How to Write an Intelligence Product in the Bottom Line Up Front (BLUF) Format

This exercise will demonstrate how to write an intelligence product in the BLUF format, using an intelligence assessment produced by the U.S. Department of Justice (DOJ) National Drug Intelligence Center (NDIC) as an example.

While you’re reading, keep in mind that the point of this exercise is to demonstrate the proper format for an intelligence piece, not to teach you about drug money laundering or prepaid cards.

Your project’s Title, Executive Summary, and Introduction will be written last. To find out why, see page 7.

In this report, the Executive Summary is called Key Judgments. Regardless of its name, this section’s purpose – to summarize the piece – remains the same.

Why, as intelligence analysts, are we so concerned about learning how to write in the BLUF format? Why don’t we each write in the style that suits us best?

Like all successful products, intelligence products must be tailored to meet the needs of their customers: policymakers and commanders.

These busy men and women rely on clear, concise, and accurate intelligence reporting to make daily decisions that affect U.S. national security, U.S. policies, and the lives of U.S. servicemen and -women. Arranging your intelligence reporting in the BLUF format helps them efficiently locate and comprehend the information they need.
Bottom Line Up Front (BLUF):

In the BLUF format, the first sentence of each paragraph will sum up all of the information in the paragraph. A good BLUF should cover all of the information in a paragraph, like an umbrella. If the paragraph contains any information that doesn’t fall under the BLUF’s “umbrella,” that information should be moved to a more appropriate paragraph or the BLUF should be changed to include the additional information. Following the BLUF, the component sentences in the paragraph should be arranged from most to least important.

Using a BLUF and arranging sentences from most to least important ensures that readers are immediately aware of your product’s most important points and that readers can locate information easily.

It is most effective to get right to the point, which is why BLUF is the best way for intelligence analysts to communicate with policymakers and commanders, who are often too busy to read and carefully digest every word of the intelligence products they rely upon to make decisions. Summarizing each paragraph at its beginning allows decisionmakers to quickly skim intelligence products without sacrificing clarity. Because materials that are not in the BLUF format—such as academic texts—may contain paragraphs with several important ideas located at the beginning, middle, or end, readers who skim these publications may inadvertently miss important information. Moreover, the BLUF format also helps readers locate information. For example, a reader looking for information on types of prepaid cards would, by skimming the BLUFs in the referenced document, immediately understand that the required information is located in the paragraph circled in red (above).
Footnotes should be used to convey additional background information, such as definitions, that is not appropriate for inclusion in the background section.

Using footnotes to convey this extra information maintains the flow of paragraphs and prevents paragraphs from becoming "cluttered" with unnecessary concepts. Footnotes also function as an excellent way to communicate to both well-informed and novice audiences in the same document by providing the well-informed reader the opportunity to read straightforward analysis without interruption, while still providing the novice reader with ample background information.
Think of a BLUF as an umbrella: All of the information in each paragraph should be “covered” by the BLUF.

Accuracy, Brevity, and Clarity:

In intelligence writing it’s imperative that the language used is as clear, concise, and to-the-point as possible. Carefully chosen language that is accurate, brief, and clear leaves nothing to interpretation, and greatly reduces the likelihood that a decisionmaker will misinterpret your analysis, and, as a result, make a decision that is contrary to U.S. interests. As a member of the intelligence community, national security and policies will be affected by, and the lives of servicemen and -women and civilians may depend on, your analysis and your ability to communicate it to decisionmakers in a way that is nothing less than crystal clear.

Prepaid Stored Value Cards: Assessment

Responsible for conducting program manager due diligence, it is unclear whether either party—the bank or the program manager—is required to verify the identities of individual cardholders. The USA PATRIOT Act requires financial institutions to verify the identities of customers for whom they have opened accounts. Although the BSA definition of money services businesses (MSBs) includes issuers, sellers, and redeemers of stored value, these businesses—unlike other MSBs—are not required to register with Financial Crimes Enforcement Network (FinCEN), retain customer identification information or transaction records, or file Suspicious Activity Reports by MSBs (SAR-MSBs). The only MSB BSA requirement applicable to providers of stored value is an obligation to maintain anti-money laundering (AML) programs. Conversely, money transmitters—also included in the BSA definition of an MSB—are required to maintain AML programs; to verify, record, and retain customer identification information on all transactions greater than $3,000; and to file SAR-MSBs on all suspicious transactions in excess of $2,000.

Open system cards that offer global ATM access without a bank account function as remittance cards, allowing traffickers to move funds electronically in a manner that approximates money transfers. By allowing cross-border remittances without the services of a bank or money transmitter, traffickers (through the use of the cards) can send remittances that are exempt from BSA requirements, including reporting requirements and verification of the cardholder’s (and recipient’s) identity. The cards are the ideal instrument for large-scale drug trafficking and money laundering operations because some of these programs have no limit on the amount of cash that can be accessed outside the host country. Moreover, many cards that are marketed as remittance cards are specifically designed to transport funds to Mexico because of legitimate demand; however, Mexico is the destination for a significant amount of wholesale drug proceeds. Cards that are not marketed as remittance cards can function as such if the provider offers multiple cards per account. Further, transactions are sometimes conducted without the cardholder’s presentation of the card (by using the account number only). This situation enables cardholders in numerous locations to add or withdraw funds or make purchases.

Because prepaid stored value cards can be obtained without securing a traditional banking relationship, they often can be obtained and reloaded anonymously or without photo verification of cardholder identity. Cardholder anonymity is a marketed characteristic of some prepaid stored value products; while other cards require identity verification, several factors make it easy to falsify identification. Many cards that are purchased at agent locations, online, or by fax do not require photo identification; in these cases, identification is often accomplished by verifying that the cardholder’s reported name, address, and social security number correspond according to a credit reporting service. This situation enables cardholders to secure multiple anonymous accounts by using stolen identities. The anonymity associated with obtaining prepaid stored value cards is maintained throughout the process of adding value to the cards, which also can be done without face-to-face interaction or identification. Most brands of such cards allow cash to be loaded anonymously at ATMs and at program managers’ or agents’ locations, making it difficult to determine the origins of funds and the identity of the funding individual or entity. Cards can also be loaded with varying degrees of anonymity via mail.

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5. The USA PATRIOT Act defines “account” as “a formal banking or business relationship established to provide regular services.”
6. Issuers, sellers, and redeemers of stored value cards may file Suspicious Activity Reports by MSBs (SAR-MSBs) voluntarily.
Text Boxes, Charts, and Graphs:

Text boxes are commonly used in the body of an intelligence product to draw attention to important concepts or highlight anecdotal material. The textbox on page 2 of the referenced assessment is used to highlight important information that must be known for the reader to understand the remainder of the assessment.

Charts and graphs should be used in the body of an intelligence product to help simplify important concepts. For instance, statistical information that is readily understood when displayed in a graph is often difficult to grasp when presented as text. Lengthy or complicated charts, however, should be located in an appendix.

Context:

Use this section to provide the reader with the context of your analysis, but be careful not to confuse context with background. The Context section should give your reader a setting for your analysis by providing additional information about the set of circumstances or facts regarding the issue you’ve analyzed, while the background section should supply the reader with information that is essential to understanding the issue. Compare the referenced “Scope of the Industry” section to the “Background” section of this document; note that a reader who was unfamiliar with the concepts outlined in the Background section would not have the necessary knowledge required to make sense of the Context section. The Context section can be titled in any manner that is appropriate to its contents.
Outlook:
The Outlook, or conclusion, should neatly sum up the content of the paper. As such, the conclusion should never introduce new ideas. Although the Outlook section of the referenced assessment includes new information, it doesn’t include any new ideas. Rather, the Outlook expands upon ideas that have already been addressed in the Analysis section. It is the presentation of these ideas – not the ideas themselves – that is new. This section can be titled in any manner that is appropriate to its contents.

Editing:
Don’t resent the editing process – everyone needs an editor, because no one writes a good first draft. Editors are necessary to identify biases, point out weaknesses in writing (for example, concepts that were insufficiently explained but, as written, made perfect sense to you and your peers, who understand the issues too thoroughly to notice such inconsistencies), correct grammar, and so on. Every intelligence agency has lots of editors, ranging from other analysts in your section to supervisors in your chain of command to professional editors in the publications department. Although editing may seem painful at times, your product is improved at every stage of the process.

The point of this exercise is to help you improve your writing by familiarizing you with the BLUF model for intelligence products, not to attempt the impossible (that is, magically making you write products that are “just right” the first time). Remember that writing in any genre is a process – a process that includes editing (i.e., lots of well-informed and well-intentioned help) – and relax.
The title of your product is often your only opportunity to “market” your product to decisionmakers, so it must accurately and concisely represent your analysis.
Accuracy, Brevity, and Clarity in Title Construction:

Even good titles, such as *Looking Back: What Today’s Use of Covert Action Should Consider with Regard to Past Failures and Successes*, can be improved. Although this title accurately conveys the subject of the intelligence product to decisionmakers, it is not yet concise nor clear.

Clear intelligence writing is as direct and literal as possible, which prevents misinterpretation. If accepted literally, however, this title could be confusing: “today” is not using covert action.

Brief intelligence writing gets directly to the point without using “extra” words, thus increasing clarity. The wordiness of this title prevents it from being readily understood.

A revised title such as *Covert Action: The Lessons of Past Failures and Successes* accurately, briefly, and clearly represents the product’s content.

Prepaid Soured Value Cards Assessment

 Laundering (FATF), which has publicly stated the need to monitor the growth of and implement AML controls for this industry, however, FATF recommendations will have little effect on non-member countries and noncooperative countries or territories (NCCTs). Legislation of regulatory controls that would allow the U.S. government to prevent foreign cards from being used in the United States will be difficult. In order to limit illicit use of foreign-issued cards in the United States, cooperation from card branders will be necessary.

Card readers should be made available to law enforcement agencies throughout the United States, particularly those located at or near ports of entry (POEs), in order to determine the value of cards—seizures of funds on cards might be possible if it could be proven that the card was funded with the proceeds of a specified unlawful activity (SUAs). If law enforcement officers who encounter suspicious cards, i.e., one (or more) high-value card or numerous low-value cards that have no credible purpose, there may be a separate basis on which to seize the cards under 18 USC 1956, *Laundering of Monetary Instruments*, or 18 USC 1960, *Prohibition of Unlicensed Money Transferring Businesses*. Law enforcement officers may be able to assemble evidence regarding the cards—specifically, information regarding how much money is loaded on the cards; how the funds were generated; where the cards are being taken and for what purpose; and, if the cards are being carried by a courier, what that person is being paid and the number of previous trips he or she has made. During this process it is important that law enforcement officers avoid alerting the suspect to their suspicions regarding the source of the funds in order to ensure that the funds are not removed from the cards by the suspect or a coconspirator.

8. Specified Unlawful Activity (SUA) is defined under 18 USC 1956 (c) (7).
Bibliography and Citations:
Government publications rarely include detailed bibliographies or citations. When drafting an intelligence piece, however, the analyst should always keep records of information sources in the form of detailed citations and a bibliography. Although this often helps analysts keep large amounts of materials organized in the short term, it’s especially useful when managers or customers ask questions about data sources weeks, months, or years after a product was written. For projects which involve the analysis of a large amount of data, it is also helpful to keep an informal record of the methodology used to analyze the data.

For this class, your final project must include citations and a bibliography. Henley-Putnam University requires the use of Chicago style according to Kate Turabian’s *Manual for Writers*. Footnotes or endnotes will be the standard for source citations, not parenthetical references and reference lists.

**Sources**

**National**
- U.S. Department of Justice
  - Criminal Division
    - Asset Forfeiture and Money Laundering Section
  - Drug Enforcement Administration
  - Federal Bureau of Investigation
- U.S. Department of the Treasury
  - Financial Crimes Enforcement Network

**Open Sources**
- American Banker
- Financial Action Task Force
- Mercator Advisory Group
- Money Laundering Alert
- Rand Corporation