmental crimes. The U.S. Treasury must make good on pledges made in the U.S. Strategy on Countering Corruption and take concrete action to extend AML obligations to the residential and commercial real estate sectors. In December 2021, the U.S. Treasury released an advanced notice of proposed rulemaking, calling for public input into the design of regulations to tackle money laundering in the real estate sector. The Treasury Department must quickly finalize a permanent and nationwide reporting regime that would require real estate professionals to identify the true nature of their clients. FACT recommends that such a regime should apply to both commercial and residential real estate transactions, without monetary thresholds, and apply to both buyers and sellers of a real estate property.

## » **Increase technical assistance to countries in the Amazon basin -**

The Treasury Department's Office of Technical Assistance (OTA) should increase assistance to countries in the Amazon basin region to boost their capacity to tackle transnational illicit financial flows from environmental crimes. Once the CTA is implemented, OTA could assist governments in understanding and accessing the new U.S. beneficial ownership directory. In addition, pursuant to funding from Congress, FinCEN should also deploy a liaison in the U.S. Embassy in Peru and Colombia whose remit would include supporting regional coordination and enhanced information-sharing on environmental crimes, in addition to narcotics-related finance.

## » **Increase sanctions against environmental crimes groups and their facilitators -**

The U.S. Treasury's Office of Foreign Asset Control (OFAC) should increase targeting efforts under Executive Order 13581, which authorizes sanctions on transnational crime organizations, and other relevant sanctions authorities, against criminal groups and facilitators responsible for environmental crimes in the Amazon basin.

## **Justice Department**

### » **Enforce AML laws to deter U.S. laundering of environmental crime proceeds -**

FACT urges the Department of Justice to continue to vigorously investigate and prosecute violations of U.S. anti-money laundering laws, along with the Lacey Act, in cooperation with relevant domestic agencies and international law enforcement authorities. Efforts like the new TIMBER inter-agency working group – which includes the Department of Justice, the Department of Agriculture, the Department of the Interior, and the Department of Homeland Security, as well as the U.S. Council on Transnational Organized Crime's Strategic Division – are welcome. The TIMBER Working Group is designed to increase the ability of the U.S. to “identify and investigate complex timber trafficking cases domestically and transnationally” and to “build the ability of partner governments worldwide to combat this devastating illegal trade.” (On illegal mining, see below for discussion of the United States Legal Gold and Mining Partnership Strategy Act, reintroduced in Congress.)



## » Improve Information Sharing via Mutual Legal Assistance Treaties (MLATs) -

The Department of Justice Office of International Affairs should simplify and digitalize requests from foreign authorities via the MLAT program to make the program more efficient. Simplifying the process, standardizing forms, and offering increased foreign training on appropriate request protocols could facilitate international information sharing. Congress should consider additional appropriations for the Department of Justice to support these improvements.

## U.S. Department of State & USAID

### » Increase U.S. government diplomatic leadership to address the illicit financial flows derived from environmental crimes, including from the Amazon region.

The U.S. Department of State should use its voice in relevant multilateral bodies, including FATF, UN Convention Against Corruption, UN Office of Drugs and Crime and the recently-launched Nature Crimes Alliance to expand focus on illicit financial flows from environmental crimes. At FATF, this includes the application of the mutual evaluation framework to governments in the Amazon region as well as the U.S. itself, with particular attention to the risk of money laundering from environmental crimes. In addition, the U.S. has an opportunity to demonstrate international leadership and draw attention to the needed international reforms, when it hosts the upcoming 10th Conference of States Parties (CoSP) to the UN Convention Against Corruption (UNCAC) in December 2023. This would build on Resolution 8/12, which was adopted at the 2019 UNCAC CoSP, acknowledging the significant interlinkages between corruption, environmental destruction and the exploitation of natural resources.

### » Increased support to partner governments and civil society groups -

With the expanded focus by the State Department and USAID on anti-corruption, the U.S. government can provide greater support to governments in the Amazon region to address illicit financial flows from environmental crimes, building on the USAID Prevenir Amazonia program in Peru, and the two bilateral Memoranda of Understanding on mining signed with Peru in 2017 and Colombia in 2018, which include capacity building and mentoring to Peru's Financial Intelligence Unit, for them to identify money-laundering risks in the mining sector and to take steps to raise scrutiny on suspicious transactions linked to illegal mining.

# U.S. CONGRESS

## »» **Support passage of the FOREST Act -**

Congress should pass the FOREST Act, first introduced in 2021 to deter illegal deforestation. The Act would prohibit “access to U.S. markets for commodities that originate from illegally deforested land—reducing the long-term incentive to sacrifice productive forests for agriculture uses. It would also increase traceability and transparency in global supply chains by obliging companies trading in covered commodities to trace their products back to the source.” Of particular relevance here, the FOREST Act calls on the U.S. to do more to prevent the “United States financial system from being used to launder proceeds from illegal deforestation.” The bill would add illegal deforestation as a specified unlawful activity, also known as predicate offenses, to the U.S. money laundering criminal statute.

## »» **Make all environmental crimes predicate offenses for money laundering -**

In addition to illegal deforestation, Congress should amend the money-laundering statute to add all foreign environmental crimes, including illegal mining, to the list of “specified unlawful activities”, known as predicate crimes. Doing so would bring the U.S. in line with international best practices including FATF standards, recent amendments to the E.U.’s 6th Anti-Money Laundering Directive, and UNODC resolution 10/6, which “calls upon States parties to develop or amend national legislation, as necessary and appropriate, in accordance with fundamental principles of their domestic law, so that crimes that affect the environment falling within the scope of the Convention are treated as predicate offenses.”

## »» **Support passage of the ENABLERS Act -**

In 2022, there was a bipartisan introduction of the ENABLERS Act, which would authorize Treasury to require professionals that “provide financial, company, trust, or third-party payment services for their clients, including those who form, buy, or sell companies, manage money and other assets, process payments, or act as trustees” to meet AML requirements as appropriate. Depending on the risk that each professional has, Treasury could require that gatekeepers “identify and verify the true owners of their corporate clients, collect and report to Treasury certain information that can be used to guard against corruption, money laundering, the financing of terrorism, and other

forms of illegal finance, establish AML programs, report suspicious activity and/or, establish due diligence policies and procedures to know their customers.” Criminals need professional enablers or gatekeepers to help them navigate the U.S. financial system and hide their ill-gotten gains. The ENABLERS Act closes a major loophole in the U.S. anti-money laundering framework by requiring certain professionals, such as lawyers, non-bank corporate service providers, and accountants, to know their customers and conduct due diligence to make sure the money they accept is not derived from criminal activity. The ENABLERS Act is awaiting re-introduction.

### » **Support passage of the United States Legal Gold and Mining Partnership Strategy Act -**

Reintroduced in 2023 in the Senate by Senators Marco Rubio (R-FL) and Bob Menendez (D-NJ) and in the House by Representatives Cory Mills (R-FL) and Sydney Kamlager Dove (D-CA), this bill is a bipartisan effort to prevent illicit gold mining in Latin America. It would discourage mining in foreign environmental protected areas and provide technical assistance to allow regional governments to use targeted sanctions on persons engaged in laundering of illicit gold assets. It would also authorize \$10 million for the State Department to develop and implement a strategy to curb illicit gold mining in the Western Hemisphere. By passing this Act, the U.S. will have increased leadership in addressing the IFFs from illicit mining in Latin America.

### » **Increase funding for FinCEN -**

The U.S. Financial Crimes Enforcement Network (FinCEN) plays an essential role in protecting the integrity of the U.S. financial system. It has also recently taken an increased interest in environmental crimes. Among other responsibilities, FinCEN is tasked with implementing the Corporate Transparency Act and putting in place anti-money laundering rules for the real estate industry, which this report identified as important measures to deter U.S. money laundering from environmental crimes. The Biden Administration has asked Congress for \$229 million for FY2024, a 20 percent increase in FinCEN’s funding above previously enacted levels. Instead, Congress is contemplating cuts to this crucial bureau. Congress should not only fully fund FinCEN for FY2024 but should also consider a multiyear effort to increase FinCEN’s budget. A long-term investment in FinCEN can empower that bureau to address money laundering loopholes in the U.S. financial system, modernize its technology, and become a more central training resource for law enforcement going after money laundering crimes.

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