Metaphors of Money Laundering

Teaching Specialized Text Translation with Corpus-Based Methods

By

Stephen Coleman Gerome

Metaphors of Money Laundering: Teaching Specialized Text Translation with Corpus-Based Methods

By Stephen Coleman Gerome

Table of Contents

List of Figures

Remember to create a link for Table 3 in the final pdf

List of Tables

Abstract

Crime spreads quickly. Language spreads even faster. In the hidden world of financial crime, illegal money moves quietly across borders, and so does the language used to describe it. Yet when metaphors rooted in one culture are translated into another, they can distort meaning and reshape how audiences perceive threats. What do money trails, dirty cash, and financial cleanups have in common? "Metaphors of Money Laundering: Teaching Specialized Text Translation with Corpus-Based Methods" explores how metaphorical language influences the understanding of money laundering in English and Spanish. By analyzing a bilingual corpus of specialized financial texts, the book offers new insights for translation, teaching, and professional practice.

Drawing from authentic federal regulatory documents, including the U.S. Treasury's Bank Secrecy Act, Anti-Money Laundering Manual published by the Federal Financial Institutions Examination Council and international compliance reports like the Financial Action Task Force (FATF-GAFI) assessments, this unique study uses a bilingual English-Spanish collection of texts or corpus to show how metaphors shape and influence the global conversation about financial crime. This approach bridges linguistic theory with real-world applications in law, regulation, and compliance.

The origins of this project stem from firsthand experience, including interpreting criminal cases for U.S. federal court proceedings, translating documents, and observing how investigators track illegal financial flows. These experiences highlighted the essential role of language in the criminal justice system, not only in the United States but also across Spanish-speaking countries. Clear communication among regulators, compliance professionals, law enforcement, and the public is essential for identifying and preventing financial crimes, such as money laundering. This personal perspective grounds the study in both experienced practice and academic theory.

In this study, you will learn how metaphorical shifts can reframe threats, shift emphasis, and uncover hidden ideological patterns across translations. You will also gain practical techniques for translating specialized regulatory language, building custom corpora, and training the next generation of translators and intelligence professionals. The intended audience includes translators, educators, compliance officers, and anyone interested in the power of language in combating financial crime.

Prior to this research, there had been limited exploration of translating metaphors within the specialized language of regulatory financial compliance and enforcement. This study fills that gap by providing an overview of the language used in this field through a corpus-based translation analysis of anti-money laundering texts. We developed a bilingual English-to-Spanish unidirectional corpus uploaded to Sketch Engine™ for analysis. Findings include intensified metaphors in translations, the addition of metaphorical expressions absent in originals, and ideological influences shaping word choice. We also detected terminological inconsistencies in metaphors related to money laundering, tax havens, and shell companies.

The study offers practical insights for translators and stakeholders involved in anti-money laundering efforts. It also emphasizes educational applications, offering guidance on building custom corpora and teaching metaphor translation within specialized financial regulation. Students gain not only from understanding translation challenges but also from hands-on experience with linguistic analysis tools, skills that are increasingly important across fields, from intelligence analysis to computer science.

Key Words: Corpora of texts, financial metaphors, money laundering, security, translation

Acknowledgements

About the Author

Dr. Stephen Gerome is an educator and researcher whose work explores language, culture, and Spanish–English translation in professional and academic contexts. He is a faculty member in the Department of World Languages and Cultures at James Madison University, where he has taught Spanish language and translation since 2006.

He holds degrees in International Relations and Modern Foreign Languages (B.A., JMU, 1998), Education and Human Resource Development (M.S., 2004), Spanish Translation and Interpreting (M.A., UT Rio Grande Valley, 2018), and Translation and Intercultural Mediation (Ph.D., University of Salamanca, 2023).

From 1999 to 2004, Dr. Gerome worked as a contract legal interpreter and translator for the U.S. District Court for the Western District of Virginia, the DEA, and the Office of the U.S. Attorney. His professional background also includes fifteen years of experience in international business and safety management, during which he has applied translation and intercultural communication skills across Mexico, South America, and Europe.

His research focuses on metaphor translation, corpus-based translation, and cross-cultural communication in law and regulation. 'Metaphors of Money Laundering' is his first monograph with Ethics International Press.

Chapter 1
Getting Started

Why this topic matters and what this book aims to accomplish

When it comes to understanding financial crime and regulation, one might picture a scene straight out of a detective thriller: shady characters, encrypted messages, and frantic pursuits of hidden money. However, what many may not realize is that this "crime" is happening in plain sight, often without anyone batting an eye. We're not talking about high-speed chases, but everyday tasks like washing cars in a supermarket parking lot or transferring funds in ways most people don't even notice. It's the kind of hidden-in-plain-sight crime that affects us all, and the metaphors used to describe it are not always as clear, or as harmless, as they seem.

This book does not claim to be everything to all readers. Instead, it aims to provide a focused, in-depth analysis of the intersection between metaphor, regulatory financial discourse, and the translation practices of English and Spanish. Rather than covering the entire field of translation studies, it emphasizes the areas where corpus-based methods and conceptual metaphor theory most clearly reveal the challenges and strategies involved in translating specialized discourse. While its primary audience includes scholars and practitioners in translation and interpreting, it is also meant for a broader group, including policy analysts, compliance and enforcement professionals, legal and financial investigators, and students of linguistics, law, finance, and criminology, anyone who

wants to understand how language shapes communication about financial regulation across cultures.

In the fields of regulatory and compliance work, especially in crime prevention, English serves as a lingua franca for diverse stakeholders. These key players, from regulators, financial firms to media, and the public, often use metaphors to convey complex threats, such as financial crime. This isn't just a rhetorical device; metaphors are effective tools for understanding and addressing security threats that impact the integrity of the global financial system.

Financial crime, especially money laundering, is a widespread global problem affecting many areas, including human trafficking, prostitution, drug cartels, and child labor (Craig). As Craig highlights, financial crime is estimated to be a trillion-dollar industry that causes serious social and economic harm worldwide. Surprisingly, it often goes unnoticed, with many people unknowingly participating in it every day, similar to the metaphor of "washing your car in a supermarket parking lot and keeping none of their wages" (Craig). This illustrates how financial crime can operate covertly, undermining financial systems and national security without detection (Financial Crime | OCC).

In their recent work, The War on Dirty Money, Gilmour and Hicks (30) emphasize how simple, everyday language about financial crime can cause serious misunderstandings. As they quote translator Kimon Friar, "Even the simplest word can never be rendered with its exact equivalent into another language." This observation is especially true in legal translation, where nuance, subjectivity, and cultural context complicate even the most basic terms. Lawyers worldwide debate the meanings of words within their legal systems, which highlights the difficulty of translating legal concepts across different languages (Gilmour & Hicks, 30).

Clear and precise communication is therefore critically important, not only for regulators but also for those involved in compliance, law enforcement, and the public, to identify and prevent money laundering. Having worked closely with members of this community and participated in many communication-related processes, I find it interesting to observe how they use and lexicalize metaphors in speech and correspondence, including translations and interpretations between English and Spanish across various Spanish-speaking countries.

My introduction to the importance of language use in investigating and prosecuting criminal activity began in the early 2000s while working as a linguist and Spanish and English judicial interpreter in the United States federal judicial system. During this time, I collaborated with the U.S. Attorneys' Office and DEA agents, interpreting proffer sessions in transnational criminal investigations and translating related documents. These experiences revealed the crucial role language plays in the relationships among everyone involved in the criminal justice process. They also sparked my interest in how investigators "follow the money trail" to uncover illegal activity. Interpreting criminal cases and translating documents in United States federal court cases provided a firsthand view of the communications involved in that realm. In the mid-2000s, I met John Cassara, a former U.S. intelligence officer and Special Agent for the U.S. Department of the Treasury. He generously offered his time to help me understand the complex phenomenon of money laundering. Completing a recent translation project, which involved translating an anti-money laundering publication from English to Spanish, bolstered my interest in further research in this specialized area. Reflecting on those cases, I became convinced that loss and gain in language are not minor details but central to the effectiveness of law enforcement communication. Before this study, there was little to no research on

translating metaphors in the specialized regulatory financial compliance and enforcement language.

The current study begins to address that research gap by offering an X-ray view of the language currently used in this field. While some have examined metaphor translation in accounting, such as Fuertes-Olivera and Nielsen, as well as Dai et al., others have studied financial metaphors and their translation, including Charteris-Black and Ennis, Charteris-Black and Musolff, Guénette, Joris et al., and Schaffner and Shuttleworth to some extent. Still, others have focused on metaphor translation and the law, like Gražytė and Maskaliūnienė, López and Orts Llopis, Foljanty, Vergara Fabregat, Faiq, and Prieto Ramos. These studies lay important groundwork, but none investigate how metaphor translation functions within compliance-driven financial regulation texts, which are unique in genre, audience, and purpose. Therefore, despite valuable research in accounting, economics, and law, the specialized discourse of financial compliance remains largely unexplored, especially from a translation perspective between English and Spanish.

Additionally, I have observed multiple instances where communication has failed or been ineffective. For example, during my work as a contract legal interpreter and translator for the Drug Enforcement Administration and the U.S. Attorney's Office, I can easily imagine how metaphorical language in financial crime cases, if mistranslated or misunderstood, could cause confusion in the courtroom. One hypothetical situation involved a case where a metaphor about "cleaning the money trail" could have been taken too literally. The phrase was meant to refer to the process of laundering money, concealing illegal financial flows through legitimate channels, but a literal translation, "limpiar el rastro de dinero," might be confusing. In Spanish, "limpiar" can also mean physically scrubbing

or erasing a trace, suggesting a tangible act of removing evidence rather than the complex legal concept of masking financial activities. Such a mistranslation might have caused investigators to focus narrowly on physical evidence, while overlooking cross-border transactions, the true heart of the crime.

Moreover, the legal teams might have been confused about the true nature of the crime, as the metaphorical meaning of "laundering" would not match the literal translation. This misunderstanding could have also affected the judicial process, with the defense or prosecution arguing based on an incorrect interpretation of the metaphor, potentially leading to delays or misdirection in the case.

This hypothetical scenario shows how a mistranslation can cause major confusion and misdirection in legal cases. But it's not just about misunderstanding a phrase; the language itself can carry deeper, more powerful forces. As Abdul Malik et al. summarize in their discussion of da Silva's The Persuasive (and Manipulative) Power of Metaphor (2016): "Metaphor is also an excellent tool to disseminate ideology, express emotion, and communicate moral purposes" (Malik et al. 513). In other words, metaphors are rarely neutral; they often shape how we think, argue, and act. However, when metaphors are translated from one language to another, they can change, deliberately or unintentionally, and in doing so, modify their impact on meaning, ideology, and emotion.

This study aims to expand the understanding of how metaphors are translated and their effectiveness in conveying intended messages. It seeks to identify which concepts influence the reader and how they impact communication from English to Spanish. Additionally, it briefly reviews existing research to enhance knowledge of the metaphorization process in communication. The ultimate goal is to

demonstrate how translators navigate metaphors not just as words but as culturally loaded choices that can reinforce or distort meaning.

In intercultural communication, translating metaphors involves lexical adjustments and adaptations to the target language to enhance understanding and practical use. Given these challenges, the research is approached with several objectives and key insights, which are outlined below.

Big Goals

The main goal of this research is to examine how conceptual metaphors are translated across languages in specialized financial and legal language, focusing on the collection of texts that make up the FinCorpAlin corpus. By identifying patterns in metaphor use and exploring their transfer or changes between English and Spanish, this study aims to improve understanding of how metaphors influence meaning in regulatory, compliance, and financial crime-related texts. Put simply, this study examines what happens to metaphors when they linguistically "cross borders," what is lost, what is gained, and what new meanings emerge.

It is no secret that translating in specialized fields like international law and financial crime can be complex, especially when metaphors cross language boundaries. The main insights of this project, however, lie at the intersection of translation studies and the discourse of international law, policymaking, compliance monitoring, and enforcement. In these areas, metaphor is not just decoration; it is a strategic tool used to identify threats, guide regulation, and influence enforcement.

In these areas, specialized language, sometimes metaphorical, plays a crucial role in conveying complex information, especially related to

preventing international financial crimes. The metaphors frequently used in English are transferred into other languages, such as Spanish, but the process reveals significant differences. Through our analysis of the FinCorpAlin texts, we examine patterns of code-switching, borrowing, and compensation, particularly in cases where direct equivalence fails. We will also explore how these linguistic and translation strategies, such as adding, omitting, and intensifying metaphors, may influence the effectiveness of communication, potentially causing misunder-standings or difficulties with legal compliance across language boundaries. Besides studying the use and translation of metaphors in financial regulatory discourse, this work also aims to enhance the teaching of specialized translation. By using corpus-based text analysis methods, it aims to inform educational approaches that equip students to navigate the complexities of translating metaphorical language across specialized domains.

In today's globalized world, there is a growing need for translators to have specialized knowledge and skills, along with proficiency in various translation tools (Bowker and Pearson; Garcia Izquierdo 132). Research on specialized discourse, especially in less-explored areas, is in high demand. One such area is the language of financial regulation, compliance, and adjudication, which has received limited attention in previous studies. Our research aimed to perform a synchronic analysis of the language used in regulatory finance and compliance texts, specifically in English and Spanish, to better understand how these languages function in these professional fields. Since metaphors play a key role in conveying complex legal and financial ideas, our study focused on how these metaphors are used and translated within this context. To structure this project in a systematic way, the following objectives guided the research process. They move from establishing a broad overview of the field to building concrete resources and,

finally, to conducting detailed analysis. Specifically, the study sought
to:

- **Map the field:** establish the state of specialized and regulatory
  language.
- **Describe the genre:** identify discourse features of financial
  regulation and compliance.
- **Trace metaphor use:** across regions (U.S., Europe, Latin
  America).
- **Build resources:** compile a bilingual corpus + glossary.
- **Analyze patterns:** frequency, terminology, and ideological
  significance.

We believe that achieving these objectives will lead to a deeper
understanding of the language used in the complex phenomenon of
money laundering. In turn, better insights into how complex concepts
are communicated from English to Spanish in crime prevention efforts
may help key stakeholders communicate more effectively. Through
corpus-based translation analysis, we will start foundational work in
classifying this genre of specialized discourse, aiming to better
understand intercultural and interlinguistic communication across
borders. To further improve our approach and analyze it more
thoroughly, we developed twelve key predictions based on earlier
questions related to translation studies. The following section presents
these key predictions.

Some predictions

- **Metaphors travel imperfectly:** losses, shifts, and mis-
  understandings occur across English–Spanish translation.
- **Cultural roots matter:** American imagery (games, sports,
  security frames) often resists direct transfer.

- **Translation choices shape perception:** established metaphors, omissions, or additions can intensify or weaken meaning.
- **Language is ideological:** U.S.-centric legal framing influences Spanish translations, embedding power structures.

We believe that money laundering is a complex phenomenon that is not well understood in English, let alone in other languages. The concept is metaphorical, highlighting the need to explain it in a way that connects with people's everyday experiences. Since meanings can differ across cultures, we thought it would be interesting to explore where English and Spanish differ or coincide in their understanding and to see if there's any loss in translation from one language to another. We recognize that using different terms for the same concepts can sometimes cause misunderstandings and confusion. We wanted to examine whether inconsistent terminology in this specialized field contributes to that. Like any form of communication, there is always a chance of misconceptions arising from what the listener reads or hears. We believed it was important to consider whether loss or change during translation might lead to such misunderstandings.

The body of texts examined contains lexicalized metaphors. Since prior research shows that certain metaphors are used frequently, especially in economics and business, we aimed to determine if similar metaphors appeared here. Because the specialized text relates to security, we also sought to assess the level of ideology present in the source and target texts. Additionally, we analyzed translational strategies for metaphors and estimated their potential impact on receptor understanding. Lastly, because money laundering regulation mainly originated from policies and regulations in the United States, the language of the translations would naturally be influenced by the

source language, American English. Next, we present a summary of the research structure.

How this book is put together

This book is organized into six chapters. Chapter 1 introduces the topic and identifies the research gap. Chapter 2 develops the theoretical framework, focusing on specialized language, metaphor, and security discourse. Chapter 3 covers corpus design and methodology. Chapter 4 analyzes findings, including the replication of Stender's CRISCORP approach. Chapter 5 discusses applications for regulators, translators, and students, while Chapter 6 summarizes key insights and suggests future directions.

How we use corpus-based translation

Since the 1990s, the study of corpora has become deeply integrated into translation studies, shaping how translation is taught and researched (Laviosa 1). Some of the earliest corpora of translated texts were "conceived within the discipline of contrastive linguistics" (ibid.). Baker and Saldanha pointed out that, beyond universal characteristics and norms of translation behavior, access to computerized corpora is also crucial (21). Baker also defines a corpus as "any collection of ordinary texts preserved in electronic format and analyzable automatically or semi-automatically" ("Corpora in Translation" 226). Other definitions include "a finite collection of machine-readable text, sampled to be as representative as possible of a language or variety" (McEnery and Wilson 177) and "a body of written text or transcribed discourse that can serve as a basis for linguistic analysis and description" (Kennedy 1).

Real-world uses of translation for bridging cultures

Since the late 19th century, studies in corpus linguistics began with linguists compiling frequency lists to examine language acquisition (Allan 12). For example, Käding's 1897 research on letter sequences in German was among the earliest (Allan 3) and involved analyzing 11 million words. According to Allan, some of the earliest developments in electronic corpus linguistics started in the late 1950s and 1960s (866). In 1951, Jesuit priest Roberto Basa used punch card machine technology to create the first machine-generated concordance, which analyzed poetry by Thomas Aquinas (ibid.). Not everyone supported corpus linguistics during this period. For instance, Noam Chomsky strongly opposed it by arguing that data do not reflect a person's competence (Allan 867), claiming that performance "cannot tell us about a person's competence because the number of sentences in a language is infinite" (ibid.).

Chomsky highlighted that internal, not external, language should be the main focus of language theory, which aims to explain it (Allan 867). He argues that no body of texts can fully represent a language and that analyzing a corpus doesn't require it to contain the entire language being studied, but rather a representative sample (Allan 868). Therefore, our corpus is not intended to encompass the entire language, but rather a significant portion of the community it represents. This segment focuses on the community's efforts to reduce or eliminate criminal activity, including law enforcement and those involved in fighting terrorist financing and financial crime. Although corpus linguistics is relatively new, it has grown rapidly with increased accessibility and technological advancements, especially electronic databases. Since the 1980s, corpus data has become vital in research (Allan 5-6).

This rapid progress has not only expanded access to linguistic data but also ignited ongoing discussions about the ideal size and composition of corpora for specific research goals. A balanced strategy that combines both large and small corpora can be the most effective. As Patton explains, "The sample must be large enough to be credible given the purpose of the evaluation, but small enough to allow adequate depth and detail for each case or unit in the sample" (58–59). Some researchers, such as Rodríguez-Inés (2015), argue that large corpora are essential for addressing certain translation issues. According to Rodríguez-Inés, a modern corpus should accurately represent the language or variety studied, have a clear design, be finite, and available in electronic format (17), all qualities that apply to the corpus used in this study.

Although earlier work in translation studies usually relied on smaller corpora, technological advances now allow for larger-scale studies. Skorczynska and Deignan (2006) argue that small corpora offer deeper insights into metaphorical use. Meanwhile, Herteg emphasizes the benefits of larger corpora for quantitative analysis and pattern recognition in metaphor research ("Business English Metaphors" 291, 293).

As Reppen notes, the size of the collection of texts depends more on representativeness and research goals than on raw word count (31). For dictionary development, corpora may need to include hundreds of millions of words, while studies of historical texts or specific authors might only need smaller, targeted samples (O'Keeffe and McCarthy 32). Ultimately, corpus design must strike a balance between practical constraints and the goal of capturing linguistic diversity. Even small corpora, when carefully curated, can provide valuable and representative insights (O'Keeffe and McCarthy 55).

Talking money and security in translation

The current research partly relies on cognitive linguistics to deepen understanding of specific metaphors in the field of financial regulation and enforcement. However, as Baker and Saldanha (113) point out, "the linguistic approach is not enough to account for the complexities of translation." It is necessary to use analytical tools and consider the context of language use. Another goal is to gain a better understanding of social perceptions through translations of metaphors used in government websites, private organizations, associations, and related published and translated documents. The texts are analyzed from the perspective of Lakoff and Johnson's ("Metaphors") theory of conceptual metaphors, with additional attention given to Kövecses ("An extended view" 116), who recently proposed the Extended Conceptual Metaphor Theory (ECMT), based on the idea that metaphors shape our understanding of the world and are used and interpreted in context.

Humans rely on experiences and memories to understand complex and abstract concepts by linking related ideas. Lakoff and Johnson ("Metaphors") state that "the essence of metaphor is to understand and experience one kind of thing in terms of another" (5). Kövecses ("An extended view") explains Extended Conceptual Metaphor Theory in three different ways, expanding on prior CMT theory. The theory considers "two dimensions of experience instead of Lakoff and Johnson's ("Metaphors") 'understanding one domain in terms of another'" (Zhang 1488). Kövecses provides a more comprehensive definition of conceptual metaphor: "a conceptual metaphor is a systematic set of correspondences between two domains of experience" ("An extended view" 2). He argues that focusing on only two domains is not enough, and four should be considered using correspondences rather than just mapping from source to target

domains (ibid.). He proposes that these four domains include "mental space level metaphors" that cover a schema from the most to the least specific (123). He also mentions that cognitive metaphor theory can include the idea of "offline schema" (ibid.). For example, a journalist writing about an interview with musician "Fats Domino about his life" after Hurricane Katrina wrote, "The 2005 hurricane capsized Domino's life" (124). What he perceived at the time and later remembered (i.e., "overturned boats") "serves as a contextual factor that activates the image schema" (124). The other three distinctions follow.

1. Relationship between grammar and metaphor
   Metaphor scholars have recently begun to recognize a strong connection between grammar and metaphorical conceptual structures, fostering interaction between the two (196).
2. Multilevel view of metaphor.
   Kövecses ("Introduction") suggested that a multilevel view of the conceptual metaphor could be represented as a four-level schema, where the metaphor includes a hierarchy of "an image schema, domain, frame, and mental space level" (197).
3. Recognizing context to explain the use of metaphors is important.

Criticism of conceptual metaphors mainly targets the methodology used to identify linguistic metaphors and the reliance on scholars' intuition (Zhang 1489). Other critiques include the focus on concepts rather than words, the direction of analysis such as top-down versus bottom-up, and the metaphoric connection to culture, specifically emphasizing "universal bodily experience" instead of the interaction between body and context (ibid). The extended conceptual metaphor theory proposes that metaphors are shaped by various contextual

factors, which can be categorized into four types: situational, discourse, conceptual-cognitive, and bodily (199).

We believe metaphors are important tools for creating similarities that support our cognitive system. They develop these expressions through two elements: source and target domains, which are transferred or projected from one to the other, with a component from the origin used to describe or represent the target domain (Samaniego Fernández, "Diseño y aplicación" 9 [Author's own translation]).

Nevertheless, we must consider the influence of ideology and cultural values in metaphor translation across different cultures, as these likely play a key role in cultural mediation. As Tymoczko notes, conceptualizations of translation are associated with the idea of translators being 'between' in the transfer process. This suggests that translators are neutral figures beyond history and ideology, which may lead to a sort of "amnesia" (Tymoczko 7) regarding the ideology and values of dominant powers inherent in cultures. We believe that analyzing the discourse in this research will uncover a certain degree of the dominant culture's ideology.

To examine the cognitive role of metaphor, Charteris-Black and Musolff used Lakoff and Johnson's ("Metaphors") idea of conceptual metaphor as a concept that explains "how two words or expressions from apparently different domains may be associated at an underlying cognitive level" (250). Their study aimed to determine how much the English and Spanish representations of a particular domain are shared by "overlapping cognitive systems" (253). They predicted a positive transfer of concepts from English to Spanish, where these systems overlap. In our research, we observed what we believe is positive transfer. However, we also found that while cognitive systems mostly aligned, not all concepts could be transferred.