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Forensic Document Examiner*, **

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Forensic Document Examiner *, **

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Latent Print Examiner

March 26, 2013

ParaFin Corporation
5190 Neil Road, Suite 430
Reno, Nevada 89502

**Re: ING Bank Bonds Examination;
Riley Welch LaPorte & Associates (RWL) Case# 12-355037**

My name is Gerald M. LaPorte, M.S.F.S. and I am a Forensic Chemist and Document Dating Specialist with Riley Welch LaPorte & Associates Forensic Laboratories. I have over 19 years of experience in the field of forensic science and 12 years of experience performing physical and chemical examinations on a variety of documents to determine how they were produced, where they may have originated from, and if they are authentic. I trained with the United States Secret Service in the field of questioned document examination with specialization in the area of ink and paper analysis. For over 6 years, I was responsible for maintaining the largest international collection of writing ink standards in the world – a collection of nearly 10,000 inks that date back to the 1920s. I served as the Chief Research Forensic Chemist at the United States Secret Service until March of 2009.

I am a member of several organizations including the American Academy of Forensic Sciences (AAFS), American Society of Questioned Document Examiners (ASQDE), American Society of Testing and Materials (ASTM) International, and the Mid-Atlantic Association of Forensic Scientists (MAAFS). I am also a contributing member in the Scientific Working Group for Questioned Documents (SWGDOC) and the European Document Examiners Working Group (EDEWG). I have conducted over 50 lectures, seminars, and training events in 13 different countries for law enforcement agencies, professional organizations, and technical experts. As well, I have organized and personally conducted workshop training in the areas of document authentication and ink analysis. I have published several scientific papers in the area of forensic document examination and authored a chapter on document fraud and forgery. I have published several scientific papers in the area of forensic document examination and authored chapters in the *Forensic Chemistry Handbook* (“Chemical Analysis Techniques Used in Forensic Document Examinations”) and *The Wiley Encyclopedia of Forensic Sciences* (“Document Fraud and Forgery”). A copy of my curriculum vitae is included as **ATTACHMENT 1**.

**Diplomate of the American Board of Forensic Document Examiners, Inc.*

***American Society of Questioned Document Examiners*

****Fellow of the American Academy of Forensic Sciences*

www.rileywelch.com

QUESTIONED DOCUMENTS

- Q1 One (1) ING BANK bond bearing the amount “een miijoen euro” and serial number FF 03735.
- Q2 One (1) ING BANK bond bearing the amount “een miijoen euro” and serial number FF 03888.

REQUEST

Conduct examinations on the ING Bonds (Q1 and Q2) to determine if they are authentic.

INTRODUCTION

Genuine financial documents are often designed such that fraudulent reproduction would be inherently difficult. This typically includes a multiple layered process by incorporating an array of security features into the document. This includes selecting a method of printing that is not commonly available to the counterfeiter, and thus, would require access to the appropriate equipment that can be relatively expensive.

On 7 May 2010, I issued a report regarding examinations I performed on two ING Bonds that were submitted from a different source than those received in this case. The ING Bonds that were presented for examination in this case were nearly identical, with the exception of having different serial numbers. In the 7 May 2010 report, I highlighted the difficulties that I encountered after trying to contact ING Bank directly as follows:

Numerous attempts were made to contact representatives from ING Bank in The Netherlands to gather information about the genuine production of the bonds. After multiple inquiries, I was informed that ING would not provide any assistance, either by producing a void genuine specimen or arranging for me to meet with a representative to inspect a genuine bond at their convenience. At the request of ING Bank, I did provide a digital image of the bonds and I received the following response on 17 December 2009 based on the digital image:

ING can immediately inform you that this "bond" is false. As evidenced by the facts that:

- 1. The number has been stamped on (never the case with a genuine bond).*
- 2. The "bond" contains many spelling errors (for example "Amsterdan" instead of "Amsterdam" and "stukkern" instead of "stukken").*
- 3. ING logo/lion is not clear and not in line with the words "ING BANK".*
- 4. A bond of this type can never be in the possession of a private person; original ones were only issued by, and for the exclusive use between Financial Institutions.*

Based on several years of experience working with issuers of secure financial documents, I found the response to be inappropriate. The evaluation of a digital image to determine the printing process is not recognized as a generally accepted forensic practice. In fact, the statement in #1 is incorrect and described in the proceeding section. The statements provided in #2 and #3 do not prove that the document is counterfeit and are addressed as well. The statement in #4 is not of forensic significance when determining the authenticity of a secure document.

As additional information, an announcement was released on June 12, 2012 from the United States Department of Justice. ING Bank N.V. agreed to forfeit \$619 million for illegal transactions with Cuban and Iranian entities. In that announcement, a portion of the statement reads:

“According to court documents, starting in the early 1990s and continuing until 2007, ING Bank violated U.S. and New York state laws by moving more than \$2 billion illegally through the U.S. financial system – via more than 20,000 transactions – on behalf of Cuban and Iranian entities subject to U.S. economic sanctions. ING Bank knowingly and willfully engaged in this criminal conduct, which caused unaffiliated U.S. financial institutions to process transactions that otherwise should have been rejected, blocked or stopped for investigation under regulations by OFAC relating to transactions involving sanctioned countries and parties.” The announcement is included as **ATTACHMENT 2**.

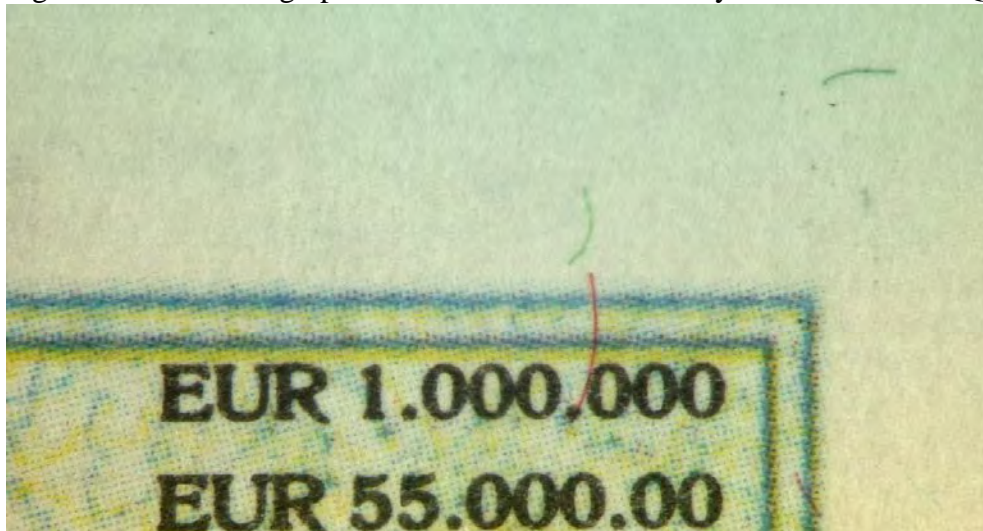
EXAMINATIONS

Physical and Optical Examinations

Visual, microscopic, and optical examinations were performed on the bonds. Optical examinations can provide valuable insight regarding the overall composition of ink and paper. The presence of colorants and other materials will directly affect the manner in which an ink absorbs, reflects, and transmits light. Ultraviolet (UV), infrared reflectance (IRR) and infrared luminescence (IRL) illumination are energy sources that can be used to evaluate the properties of an ink. The Video Spectral Comparator (VSC) 2000/HRTM was used to assess UV, IRR, and IRL characteristics.

The paper bears a watermark pattern, as well as colored (red and green) and UV fluorescent security fibers, which are embedded in the paper. A watermark is a translucent design, pattern or symbol created in paper by varying the distribution of fibers within an area of the paper to identify the manufacturer, brand, or customer. It is best seen when held up to a light. The fibers in the paper that are UV fluorescent are not readily visible under normal viewing condition, but exhibit fluorescence (glow) when exposed with an UV source.

Figure 1: Photomicrographs of different colored security fibers on Exhibit Q1



All of the printing on the front and back of the bonds, except the serial number (printed in 4 different locations), was printed with offset lithography. The offset printing used for the colored back ground on the bonds employed the use 3-color printing, i.e., combining cyan, magenta, and yellow dots. Another method that is sometimes employed is the use of a single pantone color (e.g., a specially formulated or customized color). The serial numbers were printed with inkjet technology.

Fluorescent inks that glow when exposed to an UV source were observed in numerous areas in the bond. Figure 2 depicts images showing the areas on Q1 that are printed with UV fluorescent inks.

Figure 2: Photomicrographs of UV fluorescent features on Q1.



There were spelling errors identified in the word “Amsterdam” that read “Amsterdan” and appear in 2 different places. As well, there is a separate area where the word is spelled correctly. Further evaluation of the verbiage and grammar was not possible since the wording appears to be in Dutch. However, it cannot be determined if the spelling errors were intentional, which can be used as another layer of security.

Printing images using offset lithography requires a separate application for each color such as cyan, magenta, yellow, and black. When these colors are overlaid in different proportions, a different gamut of colors will result. If the colors do not evenly overlap then the effect is a poor quality image due to improper registration. There were some areas on the bonds that were not in registration (e.g., the ING lion logo and the circular logo in the center of the bond).

CONCLUSIONS

Based on a consideration of all the results discussed in the preceding paragraphs, the following conclusions can be reached:

1. The paper used for the ING bonds exhibit characteristics that are found in security paper stock.
2. Specialized UV fluorescent inks that are commonly used in security documents of this type are incorporated in the ING Bonds.
3. Although spelling and grammatical errors found on security documents cannot be used to definitively conclude that they are counterfeit, the presence of multiple spelling errors is not commonly encountered in authentic security documents.
4. One of the most common methods used for printing images and text on security documents is a process that incorporates offset lithography printing plates. This is the same printing process used for the ING Bank bonds. However, obtaining a portable offset printing press, or gaining access to the appropriate equipment, for the purpose of counterfeiting documents is not beyond reason.
5. One of the most common methods of printing serial numbers, or other changeable information on security documents, is to use a process that allows for the printing mechanism to frequently change the numbers that will be impressed on documents during the manufacturing process. The use of an impact process such as a letterpress is often employed; however, other printing methods can be used depending on the printer. In fact, industrial inkjet printing is not uncommon in some printing operations.
6. There were some images and areas on the bonds that were not in registration resulting in inferior image quality, which can occur during the production of genuine documents. Printing variations are strongly dependent on the quality control tolerances implemented by the printing company, condition of the equipment, experience of the press operator, and quality of the printing supplies (e.g., ink and paper).

7. When presented with financial documents to determine if they are authentic, it is considered best practice to have a genuine standard either obtained from, or approved by, the issuer of the document. In the event this authentic standard is unavailable, the examination may be conducted using a listing of features contained within the genuine document. Having this requisite knowledge then allows for an examiner to identify similarities and differences in the questioned document(s) when compared with a genuine specimen. No known specimens or specifications with regard to ING Bank bonds have been provided. As mentioned in the Introduction, I previously requested and provided ING with the opportunity to collaborate by facilitating access to a genuine bond for comparison and did not receive any cooperation after making requests over a period of five (5) months, preventing me from reaching a definitive conclusion regarding the authenticity of the bonds. The lack of collaboration by the issuer, the generic response received via email, and the statements issued by ING Bank based on a digital image is highly unusual.

A handwritten signature in blue ink, appearing to read "Gerald M. LaPorte", with a long horizontal flourish extending to the right.

Gerald M. LaPorte, MSFS
Forensic Chemist and Document Dating Specialist

ATTACHMENT 1

GERALD M. LAPORTE

Curriculum Vitae

Positions: **Forensic Chemist & Document Dating Specialist**
[Riley Welch LaPorte & Associates Forensic Laboratories](#)
Lansing, Michigan USA

Education: University of Alabama at Birmingham (1994)
Birmingham, Alabama USA
Master of Science in Forensic Science (M.S.F.S.)

University of Windsor (1992)
Windsor, Ontario Canada
Bachelor of Commerce in Business Administration

University of Windsor (1990)
Windsor, Ontario Canada
Bachelor of Science in Biology (B.Sc.)

Professional

Experience: **Department of Justice, National Institute of Justice (03/09 – Present)**
Acting Director, Office of Investigative and Forensic Sciences

Duties: Provide expert analysis and advice on agency-wide programs or issues of national impact relating to forensic science; provide expert advice to top management officials; identify reasons for the nature and/or extent of program-related problems that arise and investigate area in need of improvement; write comprehensive resolution recommendations; formally present findings before large and diverse audiences, such as Federal, state, and local government representatives, special interest groups, the scientific community, and the media.

United States Secret Service (04/01 – 03/09)

Chief Research Forensic Chemist (11/07-03/09); Senior Document Analyst (06/05-11/07); Document Analyst (04/01-06/05)

Duties: Serve as the technical liaison and research chemist for the United States Secret Service pertaining to issues related to the chemistry of documents and fingerprints; coordinating clandestine tagging programs; direct all research projects within the Forensic Services Division.

Laboratory Duties: perform physical and chemical examinations on a variety of documents to determine how they were produced, where they may have originated from, and if they are authentic. These types of documents include anonymous letters (e.g., threatening, kidnapping, and extortion), suspected counterfeit identifications and financial documents (e.g. travelers checks, credit cards), contracts, and other miscellaneous written materials. Chemical examinations are conducted using thin layer chromatography (TLC), gas chromatography/mass spectrometry (GC/MS), liquid chromatography-mass spectrometry (LC/MS), infrared spectroscopy (IR), scanning electron microscopy/energy dispersive x-ray analysis (SEM/EDXA); perform chemical

tests on unknown (e.g. miscellaneous powders) and controlled substances; testify in court as an expert witness.

Administrative Duties: responsible for the overall activities of the instrumental analysis laboratory including supervising interns and contractors, establishing fiscal year budgets for laboratory supplies, maintaining and purchasing all laboratory equipment, and the overseeing of two of the world's largest databases for writing and printer inks; participate in the hiring of new employees and the training of new forensic document examiners within the instrumental laboratory.

Marymount University (08/08 – 01/09)

Adjunct Professor of Forensic Science

Arlington, VA

Duties: Prepare and conduct lecture material in various areas of the forensic sciences and prepare all laboratory exercises and examinations for graduate students

United States Secret Service, Washington, DC (04/01 – 03/09)

Virginia Division of Forensic Science, Richmond, VA (11/99 – 04/01)

Forensic Scientist

Duties: analyze evidence for the presence or absence of controlled substances using a variety of chemical and instrumental tests; utilize sophisticated instrumentation such as gas chromatography/mass spectrometry and Fourier transform infrared spectroscopy; testify in court as an expert witness

Anne Arundel County Police Department Crime Lab, Millersville, MD (01/99 -11/99)

Forensic Chemist

Duties: similar to the duties specified for Virginia Division of Forensic Science

Government Scientific Source (GSS), Vienna, VA (09/98-01/99)

Technical Specialist

Duties: serve as technical specialist in the sales of scientific and laboratory supplies and equipment.

Accu-Chem Laboratories, Richardson, TX (07/96 – 09/98)

Forensic and Clinical Toxicology Specialist

Duties: supervisor of toxicology department; sales and marketing of drug testing and occupational and environmental toxicology testing; serve as a liaison to physicians and personnel responsible for forensic urine drug testing; testify in court as an expert witness in the area of forensic urine drug testing

Jefferson County Coroner/Medical Examiner Office, Birmingham, AL (09/93 - 07/96)

Autopsy Assistant/Forensic Technician

Duties: identify, collect, preserve, and document any potential evidentiary material; eviscerate all human organs and document any relevant findings; perform histological examinations

University of Alabama at Birmingham, Birmingham, AL (01/94 – 07/96)
Guest Forensic Science Lecturer

Duties: lecture on areas related to forensic pathology and death investigation to undergraduate and graduate students

Honors/Professional Affiliations:

American Academy of Forensic Sciences (AAFS)
Mid-Atlantic Association of Forensic Scientists (MAAFS)
American Standards for Testing and Materials (ASTM)
American Society of Questioned Document Examiners (ASQDE)
American Bar Association (ABA) – Criminal Justices Section
Guest Reviewer for the Journal of Forensic Sciences
Guest Reviewer for the Journal for the American Society of Questioned Document Examiners
Contributing member and Technical Contact in the Scientific Working Group for Questioned Document Examiners (SWGDOC)
Contributing member in the European Document Examiners Working Group (EDEWG) and the
International Collaboration for Ink Dating (INCID)
Recipient of the “2005 Forensic Scientist of the Year” by the Mid-Atlantic Association of Forensic Scientists
Recipient of the United States Attorney’s Office Eastern District of Virginia “Law Enforcement Public Service Award”

Professional and Scientific Committees:

1. Co-Chair on the Standards, Practices, and Protocols Inter-Agency Working Group – **Executive Office of the President of the United States**/Office of Science and Technology Policy/National Science and Technology Council/Committee on Science/Subcommittee on Forensic Sciences
2. Participating member in the Expert Working Group for Human Factors in Latent Print Analysis
3. Participating member in the Expert Working Group for AFIS Interoperability
4. Participant member in the Expert Working Group for the Preservation of Biological Evidence

INSTRUCTIONAL COURSES CONDUCTED

1. **Workshop Instructor.** “Inkjet Technology and Forensic Examinations” at the Annual Meeting for the American Society of Questioned Document Examiners (ASQDE). Dearborn, MI, August 2009.
2. **Workshop Instructor.** “Inkjet Technology and Forensic Examinations” at the Annual Meeting for the Southern Association of Forensic Document Examiners (SAFDE). Peach Tree City, GA, April 8, 2009.
3. **Workshop Instructor.** “Inkjet Technology and Forensic Examinations” at the Skill-Task Training Assessment & Research (ST2AR) Fall Workshop. Las Vegas, NV, October 22-23, 2008.
4. **Workshop Instructor.** “Applications of Light and Color Theory in Forensic Document Examinations” at the American Academy of Forensic Sciences Annual Meeting, Washington, DC, February 18, 2008.
5. **Workshop Instructor.** “Methods Used for Authenticating Questioned Documents” at the Mid-Western Association of Forensic Scientists (MAFS) Annual Meeting, Traverse City, MI, September 25, 2007.
6. **Workshop Instructor.** “Methods Used for Authenticating Questioned Documents” at the American Society of Questioned Document Examiners (ASQDE) Annual Meeting, Boulder, CO August 13-14, 2007.
7. **Instructor for the Midwest Forensic Resource Center (MFRC)** – Recorded Training. Questioned Documents and the Crime Scene, Ames, IA, July 18, 2007.
8. **Instructor at the Federal Bureau of Investigation (FBI) Academy** - Forensic Document Examiner Training Seminar, Quantico, VA. “An Analytical Approach to Forensic Document Examination.” April 17, 2007.
9. **Instructor at the George Washington University**, Washington, DC. “An Analytical Approach to Forensic Document Examination.” February 28, 2007.
10. **Instructor at Marymount University**, Arlington, VA. An Analytical Approach to Forensic Document Examination.” November 14, 2006.
11. **Workshop Instructor.** “Authenticating Documents” American Board of Forensic Document Examiners (ABFDE). Las Vegas, NV, November 6-7, 2006.
12. **Instructor at the George Washington University**, Washington, DC. “An Analytical Approach to Forensic Document Examination.” October 18, 2006.
13. **Workshop Instructor.** “The Forensic Examination of Documents Produced with Office Machine Systems Utilizing Inkjet Technology.” The International Association for Identification (IAI) 91st International Education Conference, Boston, MA, July 3, 2006.
14. **Workshop Instructor.** “Security Features in Documents.” Mid-Atlantic Association of Forensic Scientists Annual Meeting, May 3, 2006.
15. **Instructor at the Federal Bureau of Investigation (FBI) Academy** - Forensic Document Examiner Training Seminar, Quantico, VA. “The Forensic Examination of Inks.” April 5, 2006.
16. **International Instructor in Doha, Qatar.** “The Examination of Counterfeit Documents.” March 27-28, 2006.
17. **Instructor at Marshall University**, Huntington, WV. “Forensic Science at the United States Secret Service.” March 15, 2006.

18. **Instructor at Indiana University-Purdue University at Indianapolis.** “Forensic Science at the United States Secret Service.” December 12, 2005.
19. **Workshop Instructor.** “The Forensic Examination of Printing Processes.” American Board of Forensic Document Examiners (ABFDE). Las Vegas, NV, November 7-8, 2005.
20. **Instructor at the George Washington University,** Washington, DC. “The Forensic Examination of Printers and Copiers.” December 1, 2004.
21. **Instructor at the University of Windsor,** Windsor, Ontario Canada. “Questioned Document Examinations.” November 10, 2004.
22. **Instructor at the University of Windsor,** Windsor, Ontario Canada. “Forensic Science at the United States Secret Service.” November 9, 2004.
23. **Instructor at the University of Windsor,** Windsor, Ontario Canada. “Forensic Drug Chemistry and Toxicology.” November 8, 2004.
24. **Instructor at George Washington University.** “The Forensic Examinations of Inks and Paper.” George Washington University, October 27, 2004.
25. **Workshop Instructor.** “The Forensic Examination of Documents Produced By Office Machine Systems Utilizing Inkjet Technology.” Northeastern Association of Forensic Sciences, September 30, 2004.
26. **Instructor at Federal Law Enforcement Training Center.** “The Forensic Examination of Printers and Copiers” and “The Forensic Analysis of Inks and Paper.” Brunswick, GA. June 21, 2004.
27. **Guest Speaker at the Federal Bureau of Investigation Laboratory.** “Forensic Chemistry and Questioned Document Examinations.” Quantico, VA. May 5, 2004.
28. **Instructor at Forest Park High School.** “Applications of Forensic Chemistry.” Woodbridge, VA. May 18, 2004.
29. **Workshop Instructor.** “The Forensic Examination of Documents Produced By Office Machine Systems Utilizing Inkjet Technology.” Mid-Atlantic Association of Forensic Sciences, April 20, 2004.
30. **Instructor at George Washington University.** “The Forensic Examination of Printers and Copiers.” George Washington University, November 20, 2003.
31. **Instructor at George Washington University.** “Ink and Paper Chemistry.” George Washington University, October 30, 2003.
32. **Instructor at Marshall University.** “Ink and Paper Chemistry” and “Counterfeit Identification Examinations.” Huntington, WV. September 23, 2003.
33. **International Instructor. International Law Enforcement Academy (ILEA).** “Ink and Paper Chemistry” and Counterfeit Document Examinations.” Pretoria, South Africa. May 19-20, 2003.
34. **Instructor at Federal Law Enforcement Training Center.** “Printing Processes” and “Physical and Chemical Analysis of Inks and Paper.” Brunswick, GA. June 22, 2003.
35. **International Instructor. International Law Enforcement Academy (ILEA).** “Ink and Paper Chemistry” and Counterfeit Document Examinations.” Pretoria, South Africa. May 19-20, 2003
36. **International Instructor. International Criminal Investigative Training Program (ICITAP),** U.S. Department of Justice, “Counterfeit Document Examinations” and “Ink and Paper Chemistry.” Sophia, Bulgaria. January 16-17, 2003.

PROFESSIONAL PRESENTATIONS

1. **LaPorte, G.** The Forensic Examination of Non-Original Documents and Images: Is it Reliable to Make Conclusions About the Printing Process and the Type of Ink Used to Create the Original Document? Presented at the American Academy of Forensic Sciences Annual Meeting, Washington, DC, February 21, 2013.
2. **LaPorte, G.** The Challenges of Translating Forensic Science Research into Practice. Presented at the American Academy of Forensic Sciences Annual Meeting, Washington, DC, February 21, 2013.
3. **LaPorte, G.** Forensic Science: A Discussion on the Importance of Research and Practical Applications in High Profile Cases. Presented at Penn State University, State College, PA, October 25, 2012.
4. **LaPorte, G.** A Validated Approach to Ink Dating Using Solvent Analysis. Presented at the American Society of Questioned Document Examiners (ASQDE) Annual Meeting, Charleston, South Carolina, August 21, 2012.
5. **LaPorte, G.** and Stephens, J. The Importance of Validating and Verifying a Standardized Method: Envelope Examinations and the Anthrax Investigation. Presented at the NIJ/FBI Impression and Pattern Evidence Symposium, Clearwater, FL, August 7, 2012.
6. Taylor, M., Roberts, M, and **LaPorte, G.** Expert working Group on Human Factors in Latent Print Analysis. Presented at the 7th International Symposium on Fingerprints at the International Criminal Police Organization (INTERPOL), Lyon, France, April 25, 2012.
7. Taylor, M., Roberts, M, and **LaPorte, G.** Expert working Group on Human Factors in Latent Print Analysis. Presented at the Chesapeake Bay Division for the International Association of Identification. Cambridge, MD, March 28, 2012.
8. **LaPorte, G.** and Singer, K. Artificial Aging of Documents. Presented at the American Academy of Forensic Sciences Annual Meeting, Atlanta, GA, February 23, 2012.
9. **LaPorte, G.** Trace Evidence Moving Forward. Presented as part of a plenary panel at the 2011 Trace Evidence Symposium: Science, Significance, and Impact. Kansas City, MO, August 9, 2011.
10. **LaPorte, G.** The National Academy of Sciences Report: 2 Years Later. Presented at the Chesapeake Bay Division for the International Association of Identification. Cambridge, MD, March 21, 2011.
11. **LaPorte, G.** Forensic Science: The Importance of Research for Practical Casework. Presented as a Keynote Speech at the 1st Annual World Congress of Forensic Science. Dalian, China, October 21, 2010.
12. **LaPorte, G.** The Importance of Validating and Verifying a Standardized Method: Envelope Examinations and the Anthrax Investigation. Presented at the Mid-Atlantic Association of Forensic Scientists Annual Meeting. Hunt Valley, MD, May 8, 2009.
13. **LaPorte, G.** Questioned Documents and Homicide Investigations. Presented at the Annual Meeting for the Virginia Homicide Investigators Association. Norfolk, VA, October 6, 2008.
14. **LaPorte, G.** Questioned Documents and the Sub-Disciplines. Presented at the Symposium on Special Topics in Questioned Document Analysis. Ankeny, IA, September 30, 2008.

15. **LaPorte, G.** An Overview of the Forensic Examinations on Documents Produced Using Inkjet and Thermal Printing Devices and the Increasing Need for Security. 31st Annual Global Inkjet Printing Conference, Budapest, Hungary, March 12, 2008.
16. **LaPorte, G.**, Beuchel, A, and Stepehns, J. The Examination of Commercial Printing Defects to Assess Common Origin and Batch Variation. Presented at the American Academy of Forensic Sciences Annual Meeting, Washington, DC, February 22, 2008.
17. **LaPorte, G.** Exonerations and Incarcerations: The Key Role of the Forensic Sciences – Questioned Documents. Presented at the American Academy of Forensic Sciences Annual Meeting, Washington, DC, February 19, 2008.
18. **LaPorte, G.**, Holifield, A, and Stephens, J. The Black Money Scam. Presented at the Mid-Atlantic Association of Forensic Scientists Annual Meeting, Washington, DC, May 24, 2007.
19. Schwartz, R. and **LaPorte, G.** The Effects of Common Environmental Variables on the Infrared Luminescence Properties of Writing Inks. Presented at the Mid-Atlantic Association of Forensic Scientists Annual Meeting, Washington, DC, May 25, 2007.
20. Holifield, A and **LaPorte, G.** Artificially Aged Documents. Presented at the Mid-Atlantic Association of Forensic Scientists Annual Meeting, Washington, DC, May 25, 2007.
21. Voiles, R., Stephens, J., and **LaPorte, G.** The Forensic Examination of Documents Using Print Quality Analysis Software. Presented at the Mid-Atlantic Association of Forensic Scientists Annual Meeting, Washington, DC, May 25, 2007.
22. **LaPorte, G.** Forensic Applications of Chromatography at the United States Secret Service. Presented for the Minnesota Chromatography Forum. Minneapolis, MN, March 27, 2007.
23. **LaPorte, G.** The Necessity of Security Printing for the Forensic Scientist. Presented at the 30th Annual Global Inkjet and Thermal Conference. Prague, Czech Republic, March 2, 2007.
24. **LaPorte, G.**, Stoker, D., Thomas, Y, Stephens, J, and Shaffer, D. The Analysis of 2-Phenoxyethanol for the Dating of Documents. Presented at the 59th Annual Meeting of the American Academy of Forensic Sciences, San Antonio, TX, February 22, 2007.
25. Shaffer, D., Stephens, J. **LaPorte, G.** A Comparison of the Physical and Chemical Characterization of Conventional Toners vs. Chemically Prepared Toners. Presented at the 59th Annual Meeting of the American Academy of Forensic Sciences, San Antonio, TX, February 23, 2007.
26. Nelis, E., LaPorte, G., and Thomas, Y. The Use of Electrospray Ionization – Mass Spectrometry for the Identification of Controlled Substances. Presented at the 59th Annual Meeting of the American Academy of Forensic Sciences, San Antonio, TX, February 23, 2007.
27. **LaPorte, G.** The Forensic Examination of Documents Produced on Office Machine Systems Utilizing Inkjet Technology. Presented at the California Association of Criminalistics Fall Workshop Meeting, October 12, 2006.
28. **LaPorte, G.** The Physical and Chemical Examinations of Documents Produced Using Inkjet Technology. Presented at the 4th Meeting of the European Document Experts Working Group, The Hague, Netherlands, September 28, 2006.
29. Schuler, R., Treado, P.J., Gardner, C., **LaPorte, G.**, Stephens, J. Chemical Imaging for Questioned Document Examination. Presented at the 4th Meeting of the European Document Experts Working Group, The Hague, Netherlands, September 29, 2006.

30. **LaPorte, G.** The Forensic Examination of Documents Produced Using Inkjet Technology. Presented at the Imaging Materials Seminar: Inkjet Ink, Rochester, NY, May 2, 2006.
31. Layman, M. and **LaPorte, G.** Questioned Documents and the Crime Scene. Presented at the 58th Annual Meeting of the American Academy of Forensic Sciences, Seattle, WA, February 23, 2006.
32. Shaffer, D, Stephens, J., and **LaPorte, G.** The Characterization of Envelopes for Questioned Document Examinations. Presented at the 58th Annual Meeting of the American Academy of Forensic Sciences, Seattle, WA, February 23, 2006.
33. Stephens, J. and **LaPorte, G.** The Use of Hyperspectral Contrast Imaging for the Examination of Writing Inks. Presented at the 58th Annual Meeting of the American Academy of Forensic Sciences, Seattle, WA, February 23, 2006.
34. **LaPorte, G.** and Layman, M. The Use of Supplementary Testing in Forensic Document Examinations. Presented at the Annual Meeting for the American Society of Questioned Document Examiners, Montreal, Quebec, August 15, 2005.
35. **LaPorte, G.,** Arredondo, M, McConnell, Cantu, A. The Static Method of Dating Writing Inks – A Preliminary Assessment of the United States International Ink Library. Presented at the Mid-Atlantic Association of Forensic Scientists Annual Meeting, Pittsburgh, PA, May 19, 2005.
36. **LaPorte, G.** The Forensic Examination of Documents Produced Using Inkjet and Thermal Technology. Presented at the 28th Global Inkjet and Thermal Printing Conference, Barcelona, Spain, March 16, 2005.
37. **LaPorte, G.** The Examination of Inkjet Printed Documents – What’s on the Frontier? Presented at the 57th Annual Meeting of the American Academy of Forensic Sciences, New Orleans, LA, February 24, 2005.
38. Shaffer, D. and **LaPorte, G.** Applications of Scanning Electron Microscopy/Energy Dispersive X-Ray Analysis at the United States Secret Service. Scanning: The Journal of Scanning Microscopies, Volume 26(2), March/April, 2004.
39. Arredondo, M and **LaPorte, G.** The Forensic Examination of Paper. Presented at the Mid-Atlantic Association of Forensic Scientists Annual Meeting, Wilmington, DE, April 23, 2004.
40. **LaPorte, G.** The Forensic Examination of Documents and Counterfeit Identifications Related to Terrorism and Financial Crimes. International Conference on Asian Organized Crime and Terrorism. Honolulu, HI, April 10-16, 2004.
41. Cochran, J., Glisson, F., and **LaPorte, G.** Characterization of Inks by Solid Phase Microextraction – Gas Chromatography/Time-of-Flight Mass Spectrometry. Pittconn 2004, Chicago, IL.
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43. **LaPorte, G.** The Analysis of Volatile Organic Compounds in Ballpoint Inks Using Gas Chromatography/Mass Spectrometry. Presented at the 56th Annual Meeting of the American Academy of Forensic Sciences, Dallas, TX, February 19, 2004.
44. **LaPorte, G.** Inkjet Technology: The Need for Security and Forensic Traceability. Presented at the 11th Annual European Inkjet Printing Conference, Lisbon, Portugal, November 10, 2003.

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16. Lovett Doust, J & **LaPorte, G** (1991). Population Sex Ratios, Population Mixtures and Fecundity in a Clonal Dioecious Macrophyte, *Vallisneria Americana*. *Journal of Ecology*. 79: 477-489.

Court and Deposition Testimony:

I have testified approximately 35-40 times in the Commonwealth of Virginia and the States of Texas and Maryland on issues related to forensic urine drug testing, forensic chemistry, and controlled substance analysis.

I have also testified over 30 times on issues related to forensic document examinations in State, Federal, and International courts as follows:

1. Tax Court of Canada vs L.D.G. 2000 Incorporated
Montreal, Quebec Canada April 9, 2002
2. USA v William Bartmann
United States District Court – Northern District of Oklahoma October 17, 2003
3. USA v Clayton Lee Waagner
United States District Court – Eastern District of Pennsylvania December 2, 2003
4. Matter of Singh, Atvar (A76-676-494)
U.S. Department of Homeland Security –
Immigration and Customs Enforcement July 16, 2004
5. USA vs Paul Ihle, Jr.
United States District Court – Northern Indiana September 9, 2004
6. State v Matthew C. Owens, Case # 2NO-SO3-821 CR
Nome, Alaska January 27, 2005
7. USA v Sylvester Richards Gayekpar
United States District Court – District of Minnesota October 12, 2005
8. State v Matthew Owens, Case # 2NO-S03-821 CR
Kotzebue, Alaska November 2, 2005
9. USA v Robert Sterling Miller – Western District of Texas
Austin, Texas, Case#A-05-CR-247 SS April 26, 2006
10. USA v Hector R. Lugo-Rios – United States District Court,
Judicial District of Puerto Rico
San Juan, Puerto Rico, Case#05-354 (JAF) May 24, 2006
11. USA v Nancy Harlow – Northern District of Texas
Dallas, Texas, Case#3:06-CR-011-D July 18, 2006
12. USA v Hector R. Lugo-Rios et al – United States District Court,
Judicial District of Puerto Rico
San Juan, Puerto Rico, Case#05-354 (JAF) August 25, 2006
13. State of New Jersey v Alfred Smith
Superior Court of New Jersey, County of Burlington
Mt. Holly, NJ, Case#05-1988 August 31, 2006
14. USA v Cleveland Kilgore – U.S. District Court For the
District of Maryland
Baltimore, MD, Case#RDB-06-0115 September 21, 2006
15. USA v Isidore Nouthong et al – U.S. District Court For the
Eastern District of Virginia
Alexandria, VA, Case#:1:06cr305 October 26, 2006
16. USA v Isidore Nouthong et al – U.S. District Court For the
Eastern District of Virginia
Alexandria, VA, Case#:1:06cr305 February 7, 2007
17. USA v Clyde Cook – U.S. District Court For the
Eastern District of Tennessee
Memphis, TN April 10, 2007
18. USA v Jermain Betea
Eastern District of Virginia

- Alexandria, VA, Case#1:06cr305 May 3, 2007
19. USA v Crist Dauberman
Eastern District of Virginia
Richmond, VA, Case#3:07CR040 May 8, 2007
20. USA v Jose Padilla et al – U.S. District Court For the
Southern District of Florida
Miami, FL, Case#04-60001-CR-Cooke July 12, 2007
21. Commonwealth of Kentucky v Quincy Omar Cross
Hickman Circuit
Clinton, KY, Case#08-CR-00001 April 2, 2008
22. Blau v. Schaefer, MD (Docket MID-L-3015-05)
New Jersey (Deposition) July 25, 2008.
23. People of the State of NY v Stacey Castor
County of Onondaga
Syracuse, NY, DR#05-359834/07-402152 January 21, 2009
24. International Arbitration. Bank Julius Baer Co. Ltd v
Waxfield Ltd Llc Bbcfd Sa G 04-6668-Cv 424 F.3d 278,
New York, NY. June 11, 2009
25. USA v Mark A. O’Hair, Et AL
Northern District of Florida
Pensacola, FL, Case #3:08cr75/LAC July 28, 2009
26. Giorgio v. Gibbens, M.D., et al (File No. 2392/S),
New Jersey (Deposition) August 26, 2009.
27. International Center for Settlement of Disputes (ICSID);
Libananco Holdings Co. Limited v. Republic of Turkey
ICSID Case No. ARB/06/8 November 3, 2009
28. Lake Forest Homeowner’s Association v. Orlando Lake Forest
Joint Venture, et al Seminole County
Case No. 07-CA-1867-16-L (Deposition) March 19, 2010
29. Lake Forest Master Community Association v. Orlando Lake
Forest Joint Venture, Orlando Lake Forest Inc., NTS Mortgage
Case No. 07-CA-1867-L
Seminole County, FL March 25, 2010
30. Yakov Shlimovich, Derivatively on Behalf of
Righttime Enterpirse, Inc. v. Mikhail Cheban,
The Superior Court of the State of California,
County of Los Angeles – Central District,
Case Number BC 408095 (Deposition) February 28, 2011
31. USA v Raogo Ouedraogo,
U.S. Western District of Michigan
Case No. 1:08-CR-68
Grand Rapids, MI March 10, 2011
32. Yakov Shlimovich v Mikhail Cheban, et al
Case No. BC408095
Superior Court of the State of California
Los Angeles, CA March 25, 2011
33. USA v Rami Saba

- U.S. Western District of Michigan
Case No. 1:08-CR-68
Grand Rapids, MI
May 20, 2011
34. Susana Garcia Badaracco v. Ricardo Garcia Badaracco,
Hermes Investment C. Inc ., Atrukay, Inc.,
Circuit Court of the 20th Judicial Circuit in and for
Lee County, Florida (Deposition)
September 23, 2011
35. Pactool International, Ltd v. Kett Tool Company, Inc.,
United States District Court for the
Western District of Washington at Tacoma,
Civil Action No. 3:06-cv-05367-BHS (Deposition)
October 14, 2011
36. Todd Basilone v. Ryan Basilone
Superior Court for the State of Alaska
Third Judicial District at Anchorage
Case Number: 3AN-08-10257 CI
April 30, 2012
37. Underhill v. APG Security-RI, LLC, The
Asset Protection Group, LLC, and
Dennis M. Kelly
Superior Court of Rhode Island
Case Number: C.A. No. PB 10-6489
September 18, 2012
38. Paul D. Ceglia v. Mark Elliot Zuckerberg, Individually,
and Facebook, Inc,
United States District Court Western District of New York,
Civil Action No. : 1:10-cv-00569-RJA (Deposition)
July 26, 2012
39. Cott Beverages, INC v. Americann CO-Pack, Inc.
And Automated Process and Packaging , LLC.
Fourth Judicial District Court
Civil No.: 100402774
September 24, 2012
40. Shanna K. Bever et al v. Estate of James R. Freudenberg,
In The Circuit Court of Clay County, Missouri,
Case No. 11CY-CV10505 (Deposition)
October 26, 2012
41. Aequitas Solutions, Inc. v. Larry Anderson, Gary P. Lloyd,
and C Innovation, Inc.
In the Court of Chancery of the State of Delaware
Case No. 7249-ML
November 27, 2012
42. Shanna K. Bever et al v. Estate of James R. Freudenberg,
In The Circuit Court of Clay County, Missouri,
Case No. 11CY-CV10505
November 28, 2012
43. Gerald Morawski v. Lightstorm Entertainment, Inc.,
James Cameron
United States District Court for the Central District of California
Civil Action No. CV-11-10294 MMM (Deposition)
December 20, 2012

ATTACHMENT 2



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JUSTICE NEWS

Department of Justice

Office of Public Affairs

FOR IMMEDIATE RELEASE

Tuesday, June 12, 2012

ING Bank N.V. Agrees to Forfeit \$619 Million for Illegal Transactions with Cuban and Iranian Entities

WASHINGTON – ING Bank N.V., a financial institution headquartered in Amsterdam, has agreed to forfeit \$619 million to the Justice Department and the New York County District Attorney’s Office for conspiring to violate the International Emergency Economic Powers Act (IEEPA) and the Trading with the Enemy Act (TWEA) and for violating New York state laws by illegally moving billions of dollars through the U.S. financial system on behalf of sanctioned Cuban and Iranian entities. The bank has also entered into a parallel settlement agreement with the Treasury Department’s Office of Foreign Assets Control (OFAC).

The announcement was made by Lisa Monaco, Assistant Attorney General for National Security; Ronald C. Machen, U.S. Attorney for the District of Columbia; Assistant Attorney General Lanny A. Breuer of the Criminal Division; District Attorney Cyrus R. Vance Jr., of the New York County District Attorney’s Office; James W. McJunkin, Assistant Director in Charge of the FBI Washington Field Office; Richard Weber, Chief, Internal Revenue Service (IRS) Criminal Investigation; and Adam J. Szubin, Director of the Office of Foreign Assets Control.

A criminal information was filed today in federal court in the District of Columbia charging ING Bank N.V. with one count of knowingly and willfully conspiring to violate the IEEPA and TWEA. ING Bank waived the federal indictment, agreed to the filing of the information and has accepted responsibility for its criminal conduct and that of its employees. ING Bank agreed to forfeit \$619 million as part of the deferred prosecution agreements reached with the Justice Department and the New York County District Attorney’s Office.

According to court documents, starting in the early 1990s and continuing until 2007, ING Bank violated U.S. and New York state laws by moving more than \$2 billion illegally through the U.S. financial system – via more than 20,000 transactions – on behalf of Cuban and Iranian entities subject to U.S. economic sanctions. ING Bank knowingly and willfully engaged in this criminal conduct, which caused unaffiliated U.S. financial institutions to process transactions that otherwise should have been rejected, blocked or stopped for investigation under regulations by OFAC relating to transactions involving sanctioned countries and parties.

“The fine announced today is the largest ever against a bank in connection with an investigation into U.S. sanctions violations and related offenses and underscores the national security implications of ING Bank’s criminal conduct. For more than a decade, ING Bank helped provide state sponsors of terror and other sanctioned entities with access to the U.S. financial system, allowing them to move billions of dollars through U.S. banks for illicit purchases and other activities,” said Assistant Attorney General Monaco. “I applaud the agents, analysts and prosecutors who for years pursued this case.”

“Banks that try to skirt U.S. sanctions laws undermine the integrity of our financial system and threaten our national security,” said U.S. Attorney Machen. “When banks place their loyalty to sanctioned clients above their obligation to follow the law, we will hold them accountable. On more than 20,000 occasions, ING

intentionally manipulated financial and trade transactions to remove references to Iran, Cuba and other sanctioned countries and entities. Today's \$619 million forfeiture – the largest ever – holds ING accountable for its wrongdoing.”

“For years, ING Bank blatantly violated U.S. laws governing transactions involving Cuba and Iran, and then used shell companies and other deceptive measures to cover up its criminal conduct,” said Assistant Attorney General Breuer. “Today's resolution reflects a strong collaboration among federal and state law enforcement partners to hold ING accountable.”

“Investigations of financial institutions, businesses and individuals who violate U.S. sanctions by misusing banks in New York are vitally important to national security and the integrity of our banking system,” said New York County District Attorney Vance. “These cases give teeth to sanctions enforcement, send a strong message about the need for transparency in international banking and ultimately contribute to the fight against money laundering and terror financing. I thank our federal partners for their cooperation and assistance in pursuing this investigation.”

“Today, ING Bank was held accountable for their illegal actions involving the movement of more than \$2 billion through the U.S. financial system on behalf of Cuban and Iranian entities subject to U.S. economic sanctions,” said FBI Assistant Director in Charge McJunkin. “Investigations of this type are complicated and demand significant time and dedication from agents, analysts and prosecutors. In this case, their steadfast tenacity brought this case through to today's result, and we will continue to pursue these matters in diligent fashion.”

“In today's environment of increasingly sophisticated financial markets, it's critical that global institutions follow U.S. law, including sanctions against other countries,” said IRS Criminal Investigation Chief Weber. “The IRS is proud to share its world-renowned financial investigative expertise in this and other complex financial investigations. Creating new strategies and models of cooperation among our law enforcement partners to ensure international financial compliance is a top-priority of the IRS.”

“Our sanctions laws reflect core U.S. national security and foreign policy interests and OFAC polices them aggressively. Today's historic settlement should serve as a clear warning to anyone who would consider profiting by evading U.S. sanctions,” said OFAC Director Szubin. “We commend our federal and state colleagues for their work on this important investigation.”

The Scheme

According to court documents, ING Bank committed its criminal conduct by, among other things, processing payments for ING Bank's Cuban banking operations through its branch in Curaçao on behalf of Cuban customers without reference to the payments' origin, and by providing U.S. dollar trade finance services to sanctioned entities through misleading payment messages, shell companies and the misuse of ING Bank's internal suspense account.

Furthermore, ING Bank eliminated payment data that would have revealed the involvement of sanctioned countries and entities, including Cuba and Iran; advised sanctioned clients on how to conceal their involvement in U.S. dollar transactions; fabricated ING Bank endorsement stamps for two Cuban banks to fraudulently process U.S. dollar travelers' checks; and threatened to punish certain employees if they failed to take specified steps to remove references to sanctioned entities in payment messages.

According to court documents, this conduct occurred in various business units in ING Bank's wholesale banking division and in locations around the world with the knowledge, approval and encouragement of senior corporate managers and legal and compliance departments. Over the years, several ING Bank employees raised concerns to management about the bank's sanctions violations. However, no action was taken.

For decades, the United States has employed sanctions and embargoes on Iran and Cuba. Financial transactions conducted by wire on behalf of Iranian or Cuban financial institutions have been subject to these U.S. sanctions. The TWEA prohibits U.S. persons from engaging in financial transactions involving or benefiting Cuba or Cuban nationals and prohibits attempts to evade or avoid these restrictions. IEEPA makes it a crime to willfully attempt to commit, conspire to commit, or aid and abet in the commission of any violations of the Iranian Transaction Regulations, which prohibit the exportation of any services from the United States to Iran and any attempts to evade or avoid these restrictions. IEEPA and TWEA regulations are administered by OFAC.

The Investigation

The Justice Department's investigation into ING Bank arose out of ongoing investigations into the illegal export of goods from the United States to sanctioned countries, including Iran. For instance, ING processed payments on behalf of one customer, Aviation Services International B.V. (ASI), a Dutch aviation company which was the subject of a U.S. Commerce Department-initiated criminal investigation, through the United States for trade services relating to the procurement by ASI of dual-use U.S. aviation parts for ASI's Iranian clients. The ING Bank investigation also resulted in part from a criminal referral from OFAC, which was conducting its own probe of ING Bank.

ING Bank's forfeiture of \$309.5 million to the United States and \$309.5 million to the New York County District Attorney's Office will settle forfeiture claims by the Department of Justice and the state of New York. In light of the bank's remedial actions to date and its willingness to acknowledge responsibility for its actions, the Department will recommend the dismissal of the information in 18 months, provided ING Bank fully cooperates with, and abides by, the terms of the deferred prosecution agreement.

OFAC's settlement agreement with ING deems the bank's obligations to pay a civil settlement amount of \$619 million to be satisfied by its payment of an equal amount to the Justice Department and the state of New York. OFAC's settlement agreement further requires the bank to conduct a review of its policies and procedures and their implementation, taking a risk-based sampling of U.S. dollar payments, to ensure that its OFAC compliance program is functioning effectively to detect, correct and report apparent sanctions violations to OFAC.

The case was prosecuted by Trial Attorney Jonathan C. Poling of the Justice Department's National Security Division; Assistant U.S. Attorneys Ann H. Petalas and George P. Varghese, of the National Security Section of the U.S. Attorney's Office for the District of Columbia; and Trial Attorney Matthew Klecka of the Criminal Division's Asset Forfeiture and Money Laundering Section.

The case was investigated by the FBI's Washington Field Office and the IRS-Criminal Investigation's Washington Field Division, with assistance from the Treasury Department's OFAC and the Commerce Department's Bureau of Industry and Security.

The Department of Justice expressed its gratitude to Executive Assistant District Attorney, Chief of Investigation Division Adam Kaufmann; and Assistant District Attorneys Sally Pritchard and Garrett Lynch of the New York County District Attorney's Office, Major Economic Crimes Bureau.