



**VNiVERSIDAD
D SALAMANCA**

PROGRAMA DE DOCTORADO EN CIENCIAS SOCIALES
(LÍNEA DE INVESTIGACIÓN EN TRADUCCIÓN Y MEDIACIÓN INTERCULTURAL)

**The Translation of Lexicalized Metaphors in Interlinguistic
and Intercultural Communication of Financial Security
Discourse: A Corpus-Based Analysis of English and Spanish
Texts about Money Laundering**

Tesis doctoral de

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TÍTULO: The Translation of Lexicalized Metaphors in Interlinguistic and Intercultural Communication of Financial Security Discourse: A Corpus-Based Analysis of English and Spanish Texts about Money Laundering

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ABSTRACT

Financial crime is a significant factor in most transnational crime in general and is wide-reaching. Many critical stakeholders use specific metaphors in their communications to communicate security threats. Metaphors are often idiomatic speech that does not transfer easily from one language to another because they originate from cultural concepts. Within the public safety, regulatory and compliance community, key stakeholders from different linguistic backgrounds use English as a contact language to interact with their counterparts, the media, the public, and stakeholders to ensure regulatory compliance. Translating metaphors requires a special set of skills acquired through deep cultural knowledge and experience in both source and target cultures.

The beginning of our research emanated from observing how language played a crucial role in relationships between everyone involved in the criminal justice process, not limited to the United States but also in a multitude of Spanish-speaking countries and geographical regions. Highly effective communication is critical for those who regulate against it, those involved in compliance initiatives, law enforcement, and the general public to better recognize and prevent money laundering. This project's genesis came from interpreting criminal cases, translating documents in United States federal court cases, and observing how investigators followed the money trail to uncover illegal activity. The first-hand view of communications in that realm revealed how language played a crucial role in relationships between everyone involved in the criminal justice process, not only in the United States but also in many Spanish-speaking countries and geographical regions.

Before this study, there has been little to no research on translating metaphors in the specialized regulatory financial compliance and enforcement language. The present study begins to fill that gap in research by providing a synchronic X-ray view of the current language spoken in that field through

a corpus-based translation analysis of anti-money laundering texts. We developed a bilingual English-to-Spanish unidirectional corpus which we uploaded to Sketch Engine for analysis. Finally, we analyze and discuss translation techniques from English to Spanish and terminological findings. We found instances of intensifying metaphors from the source to target texts and adding or inserting metaphorical expressions in the target text where none were present in the source. We also found an ideological presence in translated expressions, consistent with other investigations involving security discourse. Finally, we found terminological inconsistencies in the metaphors for *money laundering*, *tax haven*, and *shell company*. We suggest practical implications for translators and stakeholders in the anti-money laundering discipline. We also provide pedagogical applications from custom building corpora and teaching translation of metaphors in the specialized financial regulation and compliance language. Developing specialized corpora and learning to use corpus-based translation analysis software will help translation students be better prepared for and improve the future of translation studies and their applications in specialized areas and beyond. Providing students with experience using linguistic analysis software will also help build critical technology skills that they will be able to apply across disciplines in the humanities and beyond, such as intelligence analysis and computer science.

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

RESUMEN

La delincuencia financiera es un factor relevante en la mayoría de los delitos transnacionales en general y tiene un gran alcance. Muchas personas interesadas utilizan metáforas específicas en sus comunicaciones para transmitir las amenazas a la seguridad. Las metáforas suelen ser expresiones idiomáticas que no se transmiten fácilmente de una lengua a otro debido a que tienen su origen en conceptos culturales. En lo que respecta a la seguridad pública, la reglamentación y el cumplimiento de la normativa, los principales interesados de diferentes orígenes lingüísticos utilizan el inglés como lengua de contacto para interactuar con sus homólogos, los medios de comunicación, el público y las partes interesadas para asegurar el cumplimiento de la normativa. La traducción de metáforas requiere un conjunto especial de habilidades adquiridas a través de un profundo conocimiento cultural y experiencia, tanto en la cultura de origen como en la de destino.

El comienzo de nuestra investigación se debió a la observación de cómo el idioma desempeñaba un papel fundamental en las relaciones entre todos los implicados en el proceso de justicia penal, no solo en Estados Unidos, sino también en diversos países y regiones geográficas de habla hispana. Una comunicación altamente eficaz es esencial para que aquellos que regulan la lucha contra el blanqueo de capitales, quienes participan en iniciativas de cumplimiento de la normativa, las fuerzas y cuerpos de seguridad, así como el público en general, reconozcan y prevengan mejor el blanqueo de capitales. La génesis de este proyecto se remonta a la interpretación de causas penales, la traducción de documentos en casos de tribunales federales de Estados Unidos y la observación de cómo los investigadores seguían el rastro del dinero para descubrir actividades ilegales. La visión de primera mano de las comunicaciones en ese ámbito reveló cómo el idioma desempeñaba un papel

fundamental en las relaciones entre todos los involucrados en el proceso de justicia penal, no solo en Estados Unidos, sino también en muchos países y regiones geográficas de habla hispana.

Antes de este trabajo, apenas se había investigado la traducción de metáforas en el lenguaje especializado del cumplimiento y la aplicación de la normativa financiera. El presente estudio comienza a aclarar esa laguna en la investigación al ofrecer una radiografía sincrónica de la lengua que se habla actualmente en ese ámbito, a través de un análisis de la traducción de textos contra el blanqueo de capitales basado en un corpus. Desarrollamos un corpus unidireccional bilingüe inglés-español que hemos subido a Sketch Engine para su análisis. A continuación, se examinan y discuten las técnicas de traducción del inglés al español y los descubrimientos terminológicos. Encontramos casos en los que se intensifican las metáforas de los textos de origen a los de destino y se añaden o insertan expresiones metafóricas en el texto de destino en lugares en los que no se habían utilizado. Asimismo, observamos una presencia ideológica en las expresiones traducidas, de acuerdo con otras investigaciones sobre el discurso de la seguridad. Por último, nos encontramos con incongruencias terminológicas en las metáforas de blanqueo de capitales, paraíso fiscal y compañía de Shell. Nos sugerimos implicaciones prácticas para los traductores y las partes interesadas en la disciplina de la lucha contra el blanqueo de capitales. Asimismo, ofrecemos aplicaciones pedagógicas a través de la creación de corpus personalizados y la enseñanza de la traducción de metáforas en el lenguaje especializado de la regulación y el cumplimiento financiero. El desarrollo de corpus especializados y el aprendizaje de utilizar software de análisis de traducción basado en corpus ayudarán a los estudiantes de traducción a estar mejor preparados, así como también mejorarán el futuro de los estudios de traducción y sus aplicaciones en áreas especializadas y más allá. El brindar a los estudiantes experiencia en el uso de nuevos programas informáticos de análisis lingüístico también

contribuirá a desarrollar aptitudes tecnológicas críticas que podrán aplicar en otras disciplinas de las humanidades y más allá, como el análisis de inteligencia y la informática.

Palabras clave: Blanqueo de capitales, corpus textual, metáforas financieras, seguridad, traducción

CHAPTER 1 – INTRODUCTION

1.1. Motivation and objectives of the research

Within the public safety, regulatory and compliance community, key stakeholders from different linguistic backgrounds use English as a contact language to interact with their counterparts, the media, the public, and stakeholders to ensure regulatory compliance. Many use specific metaphors in their communications for what are regarded as security threats. Financial crime is a major factor in most transnational crime in general and is wide-reaching. Whether involving human trafficking, prostitution, drug war victims, and child labor worldwide, it is a global phenomenon (Craig). Financial crime amounts to “a trillion-dollar industry,” exacting a substantial social and economic cost on the people it affects (Craig). But money laundering is something many people “interact with every day without noticing” and is poorly understood or even recognized in many cases (Craig). Financial crime can occur in plain sight without people noticing, such as “people washing your car in a supermarket car park and keeping none of their wages” (Craig). It threatens the safety and integrity of financial systems worldwide and national security (Financial Crime | OCC). “Financial crimes affect everyone, and gaining insight into its true magnitude and devastating effects is of paramount importance” (Hope 301). In their recent book, *The War on Dirty Money*, Gilmour and Hicks (30) described current communication on the subject in this way: “the meaning of simple words causes serious, even grave, problems.” They rightfully quote translator Kimon Friar “Even the simplest word can never be rendered with its exact equivalent into another language”. Since Friar translates poetry full of emotion, subjectiveness, and nuance, one might think legal translation is more objective. However, lawyers worldwide argue over word meaning in their native languages (Gilmour and Hicks, 30).

Highly effective communication is critical for those who regulate against it, those involved in compliance initiatives, law enforcement, and the general public to better recognize and prevent money laundering. Having worked closely with this community's officers and agents and having been involved in many of the processes regarding communications, I find it fascinating to observe how they use and lexicalize metaphors in speech and correspondence, including translations and interpretations between English and Spanish throughout 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. Having worked with the United States Attorneys' Office for the same district and with agents from the Drug Enforcement Administration, I interpreted many proffer sessions involving investigating and prosecuting transnational criminal enterprises. I have translated documents from English to Spanish related to those efforts. I have observed how language is crucial in relationships between everyone involved in the criminal justice process. I became increasingly interested in how investigators followed the money trail to uncover illegal activity. Interpreting criminal cases and translating documents in United States federal court cases provided a first-hand view of communications involved in that realm. In the mid-2000s, I met John Cassara, a former CIA Officer, and Special Agent for the U.S. Department of the Treasury. He generously offered his time to help me understand the complex money laundering phenomenon. Completing a recent translation project involving English to Spanish translation of an anti-money laundering publication bolstered my interest in further research in this specialized area. Reflecting on those cases, I can attest to the sensitivity and salience of loss and gain in language use. Before this

study, there was little to no research on translating metaphors in the specialized regulatory financial compliance and enforcement language.

The present study begins to fill that gap in research by providing a synchronic x-ray view of current language spoken in that field. While some have addressed metaphor translation in accounting Fuertes-Olivera and Nielsen, Dai et al. Others have examined financial metaphors and translation; Charteris-Black and Ennis, Charteris-Black and Musolff, Guénette, to some extent, Joris et al., and Schaffner and Shuttleworth. Still others have addressed metaphor translation and the law such as Gražytė and Maskaliūnienė, López and Orts Llopis, Foljanty, Vegara Fabregat, Faiq, and Prieto Ramos. However, none of these researchers have looked at the translation of specific language of regulatory financial compliance and enforcement, nor did they specifically analyze translation directionality from English to Spanish.

In addition, I have witnessed, on several occasions, how communication has failed or turned out to be ineffective. So much communication in both English and Spanish is metaphorical. As Abdul Malik et al. eloquently put forth in summarizing 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). But in translation from language to language, such communications are sometimes altered either intentionally or unintentionally.

This study intends to expand the body of knowledge regarding the translation of metaphors and their emotional effects, as well as to learn not only what concepts move the reader but also how they affect communication. It also aims to explore, albeit briefly, existing research to understand the metaphorization of communication better. Finally, this research seeks to contribute to the current knowledge of using and translating metaphors in specialized languages. During intercultural

communication, metaphor translation often requires similar lexicalization and adaptation to the target language in order to provide for better understanding and practical application. Considering these challenges, we approached the research with several objectives and hypotheses that follow.

1.1.1. General objectives

The hypotheses for this project come within the field of translation studies and focus on the discourse within international law, policymaking, compliance monitoring, and enforcement, as well as in adjudication (Section 2.3.7.) within this community where there is a language used for specific purposes, often including the use of metaphors originating in English. This language is used by the people involved with this community to carry out the processes to communicate information regarding international financial crimes worldwide. Additionally, this specialized language will illustrate noticeable differences in the use of translated metaphors and patterns of “code-switching” with borrowing in addition to compensation in some instances where an equivalent concept may not exist. We will also discuss whether these differences may lead to less effective or unsuccessful communication. Additionally, we will analyze translation strategies, including adding and omitting, and the intensifying metaphors between the source and target texts.

1.1.2. Specific objectives

Today’s global community increasingly requires translators to have specialized knowledge and expertise and be familiar with various translation tools (Bowker and Pearson, Garcia Izquierdo 132). There is a demand for more research on specialized discourse, especially in areas where few prior studies have been conducted. The language of financial regulation, compliance, and adjudication is an area that has not been researched much. Our plan set out to conduct a synchronic, x-ray examination of the language spoken in regulatory finance and compliance to understand better

how that language is used and among whom. Since we began with metaphors as the part of the basis for inquiry, we planned to examine how metaphors were used and translated.

Objective 1: To establish a state of the issue regarding specialized languages, in general, and regulatory language, in particular.

Objective 2: To describe the genre of financial regulation, compliance, and adjudication in the specialized language of the field.

Objective 3: To analyze the linguistic variation in the use of metaphors in the field between the United States, Europe, and Latin American countries.

Objective 4: To compile a synchronic and chronological comparison corpus of Spanish and English metaphors representative of the regulatory finance phenomenon.

Objective 5: To develop a list of the most commonly used terminology in English and Spanish in glossary form.

Objective 6: To analyze the metaphors present in FinCorpAlin as they are used between the United States, Europe, and Latin American countries.

Objective 7: To determine the frequencies of lexical phrases in Spanish and English in FinCorpAlin.

Objective 8: To underscore the ideological role of the conceptual metaphor in the investigated field to apply it to the didactics of translation, including the application and discussion of different translation strategies.

Objective 9: To detect new metaphors and new terms used in the field of financial regulation and compliance and to classify specific metaphors detected in the regulatory and compliance corpus texts.

Objective 10: Briefly describe characteristics inherent to financial regulatory-compliance discourse, such as acronyms and abbreviations, phraseological units.

Achieving these objectives, we believe, will contribute to a better understanding of the language of the complex phenomenon of money laundering involving specialized discourse. Through corpus-based translation analysis we will begin the foundational work in classifying this particular genre of specialized discourse that has implications for improving intercultural and interlinguistic communication transnationally. To further refine our approach and analyze in greater depth we have developed twelve hypotheses derived from prior questions involving translation studies. The following hypotheses are presented in the following section.

1.1.3. Hypotheses

1. Because of the variety of metaphors used in the discourse analyzed, there is a possibility of **nuanced losses in the transfer** between English and Spanish in the translations explored.
2. The **lexicalization of metaphors** in discourse analysis presents a **risk of forming misconceptions** about the purpose of the original texts.
3. Metaphorical communication based on contextualization presents **problems of uniform understanding** intra and cross-culturally.
4. The formation of metaphors in the financial discourse is based on **images and concepts of U.S. origin**.

5. **Conceptual metaphors** used in economic, financial, and law enforcement security discourse are **based on cards, game, and sports concepts**.
6. Certain **expressions** are **metaphorized to elicit emotional reactions**.
7. In certain instances, the **translator chooses to look for and use a metaphor already lexicalized** in the target language to capture the meaning of the metaphor in the source text.
8. There is a **conceptual divergence between Spanish and English in terms of exceptionality** (in our case, money laundering and terrorist financing).
9. Translated conceptual metaphors **construct the perception of reality** by activating pre-existing knowledge that leads to **superficial interpretations of that reality**.
10. Concrete **metaphorical articulations** are **subjected to gaining or losing essential effects** in the reception of the target text.
11. If **metaphors** are part of the language, whose **development is based on culture**, then the **meanings differ from culture to culture**.
12. Since the U.S. was the first to deem money laundering as a crime, **U.S.-centric language influences Spanish translation**.

We believe the phenomenon of money laundering is complex and not widely understood in English, much less in other languages. The phenomenon is metaphorical, alluding to the need for it to be expressed in a way that resonates with people's everyday lives. Since conceptual meanings can differ based on the culture, we thought it would be interesting to explore where English and Spanish diverge or converge conceptually and determine if there was any loss in transfer from language to language. We know that expressing the same concepts using different terms can sometimes create gaps in understanding and confusion. We wanted to explore whether terminological inconsistency in this specialized genre was a factor. As with any communication there is always a risk of forming

misconceptions based on what the receptor reads or hears. We thought it appropriate to consider whether loss or change in transfer created opportunities for such misconception.

The corpus texts examined contain lexicalized metaphors. Since prior research indicates certain metaphors are frequently used, such as in economics and business, we wanted to determine if similar metaphors were present. Since the specialized text is security related, we also wanted to determine the degree to which ideology was present in the source and target texts. Additionally, we examined translational strategies for handling metaphors and estimated their potential effects on receptor understanding. Finally, we believe that since money laundering regulation was primarily born from policy and regulation of the United States origin, the language of the translations would be inherently influenced by the source language. Next, we present a summary of structure of the research.

1.1.4. Summary of the research structure

The present doctoral thesis is structured in **six chapters**, with **Chapter one** as an introduction. **Chapter two** elaborates on the theoretical framework of the most salient features of specialized languages and their related concepts. **Chapter two** presents a brief compilation of the literature surrounding the development of novel metaphors, the discourse of security, politics, and terrorism, and the translation of metaphors in economic and financial texts. **Chapter three** will present the methodology of the construction of the corpus and examine the terms and aim to define the specific phenomenon. **Chapter four** discusses and analyzes the results, discussion and analysis. We also attempt to partially replicate the methodological approach of Stender's "El lenguaje económico alemán y español de la prensa especializada: análisis basado en un corpus de la crisis económica

(CRISCORP)” (Stender), using Deignan et al. to analyze the translated metaphors from English to Spanish in FinCorpAlin.

Chapter five will discuss practical applications for stakeholders, agents, and actors in financial regulation and enforcement that work interculturally between and across English and Spanish-speaking cultures. We also discussed approaches and applications for practicing translators and students of translation. In **Chapter six**, we attempt to illustrate how this research advances the study of metaphorical translation in specialized language and the use and future application of constructing specialized corpora for corpus linguistics research. This dissertation will adhere to the Modern Language Association (MLA) style as it is the style traditionally used to write papers and cite sources in liberal arts and humanities.

1.2. Chapter summary

We began Chapter one with a discussion on our motivation for this project, followed by the broader, directional objectives of this research and eight specific objectives we set out to accomplish with this work. We then presented a summarized structure of the thesis by chapter. Next, we introduced the hypotheses we set out to test, followed by the directional objectives of the research in general in Section 1.1.2. We then presented the specific goals set out in this research project in Section 1.1.3. Finally, we provided an outline summary of the structure of this work in Section 1.2.

CHAPTER 2 – THEORETICAL FRAMEWORK

This chapter begins with a discussion of corpus-based translation studies or CBT and provides a brief overview of its evolution and relationship with corpus linguistic studies which we discuss in the following Section 2.2. In Section 2.2., we delve into the areas of corpus specialization, size and some of the useful language analysis features offered such as concordancing. In the next section we discuss corpus linguistics and its relationship with translation and intercultural mediation. We discuss bilingual corpora, directionality, and parallel and comparable corpora. We then discuss alignment of texts in automated and manual preparation for corpus creation followed by applications of corpus linguistics in research. We attempt to define regulatory financial discourse in Section 2.3.6., and then discuss translation of security discourse. In this chapter we also examine the origin of metaphors and offer several definitions from the literature, we then discuss the influence of metaphor on law and compliance enforcement agencies. We briefly explore cognitive linguistics and metaphor creation and the use of metaphors in economics and finance and their translation in that field. We conclude the chapter with a discussion of money laundering and potential translation opportunities and solutions.

2.1. Corpus Based Translation Studies.

Since the 1990s the study of corpora has become completely integrated in translation studies and has influenced the way translation is taught and studied (Lavisoa 1). Some of the first corpora of translated texts were “conceived within the discipline of contrastive linguistics” (ibid.). Baker and Saldanha noted that apart from universal characteristics and norms of translation behavior, access to computerized corpora (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). Additional definitions are “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).

2.2. Corpus Linguistics as a Research Method

Since the late 19th century, studies of corpus linguistics began with the compilation of frequency lists by linguists in the field to study language acquisition (Allan 12). For example, the research on letter sequences in German done by Käding in 1897 was one of the first (Allan 3) and involved 11 million words. According to Allan, some of the earliest studies of electronic corpus linguistics began in the late 1950s and 1960s (866). In 1951 a Jesuit priest, Roberto Basa used punch card machine technology to produce the first machine-generated concordance to analyze poetry by Thomas Aquinas (*ibid.*). Not everyone was in favor of corpus linguistics during this era. For example, Noam Chomsky made a vigorous opposition known by asserting that data do not reflect whether a person is competent (Allan 867), arguing that performance “cannot tell us about a person’s competence because the number of sentences in a language is infinite” (*ibid.*).

Chomsky pointed out that internal, not external, language should be the central focus that language theory should explain (Allan 867). Chomsky reasons that no corpus can encompass the representation of a language in a complete way and that a corpus analysis does not require the corpus to contain the entire language under investigation to be meaningful but rather a representative sample of the language (Allan 868). Thus, our corpus is not intended to cover an entire language but a significant segment of the represented community. The segment is based on the community

participating in reducing or eliminating criminal activity. Law enforcement agents and participants in countering the financing of terrorist activities and financial crime. Although corpus linguistic research is relatively new, it has grown significantly with accessibility and technological advances, especially electronic databases; since the 1980s, corpus data has evolved into playing a critical role in research (Allan 5-6).

2.2.1. Corpus specialization

There is an increasing need for specialized corpus development. As Bowker and Pearson (17) affirms, “Specialized target language (TL) corpora constitute an extremely valuable resource for translators.” Specialized corpora provide important data for translators. For example, when translation decisions must be made regarding word order, synonyms, or orthographic variants, translators can refer to specialized target language corpora to help make those decisions (ibid.). Specialized corpora also provide a valuable source of terminology representative of the genre or recognized authority in a given field.

In some instances, governmental institutions [sic and other recognized authorities] are considered the source of authority on the terminology used in specialized domains (Rigaud Peixoto 1). As Rigaud Peixoto points out, it is mostly “those institutions with regulatory roles in a given country” (ibid.).

Analyzing specific terminology according to its domain is critical in characterizing specialized discourse (Prieto Ramos and Cerutti 45). Prieto Ramos and Cerutti recently (2023) provided an example of specialized corpus development with a multi-genre LETRINT. Their specialized corpus on institutional, legal translation provides needed analysis of phraseology and terminology of multiple legal genres “representative of three legal functions” (ibid.). Prieto Ramos emphasizes the

soundness of methodology, not merely corpus size, as critical to specialized corpora being fit for their research aims (“The use of corpora” 8).

2.2.2. Corpus size

A balance between large and small corpora is sometimes ideal. As Patton has pointed out, “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” (Patton 58-59).

Although some researchers, such as Patricia Rodríguez-Inés (2015), believe that a large corpus is needed to solve certain translation issues. Rodríguez-Inés (ibid.) notes that a corpus today should have the following characteristics: It is representative of the language or its variety, has defined design criteria, is typically finite, and is in an electronic format (17). The corpus of this research meets all these criteria.

While translation studies have historically used smaller corpora, new technology has opened up potential for larger scale exploration. Skorcznska and Deignan (2006) advocate that smaller corpora allow for a deeper examination of metaphors. We believe combining larger comparable corpora (which we will elaborate on in Section 2.3.) and samples from a smaller corpus of translations would give us a better range of data to analyze.

On the other hand, as Herteg asserts (“Business English Metaphors” 291), larger corpora allow for quantitative examination electronically and thus are more valuable to metaphor research. Other advantages of examining conceptual metaphors with corpora are access to available data, analyzing language use in context, and looking for linguistic patterns on a large scale (Herteg “Business English Metaphors” 293).

As Reppen (31) points out, the question of corpus size is challenging to resolve. It is not always about a specific number of terms. However, if creating dictionaries, for example, the number of terms should be as large as tens or hundreds of millions of words. Still, if it is a question of historical texts of a specified era or author, a smaller representative corpus of the language of the subject research is sufficient for representativeness (O'Keeffe and McCarthy 32).

In general, the question of corpus size is resolved in two ways: first, if the sample is representative of the language under investigation, and second, if it is practical in terms of time constraints (O'Keeffe and McCarthy 32). Most corpora fail to be wholly representative but capture enough of a language to achieve adequate representation (*ibid.*). The size or number of terms is relative to the object of the research, of the corpus design, and whether it is accurately representative (*ibid.*). Between 1960 and 1991, the prevailing belief was that the larger the corpus, the more valuable it was, but by the early 1990s, a movement began to recognize as well as advocate for the utility of smaller corpora (O'Keeffe and McCarthy 55). It was thus asserted that a small corpus could provide a representative and balanced view of the specific language subject under investigation (*ibid.*).

2.2.3. Concordancing

This research will use methods borrowed from corpus linguistics, such as applied concordances, to establish equivalences. This research will use methods borrowed from corpus linguistics, such as applied concordances, to establish equivalences. Corpus linguistic research is increasingly becoming an important method of language inquiry; Laviosa, Sardinha, Sánchez Ramos and Vigier Moreno, López-Rodríguez and Tercedor-Sánchez, Herteg et al., Álvarez García, Abdul Malik et al., and Mikhailov. Corpus linguistics (CL) provides an empirical approach to studying language that is in

actual use. CL uses computer technology, allowing for the manipulation of data not possible with printed data and in very large volumes.

Concordancing allows researchers to look more closely at specific cultural references are expressed and how terms are translated. Another feature of CL is that it allows researchers to create word lists from specialized languages. Particularly relevant to translation studies, bilingual concordancers are used on aligned parallel corpora, as we have done in this research, and also discuss CL further in sections 4.4.-4.5. and 6.2. Wordlists allow for the production of word clusters that are measured and ranked by frequency and alphabetic lists that assist the researcher in better understanding language use (Bowker and Pearson 117). Other features of CL include automated vocabulary and glossary lists and to identify equivalents (Bowker 138).

2.3. Corpus Linguistics in Translation and Intercultural Mediation

The present research is framed, in part, based on cognitive linguistics to deepen the knowledge 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 apply analytical tools and contextualize language use. Another objective is to understand better social perceptions through translations from 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 consideration given to Kövecses (“An extended view” 116) recently proposed Extended Conceptual Metaphor Theory (ECMT), in accordance with the idea that metaphors shape our conception of the world are used and understood contextually.

Humans rely on experiences and memories sustained by an association of related ideas to understand complex and abstract concepts. Lakoff and Johnson (“Metaphors”) assert that “the essence of metaphor is to understand and experience one kind of thing in terms of another” (5). Kövecses (“An extended view”) elucidates Extended Conceptual Metaphor Theory in three distinct ways building 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 proposes a more refined definition of conceptual metaphor: “a conceptual metaphor is a systematic set of correspondences between two domains of experience” (“An extended view” 2). Kövecses posits that two domains are insufficient, and four must be considered using correspondences instead of mapping from source to target domains (ibid.). He suggests the four domains of distinction to include “mental space level metaphors” that range on a schema from most to least specific” (123). He further asserts that cognitive metaphor theory can include the concept 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 then remembered (i.e., “overturned boats”) “functions 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 close connection between grammar and metaphorical conceptual structure, whereby a cross-fertilization occurs between grammar and metaphor (196).

2. Multilevel view of metaphor.

The need for a multilevel view of the conceptual metaphor was proposed by Kövecses (“Introduction”) in a four-level view or schema whereby the conceptual metaphor is composed of a hierarchy of; “an image schema, domain, frame, and mental space level” (197).

3. Importance of recognizing context to explain the use of metaphors.

Criticism of conceptual metaphors has primarily centered around the theory being centered on methodology to identify linguistic metaphors and that scholars identify conceptual metaphors based on intuition (Zhang 1489). Other criticisms include the emphasis on concepts over words, the direction of analysis such as top-down as opposed to bottom-up, metaphoric relationship to culture, i.e., focus on “universal bodily experience” as opposed to the interaction of body and context (ibid). Extended conceptual metaphor theory posits that metaphors are influenced by an array of contextual factors, which can be grouped into four contextual categories: situational, discourse, conceptual-cognitive, and bodily (199).

We believe metaphors are “essential for creating similarities to support our cognitive system.” They form these expressions by two elements, source and target domains, and transferred or projected from one to the other, using a component in origin to describe or represent the target domain” (Samaniego Fernández “Diseño y aplicación” 9 [Author’s own translation]).

Nonetheless, we must consider the role of ideology and cultural values in metaphor translation from one culture, which likely plays an essential role in cultural mediation. As Tymoczko points out, conceptualizations of translation are often associated with translators as being “‘between’ in the transfer process”. This seems to imply the neutrality of the translator above history and ideology, which may contribute to a sort of “amnesia” (Tymoczko 7) regarding the ideology and values of

dominant power inherent in cultures. We believe the nature of discourse analyzed for this research will reveal a certain degree of the dominant culture's ideology.

To consider the cognitive role of metaphor, Charteris-Black and Musolff used Lakoff and Johnson's ("Metaphors") idea of conceptual metaphor as one that describes "how two words or expressions from apparently different domains may be associated at an underlying cognitive level" (250). Their study aimed to establish the degree to which the English and Spanish of a particular domain is represented by "overlapping cognitive systems" (253). They predicted a positive transfer of concepts from English to Spanish, where those systems were seen as overlapping. In our research, we found what we believe is a positive transfer. However, we also found that while cognitive systems seemed to coincide mostly, not all concepts were transferable.

We believe that that the cognitive approach to metaphor analysis can help to identify different conceptual system levels in English and Spanish metaphorical references. We feel that, in many instances, generic metaphorical references are translated using a formal equivalence method. We are curious to determine if specialized metaphors are paraphrased or omitted, retained, replaced, modified, intensified, and sometimes added where no source text metaphor previously exists.

We will analyze each metaphor's function, significance, and role in communicating values or concepts. Using the principles of the cognitive approach to identify metaphorical domains and to determine which conceptual domain is in effect in both source and target texts is similar to a recent study by Shehab et al. (121). In contrast to the traditional view of metaphor as limited to being a rhetorical device or figure of speech, cognitive theory views metaphorical language as it relates to conceptual systems of specific situations and instances of communication (ibid.). We apply a cognitive approach similar to Shehab's study of metaphor use in business. In financial regulation and

compliance language use, agents, functionaries, and officials use metaphors to describe relationships between the *vehicle*, or *image*, and the *tenor*, or *subject* of the metaphor.

As Kövecses (“Standard and extended conceptual metaphor” 192) pointed out, metaphor “mappings are systematic conceptual correspondences between the source [text] target [texts]” (ibid.). Shehab et al. (121) point out that “conceptual elements of B correspond to conceptual elements of A.” As such, B represents the source text, and A, the target. As such, we find in the mapping of domains elements of the source domain mapped to elements of the target domain by way of correspondences between both (122). Such mapping is considered a critical process in cognitive metaphor theory. The order of target and source conceptual metaphors are reversed to yield a cognitive approach to metaphor translation (ibid.).

According to Kövecses, “we adopt this convention to emphasize the point that understanding typically goes from the more concrete to the more abstract concept” (“Metaphor: A practical introduction” 7). For instance, Kövecses illustrates the mapping process using the conceptual metaphor which refers to social organizations as plants. They have branches, grow, and sometimes require pruning; after which they flourish and blossom (7). Kövecses specifically references the “black market as flourishing” (ibid.), a metaphor that also surfaced in our research.

2.3.1. Bilingual Corpora

For the bilingual corpus, we compiled texts representing the field of regulatory finance and security discourse of the current communication in the field. We compiled source texts and their 1:1 translation, created a bilingual corpus, and extracted metaphors in both languages. The corpus texts come directly from regulatory bodies, including cooperating international organizations developed to prevent financial crime. The language of the research phenomenon is contemporary, primarily based

on the last 30-50 years. We intended to x-ray the current communication by sampling Internet sites and reports within a 10–15-year period. The documents comprising our corpus comprise discourse from economic, financial, business, regulatory and law and order perspectives. Economic-financial discourse produced by government actors, law enforcement agents, etc., directed at officials and other interested parties through reports, Internet (Web) sites, and related regulatory media serving specific ideological interests.

2.3.2. Directionality of corpora

As Laviosa affirms, the bilingual parallel corpus can be unidirectional or bidirectional. The unidirectional corpus consists of two sub corpora that are original texts in “language A,” and the other subcorpus is comprised of translations of those texts in “language B” (84). She points out that the “unidirectional specialized parallel corpus is used to discover norms of translational behavior at different levels of linguistic analysis...[and] to retrieve and examine terminological, phraseological, syntactic, and stylistic equivalents” (ibid.). We used the unidirectional parallel corpus in our research for all these reasons.

As previously stated, our corpus is a parallel, unidirectional bilingual corpus with EN-ES directionality. It was then processed and stored in Sketch Engine under FinCorp, composed of two monolingual corpora in English and Spanish. The two languages were aligned using Wordfast Aligner by segments and paragraphs to observe the translations better. Sketch Engine allowed for processing the large samples of both languages to identify what is typical and frequent and what might be considered rare or unusual language behavior.

2.3.3. Parallel and Comparable Corpora

A comparable corpus is a compilation of non-translated texts that are similar or of the same genre. Comparable corpora can be compiled in each language being examined to compare language use. Specialized comparable corpora are compilations of original texts collected based on similar criteria such as subject matter, topic, etcetera (Laviosa 84). Comparable corpora represent “units of language that are comparable denotationally, connotationally, and pragmatically” (ibid.). Conversely, parallel corpora can be either bilingual or multilingual and are composed of texts produced in each language. Bilingual parallel corpora can be either unidirectional or bidirectional (ibid.). Unlike comparable, unidirectional parallel corpora are composed of two subcorpora, one of the original texts, and the other of their translations in the target language (ibid.). Bidirectional parallel corpora consist of four subcorpora and their respective translations in both directions (ibid.). Parallel corpora are used to study different “linguistic patterns in translations and their source texts” (ibid.).

2.3.4. Alignment

Once identified and decided which documents we would use to create the corpus, we downloaded the documents from the corresponding websites, catalogued them in a portable document or pdf format on a memory drive, and then converted them first to the *GlobalLink Package* format, then to Microsoft Excel to be uploaded to the Sketch Engine using the Manage Corpus section to take advantage of the automated analysis. To analyze the translations of each segment one by one, the source text documents and those translated into target text were uploaded to Wordfast Aligner, a translation memory alignment program developed by the company *Wordfast LLC* (Wordfast 2021).

Wordfast is a computer-assisted translation tool invented by Yves Champollion in 1999 (Wordfast). The online platform offers several tools for alignment, including *Wordfast Text Aligner*,

Wordfast AutoAligner, and *PlusTools* (Wordfast). We used *Wordfast AutoAligner* for this research because of its functionality in processing large amounts of text. *Wordfast* aligner works by matching the source documents with segments of the target document for alignment. One step in preparing the texts for alignment was to convert them into a *GlobalLink Package* that facilitates the processing of the documents by storing them together in a single file (Wordfast). As previously mentioned, after completing processing with the automatic alignment tool, our team manually post-edited the documents for errors to ensure proper alignment of each paragraph in English to Spanish. After the final revision, we uploaded the documents to Sketch Engine. Next, we used Sketch Engine's automatic grammatical analysis and tagging to extract the sample data.

2.3.5. Applications of Corpus Linguistics Research in Translation Studies and Intercultural Mediation

Corpus linguistics is considered a crucial tool for modern translators (Laviosa, Kübler et al., Baker (“Corpus Linguistics”), Baker and Saldanha. Baker (“Corpus Linguistics” 11) points out that large corpora will provide unique opportunities to observe language, allowing for exploration that previously had not been possible, including translation behavior. Baker acknowledges that translation studies have reached a point where the discipline needs the “techniques and methodology of corpus linguistics” to move forward (“Corpus Linguistics” 22). The pace of evolution in global communication and specialized languages will continue to grow rapidly. As such, the need for acquiring new knowledge of discourse conventions, coinage of new terminology, and other changes in speech (ibid.). Kübler et al. (807) affirm “the tools brought by corpus linguistics offer access to language-in-the-making” and specialized and emerging fields. Corpus linguistics provides new potential for specialized translation training through the analysis of “language use and production” as well as for training students of translation (809). Baker and Saldanha (22) assert that corpus

linguistics helps answer long-standing questions regarding the size and nature of translation units, “the type of equivalence which is achieved in practice and the level at which it is achieved.” As technologies evolve, greater opportunities will emerge for studying specialized translation as well as specialized language use. Better understanding of rapidly changing language use will require focused corpus linguistic research. Maci and Sala (145) affirm, intercultural understanding relies on “proactive and in-depth analysis of the ways in which language is used, and emotion [...] particularly in terms of its relevance in multi and interlingual communication”.

2.3.6. Defining regulatory financial discourse

We should begin by stating that finance has often been viewed as a discourse of abstraction and complexity in academics, the popular financial press, and the financial services industry (La Berge 94-95). We will attempt to clarify what we are referring to as financial regulation.

Let us start by defining financial regulation. Financial regulation is the development and control of financial markets, as Lopes Seabra (473) asserts, “through typical state procedures such as formal written rules, bureaucracy, and institutional creation.” Financial regulation is also closely associated with legal and accounting discourse (Walters-York; Llewellyn and Milne).

We should begin by attempting to define policy discourse in general. Evans (in Sharman 637) described it as “a swamp of impenetrable jargon that purports to be about language and symbols.” Barnett and Duvall (55) assert, “productive power concerns discourse, the social processes and the systems of knowledge through which meaning is produced, fixed, lived, experienced, and transformed.” While we do not view the specialized discourse in this research as impenetrable, we acknowledge the field's jargon.

We adopt the notion of regulatory discourse put forth by Sharman, where “the policy community is discursively constituted both by the content of its outputs (handbooks, peer evaluations, etc.) and the mode of its interaction (working groups, plenary meetings, etc.)” (647). The power of regulatory discourse resides in “conferring or withholding sought-after social acceptance rather than material goods, which stems from its control over a body of technical knowledge and language” (ibid.). This power applies to what Sharman calls the arcana of Anti-Money Laundering policy discourse (647). Arcana is a term referring to mysteriousness or unknown qualities (*Oxford English Dictionary*). He further opines, “this is very close to Barnett and Duvall’s ‘productive power’: ‘the socially diffuse production of subjectivity in systems of meaning and knowledge’ (in Sharman 647).

Financial communication in today’s world represents a critical type of business discourse, also referred to as the “periodic reporting and publication of economic data related to a company’s performance to inform interested parties” (Crawford Camiciottoli 13). Most financial reports are characterized as accounting discourse because they include financial performance data. Financial discourse also includes public relations communications. Public relations communication often relates to implementing policies and “internationally recognized accounting principles” (Crawford Camiciottoli 11). While public relations communication tends to be more generalized, financial reports are often specialized jargon.

El-Haj et al. point out financial discourse complexity recognizing it as “jargon-heavy and context-specific” (268). For instance, “the Fog index for the average 10-k annual report exceeds 19.0, implying the disclosure is unreadable according to standard interpretations of the measure” (ibid.). The fog index or the Gunning Fog Index is a test to determine readability, that is the level of difficulty a text is to read. It includes average sentence length, percentage of lengthy words in the text, and provides a sum of the average of both long words and sentence length (Trinidad). It should be noted

that financial market regulators “routinely raise concerns about complex disclosures,” stressing the need to simplify and understand language according to the Financial Reporting Council of the Securities and Exchange Commission (El-Haj et al. 268).

Accounting discourse is oriented around three principal agendas, according to Llewellyn and Milne 807):

1) professionalized instruction discourse including practice codes for; 2) codified accounting texts that result from instructional codes; and 3) professional, organizational or societal discourses that elaborate, make claims for or seek to change these practice codes.

Both accounting and finance discourse then can be distinguished by their codification. An example of professionalized instruction discourse would be “rules that underlie the construction of a profit and loss account or the codified procedures that underpin an audit” (ibid.). As for codified accounting resulting from instructional codes, an example would be “a balance sheet or a financial audit” (ibid.). Professional or societal discourses “elaborate, make claims for or seek to change [...] ‘accruals,’ ‘standard setting,’ and ‘creative accounting’ discourses” (Llewellyn and Milne 807). Llewellyn and Milne warn codification is sometimes a flawed solution because companies can move beyond the boundaries of legal practice without that movement “being readily apparent in the accounts as scandals of [companies like] Enron, Worldcom and Parmalat demonstrate” (814).

Since accounting is codified, the lay public may inaccurately believe that accounting texts represent non-negotiable reality and “one-to-one mapping, but this is not the case” (ibid.). Llewellyn and Milne remind us, “accounting can be manipulated, in large part, due to the complexity of practice codes” (ibid.). In linguistics, codification is a process whereby a model for standard language usage is selected and developed (Ayres-Bennett). As Llewellyn and Milne (814) point out, “accounting discourse (as other codified discourses) should have a stringent holdover practice; when new codes

are introduced, practice should change more or less immediately.” We also discuss financial and accounting discourse in 2.7. In that chapter, Bastidas Canelones (62) discusses the specialized financial accounting and taxation languages as creating tension.

2.3.7. Translating the discourse of security and politics

State criminal policy is responsible for the security communications that society generally deals with from social problems such as financial crime. These communications are involved in shaping perceptions of risk. According to Calzado and Lobo , conflict is transmitted, just as the experience of fear is narrated through specific categorizations projecting a particular perception that becomes a collective perception. The way of thinking and narrating about a subject developed from experience is an element of power relations (ibid.). It means that we define truth through expressions. The perceived truth turns out to be “a flexible army of metaphors [...] illusions that have been forgotten to be [truth] as such” (Calzado and Lobo 7). According to Calzado and Lobo (7), when “the image of the notion dissolves, its initial metaphor is omitted, [...] and it becomes an illusion of truth”. In the face of regulatory abstractions, foundational ideas are put forth that explain the world that can turn out to be fictitious truths (ibid.). Brooks points out the problems of security discourse in *How Everything Became War, and The Military Became Everything: Tales from the Pentagon* (2016). For example, phrases such as “The global war on terror” were favored during particular administrations in the U.S. White House (ibid.). Brooks quotes the philosopher Ludwig Wittgenstein for his famous optical illusion of the duck and the rabbit to show the theory of language games (Brooks “Ducks-Rabbits”). For Wittgenstein, one cannot imagine that words are simply representations of a fixed external reality, but language is inseparable from its context (ibid.).

Furthermore, MacDonald et al., in their book, *The discourse of security* (2019), conducted critical discourse analysis (CDA) research by collecting over 100 security-related documents from U.K. government websites. They demonstrate the role of security discourse and its role in both society and politics (292). Moreover, their analysis sheds light on how concept formation develops and has been accepted as beliefs and practices (ibid.). MacDonald et al. point out that the discourse analysis of other research on nuclear strategy during the Cold War has been examined from a cognitive standpoint. That research focuses on using metaphor in critical documents during the 1986-1996 era, in addition to a dialogic stance that examines the flow of discourse between relevant parties at that time (58). They establish essential metaphors in forming postwar politics that emerged in that era (ibid.). To exemplify, *container* (to denote U.S. policy) and *force* (to represent *pressure* exerted by the USSR on the U.S.) as well as *path* (to indicate activities of the then USSR) (59). The use of metaphor is highlighted in the discourse dealing with the cold war and then again emerges after the 9/11 attacks when metaphors as well as metonymies were routinely applied to frame the nature of the events and, to pit the “west” against the other, the “terrorists” and “American people” against the “Iraqi people” (MacDonald et al. 70). The “war on terror”, itself a metaphor and during the following years the discourse was highlighted by a use of conceptual metaphors of war and crime were routinely deployed during the administration of President George Bush (70). Also notable is the use of metaphor in public debate on the eve of the invasion of Iraq by the United States when metaphors were used in British, French, and American news, metaphors in the form of “war as a game” and “schedule” and “program” of war, as well as “selling the plan” and “advocating” war (71). In the run-up and aftermath of the Second Gulf War the most important application of the metaphor was evidenced since World War II (77).

In MacDonald et al.'s research, two linguistic phenomena revealed the occurrence of clauses containing grammatical agents linked to the same verbs and the recurrent use of particular metaphors at an almost predictable level (MacDonald et al. 125). For example, they found the term *architecture* to express the purposeful reorganization and construction of a new structure for exchanging intelligence (277). They also used the expression *fusion centers* to establish meeting places between agencies (ibid.). Using language through metaphor represents a strategy to develop alliances, support, and collaboration between and within allied countries. From this perspective, the transmission of ideas requires translation and interpretation. Thus, translation and interpretation play an essential role in this discourse.

The evolution of translation has presented the opportunity to apply analytical approaches beyond traditional theories. As stated by Toury ("The nature and role of norms"), "being a translator cannot be reduced to the mere generation of utterances" (53). In addition to analyzing translation patterns, a sociocultural analysis and political influences within the cultural context must be incorporated. In contrast to the normative theory that examines regular patterns of abstract selections in translations, a focus on narrative within and outside the text draws attention to the motives for particular selections to look beyond the text to the political and social context of the interaction (Kim and Zhu154).

As Baker asserts, the narrative we craft through translation can be linguistically accurate but still mislead and disorient (151). For example, particular titles are applied to translations to formulate narratives as threatening or extremist (168). For instance, a pro-Israel advocacy group by the name of Middle East Media Research Institute (MEMRI) produced translations such as "Koran Commentary for Children Published in Egypt Features Incitement to Fight Christians and Jews" and "Egyptian Government Preacher Incites Children to Martyrdom" (168). Baker cites other examples

of news headlines reformulated using a narrative embellished with persuasive language. As Baker highlights, public depictions of terrorism and security, formulated by a range of institutions assumed to be nonpartisan, are pervasive in our lives. These institutions are vested in painting some communities as extremist or terrorist and succeed through carefully chosen translations. Such elaborations of narratives distinct from the original texts escalate tensions and fuel political agendas. The narrative theory allows us to understand the whole program of translation and the specific selections at the text level (170).

Law enforcement in the United States has used and abused language to achieve its goals (Shuy). In his book *Creating Language Crimes: How Law Enforcement Uses (and misuses) Language* (2005), Shuy elaborates on 11 conversational strategies and how they demonstrate power through his analysis of 12 cases in which crimes were invented through the conversational strategies applied by agents and their representatives (12). Lawyers use their particular metaphors carefully and then reframe the opposite side's metaphors to suit their objectives (Shuy 38). For example, in a widely known case, *People v. O.J. Simpson*, the defense and the prosecution used metaphors to persuade. The metaphor as a figure of speech of a bomb was applied by the prosecution in its description of the defendant as a "ticking time bomb" ready to explode, the trial as a "jigsaw puzzle," and the defense took advantage of this to reframe it in its own way (Cotterill 199-213).

Professions see things through a viewpoint specific to their profession. According to Goodwin (1996), law enforcement agents have their own vision as professionals that provides a way of understanding and organizing events (ibid.). The three criteria required of a profession to form a vision are 1) coding process, which transforms phenomena into objects of knowledge that inspire discourse; 2) highlighting, which emphasizes certain phenomena; 3) producing and articulating a

material representation, i.e., the vision of the profession makes us see things through its own optics (Goodwin 606).

Discourses possess a particular productivity: they produce knowledge about a phenomenon, a specific language to talk about it, and behaviors about it and the world (Martini). As Milliken (1999) asserts, discourses constitute a “regime of truth” that rules out other ways of interpreting that phenomenon (229).

The discourse in financial crime prevention and compliance has been influenced by the discourse of security, which includes influence from economics, finance, the law, and politics. The framework of the law has been interpreted based on metaphors that seem to present some ambiguity. As Milliken points out, the regime of truth has been shaped by influence and metaphors originating in U.S. law enforcement and has spread throughout the Spanish-speaking world.

Cambridge Professor Jason Sharman has conducted extensive research on global regulation of money laundering, pointing out in 2008, just twenty years prior, no country had a policy against money laundering; by 2008, over one hundred and seventy countries had some type of anti-money laundering policy in place (635). In his 2008 analysis of Anti-money laundering (AML) policy diffusion, Sharman discusses how the rapid adoption of AML policy is driven by “discursive, power-based mechanisms” (635). Sharman argues discourse is essential to power as it produces both intended and unintended effects (*ibid.*). For example, we need only look to the discursive practice of “being excommunicated during the Middle Ages,” which is an exercise of power (635).

Indirectly, discourse represents power by providing certain actors with privileges and entitlements enjoyed by only a few (Sharman 637). Further, the actors involved with policy,

governments, and others highly value words, symbols, and representations (ibid.). Actors in the financial sector often use the expression “the perception is the reality” (ibid.).

The discourse of financial regulation and compliance is policy and power-based. Four main discursive mechanisms exist for spreading and implementing policy, including regulation and compliance. Sharman states they are “learning or lesson-drawing, coercion, mimicry or emulation, and competition effects” (635). Sharman argues that instead of learning, the mechanism most used to increase policy implementation has been “coercion in the form of blacklisting, mimicry in line with changing conceptions of social acceptance [...] of regulators” (635). The mechanism of competition effects can be seen from subjective risk ratings (ibid.).

First, the process of coercion through blacklisting by the Financial Action Task Force was “a deliberate and calculated use of power [...] to impose AML policies.” (Sharman 636). The following mechanism employed was mimicry. Transnational networks defined laws as the standard modern states should adopt, implying new social expectations to uphold (ibid.). The effects of competition came about as firms developed subjective alternatives for AML risk. Material penalties resulted from failing to adopt the “symbolically important AML policies” (636).

The preceding discussion highlights how discourse is critical in the specialized field of financial regulatory compliance. Words carry “weight” and convey power which is evident from Sharman’s (2008) discussion on anti-money laundering policy diffusion. Although Sharman does not consider the translation variable in the diffusion of policy throughout the Spanish-speaking countries, he highlights methods by which a largely coercive and asymmetrical discourse was applied. For example, blacklisting, and “manipulating incentives for private actors” (180). Additionally, Powerful states attempt to enforce global standards relating to a wider range of economic activities (180). While

the diffusion of AML policy was indeed rapid, he views many AML policies as largely ineffective (636, 643). For example, countries attempting to legitimate themselves on an international level sometimes adopt ineffective policies when such policy measures are expedient and low cost (643).

To demonstrate the impact of metaphors in the socio-political realm of law enforcement, one need only turn to a criminal case in the United States and its subsequent investigation. In the city of Buffalo, New York, in the early 1990s, for example, there was a case of a serial rapist where, over 15 months, police withheld information about the suspect rather than disclose it to the public based on fear of compromising traps set for the wrongdoer (Thibodeau et al.). It turned out that 11 girls were raped, and it was revealed that eight rapes could have been prevented if the police had not withheld information about the rapist (ibid.). The women raped turned out not only to be victims of the rapist but also of metaphor, asserts George Kelling, Rutgers University professor in criminal justice studies (ibid.). Kelling points out that the police were so entrenched in hunting the criminal that they neglected their obligation to inoculate the community against further harm (1).

Metaphors can determine social policy and thus influence how we consider issues such as crime, war, and economics. A change in metaphor can alter concepts, leading to changes in social policy, especially regarding crime (Thibodeau et al. 2009). The investigators conducted empirical research to determine whether metaphors influence people's reasoning about social issues such as crime. In their study, they focused on how metaphorical references to crime lead to reasoning and ways of coping with crime. Two different metaphors were applied to the controlled experiment to identify crime: first, a predator, and second, a virus. They used a population of students, and the results showed that the metaphors used influenced the participants' concepts of crime and their approach. Participants in the group who conceptualized crime as a virus showed a preference for

community social reform by the infected. Conversely, participants who viewed crime as a predator preferred hiring more police officers and building more prisons (Thibodeau et al. 2009).

In recent research, Thibodeau et al. (2017) revealed that metaphor encompasses and conveys a range of beliefs and attitudes (1375). In their examination, they conducted an experiment using metaphors to describe how police work is carried out. A sample population of students divided into two groups were given two sets of metaphors to describe the role of police officers. The first group was assigned the metaphor of a policeman as guardian and the other warrior (ibid.). The group exposed to the guardian metaphor demonstrated more positive attitudes, while the group exposed to the warrior metaphor emphasized the association of violence and aggression with police (ibid.). Lakoff and Johnson (“Metaphors” 12) state, “to live by a metaphor is to have your reality structured by that metaphor and to base your perceptions and actions upon that structuring of reality.”

Metaphors influence how we reason by what Lakoff and Johnson refer to as highlighting and hiding (10). From a sociological point of view, metaphorical framing changes perceptions and adjusts reasoning (Reijnierse et al.). While we pay attention to one facet of an issue, we then ignore or discount those of another, allowing facets oriented to that concept to be hidden or set aside (Lakoff and Johnson “Metaphors” 10). The focus of attention is inevitably centered on one thing at the expense of the other. Reijnierse et al. conducted research in which they attempted to measure the influence of metaphor in influencing opinions.

Extending the metaphorical framing of text scripts, they experimented with two groups of participants. Each group was given sentences with metaphorical expressions, and each had to evaluate the effectiveness of the normative measures to solve the crime problem elaborated in the text (Reijnierse et al.). The research brings forth the concept of highlighting and hiding in the sense that

if the crime problem is referred to as a virus, it highlights the idea that it should be prevented by making the population immune which also highlights the concept of social reform as a response to the problem (ibid.). On the contrary, if crime is a predatorial beast, apprehending criminals becomes the priority for prevention, highlighting the concept of strict law enforcement as the answer. Alternatively, if the concept of crime is of a virus, it then hides the idea of strict law enforcement and highlights the concept of social reform (ibid.). Metaphorical framing is very useful because of the way we choose some perceptions of reality and highlight them by making them more salient in the communicative text in such a way as to promote a particular definition of a problem (ibid.). In other words, the perspective we lend to an issue may influence how the communication receiver understands or evaluates the issue (ibid.). Through the preceding examples cited in Sharman, Thibodeau et al. (2017), Reijnierse et al., and MacDonald et al., we can see how discourse has played a critical role in legal compliance/law enforcement, regulatory communications, and implementation.

Ontological and epistemological assumptions shape translation research methodologies, thus reflecting translation studies' development (Baker and Saldanha 479). In the following pages of this chapter, we will elaborate on the theoretical framework of metaphors that we intend to apply to this research. This discussion of theory is followed in the next chapter by the corpus selection criteria, a description of the corpus, the research methods, the technology used, the hypotheses, data reliability, and the advantages and limitations.

The language of this research phenomenon is contemporary, as it has developed only over the last 30-50 years. We intended to provide an x-ray view of the actual communications by taking samples from internet sites and reports within the last 10 to 15 years. We will examine discourse from economic-financial, regulatory, political, and security perspectives. The term security is used to refer to compliance enforcement and adjudication, and crime prevention (Meerts). Adjudication means

when matters in question are decided by those with authority vested with the power to resolve or rule on an issue (“Adjudication”). Much of the discourse involved in this research is used in international relations. Specifically, the language used to prevent financial and other organized crime. Security discourse comes mainly from a country's state or government and often focuses on international relations (Echavarría Álvarez 62).

Economic-financial regulatory and political discourse is produced by and for government actors, law enforcement agents, officials, etc., and directed toward officials and other stakeholders through reports, Internet (Web) sites, and media, often serving specific ideological interests. As Martínez Egido (276) has pointed out in the examination of economic-financial discourse, the media directed at citizens or lay persons “always serves a number of ideologically marked interests” (ibid.). Regarding economic and financial discourse, regulatory and law enforcement in the international and intercultural space use a discourse that often contains ideological messaging that provokes reactions in the target readership.

Martínez Egido (277) points out that this specialized language consists of two distinct components: economic-financial theory and business Spanish, which uses semi-technical and informative language. The present research focuses on economic and financial discourse, Spanish for business and regulatory, adjudication, and compliance discourse, which contains some political and ideological language used in compliance and law enforcement.

The language of law enforcement or security discourse forms the third part of this research and is rooted in legal discourse. In his book, *Creating Language Crimes: How Law Enforcement Uses (and Misuses) Language* (2005), Shuy affirms three criteria are needed to create the vision for a profession. First codification, which transforms the phenomena into knowledge to animate the

discourse. Next, highlighting, making phenomena salient, and finally, producing, and articulating material representation (x). It is important to understand that the law enforcement profession has its own vision in which events are viewed and interpreted based on those norms. In other words, vision becomes influenced through the lens of the mission (Shuy).

Previous studies have examined the use of economic metaphors in Spanish and English. Some have shown similar expressions relating to economic and other crises such as armed conflict or war (Charteris-Black and Musolf; Alejo; Stender; Flusberg et al.). Different expressions are usually seen in frequency and negative or positive contextual meaning (Gutiérrez 25). Conceptual metaphors can create neologisms in specialized language. Often, metaphors in one language become so lexicalized that their lexicalization is transferred to the target language. The process often derives from transmitting the concept through metaphors originating in English to coin new terms in the target language (Haddad Haddad and Montero Martínez 4). Regarding the translation of conceptual metaphors, issues such as transfer weakening, loss of saliency, and asymmetric concepts between English and Spanish may arise.

The language adopted by legal regulators, especially law enforcement, is influenced partly by the evolution and reformation of law enforcement or policing in the United States during the 1950s (Kelling). As part of this reform, police forces were required to create disciplined organizations modeled after the military (ibid.). Kelling asserts that the language used in law enforcement is filled with metaphors, e.g., “war is fought against crime” or “lady justice is blind” (ibid.). So ingrained is metaphorical language in law enforcement culture, a task force on 21st-century policing in the United States under then-President Obama recommended the need to change the language from referring to police as “warriors” to that of “guardians” (Thibodeau).

As with almost all ideologies, consolidating their ideas indicates the importance of forming allies to “fight” against a perceived and recognized evil. First, it is necessary to convince the public or to reinforce the beliefs of those already convinced that a given phenomenon “is the way it is.” Thus, describing phenomena and shaping them in the eyes of the reader is crucial for the consolidation and dissemination of the ideology in question. Such descriptions use concrete metaphorical articulations, which, when translated, are subjected to a process of gain, conservation or loss, with presumably essential effects on the reception of the target text. Thus, the primary focus of the present analysis will be on the translation of metaphor, understood as a means of transferring meaning that, when translated, must still be able to elicit the reader's reaction in the target language effectively. One might therefore assume that certain expressions are metaphorized to elicit a reaction. On certain occasions, the translator chooses to look for and use a metaphor already lexicalized in the target language to capture the meaning of the metaphor in the source text. As Charteris-Black et al. (20) point out, there is some “conceptual divergence in terms of exceptionality [saliency] in specific metaphors” between Spanish and English.

It is worth mentioning that the translations examined have a specialized or specific purpose for a more far-reaching communication of information that is considered relevant to a Spanish-speaking audience who may need to be persuaded to action. In the 1970s, Vermeer proposed the core idea of the functionalist school. The idea promoted that translation must have a communicative function for the end reader (Mohatlane 80). The translation must provoke a similar reaction in both the reader of the source and target texts if it is determined that the function of both texts must be the same. Therefore, the translator needs to consider the meaning of the source text as the meaning itself and how the reader will receive it.

The use and study of metaphors in literature are abundant, so it is informative to other fields. We will borrow from literary translation the concept of not losing sight of the aesthetic or subjective effect in the translation process. Doing so has the negative consequence of focusing too much on the purely semantic value of the source text, i.e., a translator may be overly concerned with the source text in a way that reduces the quality of the metaphorical transfer. Edith Grossman proposes a slightly different prism than Vermeer's in that she focuses on the reception of the text and how the reader will perceive it.

The use of metaphor is often complex, and the translation, if it fails to convey the core meaning and its underlying implications, can leave the reader without receiving the message as it should in its entirety. As Samaniego Fernández (“La traducción” 1) reminds us, “a metaphor seems to be an extremely dynamic phenomenon [...]”. Such dynamism presents translation challenges. Riedemann and Diéguez (345) states that it is a subject “little studied within the framework of modern translatology”. Metaphor is a phenomenon whose “frontiers are constantly changing” (Samaniego Fernández “La traducción” 1). This continual changing and fluidity may be a factor in borrowing terms and foreignization from source to target texts. The text of the translated project combines concepts from antiquity and the present day, mixed with modern communication, technical terminology from the financial world, accounting, and legal language. Therefore, it required some degree of interdisciplinary research to cover the characteristics presented by the metaphors.

As semi-political texts with legal and macroeconomic overtones, metaphor is a recurring element throughout the discourse that establishes a basis for conceptualizing reality dynamically. This research analyzes the following documents: Bank Secrecy Act/Anti-Money Laundering Manual (BSA/AML), an Anonymous remittance Company’s Anti-Money Laundering Manual (SampCo), Financial Action Task Force (FATF-GAFI) documents, Egmont Group documents, and a European

Union document (Directive 2018/1673 of the European Parliament and of the Council of 23 October 2018 on Combating Money Laundering by Criminal Law). The translations were analyzed against the data from the comparable corpora FinCorpComp which we developed for a more extensive study of metaphor translation in financial crime. This research examines financial crime terms and metaphors as persuasive, motivational mechanisms in the source texts and their subsequent translations.

2.4. The Origin of Metaphors and Definitions

The word metaphor comes from the Greek *metaphora*, meaning to transmit or, in English, carry over (Meyer et al. 2). A basic explanation describes it as a resource to transfer the elements of a known concept to an unknown one (ibid.). Lakoff and Johnson (“Metaphors” 171) describe it as “the essence of metaphor is understanding and experiencing one kind of thing in terms of another.” In traditional Terminology, the concept, not the term or the word, is taken as the starting point for meaning description. (Temmerman “Towards New Ways” 19). Thus, it can be helpful to consider the concept when translating metaphor if we are evoking the equivalent meaning of the source to the target text. Temmerman expounds on the notion of a transaction as further defining the metaphor.

According to Temmerman (“Towards New Ways” 171), metaphors are “an instrument of thought, and a transaction between the constructive effects of context, imagistic and conceptual representation, and general encyclopedic knowledge.” Metaphors are also seen as multidimensional phenomena that convey ideas that are hard to express in other ways (“Towards New Ways” 159).

Temmerman (“Towards New Ways” 161) points out that metaphor, from an objectivist standpoint, must be viewed through the framework of realism and asserts that cognition results from mental constructions through our experiences. What became known as cognitive linguistics was the

framework based on Lakoff and Johnson's research which viewed an integration of both the humanities and linguistics in a socio-cultural environment ("Metaphors" 161). Cognitive linguistics studies the creative potential of language as it influences human understanding (Temmerman and Van Campenhoutd 1). As such, metaphor plays a crucial role in human communication, especially in intercultural transfer through translation. Nonetheless, before exploring translated metaphors, we should first define what we refer to as a metaphor.

Defining metaphor remains a challenge even twenty-five centuries after its first development (Fernández Colomer, Stender). Researchers use a diverse range of theoretical concepts to identify, describe, categorize, and classify metaphors (Schäffner and Shuttleworth 94). The present research will focus on conceptual metaphors in the specialized discourse that is the focus of this study. Metaphors in specialized texts have the dual role being both conceptual and aesthetic. Aesthetics refers to the reaction of the users caused by the metaphor (Fuertes-Olivera and Pizarro Sánchez, 46). Pedro Fuertes-Oliver a Professor of English studies at the International Center for Lexicography at the Universidad de Valladolid in Spain and Isabel Pizarro Sánchez, also Professor of Linguistics at UVA have both published extensive research on translating economic texts. They also advocate for a mixed approach of the aesthetic and cognitive with metaphor analysis in specialized texts (46). Terms are expressions that result from understanding and naming based on metaphorical scenarios. Fuertes-Olivera and Pizarro Sánchez argue "their aesthetic value can increase motivation" to help users with these terms (46). The texts are analyzed with consideration to Rossi's metaphorical isotopies that allow for the creation of new words from the source cognitive metaphors, which are shared and accepted (Rossi 157). In this sense, the terminology of finance, economics, security, and politics is shared among stakeholders and translated from source to target texts.

Rossi poses the question: “to what extent can the metaphorical isotopies underlying a specialized domain shape the concepts that constitute it?” (Rossi 63 [Author’s own translation]). Rossi goes on to assert that metaphorical isotopies can indeed help technical domains where the mapping at the basis of the metaphor allows for the transfer of the ontology of the source domain to the target (ibid.). The specialized texts analyzed in the present research will explore the degree of mapping from source to target domains of the conceptual metaphors under examination.

Lakoff and Johnson state that most of our conceptual system is metaphorical. They also indicate that it is essential to synthesize the conceptual system of everyday life, which is not limited to the intellectual. They also assert that it also encompasses parts of life that construct our thoughts, how we communicate, and how we interpret reality in our lives (Kamal and Abid 194). They further state that “many of the similarities we perceive are the result of conventional metaphors that are part of our conceptual system” (Lakoff and Johnson “Metaphors” 147). Conceptual metaphor indicates groups of projections between the source domain and target domain and a group of inferences made possible by that association (Soriano). Zhou emphasizes that it is easier to perceive the source domain than the target domain (83-84).

Metaphorical expressions are, as Fernández Colomer points out, “tools of greater expressiveness” (361). According to Soriano (97-98), “conceptual metaphors are abstract schemes of thought that manifest themselves in many ways, including language.” It should be noted that expressions may vary between different languages despite being the same conceptual metaphor (ibid.). From one point of view, metaphor is seen as a pragmatic-cognitive procedure that has functions of argumentative reinforcement, an instrument for lexical creation, a mechanism for understanding abstract concepts, a procedure for forming euphemisms as well as dysphemisms, and a mechanism for intensifying semantics (Fernández Colomer 361). It is on the latter that we direct

the focus of this research. The intensification of communication will be evaluated under the lens of the intensity of the domain in which metaphors are applied.

Aristotle's definition speaks of metaphor as a transfer of meaning; he understands it as a recognition of the similarity between two elements. This similarity - which can only be ontological - can be more or less evident to people, which is why one could speak of a more poetic aspect of metaphor (more inventive) and another more ordinary (González 36 [Author's own translation]).

Lakoff and Johnson ("Metaphors" 3) state:

For most people, metaphor is a device of the poetic imagination, and rhetorical flourish, a matter of extraordinary rather than ordinary language [...] We have found, on the contrary, that metaphor is pervasive in everyday life, not just in language but in thought and action. Our ordinary conceptual system, in terms of which we both think and act, is fundamentally metaphorical in nature.

Kövecses asserts four domains must be considered using correspondences instead of just mapping from source to target domains ("Levels of metaphors"). The three distinctions follow; the Relationship between grammar and metaphor, a multilevel view of metaphor, and the Importance of recognizing context to explain the use of metaphors ("Levels of metaphors" 197). Further, the conceptual metaphor is composed of a hierarchy of; "an image schema, domain, frame, and mental space level" (ibid.).

Another definition elaborates that "...a metaphor is formed by two elements and a transference or projection from one to the other" (Snell-Hornby 56). A metaphor is a complex of three dimensions

reflecting the tension between semblance and disparity, whereby, as Newmark points out, a new truth is created that requires a “suspension of disbelief, a fusion of perception and imagination” (296).

Michel Le Guern, in his work *La metáfora y la metonimia* (13), quotes Du Marsais, who offers the following definition: “Metaphor is a figure by means of which one transports, as it were, the proper meaning of a word to another meaning that only suits it by virtue of a comparison that resides in the mind” (13).

To refine the definition of metaphor, we must also define metonymy and synecdoche. According to rhetoric, metaphors are classified as tropes or figurative uses of language (Font Saravia 2004).

Metonymies consist of the designation of an object by the name of another object which forms, like it, an absolutely separate whole, but to which or to whom it owes, more or less, either by its existence or by its way of being (in Font Saravia 6-7).

And then synecdoche as:

Synecdoche is a kind of metonymy, by means of which a particular meaning is given to a word that, in its proper sense, has a more general meaning, or, on the contrary, a general meaning is given to a word [...] In a word: in metonymy I take one name for another, while in synecdoche I take the more for the less or the less for the more” (in Font Saravia 7).

As Rodríguez states, metaphors arise from language understood as a way of life and have their origin in “the discursive dynamics of speakers, capable of establishing relationships and sharing meanings” (206).

Metaphors have also been defined as “a mapping, a relationship between two conceptual sets where an idea referring to a sensory experience that is easier to understand gives a series of properties to a second, more abstract idea, in order to facilitate the understanding of this second idea” (Rodríguez).

Javier Gómez-Ferri offers the following definition:

Metaphor is in general the trope of resemblance and similarity. To be more specific, metaphor is the transposition of the name of one thing to another. With it one can achieve a poetic or humorous effect; but also, an intellectual illumination. ([Author’s own translation] 57).

Goatley defines metaphor as: “A metaphor occurs when a unit of discourse is used to refer unconventionally to an object, process or concept, or colligates in an unconventional way” (8).

Also offering the following definition:

Metaphor [...] is not a mere reflection of pre-existing objective reality but a construction of reality, through a categorization entailing the selection of some features as critical and others as non-critical, metaphors can consciously be used to construct [...] reality (Goatley 155).

Diccionario de la Lengua Española (Real Academia Española) defines metaphor as:

traslación del sentido recto de una voz a otro figurado, en virtud de una comparación tácita, como en las perlas del rocío, la primavera de la vida o refrenar las pasiones” y otra entrada plasmación en el discurso de un sentido recto y otro figurado.

Newmark affirms that the metaphor is “the figurative word used, which may be one-word, or 'extended' over any stretch of language from a collocation to the whole text” (105).

According to Kohl (2), understanding metaphor depends on which framework or domain it is situated in as well as the discipline in which it is examined (in Stender 51). Stender points out that metaphor has been categorized in a variety of ways depending on the domain as elaborated below:

Field	Main interest
Literary sciences	the linguistic form
Rhetoric	Psychological outcome
Philosophy	Attention to defining your performance
Other fields	Mental, structural, etc.

Table 1. Understanding metaphor by domain (in Stender 51)

Punter asserts that “there is no single, universal, ahistorical definition” (144). Metaphor is taken according to different cultures and times (Punter). For this research, we use a traditional and concise definition of metaphor elaborated by Dickins (228). A metaphor is “a figure of speech in which a word or phrase is used in a non-basic sense, this non-basic sense suggesting a similarity or analogy with another, more basic sense of the same word or phrase” (ibid.). Fossilized or cliché metaphors, for example, are “cold war” or “liquid gold” (Boquera Matarredona).

2.4.1. The creation of metaphors and their lexicalization

This research is intended to contribute to Translation Studies and the study of specialized translation as well as metaphor translation by investigating how metaphors have been handled in translating documents of the financial regulation, compliance, and enforcement sector. As such, the corpus analyzes lexicalized metaphors and possible neologistic metaphors.

As Rossi affirms, “metaphor is a tool for creating new terms [...] [and] metaphor in specialized discourse is a privileged laboratory to observe linguistic and social dynamics” (in Bordet and Pic 2).

From an ontological point of view, the cognitivist movement has helped to recognize the modeling power of metaphors such as in Timmerman's analysis of genetic engineering in comparison with a geographic map (in Rossi 53). A conceptual projection from the source domain to the target domain, in essence, models the target domain in what Rossi refers to as an "ontological photocopy" (ibid.).

Several examples of the modeling function of metaphors follow, such as the anthropomorphic metaphor in the wine-tasting domain, the animal metaphor in finance, and the metaphors of gastronomy in astrophysics (Rossi 54-60). Temmerman stated that didactically applied metaphorical gestalts lead to lexicalizations creative metaphorizations lead to neologisms that are more likely to be accepted as specialized terms (Temmerman "Towards New Ways" 158). Gestalt theory refers to the "A 'shape', 'configuration', or 'structure' which as an object of perception forms a specific whole or unity incapable of expression simply in terms of its parts" (*Oxford English Dictionary*). As such, Temmerman breaks down the text types where each is produced, namely in research articles where analogies are introduced, specialist manuals where metaphors are present, and popularized texts in which analogies are made more explicit ("Towards New Ways" 205). In research articles, Temmerman asserts that neo-lexicalizations result from analogical thinking that is conscious or subconscious, but in specialist texts, she provides an example for the concept of the gene as information in the analogy of DNA as a language that can be 'read' and 'deciphered' (ibid.). Additionally, the example analogy of DNA as 'software' is asserted in that information can be 'stored' and 'transmitted' ("Towards New Ways" 206). The third type of text, referred to as popularized, aims to take complex subjects and make them able to be understood by non-specialists (ibid.). An example of genetics is language, which follows where genes "evolve like vocabulary of a language" ("Towards New Ways" 208).

“Creative thinking is often reflected in the use of metaphors” (Temmerman “Towards New Ways” 69). The life sciences are an example of this, whereby metaphorical lexicalizations manifest symbolic understanding of the environment for new categories in the discipline (ibid.). In their book *Dynamics and Terminology: An Interdisciplinary Perspective on Monolingual and Multilingual Culture-Bound Communication* (2014), Temmerman and Campenhoudt provide research that confirm the development of knowledge as both a dynamic and negotiable process in “sociocognitive and pragmatic settings and that the creative potential of many languages plays an important role... in domain-specific knowledge development” (3). Intercultural communication requires effective metaphorical transfer from source to target texts. Temmerman affirms that metaphors are culturally grounded in our physical and cultural experiences (“Questioning the univocity” 81). The influence of English has played a significant role thus far in the intercultural communications between specialized English and Spanish fields. Pedro Fuertes-Olivera and Sandro Nielsen illustrate the dynamics of European accounting in “The dynamics of accounting terms in a globalized environment: The role of English as Lingua Franca” (Temmerman and Campenhoudt 215). Specifically notable is how English has influenced international accounting terminology creation. Multiword accounting terms are translated into Spanish as well as novel metaphors present in Spanish accounting terminology (Temmerman and Campenhoudt 11). While English continues to influence language worldwide, so has the blending of words in metaphorical expressions, which has been around since antiquity. For instance, blood theory was devised by Aristotle (384-322 BC) as well as others of that period. It was believed that one’s inheritance was concerned with blending parental qualities like mixing two liquids (ibid.). Expressions such as “royal blood, bad blood, blood relative, blueblood, and mixed blood” are everyday speech hardly even questioned (Temmerman “Questioning the univocity” 83).

Another facet of new expression creation is using abbreviations and acronyms, which is relevant to the present research. Many acronyms are used in place of or as the proper name. The *Oxford Advanced Learner's Dictionary* (2022) defines Acronym as “a word formed from the first letters of the words that make up the name of something” (“Acronym Noun - Definition, Pictures, Pronunciation and Usage Notes | Oxford Advanced Learner's Dictionary at [oxfordlearnersdictionaries.com](https://www.oxfordlearnersdictionaries.com)”). The creation of neologisms in abbreviation or with the use of acronyms has become increasingly popular in proportion to the use of English in economic texts (Stender 45). In the present investigation, we found the abbreviated neologisms such as AML as ALD (Anti-Lavado de Dinero) in the target texts. We discussed AML in Section 2.3.7. We believe these neologism creations were borne close together in that they were created within a similar time frame. García Palacios says that neologisms are sometimes not translated into Spanish in the same form as the English term due to “having been born at the same time in both languages” (24 [Author's own translation]). Evidence shows the words were first born in English, and subsequent translations followed. A crossover of terminology seems to be a factor in the texts of FinCorpAlin, as we shall see in the results. For much of the terminology, it remains unknown whether the translated terms were formed based on the word formation rules of English or Spanish. This question would require cognitive linguistic analysis beyond this investigation. We instead would like to focus on what García Palacios deems “transfer sub-competence” (25), which is the ability of translators to capture “networks of relationships” between terms and other concepts (García Palacios 25).

In terms of communicating, acronyms contribute to neologisms in that they are easy to create and allow for converting letter formulations into new terms. These new terms “take on their own identity within a given language” (Corbacho Sánchez 18). In some cases, “acronyms adapt to phonetic and morphosyntactic norms to the degree they become completely lexicalized.” In such cases, they

are widely known and do not require spelling out (ibid.). Using abbreviations has become an identifying feature of economic lexicon (Corbacho Sánchez 19).

Acronyms are a type of abbreviation that forms a pronounceable word created using the first letters of the words in the expression (Bennane 156). This definition is reinforced by Levy (417), who stated acronyms are “derived from the initial letters of the words that make up the complete expression”. Levy further asserts that acronyms are distinguished from abbreviations is that acronyms are “pronounced as words rather than pronounced letter by letter” (ibid.). Abbreviations, as Bannane asserts, help create processes for enriching vocabulary in the language (ibid.). Acronyms began as abbreviations to speed up the vehicle of expression by making the expression quicker to write or speak, according to Halliday and Martin (229). Acronyms are pronounceable as words that are often integrated into the language as nouns (Reguera and Stender 98). Sometimes, the reader understands the acronym's meaning without knowing what the components of each letter represents. Reguera and Stender offer the example of the lexicalized acronym of *laser* in English: Light, Amplification, Stimulated, Emission of Radiation (98).

The lexicalization of acronyms begins when the acronym meaning becomes more robust than the words in an expanded form of the original expression (Bennane 158). An example is the phrase, “NATO has a negative connotation for some nations as it refers to the interference of this organization in wars [...] where many civilians were killed” (ibid.).

Some scholars, such as Fandrych, believe that “Abbreviations, the smallest graphemic units in the English language, are the building blocks for one of the most creative word-formation processes in the language” (112). Abbreviations lend to the creation of neologisms. These are formations where the first letter is written in upper case, followed by lower case letters without periods between letters

(Morín Rodríguez and Castellano Alemán 92). We found many examples of these types of expressions (AMLRs, FinCen, AML/CFT, SAR, FIA, etcetera). Additionally, as Levy asserted, these acronyms' distinguishing factor from abbreviations is that they are all used as words. While easy to create, abbreviations and acronyms can make understanding difficult, especially for laypeople outside specialized fields (Reguera and Stender 97).

Our conceptual system underlies how we act and think. It is, by nature, metaphorical asserted by Lakoff and Johnson (“Metaphors” 3). Professor of French philology at the Universidad de Alicante, Montserrat Planelles Iváñez asserts, the combination of our reason, experience, as well as imagination form the basis of our conceptual system that shapes the creation of metaphors in a particular experientialist synthesis (308).

From a cognitive semantic point of view, our system of concepts governs lexical as well as phraseological creation in a metaphorical way. Therefore, metaphorical expressions are both linguistic and cognitive phenomena that correspond to how we perceive our existence (Planelles Iváñez 2014). She further asserts, lexical creation by means of metaphorical conceptualization is intimately linked to cognitive processes going beyond the limits of the language system. to facilitate understanding through basic concepts of everyday use (309 [Author’s own translation]). The creation and use of metaphors to clarify ideas and share concepts are based on a particular shared understanding by the communicators. From the outset, communication depends on concepts that resonate among those who share the communication. We create metaphors to make sense of concepts. Aristotle wrote [the best thing, to a great extent, is to be master of metaphor” (in Ricoeur 227). We better understand the evolution of metaphors by understanding how they originated. Creating meaning is fundamental to understanding how and why we use metaphors to convey understanding and make sense of abstract and complex concepts (Ricoeur 2003).

According to Samaniego Fernández (2000), there are different types of metaphors according to their degree of lexicalization. The gradation usually progresses from the “dead, lexicalized, fossilized, frozen or petrified metaphor to the novel, original, creative, living or new” (Samaniego Fernández 281). In addition, between the two extremes are what Samaniego Fernández refers to as traditional and semi-lexicalized metaphors (ibid.). Dead metaphors are related to general terms that barely realize their image (Dickins 236). To be classified as dead, there is little likelihood that the discourse community members process it in an analogical sense (Boquera Matarredona 102). Lexicalized or stock metaphors consist of usage recognized as metaphorical but whose meaning is determined. For instance, as we have mentioned above (Section 2.1.) the example of a “rat” as a person who abandons his friends or associates; the word rat is fixed so that he can look up the word in the dictionary (ibid.). Lexicalized metaphors are those the speaker does not perceive as a metaphor and have formed as an element of the linguistic and cultural system (Samaniego Fernández “Diseño y aplicación”). With non-lexicalized or active metaphors, the metaphorical meaning is not fixed and can be changed according to the context (Boquera Matarredona 104-105). Lexicalized metaphors, according to Van den Broeck (1981), “have gradually lost their uniqueness and have become part of the established semantic stock (or lexicon) of the language” (75).

To describe the concept of lexicalized and non-lexicalized metaphors, Dickins (236) elaborates on Goatley's (1997) comparative theory that uses three concepts, vehicle, topic, and grounds, on which a lexicalized metaphor is based. Lakoff and Johnson's theory elaborates the naming as the source domain, target domain, and mapping (“Metaphors”). It should be noted that the lexicalized metaphor may have functional relevance in one text but not in another, according to Van den Broeck (76).

Rabadán describes the novel metaphor as violating the linguistic and literary rules of the synchronic polysystem. It leaves the linguistic sphere that the reader would consider normal (ibid.). Samaniego (“Diseño y aplicación”) states that the novel metaphor demonstrates the highest degree of violation of linguistic as well as literary rules. Boquera Matarredona asserts that active metaphors depend on the context and the interaction between the vehicle and the topic to which they refer (105). Non-lexicalized metaphors are those that have not been used before and use original, sometimes surprising, images produced by the linguistic creation of the speaker (ibid.). New metaphors are unusual and unexpected uses of words that arise from spontaneous creation requiring the receiver to interpret them (Boquera Matarredona). The living metaphor is evolving, creating new realities and expanding knowledge (ibid.). The new metaphor can create new realities (Boquera Matarredona 2005) while covering up others, as Ortega y Gasset asserts, and thus has “the most fertile power that man possesses” (in Font Saravia 372-373). There is a close relationship between the trope and the speaker's performance (Ricoeur).

Lizcano (68-71) points out that new metaphors, to express changes in the image must have at least three conditions; First, the imagery is not susceptible to definition, so it is the source of the definition. Second, the imagery comprises a “whirlwind” of determined forms, precipitating identities. Third, as a result of the above, two opposing, if not contradictory, tensions are rooted in the imaginary (Lizcano 54-70 [Author’s own translation]). New metaphors allow for creative expression and expansion of communication to better share convey human expression. The present research examines *money laundering* which although a lexicalized expression, certainly conjures imagery that is the source of the definition. For example, money hanging on a clothesline, another image; *fiscal paradise* evokes the image of an idyllic locale. Future investigation of specialized language use should include new metaphor creation in addition to other types of metaphors used.

Metaphors serve us fundamentally in communicating abstract or complicated ideas and concepts. Since *Metaphors we Live By*, Lakoff and Johnson, a wide range of literature on metaphors has emerged. Metaphor is more than a rhetorical flourish but a fundamental component of our conceptual system and governs how we act as much as we think (3). Moreover, concepts govern people's everyday behavior, perception of the world, and relationships with other people (3). Lakoff and Johnson distinguish between conventional or literal metaphors and novel or imaginative metaphors.

2.4.1.1. Novel metaphors

New metaphors are sometimes created through a blending process whereby two domains come together to illustrate concepts. As Fauconnier and Turner proposed, novel expressive effects are created by blending. Croft asserts that metaphor involves the interaction of two domains developed from two areas of intention, the content of the vehicle domain is part of the construed target by way of the communication process and blending (Croft and Cruse 38). Metaphor involves the activation of the correspondences and blending of two domains but gets weakened once the metaphor is established (Croft and Cruse 207). As Prandi (“Conceptual conflicts” 216) points out, new metaphors are created in thought in that, concepts of “individual creation are either creative elaborations of shared metaphorical concepts, such as the concept of linguistic value, or the outcome of conflictual combinations” whereby metaphors “complete in thought, a path that started in words” (ibid.).

According to Romero and Soria (389), novel metaphors symbolize new ways of thinking, “which means that they are not systematically used to structure part of our conceptual system.” According to Samaniego Fernández (“Diseño y aplicación”), a relationship between the conceptual metaphor and the real world has to do with previous relationships established between the subject to which it refers and the conceptual metaphor. There is a cognitive distance that extends a degree of

approximation between the spoken subject and the chosen metaphor (ibid.). Samaniego Fernández (“Diseño y aplicación”) asserts that there is some functional variation between literary and scientific conceptual metaphors. Literary metaphors have evocative functions, while scientific metaphors tend to have an exploratory function, a difference between evocative or explanatory functions depending on the field (391).

There are several definitions for the novel metaphor. Samaniego Fernández (“Diseño y aplicación”) cites Larson, who defines it as “that which the author or speaker has constructed at the moment of its expression” (413). Others have defined novel metaphor as “when an individual juxtaposes conceptual referents never before combined, producing both a semantic anomaly and a new conceptual insight” (in Samaniego Fernández “Diseño y aplicación” 413). It should be noted that Meyer et al. (3) point out that there may be a variation in the classification of living, lexicalized, or dead metaphors according to the field in which they are used. If a metaphor is considered dead and is regularly used by experts in the field, it may not be regarded as dead to people outside that domain (ibid.).

Samaniego Fernández (“Diseño y aplicación”) defines novel metaphors as “those linguistic expressions of a conceptual metaphor that cumulatively present” (413). According to Samaniego Fernández (ibid.), novel metaphors must have the following attributes: have an element of figuration, offer multiple linguistic expressions, have an indefinite length, must not be institutionalized, speakers perceive them as metaphors, and present several possibilities according to users based on pre-existing similarities that attract attention (ibid.).

Xu elaborates on novel metaphor: “when a metaphorical vehicle functions in an original way as a prototypical representative, we consider it a novel metaphor. It is a reconceptualization of the entity involved, sometimes with unconventional terms or unfamiliar categories” (Xu 88-90).

The directionality of the metaphor has to do with its creation as well. “The metaphorical source domain tends to represent a conceptually more accessible concept than the target” (Tourangeau and Sternberg in Gibbs 296). Focusing on the idea that metaphors are categorical, in novel metaphors, the category is created, and the “metaphorical vehicle serves as the name of that category” (in Gibbs 69). Ortiz de Zarate (294 [Author’s own translation]) asserts, “a metaphor will be all the more novel, the more different the respective categories of the topic and vehicle”. That is, the source domain is more accessible than the target concept, which, it seems, contributes to the influence of the original concepts in creating new metaphors.

While we will analyze a variety of metaphors from the bilingual corpus, it would be impractical to examine, at a deeper level, all metaphors in this research. Therefore, the analysis is restricted to lexicalized conceptual metaphors and those that are novel in the field of regulatory financial discourse being analyzed.

2.4.1.2. Lexicalized and non-lexicalized metaphors

Lexicalized metaphors are expressions used so frequently they convey a sense of familiarity in communications. They “receive predictable interpretations, wholly from the local context of predication,” as Blank states, further asserting, “they are not only familiar but also make sense as literal language” (21). Blank argues metaphors can be lexicalized simply by adding them as idioms to the lexicon, as people can quickly comprehend familiar idioms as comparable phrases when used in unidiomatic ways (ibid.). Additionally, abstraction is used where the expression's literal sense is

weakened and can cover metaphorical or literal meanings (ibid.). Dickins describes using language in a recognizably metaphoric way (231). He provides the example of calling someone a 'rat' in the sense of a person who is a traitor, noting that the meaning is relatively fixed in the language (ibid.).

A non-lexicalized metaphor has no fixed meaning and can vary based on context (Dickins 232). The reader must interpret this type of metaphor as in the example; a man is a tree which could be construed contextually based on the focus of the utterance (ibid.). For instance, referring to what he reveals and what he does not (root system, etc.). A change of context changes the interpretation whereby if the focus is on the description of lives, a reader might conclude a man is a tree' that grows and bears fruit (ibid.). Thus, Dickins reminds us that the potential for non-lexicalized metaphors to be interpreted differently is primarily a function of the different grounds associated with the contextual vehicle of the metaphor (ibid.). For lexicalized metaphors, the grounds is the sense or meaning of the metaphor whereby the likeness relationship that is perceived or suggested does not define the metaphor's purpose (233). We discuss this further in following section.

2.4.2. Influence of the metaphor in law and compliance enforcement agencies

Using the metaphor in a police setting is nothing new. In the 19th century, the philosopher Ralph Waldo Emerson wrote in his essay *Worship*, that the best police at night is a *gas lamp* (Bouman 63). This metaphor demonstrates the values of city dwellers in a time of significant changes and threats (ibid.). Emerson made the association between streetlights and police through the metaphor of these two new concepts in a society where, in the previous 50 years, neither contemporary police nor *gas lamps* existed (ibid.).

Another example of a metaphor in the discourse of security is the concept of the *broken windows* theory. Wilson and Kelling developed the broken windows theory in their research on crime

based on an experiment conducted by Stanford University psychologist Phillip Zimbardo, who concluded that crime is higher in neglected or disorderly areas. They used the primary metaphor that “one broken window becomes many” (4). The *broken window* metaphor was used to encourage changes in law enforcement because of its socio-political influence. The idea of the *broken window* has changed the operational perspectives of dozens of law enforcement agencies worldwide (Herrera Arrando 594). The concept was promoted by the vehicle of metaphor.

Another important and widely used metaphor is *zero tolerance*. This concept seems to have contributed to the overzealous applications of the law we have witnessed in contemporary U.S. culture, often seen in U.S. media. An idea used in the 1990s began in New York (Newburn and Jones 2007). The concept of *zero tolerance* implies a strict application of the law related to the philosophy of *broken windows* for some understanding of the need to strike with maximum legal force at petty crime. Kelling states that *zero tolerance* is “the bastard child of the broken windows theory” (Herrera Arrando 194). The concept, encouraged by the metaphorical expression, was adopted and promoted as applying the law above all else (ibid.).

Police officers in the United States are noted for an increase in their use of military metaphors used to carry out what is [known as] “preventive overaggressive policing” (Regan 14). To quote Mark Twain, “if you only have a hammer, everything begins to look like a nail” (Clemens). If everything looks like war to government institutions, everything will look like a military mission (Brooks “How Everything Became War”). In her book *Tangled Up in Blue* (2021), Rosa Brooks affirms the extensive use of military metaphors in law enforcement. She thus indicates that most trainings for police elements in the United States are modeled off military training camps (ibid.). Chan states that the military model organizes most law enforcement agencies. The military metaphor is usually understood as a disciplined regime that pays attention to specific details at the cost of relationships

and decisions in its dealings with citizens. Adopting the metaphor presents opportunities for communicative gaps where cultures do not share the same conceptual imagery related to metaphorical expressions. As Kerbel asserted, the metaphor is the message. To ensure adequate transfer of meaning and salience, translators must consider the inherent political content and different legal traditions in both source and target texts. Translators must be aware of conceptual disparities between legal and political climates and traditions. Prieto Ramos (“Translating” 177) points out, “the transfer process can be particularly complex in the case of polysemic terms with metaphorical and nonmetaphorical uses.”

2.5. Conceptual conflict approach to understanding metaphor

Conceptual conflict arises in complex meanings presenting conceptual relationships inconsistent with our shared system of conceptual presuppositions. These perceived conflicts can “offer more specific resources for text analysis and translation than the mapping of source and target domains” (Prandi “Conceptual conflicts” 7). Conceptual conflict, introduced by Prandi, is a model that helps in identifying and analyzing metaphors using both unconventional and conventional elements which Rizzato asserts, “represent a precious tool for translators” (2). Prandi provides the following example of conceptual conflict in the poem by Emily Brontë: “And winter pours its grief in snow” (23). Our shared conceptual structures do not support *grief* as something that is *poured*, nor that winter can *feel*, nor are snow and grief associated with each other (ibid.). Examples from our research are seen in the terms *terror finance*, and *capital flight*, expressions that generate some frictional divergence in meaning. In the example of terror finance, conflict is shaped against the shared conceptual images of terror, a consistently shared idea that is assumed to be solidly understood. As such, terror is projected onto the “tenor” of finance, which would be seemingly conflictual. The same is true where capital is projected onto flight conjuring up images of airborne

money in flight. A conflictual meaning then arises that does not rely on a shared understanding of language to make sense and requires contextual or co-textual interpretation based on the communicative situation (ibid.). The shared understanding of the specialized language in this investigation requires contextual understanding that money is used by certain parties for funding activities that finance terror. Additionally, capital that moves or is evacuated quickly from one place to another, in essence, flies.

Rizzato (2) asserts, “under a cognitivist perspective, the conceptual metaphors *emotions* are *liquids* (within a person) and *seasons* are *persons*” provide an example of this. Nonetheless, the two mappings do not reveal the symbolic meaning in the preceding sentence. “Emotions are liquids (within a person) may explain” (ibid.) the significance of the expression as that of experiencing overwhelming grief. In the following example, we can see the use of different conceptual metaphors from everyday language that would otherwise seem to have conflictual meanings. Grief is represented as a “liquid submerging a person way beyond his or her capacity” (ibid.). In the preceding example, the relationship between “meaning, interpretation, figure, and message” takes shape. At first, the meaning seems inconsistent with the concept, hence the conflict. Then, the interpretation of meaning connects an idea with a message that “gives shape and content to the figure” (ibid.).

Unlike conventional metaphors, conflictual metaphors involve a figurative interpretation in their creation, which is very relevant to their translation (Rizzato 3). Prandi’s introduction and the conflict-based distinction between living and conventional metaphors make up a component of considering the plurality of metaphors. Distinguishing between these metaphors helps reveal more practical application to translating that is limited by the more traditional conceptual metaphor theory or CMT (ibid.). Awareness of conflictual metaphors allows translators to be more conscious of the active role in which context plays. As Prandi points out, this approach helps by “urging the addressee

to infer unexpected projections that go beyond conventional mappings” (Prandi “Conceptual conflicts” 257). Professor of linguistics and head of the department of Modern Languages at the University of Genoa, Italy, Michele Prandi has conducted extensive research on metaphors. He offers an example of the creative energy seen in Tocqueville’s *Souvenirs* (ibid.). The acquisition of new metaphorical value can be seen in the passage: “‘La vérité est pour moi [...] une lumière que je crains d’éteindre en l’agitant’ (Truth is light for me, for I fear to put it out by shaking it), (Prandi’s translation “Conceptual conflicts” 258).” In preceding example *vulnerability* instead of *brightness* is projected on the *truth* (“Conceptual conflicts” 257-258).

Unlike shared conceptualizations, conflictual ones offer elements that “provide a unique, complex expression that unleashes its figurative and creative potential through an additional interpretative effort on the part of the reader” (Rizzato 2). Simple awareness of this phenomenon is valuable to the translator for the interpretative act “triggered by the metaphor to make sense of it and for the creative act required to translate it” (ibid.).

Frame and focus are critical components of complex conflictual meaning (3). The frame is represented by its consistency with the ongoing discourse. In contrast, the focus presents an incoherent or inconsistent concept (ibid.). Rizzato provides the example of Blake’s poem *The Night* where ‘the moon smiles.’ (ibid.) The ‘moon’ is consistent with the communication or nocturnal setting [...] whereas smiles is the strange, inconsistent element” (ibid.). Such complex conceptual structures include “covert constituents” of the frame and focus. They are represented through tenor and subsidiary subject that elicit implicit meanings that should be conveyed in translation (ibid.).

Prandi’s model “detects differences among figures through accurate typology (Rizzato 4). The author of *Researching Metaphors: Towards a Comprehensive Account* examines different figures and

their impact on meaning construction, for example, the “different implications of the mechanism of analogy displayed by simile, as opposed to the workings of conceptual conflict in metaphor” (ibid.). Newmark proposed translating metaphors as similes as the “third best strategy out of seven” in resolving metaphor translations (ibid.). We elaborate on Newmark’s seven strategies in Section 2.8.2. The notion that simile is a good translation for metaphors is still pervasive (ibid.).

Additionally, identifying metaphorical swarms can be an essential asset in translation as it reveals significant textual features that translators need to recognize “the network of figurative elements” that may be “scattered about throughout lengthy texts (Rizzato 5). Metaphorical swarms are what Prandi and Rossi describe as a “set of conflictual expressions springing from a single conflictual metaphorical concept and documented in texts (98). An example of the swarm concept of expressions is “motivated by the idea of liquid light in English Romanticism” (144) as in “The light that *flow’d* down on the winds (Blake) [and] *liquid streams* of light (Shelley)” (in Prandi and Rossi 144).

While CMT was crucial in revealing how generalizable metaphors are part of everyday language, generalization may present problems. By overemphasizing universal elements of conceptual metaphors and pattern identification across languages, we run the risk of downplaying culture or de-emphasizing language differences that may impact translation quality (Rizzato 3). Context and situational aspects of metaphor interpretation are critical to accurate translation and claims of the universality of conceptual metaphors may result in negative translation consequences (ibid.). Translating unconventional elements requires sensitivity to deviation from norms and identifying strategies for recreating deviations in the target text resulting in similar results (ibid.).

2.6. Cognitive linguistics and metaphor creation

Three main hypotheses guide the cognitive linguistic approach to language: first, language is not “an autonomous cognitive faculty”; second, “grammar is conceptualization” and third, “knowledge of language emerges from language use” (Croft and Cruse 1). The function of language used by humans is no different than other cognitive abilities, and linguistic knowledge is the same as other conceptual structures. Cognitive linguists believe that sounds are the input and output of cognitive processes that influence speaking and understanding (2). Grammar as conceptualization is the idea that a central part of cognitive ability is conceptualizing the experience to be communicated. Grammatical inflections and constructions help communicate the experience (ibid.). Finally, the hypothesis that language knowledge emerges from language use is that categories and structures are built through an inductive process (ibid.). How this applies to metaphor creation and communication may be most evident in the conceptualizing of experiences, as in the second hypothesis through grammatical constructions creating aimed at creating the desired communicated experience.

From a linguistic point of view, a widely held belief is that the creation of meaning occurs through acquired knowledge and concepts constructed by physical experiences. And as Ricoeur (2003) asserts, “mental representations” of physical experiences are rooted in social activities (Ricoeur 2003: ix). From a cognitive linguistics point of view, the mind forms a schema to construct meaning (Sinha 2007). Our conceptual system defines reality and how we see the world. Such a system is metaphorical; thus, we think based on metaphor (Lakoff and Johnson “Metaphors”). Metaphors form how we perceive, think, and do (ibid.).

Ricoeur (2003) stresses that the necessary conditions for a metaphor to be good are realism, clarity, nobility, coherence, and naturalness, which “only apply to newly invented metaphors...that

have not yet received the approval of general use” (72). Unlike the lexicalized metaphor, newly created metaphors have not yet been universally integrated in language use. In his discussion of forced metaphor and newly created metaphor, Ricoeur (ibid.), points out that in language specific ideas do not have signs and “catachresis refers to a situation in which a sign, already assigned to a first idea, is also assigned to a new idea, this latter idea having no sign at all or no other proper sign within the language,” thus every trope is an extension meaning is also a catachresis (71). The distinction between new usage and standardization is being forced in current speech discourse and forms an essential part of verbal expression (ibid.). Ricoeur (72) further points out that standardized tropes are in between invented tropes and catachresis resulting from the lack of adequate words and the need to supplement their deficiency (ibid.). Ricoeur points out that there is a limited number of words to express an infinite number of ideas (ibid.). Additional reasons or motives for creating new metaphors include lack of vocabulary to express ideas, expressing pleasure as it is experienced, and giving *color* to speech, to astonish the reader by new combinations “breath force and energy into the discourse” (73).

The metaphorical sense of a word presupposes a contrast with the literal sense as a basis, and such a contrast goes beyond semantic appropriateness (Ricoeur 342). With lexicalization, several features that support the heuristic function disappear. For instance, forgetting the usual sense causes us to overlook the deviation related to the isotopies of the context (343).

Fuertes-Olivera asserts that metaphor relies on mapping, where there is a process of establishing correspondences between familiar source domains and the unfamiliar concepts of the target domain (3). Further, metaphors operate in a kind of inter-domain experience projecting between concepts. The effectiveness of the metaphor depends on one’s knowledge of the source domain (ibid.).

2.7. The use of metaphors in economics and finance

In today's globalized world, connections between politics, economies, and cooperation between nation-states must be fluid and precise regarding communication between diverse languages. English is considered the lingua franca for its influence on other languages and cultures. However, the general awareness of foreign languages is not enough as new terms are created with the development of international commerce and crime. These new terms sometimes contain elements characteristic of the foreign language, as seen in economic terms.

An examination of the translation of metaphor in economics begins with an analysis of the use of metaphor in economics. Thus, a literature survey reveals several essential publications in the field. For example, *Metaphor and Mills: Figurative Language in Business and Economics* (Herrera-Soler and White), *Metaphor and Translation: A Case Study in the Field of Economics* (Fuertes Olivera), *Economic Anglicisms: Adaptation to the Spanish Linguistic System* (Zurita), *Where Does the Money Go? An Analysis of the Container Metaphor in Economics: The Market and the Economy* (Alejo), “El poder de las metáforas en el periodismo económico” (Álvarez-Peralta 2014), *Qué hacen las metáforas en la ciencia: Un panorama reflexivo sobre la metáfora en la economía* (Gómez-Ferri), for starters.

The selection of metaphors in acquiring English for specific purposes is often influenced by existing metaphor constructions (Charteris-Black “Metaphor and vocabulary”). In an investigation, Charteris-Black (“Metaphor and vocabulary”) developed a case for the vocabulary formation of economic ESP (English for Special Purposes) using metaphors about the subject matter as they note “on lexis that reflects important underlying metaphors on the subject” (149). The research identified high-frequency lexical references compared between the *Economist* magazine and the *Bank of*

English corpus (ibid.). They analyzed animate metaphors used to describe the economy and economic organizations while inanimate metaphors to describe market movements (ibid.). The key concept from this perspective is control, and beyond human control, economists look to nature to create the metaphors that describe capitalism (Charteris-Black “Metaphor and vocabulary” 163). For example, researchers Charteris-Black and Ennis found that metaphors referring to the state of the economy as mental health was more common in Spanish compared with English where the state of the metaphors of physical health were more commonly used to express economic conditions (262).

In a subsequent investigation, Charteris-Black and Ennis compared the linguistic and conceptual metaphors of a corpus of financial reports from English and Spanish periodicals during the 1997 stock market crash. Their research points to similarities in metaphors between the two languages at both the linguistic and conceptual levels (ibid.). It also highlights some divergences in the frequencies of linguistic metaphors, but both represented the economy as an organism and market movements as natural disasters or physical movements (ibid.). It is worth noting that the psychological mood is predominant in Spanish metaphors, while in English, nautical metaphors are more prevalent (262).

Ever since economists began to study what Adam Smith referred to as “the human propensity to truck, barter, and exchange one thing for another” (Herrera-Soler and White 49), they have resorted to the use of metaphors to make sense of concepts such as markets and money (Herrera-Soler and White 49). In their book *Metaphor and Mills: Figurative Language in Business and Economics*, Herrera-Soler and White, point out that economic theorists use metaphor profusely and are conscious of doing so (1). The development of economic thought over the centuries results from recurring networks of organic and mechanical metaphors (7-8). The economy is organic in the sense of an organism that functions well or poorly according to the outcome of what happens in the economy, as

blood in the human body as money in the economy plays a role in its functioning (ibid.). Blood circulation keeps the organism alive and healthy just as money circulation keeps the economy alive and healthy (ibid.).

Fuertes-Olivera and Velasco Sacristán assert that metaphors and their constructions arise from terminological work. They point out that terminologists devise metaphors to enhance the rhetorical power of the text (in Herrera-Soler and White 159). In the article “Metaphor and Translation: A case study in the field of economics,” Fuertes-Olivera affirms the challenging nature of translating economic metaphors. He then provides some strategies the translator must choose to solve semantic problems: use an exact equivalent, look for a metaphorical phrase that expresses a similar sense, and replace an untranslatable metaphor with an approximate literal paraphrase (Fuertes-Olivera 88).

There is considerable evidence in numerous figurative expressions of animate metaphors applied to describe the economy according to Velasco Sacristán (118), for example, its growth, depression, and organization as a parent company. In addition, inanimate metaphors in the form of animals describe their movements as animals, for example, a galloping horse, a bear, or a bull (bear and bull in English) (Velasco Sacristán 118). Business metaphors such as war are also seen in propaganda campaigns, market competition, corporate invaders, and metaphors from the sports field, such as key players, in stalemate or tie (ibid.). Other typical themes for economic metaphor in English are mechanisms and machines, greeting and fitness, war and combat, plants and gardening, and ships and navigation (Boers 2000). Other examples include business as a card game with expressions of *game, play, invite, ask for cards, and move cards* (Negro Alousque 80). Other examples are business as a novel or soap opera that goes through scenes, as well as chapters (ibid.). As for business acquisitions, the metaphor of marriages, is used (ibid.). In Negro Alousque’s investigation the Spanish texts revealed a total of eleven metaphorical expressions “*partida, jugada, envite, pedir*

cartas, mover ficha” while the English sample of card game has only four expressions: “*game of poker, hand of poker, move, trump card*” (ibid.).

There are many anglicisms in Spanish whose habitual and frequent use generates a certain linguistic interference between English and Spanish, according to López Zurita. Professor of French and English philology at the University of Cádiz, Spain, Paloma López Zurita, asserts there is a fashionable tendency to insert English words into Spanish that produces redundant neologisms (ibid.). Moreover, languages in regular contact tend to share lexical borrowings, with the most influential one predominating. Mechanisms other than borrowings are what López Zurita points out are sporadic borrowings that are also referred to as *foreignisms* and *periphrasis* (95). Another mechanism is the use of equivalents whose foreign origin is seen as, for example, “fútbol” (ibid.). Calques incorporate the foreign word into the other language whose meaning has been translated, and the calque retains its original form (ibid.). López Zurita defines equivalents as “words that, although translated directly, have the same sense value in the source language” (96). Next, the term periphrasis is used to describe cases where an “equivalent element to the one we want to translate” and is a “rhetorical device that substitutes one term for a number of words, a location, which defines and paraphrases it” (97). What is to be translated is missing, or the intention is to clarify. It is usually applied using explanatory or definitional paraphrasing (ibid.). Such mechanisms typically carry out changes in semantic relations through generalization and specialization that cannot be assured to be synonymous (López Zurita 2005). Moreover, López Zurita highlights the dominance of the Anglo-Saxon economy in exporting an increasing number of linguistic terms to other languages (111).

In his article “Where Does the Money Go? An Analysis of the Container Metaphor in Economics: The Market and the Economy” Alejo outlines an explanation of the issues of metaphors and the theory-building metaphor of economics. He stresses that metaphor in economics can be

analyzed in two ways, one from the point of view of an economist who focuses on theory or theory building, the generation of knowledge, and the generation of abstract concepts. In contrast, the linguistic level focuses on the level of processing with a focus on the discourse generated and the purposes carried out by the economic metaphor (Alejo 1138). He points out that essential economic metaphors are classified into auction, mechanical, and biological (ibid.). While we do not have sufficient time to elaborate on each of these economic metaphors, we assert the mechanistic metaphor is the most important in economic expression as affirmed by Alejo (ibid.). He also asserts that for a conceptual metaphor to be relevant in a specialized language or register, it must “cut across both terminological and discursive levels,” and attain a presence in both can be considered productive in language use (1148). There are many examples of the strategic application of metaphor in contemporary media. An investigation of the 2008 global financial crisis analyzes the metaphors used in the newspaper *El País* in September of that year in *El poder de las metáforas en el periodismo económico* (Álvarez-Peralta). Their research followed the methodology of metaphorical discourse analysis that revealed how conceptual metaphors gave rise to conceptualizations of the subprime mortgage crisis (ibid.). They applied natural disaster, biomedical, and cyborg metaphors to represent the crisis events in which Álvarez-Peralta (345) identifies ideological biases in the metaphorical constructions. For example, the discourse coincides with banking interests while showing a tendency to conceal responsibilities for the disaster (ibid.).

2.8. Translation of financial and economic metaphors

The amount of common ground enjoyed by English and Spanish sometimes helps or hinders translation between the two languages (Fuertes Olivera 82). Both are Western cultures with similar worldviews, and cognitive metaphor theory, stylistics, and grammar play essential roles in translation (ibid.). Cognitive metaphor theory allows us to determine whether metaphorical expressions

encompass the same domains of both source and target texts, whether they coincide in underlining the same ontological and epistemic correlations and whether they demonstrate similar metaphorical denotations of the target concept (82-83). Stylistics shows whether both expressions can be placed in the same position on a stylistic scale, and grammar will indicate their morphosyntactic similarity (83).

It is worth noting that Finance and Economics are two distinct disciplines, as are Financial Accounting and Taxation, that have their own specialized languages (Bastidas Canelones 62). [In his article “Tensiones disciplinares entre la Contabilidad Financiera y la Tributación producidas por su lenguaje especializado” (ibid.), Bastidas Canelones describes disciplinary tensión between financial accounting and taxation terminology. The study describes a high degree of language specialization in both languages and a resultant incompatibility in semantic and semiotic linguistic structures within both discourse fields (59). Bastidas Canelones points out the possibility that dissimilar belief systems may be the cause of less effective communication between them. He further asserts that the more specialized the language of the discipline, the lesser the possibilities are for effective communication between the language systems (69). Differences in specialized languages present additional considerations for the successful transfer of metaphors from English to Spanish. Although these were used more frequently in Spanish, the incidence of this essential business/economics metaphor was high. An example of this variability in the English language follows.

The accounting concept of *assets* is defined differently between academics and issuing authorities, such as the International Accounting Standards Board (IASB). The IASB defines assets as a resource controlled by the entity because of past events, from which the entity expects to obtain, in the future, economic benefits” (Bastidas Canelones 63 [Author’s own translation]). Conversely, academics have defined assets as ‘probable future economic benefits obtained or controlled by a particular entity as a result of past transactions or events’ (ibid.). Notably, the former defines the

concept as a ‘controlled resource,’ and the latter defines it as ‘future economic benefits regardless of whether the resource's control is exercised (ibid.). It should be noted that beliefs are transformed into what we consider knowledge, as Van Dijk asserts, “from the constant syntagmatic relationship between concepts” (Bastidas Canelones 62 [Author’s own translation]).

Hatim and Mason point out that metaphor has a cumulative effect of occurrences that seems to indicate the perception of reality to be captured by the translator (4). When translating metaphors, there is “little point in seeking to match” the words of the source text without considering the writer's worldview (4). Additionally, texts can be seen as the result of selections that are “motivated by the status of the source text” (Hatim and Mason 4). The resultant text is a product of both producer of the source text and the translator (ibid.). Fuertes Olivera provides an example of not sufficiently considering the worldview of the target audience in an inadequate economic translation with the use of a horse metaphor as *inflation gallops* as if it were a horse. The translation represented economic inflation from an English source text to Spanish but did not consider the equivalent metaphorical expression (89). In this case, the idea of the creation of inflation, a key concept to understanding the phenomenon's evolution, was omitted (ibid.). In the example, the translator used the sequential words creep, trot, canter, and gallop, which make sense in English but are not used in Spanish (82-89). The translator should have used a “Spanish geometrical metaphor” that resonates better with the target reader such as “*espiral inflacionista*” which better represents out of control inflation (89).

2.8.1. Money laundering and lack of terminological congruence in Spanish

An essential regulatory milestone against organized crime was the Palermo Convention, or the United Nations Convention against Transnational Organized Crime, a multilateral agreement supported by the United Nations and approved in 2000 (Hourani-Martín and Tabares-Plasencia

2020). The convention, once in force, began to influence domestic legislation in Spanish-speaking countries even though they already had laws in force in this field (Hourani-Martín and Tabares-Plasencia 2020). Researchers Dunia Hourani Martín who specializes in terminology, phraseology and corpus linguistics at the University of Verona, Italy and, Encarnación Tabares Plasencia, a researcher at the University of Leipzig Institute of Applied Linguistics and Translatology, assert there has been some influence of terminological development born in politics and media (110). In their investigation they examined a comparable corpus made up of legislation from twenty different Spanish speaking countries relating to criminal law and procedure (109). They found variation of terms in Spanish to be profuse as in the example of attempting to define *organized crime* in Spanish as “*crimen organizado, criminalidad organizada, delincuencia organizada.*” (109). In the United States, the term *organized crime* was born by a community organization composed of bankers, lawyers, and businessmen to fight crime under the Chicago Crime Commission (Lampe 104). Within the framework of organized crime comes the concept of money laundering. We believe terms and expressions in the present research are also influenced by the media and security discourse.

Since the 1920s, in the prohibition stage in the USA, mobsters (Al Capone) used laundromats to legitimize their profits from illicit activities. In addition, when some mobsters used the laundry to remove the smell of fuel from the cash coming from gas stations, the metaphor was coined as money laundering (Sánchez Romero and Montealegre Callejas, Martínez 5). España Alba (49) asserts, money laundering has existed since ancient times. However, it has been a crime often associated with other crimes, such as terrorism and organized crime. Hourani-Martín and Tabares-Plasencia (112) assert that the concept was initially linked to drug trafficking and then became associated with terrorism or other forms of crime requiring significant resources in an international environment. Jorge Urbaneja Cillán, Professor of International Law and International Relations at the Universidad

de Alicante, Spain, stated, “Money laundering is, at present, a criminal phenomenon of an eminently transnational nature, affecting, with greater or lesser intensity, most states and regions of the world, regardless of their economic, legal or political regime” (219). We have presented the problem that money laundering has created on a transnational level. Next we will discuss the evolution of the expression of this crime.

By nature, investigating metaphors related to money laundering must include certain terminology that is integral and recurrent in discussing the phenomenon. For instance, *tax havens* are examples of expressions with a long history. During the 17th century, pirates preyed on English trade and, when looking for places to hide their booty, found certain areas in the Mediterranean where city-states competed to accommodate them (Blum et al. 8).

In the United States, *money laundering* is known for concealing illicit origins of money. It goes back to antiquity with the trade of fake goods to transport illegal merchandise and profits (Unger and Van der Linde 2013). The Hawala system, originating in the Middle East and South Asia, meaning “in trust” in Hindi and “transfer” in Arabic, has served both legal and illegal transactions (Nakhasi 477, Wheatley 347).

Over the last hundred years, and in the late 20th and early 21st centuries, organizations have been developed to prevent financial crime: namely, *money laundering* or the *legitimization of assets, capital*, and other forms of illicitly derived property. Metaphorical expressions have been developed to communicate this complex phenomenon of handling assets in illicit ways, whether money or additional capital.

There are currently 17 Spanish-speaking countries that participate in prevention efforts through government agencies with a special focus (see Table 2 below). There are seven variations in the

names of the bodies, although all share the same objectives in the fight against illicit financial activities.

Unidad de inteligencia financiera	Unidad de análisis financiera y-o económico	Unidad de investigación financiera	Unidad de información y análisis financiera	Unidad de Información Financiera	Unidad Nacional de Inteligencia Financiera
Perú	Nicaragua	El Salvador	Uruguay	Argentina	Venezuela
México	Ecuador	Bolivia	Columbia		
Costa Rica	Panamá				
Guatemala	Chile				
Honduras					
Paraguay					
España					

Table 2. Variation in references to financial intelligence units across Spanish-speaking countries (Author's own elaboration)

In response to growing concerns about financial crime, Group of 7, or G7, formed the Financial Action Task Force, or FATFA, in 1989. It should be noted that the name, Financial Intelligence Unit, is seen in six variations of the 17 countries that have adopted this type of regulatory and compliance organization. Nonetheless, all FIUs collect financial intelligence such as currency transaction reports and suspicious transaction reports (Cassara [email interview]). The FATF has grown from its original 16 countries from 1991 to 1992 to 28 member countries and in 2000 to 31 and currently with 39 members (“FATF-GAFI.ORG - Financial Action Task Force (FATF)”).

The FATF urges its members (through its recommendations) to enact financial intelligence reporting requirements, establish FIUs, etcetera. FIUs were formed due to the urging of the FATF, but as a group, they belong to Egmont (Cassara [email interview]). In 1996, the Egmont Group of

Financial Intelligence Units was formed. There were only about six FIUs at the time. Today, there are 167 FIUs around the world. All the financial intelligence units have in common the collection, warehousing, analysis, and (to one extent or another) dissemination of financial intelligence.

The Council of Europe established MoneyVal in 1997. Its main goal was to prevent financial crime and the financing of terrorism. Another one of its objectives was to ensure that member countries were put in place. MoneyVal then aided in developing and implementing systems to counter terrorist financing and money laundering (Council of Europe).

The reason for the focus on financial crime prevention organizations arises in part from their primary functions of communication as well as inter and intra-cultural mediation. Another reason is the novelty of anti-financial crime organizations with their establishment in the last decades of the 20th century and further development in the 21st century, especially after the attacks in the U.S. on September 11, 2001, as a response to the growing threat of terrorism. The documents used in this research on each body's website are available to the public without restriction. It should be noted that the linguistic records are semi-technical with a mixture of specialized economic-financial terms and common phrases and terms.

As Tondini (5) asserts, the expression was first used in the legal field in a case in the United States in 1982. However, the expression was coined much earlier. It should be noted that money laundering was not a crime in the United States until 1986 (Mosteyrín Sampalo 67). U.S. law was established and promoted the use of the term from the 1980s when it was enacted, The Money Laundering Control Act of 1986 in the United States, federal public law 99-570 consisting of two sections: 18 U.S.C. § 1956, and 18 U.S.C. § 1957 (Cassela). It was not until 1988 Vienna Convention

of the United Nations that obliged member states to criminalize money laundering (Mosteyrín Sampalo 67).

There are a variety of expressions in Spanish to express the concept of money laundering. The significant challenge is that a consistent global definition is lacking (Martínez 19, Jiménez Sanz 66). Given the variety of lexicalized metaphors on the phenomenon, it is worth examining the relationship between translation and terminology that has an essential connection with specialized translation and in linguistic contexts of neologisms (Cabré “La terminología” 2). Two common elements express the concept of money laundering from a legal point of view.

- First, it starts with goods, which are usually money, that come from illicit means and,
- Second, the attempt to reintroduce licit goods with a legitimate appearance in economic traffic (Mosteyrín Sampalo 117).

Jiménez Sanz states, “Some of the terms used synonymously are not terms that are unanimously accepted in legal doctrine” (66). Therefore, it cannot be assumed that the expressions coincide in their meaning. The term *blanqueo* is from the verb *blanquear*, which, according to the *Diccionario de la Lengua Española* (Real Academia Española), indicates “to make something white,” “to show the whiteness that it has,” and “to make black money legal” (Author’s own translation).

But Isidoro Blanco Cordero, Professor of Criminal Law at the University of Alicante in Spain, and widely published author about money laundering asserts, the two terms involve different concepts. The distinction is between what has been termed “black money” and “dirty money,” metaphorical terms translated literally into English from Spanish that differentiate the specific means by which illegal cash proceeds can be obtained. If it is black money, “it must be bleached, and if it is dirty, it must be laundered or cleaned” (87 [Author’s own translation]). That is, it is based on the

origin of the money or goods. That “black” money originates from legal, commercial activities but evades tax obligations” (ibid.). Ricardo Mosteyrín Sampalo is an Economic Crimes Prosecutor of the Provincial Prosecutor's Office of Las Palmas who completed his doctoral work on money laundering affirms, black money is considered as that which has evaded taxation but does not necessarily have criminal origin (48). On the other hand, “dirty” money comes from criminal business, i.e., smuggling, drug trafficking, human trafficking, etc. (España Alba 53). Once the money from their illicit activities has accumulated, criminals (Sánchez Romero and Montealegre Callejas 2003, Sansó-Rubert 2005), as well as criminal organizations (Gluyas Millán 2004), hide or disguise the dirty money so that the authorities cannot discover its origin (ibid.). Sánchez Romero and Montealegre Callejas (2003) confirm that the term *lavado* is the preferred term in South America (and apparently in most of the Americas) and derives from the English expression money laundering (147).

Other, less frequently used terms are “normalization,” “regularization,” “conversion,” and “naturalization,” linked to the phrase “of the capital of criminal origin” (Jiménez Sanz 28, Ruiz Vadillo 1992). Other terms are recycling, legitimization, financial concealment, and legalization (Sánchez Romero and Montealegre Callejas 148). Recycling derives from the Italian *riciclaggio*, which refers to the reuse of materials for environmental reasons but is used to legitimize activities by the launderer to keep laundered proceeds undetected. Financial concealment attempts to remove the laundered identity of proceeds, legalization attempts to give the appearance of legality to the illicit activity, and normalization is about entering the money of illegal origin into the licit economy (ibid.). It is worth noting that many of these terms which tend to vary are also metaphors (i.e., recycling, conversion, naturalization).

2.8.2. Potential Translation Opportunities and Solutions

Analyzing the entirety of the text helps provide additional insight into this area. Specialized terminology presents particular problems in translation that the technical translator must be able to resolve (Cabré “La terminología” 29). Expressing an idea in one language involves drawing along socially agreed concepts from the point of view of that language (Cabré “La terminología” 30 [Author’s own translation]). This process creates a certain cultural bias that can only be overcome through consensus or by standardizing the concept. Such agreement or standardization does not always take place during the translation process. Thus, bias may show up in the target text in the form of non-standardized terms or, as Temmerman and Campenhoutd assert, are in the form of terms that are “colonized” by English concepts and terms where “culture-bound domains are weakened” (11).

Different cultures conceptualize the world in different ways. Dagut (32) asserts that there is no simple rule for translating metaphors, but how a translatable metaphor is from the source language depends 1) “on the cultural experiences and semantic associations exploited by it” and 2) “the extent to which these can, or cannot, be reproduced non anonymously in the target language, depending on the degree of overlap in each case” (ibid.). Punter also states the possibility of verifying that a complete translation is always in suspense and “the recognition of the metaphor thus becomes not only a sign of power but also a powerful marker of cultural instability” (102).

The pace of change in modern communication is quite strong. Changes are constant, which influences concepts shared by communities. “Languages undergo constant transformation as each linguistic community continually creates new terms to express new realities or to modify existing ones” (Tricás Preckler 145). Vázquez-Ayora asserted, “True translation must be independent of the

tyranny of words, ranks, grammar and forms of style” (in Tricás Preckler 154). Nevertheless, techniques will be needed to guide translation activities.

Tricás Preckler (ibid.) considers the adaptation technique as an oblique translation procedure of text retrieval. In contrast, equivalence, involving substituting completely different stylistic and structural means to express the shared reality, is used as a procedure in sayings, idioms, and lexicalized metaphors (138). Tricás Preckler provides a set of oblique translation techniques summarized in two groups in the following table. Preckler’s techniques as listed are based on Vinay and Darbelnet.

Oblique translation techniques	
Transpositions	<p>Main idea: priority to the recovery of semantic and pragmatic function when recording in the target language regardless of whether the new text produces the same morphosyntactics.</p> <p>“The process of replacing one part of the speech with another, without changing the message” (Tricás Preckler 158 [Author’s own translation]).</p>
Modulations	<p>The technique that performs displacements at the point of view. It consists of substituting</p> <ul style="list-style-type: none"> - one part for another - The container for the content - Negatives by negated affirmations - Subjects by changes from passive to active voice - Interrogative segment for assertive or dubitative segment

Adaptation	to contemplate the discourse from a certain distance and adapt references to the new reader, as well as to the unique situation.
Equivalence	It substitutes different stylistic and structural means to express the same reality (ibid.).
Direct translation techniques	
Use of loan words and calques	Polyphonic phenomena are voices of another linguistic system.
Literal translation	Word for word

Table 3. Translation techniques by Tricás Preckler (30, 80, 162)

According to Newmark, “Whilst the central problem of translation is the over-all choice of a translation method for a text, the most important particular problem is the translation of metaphor” (104). The opportunity to convey the meaning of the message through metaphor, although formidable, is essential for the understanding between cultures, nations, and participants in the dialogue who will benefit from understanding each other. It is necessary to identify the functioning of metaphors to translate them better. There are translational approaches to meet this challenge. One proposed by Dickins presents two models, the complete and simplified models for translating metaphors (228).

In his simplified model, Dickins proposes a continuum of lexicalized and non-lexicalized metaphors, starting with dead metaphors and lexicalized metaphors on the left and going to the original non-lexicalized metaphors (248). Dickins asserts that the following model can be applied to analyze examples of individual source texts and target texts.

Dead	Stock/Existing	Recent	Schematic - adapted	Original
Lexicalized			Not lexicalized	

Table 4. Dickin’s revision of the Newmark typology (248)

In his complete model, he builds on the more simplified model but deepens the facets of language-oriented metaphor; as Dickins asserts, there are certain necessary dimensions, such as the figurative-specific and the non-figurative-specific (ibid.). Dickins’ model uses a continuum from dead metaphors to original metaphors, which he asserts “seems to accurately mirror increasing degrees of metaphorical forcefulness” (248). He argues that points along the continuum correspond to “relatively intuitive categories” and that some metaphors can be placed between “schematic and original metaphors.” In contrast, the metaphor classification moves from lexicalized to non-lexicalized (249). Dickins placed original and schematic metaphors in separate categories because schematic metaphors “involve appeal to conventions for their interpretation” (249). “Schematicity [is] the extent to which metaphors fit into metaphoric schemata” (265). He further states that metaphors that fit within larger schemata of metaphorical expression are “schematic metaphors” (243). The following table illustrates the specific figurative dimensions.

Topic, vehicle, sense-grounds	Similar non-basic relationship between vehicle and topic
Lexicalization and non-lexicalization	Differentiated categories between non-lexicalized metaphors and non-metaphors, but with blurred boundaries.
Schematic	The degree to which metaphors fit into a metaphorical scheme.

Table 5. Specific figurative dimensions (Dickins 265)

The following table illustrates the non-specific figurative dimensions presented by Dickins (2005) which we will elaborate on next.

Meaning reflected	Degree of the prominence of the vehicle concept Continuous from weakly reflected strongly reflected vehicles
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Perceived recency of the metaphor	Continuous from not recent to very recent
Technical and non-technical	A continuum from non-technical to very technical

Table 6. Nonspecific figurative dimensions (Dickins 265)

In the first dimension, as with lexicalized metaphors, Dickins asserts the translator “has a secondary sense that instead of a “grounds-proper”, the sense “functions as a real grounds or a pseudo-grounds” (265). The first dimension is not only specific to metaphor but also figuratively because “the topic, vehicle, sense/grounds model” may also apply to parts of speech beyond metaphor (265). The second dimension, lexicalization vs. non-lexicalization forms the basis to distinguish “between grounds and sense,” and instead of being limited only to metaphor, “any figure of speech may be lexicalized or non-lexicalized” (265). The third dimension that is schematic, applies to metaphors that are lexicalized as well as non-lexicalized. In essence, metaphorical schema are “general and conventional” schema of a language that recognizes metaphor in context. Dickins uses the example in English “argument is war” is more easily interpreted than the utterance “he redeployed his troops” in the context of and argument as the latter is not lexicalized (265). He also points out that metaphorical schema are more important in the case of new metaphors and not as relevant to lexicalized ones (248).

Dickins’ dimensions four through six are important in understanding how metaphors function but are not limited to figurative speech; they are applicable across domains (266). In dimension four, “reflected meaning” is similar to “figurative-specific” and is seen in the metaphor but also in “other figures of speech,” for example, “such as the metonymic ‘bourbon-on-the rocks’ (266). Dimension five is that of perceived recency that is a continuum as opposed to a discrete category. Dimension six is addresses technicality whereby “technicality is a matter of degree” and on a continuum” where

technical metaphors “need to be translated by the appropriate TL technical term, regardless of the metaphorical status of this term” (267).

Stender offers additional concepts that help conceptualize structural domains. Stender points out that source domains are concrete concepts used to define target domains more quickly than those more abstract (63). The vehicle conceptualizes a new abstract concept or term (ibid.). According to Stender, the topic is the term that will be substituted by the vehicle (non-conventional term). The basis is the similarity shared by the original concept and the metaphorical (ibid.).

To compare metaphors between two different languages and cultures, one must identify the other linguistic codes and ways of expressing thoughts not only conceptually but also linguistically (Stender 64). A linguistic corpus, as well as lists of metaphors from the financial field, are features of Stender’s research. Her study presents a terminology study and translation research in the specialized field of economics. Our research follows a similar approach while focusing on a different area of specialized communication that has scarcely been examined. When translating, it is essential to recognize the difference between lexicalized and non-lexicalized metaphors; according to Dickins (2005), the differences reside in the vehicle of the metaphor and the *grounds* or sense (234).

The views of three significant figures in translation studies have addressed approaches to the translation of metaphor, Menachem Dagut, Raymond Van den Broeck, and Peter Newmark. Dagut believes that “the translation of these linguistic elements” of metaphor depends on the translator's bilingual competency level (24). It is and that it is a “matter of finding their equivalent in the target language and proposes differentiating metaphor between polyseme and idiom” (ibid.). Additionally, Dagut stresses the importance of considering culture in translating metaphor and using parallel texts in metaphor analysis to address an evidence-based systematic approach (ibid.). Rodríguez notes

Newmark agrees with Dagut that metaphor involves cultural and personal experiences. Still, contrary to Dagut, he believes metaphors can be universal and cultural metaphors are more difficult to translate (16). He states that what “determines the translatability of a source-language metaphor is not its boldness or originality, but the degree to which the cultural experiences and semantic associations on which it is based are shared among speakers of the target language” (Dagut 28).

Regarding metaphor translation, Van den Broeck (77) believes in creating categories to understand metaphorical function. Creating such categories helps to be able to translate to what he considers “optimal correspondence between source and target texts. Further, Van den Broeck puts forth the notion of the “process by which a metaphor shifts from performance to competence” (75-76). Van den Broeck describes possible applications of the theory of translation of metaphors as three options: strictly, the use of substitution, and paraphrase (77). The metaphor is translated in the strict sense when the vehicle and tone are transferred to the target language, in case of a lexicalized metaphor; two situations arise depending on whether the vehicles of the source language and the target language coincide (ibid.). The metaphor will be idiomatic if the vehicles of the two languages coincide. Still, if they do not coincide, the metaphors will be either a “daring innovation” or a semantic anomaly (ibid.). When using the substitution approach, the source text vehicle is replaced with a target text vehicle. These vehicles are then considered translation equivalents that share a common tone (ibid.). When using a paraphrase, the source text metaphor is subject to paraphrasing without metaphorical expression in the target text. It results in more commentary than translation (ibid.). The following table presents Broeck’s model of the different modes of metaphor translation.

Translation in the strict sense	When translations use similar vehicles between the source text and the target text
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Substitution	When translations replace the source text vehicle with another vehicle of similar tone for the target text
Paraphrasing	When the translation is not a metaphorical expression in the target text, and commentary must be produced.

Table 7. Broeck's model of modes of metaphor translation (77)

Newmark asserted that metaphors comprise images, objects, and meaning (105). He also points out that metaphor is the only link between aesthetic and expressive function across languages; it connects with four of the five senses (43). Newmark addresses six metaphors: “dead metaphors, cliché metaphors, stock metaphors, adapted metaphors, recent metaphors, and original metaphors” (106). Rodríguez Márquez (20) points out a disadvantage in Newmark's translation approach. He asserts it is because it views each metaphor as isolated “regardless of its context or its relation to other metaphorical expressions” (ibid.). It is difficult to know when a metaphor becomes dead or stock (established metaphor) (Rodríguez Márquez, Samaniego Fernández “La traducción”). Moreover, a cliché metaphor is similar to a stock metaphor (ibid.). Therefore, the typology addressed by Newmark, which requires identifying which metaphor to translate, presents difficulty in choosing the appropriate translation methods. (Rodríguez Márquez 20). Van den Broeck emphasizes that translating conventional metaphors is a matter of selecting the proper mode or procedure since they are part of a shared cultural heritage (81).

As for specialized language, the translator must decide between “visual means, what efforts the receiver has to make to be able to understand the text” (Stender 23). Moreover, translation is a communication of the element that Stender calls “the communicative relationship [...] composed of

three axes: the communicative distance, the acts and the addressees” (ibid. [Author’s own translation]).

An essential tool for translators is using corpus linguistics that provides data to refute or affirm different hypotheses in establishing translational patterns and comparing translations. In translation, there is a tendency for simplification, standardization, or explicitation (Stender). Stender argues that the use of a native language corpus can help improve both translation and expression (140).

Despite their commonality across cultures, not all conceptual and linguistic metaphors are shared in two languages; Deignan et al. noted several cross-cultural differences. For example, in research with Polish college students, they found that different linguistic expressions were used when analyzing metaphors in English. Still, the same conceptual metaphor had been applied, with another expression; conceptual metaphors were different, and in another, the words and expressions carried similar literal meanings but with different metaphorical meanings (353).

Gideon Toury (“Los estudios descriptivos”) proposes the following options for metaphor translation: 1) metaphor by the ‘same’ metaphor; 2) metaphor by a ‘different’ metaphor; 3) metaphor by non-metaphor; 4) metaphor by 0 (i.e., complete omission, leaving no trace in the target text); [...] 5) non-metaphor by metaphor; 6) 0 by metaphor (i.e., pure and simple addition, without any linguistic motivation in the source text” (Luarsabishvili 257). Snell-Hornby emphasizes that different languages have different symbols to consider when translating metaphors. Symbols carry different concepts, and the meaning of the metaphor resides in the culture (in Luarsabishvili 257).

Newmark proposes seven strategies for translating metaphors: “1) Reproduce the same image or vehicle as in the source language (ST); 2) Replace the metaphor with a standard image in the target language (TT), which does not clash with the culture of the (TT); 3) Translate the metaphor with a

simile or comparison; 4) Translate the metaphor with a simile or metaphor in addition to an explanation that allows the layperson to understand the meaning; 5) Convert the metaphor into a meaning where there is no equivalent metaphor; 6) Eliminate the metaphor if it has no meaning or practical function; 7) Use the same metaphor with an explanation to clarify its meaning” (in Octavia 11-12).

Larson stresses that translation should focus on meaning rather than form; thus, once the translator identifies the original text's meaning, they aim to reproduce the same in the receptor language. The first step is determining whether the metaphor is a living or dead metaphor, in which case the meaning can be translated directly (*ibid.*). On the contrary, if the metaphor is considered living, it should be analyzed carefully by the translator (278). Larson (279) proposes five strategies for translating metaphors:

1) Retain the metaphor if the receptor language allows it, 2) Translate the metaphor by simile, 3) Replace the metaphor with another metaphor that belongs to the target language, 4) Retain the metaphor by adding an explanation and, 5) Convert the metaphor into another word that is not a metaphor. (*ibid.*).

Madelblit proposed the “cognitive translation hypothesis,” whereby two schemes classify metaphor translation. First, “if the expression in the source language and its equivalent in the target language correspond to the same metaphorical concept or have similar mapping conditions (SMC), and second if the expressions come from a different metaphorical concept and have different mapping conditions (DMP)” (in Burmakova and Marugina 530). Thus, when the two languages correspond with the same metaphorical concept, the metaphor will be translated by selecting an equivalent metaphor or simile in the target language (*ibid.*). In cases where the source language does not correspond to the same metaphorical concept in the target language, more challenges are presented

when translating the metaphor, and the translator must use the technique of selecting a simile in the target language, paraphrase, footnote, explanation, or omission (ibid.).

Differences between and across cultures have often presented challenges in translating metaphors because of source and target language variations. The more similar the two cultures conceptualize their experiences, the easier the translation will be since the metaphors are related to distinct conceptual domains, the translator has to ensure that they correspond to the same metaphorical concept in the target language (Al-Hasnawi, Rossi).

When translating source language texts from another culture, one must remember the specific “patterns of thinking and acting” in one's own culture. At the same time, recognize the patterns of the reality of the target language culture (Al-Hasnawi 5). Referring to cognitive elements, Al-Hasnawi developed the following cognitive hypotheses for translation of metaphors into three schemas as presented in the following table.

1. Corresponding metaphors between languages.	The conditions reflect shared ideas expressed by identical metaphors between the two languages.
2. Metaphors correspond between languages, but their lexical implementation differs in the target language.	Metaphors differ based on their lexical systems between the source and target languages.
3. The metaphors do not correspond.	The metaphors lack cultural equivalents in the target language.

Table 8. Cognitive equivalent hypothesis for metaphor translation (Al-Hasnawi 7-8)

Metaphors are seen as more than just stylistic or even conceptual tools but rather as a “linguistic and discursive process” (Drouin et al. 46). Specific scientific and technical terms are given meaning through the process of metaphorization (Drouin et al. 46). Communicating through metaphors may

include “intratextual movement” (47). Terms are processed differently according to the scope of the discourse bringing about a kind of movement in the text (ibid.). For instance, Drouin et al., cite their Internet Forums Subcorpus as having a clear popularization scope where quotation marks are rarely used to signal terms; they are often used in other subcorpora (ibid.). Drouin et al. illustrate how the culture of the expert can “overtake the popularization scope of the text” (49). This happens when experts translate what they view as ‘real words [that] having no equivalents’; they believe translating them takes away from their meaning (ibid.). The practice of negating translations can lead to “terminological resistance” in that experts believe certain terms are the only way to express reality (ibid.) accurately.

2.9. Chapter Summary

In Chapter two, we have discussed the theoretical framework. In Section 2.1., we also have discussed corpus-based translation studies (CBT) and how it is critically important in the contemporary study of language on many levels. In Section 2.1.2., we have discussed corpus size; in Section 2.2., corpus linguistics as a research method; in 2.2.1., concordancing. Corpus size is an important consideration in any research project and one which we contemplated in developing our corpus. Using linguistic analysis tools and methods such as concordances provided a view into the language under examination providing new insights and allowing for analysis of translation strategies applied. In Section 2.3., we have presented the general theoretical framework of this research. In sections 2.4.-2.5., we have discussed the origin of metaphors, including definitions offered, their creation and lexicalization, and their influence on law and compliance enforcement. We then discussed and analyzed metaphors through the framework of cognitive linguistics in Section 2.6. Next, we have explored and discussed metaphor use in economics and finance in Section 2.7. We examined the genre of economics and finance as it is closely associated with the language of this

research. In Section 2.8. we have reviewed previous research on the use of metaphors in economics and finance. We conclude the chapter with a discussion on translation opportunities and solutions of metaphors as informed by Dagut, Van den Broeck, Newmark, Toury (“The nature and role of norms”), Madelblit, Cabré (“La terminología”), Stender, Temmerman and Campenhoudt, Preckler, and Dickins. Next, we will provide the methodology applied to the present research project.

CHAPTER 3 – METHODOLOGY

In the section on methodology, we begin with an overview of the challenges and opportunities of using corpora to study language. Next, we discuss the thematic and semantic aspects of our corpus texts then discuss identification of metaphors including manual, automatic, and mixed method detection. In Section 3.4. we describe our bilingual corpus including the documents we selected and the institutions where this discourse is found. We then discuss the corpus typology and analysis followed by the language analysis software we used in our research. In Section 3.4.6., we discuss our methodology for the collection and analysis of data.

3.1. Methodology Overview

This chapter outlines the model of analysis globally by analyzing the problems that arise with the lexicalization of metaphors. New technologies provide a range of options in terms of research, storage, and data presentation methods when studying corpus linguistics. Working with corpora has proven beneficial for translation studies and contrastive and descriptive linguistics, discourse analysis, second language teaching, teaching specialized language, and developing computer-assisted translation and machine translation tools (Stender). Baker (“Corpus Linguistics and Translation Studies; Text and Technology” 233) asserts, “the rise of corpus linguistics has serious implications for any discipline for which language plays a role.” While we developed our own corpus using very different text types, we attempted to partially replicate procedures in Stender’s “El lenguaje económico alemán y español de la prensa especializada: análisis basado en un corpus de la crisis económica (CRISCORP)” (ibid.).

3.2. Thematic and Semantic Aspects of the Corpus Texts

The characteristics of this doctoral research require limiting the corpus to the semantic field of focus. We have selected the language in regulatory discourse comprising financial, economic, legal, and security discourse concerning illicit financial activity. Further reasoning for this focus is as follows:

1. The discourse of economics and finance is abundant with metaphorical expressions.
2. Regulatory and security discourse includes expressions intended to provoke action on the part of the reader.
3. The focus of this research, the use of metaphor to describe financial crime, is relatively new in that discourse in financial crime prevention and enforcement was born in the last decades of the 20th century.
4. The documents analyzed in this investigation are in the public domain, are easily accessible, and developed to influence behavior and concepts in the minds of those who read them. The texts and websites are designed with a specific focus and are limited to organizations and individuals who are stakeholders in preventing financial crimes.
5. The translated documents are unidirectional from English into Spanish, carry equivalent expressions, and are accessible in the public domain from both websites' electronic versions of texts, such as portable document formats (pdf).

Next, we discuss metaphor identification, its challenges and solutions offered by prior researchers as well as our approach.

3.3. The Identification of Metaphors

Identification of metaphors in large texts presents challenges. To rely on intuition alone is insufficient in identifying whether terms are used metaphorically or not. Such a lack of empirical evidence to support a claim of metaphoricity affects the reliability of the research. As such, a claim that a particular term is used metaphorically may fit the purpose or orientation of a particular research project but may in fact be biased affecting comparability and theoretical claims (Pragglejaz). Several approaches to the initial collection of metaphors have been extracted from studies within the last twenty years. We consider the Pragglejaz group method for metaphor identification that is widely used as a manual procedure for smaller corpora. Due to the corpus size of over one million words, the Pragglejaz Group method of manually selecting lexical units of the entire corpus was not practical for the entire corpus. Instead, we adopted a blend of metaphorical pattern analysis developed by Stefanowitsch (“Words and their metaphors”) and the Pragglejaz Group method that served as basis for conducting a sample from one of our key documents, the Bank Secrecy Act/Anti-money Laundering Examination Manual (BSA/AML) and mining key search terms from that sample.

In that process, we manually extracted metaphors using the Metaphor Identification Procedure developed by Steen et al. (167).

The MIP method suggested that metaphors be identified by lexical units by

- 1) Reading the text, then,
- 2) Identifying lexical units,
- 3) Establish the meaning of each lexical unit in the context

- a. Establish whether each lexical unit could have more than one meaning in other contexts.
- b. Suppose the lexical unit has a more fundamental meaning in another context. In that case, deciding whether contextual and basic meanings are different but can be understood in all contexts is necessary.
- c. The lexical unit is determined to be a metaphor if the answer is affirmative.

We started with two terms in the target language: *Dinero*, the expressions, *anilavado de dinero*, *lavadores de dinero*, and *lavado, delito de lavado de dinero*. We then recorded all equivalencies in the source language. Next, we repeated this process in reverse. We started with the words *money* and *launder* and looked for 5 terms to the left and 5 terms to the right to detect possible metaphorical expressions. We searched for Key words in context (KWIC) using Sketch Engine to tag parts of speech (POS) in English. We then applied the Pragglejazz method for analyzing each lexical units in parallel concordance. In the following section we discuss manual detection method and some historical practices for metaphor detection.

A metaphor identification process (MIP) was attempted systematically by the Pragglejazz group in 2007 by using lexical units in discourse (2). While the MIP method is comprehensive, it is a word-for-word, manual examination method and impractical with large corpora. Before the Pragglejazz group, Mason (23) developed CorMet, which attempted to identify metaphorical mappings between concepts in large corpora using an automated process through WordNet, a lexical English database (ibid.). The MIP procedure was updated at the Vrije Universiteit in Amsterdam in 2010 (Steen et al.). MIPVU is considered an enhanced form of MIP in that it also determines basic and contextual senses within the same parts of speech and word types. It also identifies metaphors through vehicle term or phrasal structures, not lexical units (Nacey et al. 3). Nevertheless, the MIPVU procedure does not identify conceptual metaphors, which is the focus of the present research. Herteg et al. (55) affirm “the best way to identify money metaphors is the corpus-based approach” and advocate amassing

specialized texts. Research on metaphors provides a better understanding of cross-cultural relations. As Herteg (“Business English” 291) points out regarding metaphor corpora, “metaphors are seen as valuable tools for linguistic research, as bridges between linguistics and other disciplines with well-established institutional identity: biology, mechanics [and] physics.” Thus, metaphor research serves linguistic research as a bridge between other established fields and linguistics.

Linguistic corpora can be examined in various ways, “manually, automatically, and semi-automatically” (Herteg “Business English” 291). “Larger corpora can be explored electronically and thus offer more valuable resources for researching metaphors” (ibid.). Of the several approaches reviewed to collect metaphors from the corpus, one way is to identify the linguistic metaphors from discourse (Zhang 1489). Another way is to use an “A is B” format to collect linguistic expressions of metaphor (ibid.). In essence, the “A is B” method is to identify metaphors by their syntactic form as “one-shot mappings of an image onto another” (Cserép 267). Expressions of metaphor go the limited syntax and can occur in different patterns (263).

Considering these approaches, we applied the basics of Metaphor Pattern Analysis developed by Stefanowitsch (“Words and their metaphors”) by selecting from the bilingual corpus two lexical items from the target domain along with samples of their occurrences. Since our objective was to study metaphors related to financial crimes associated with the target domain of financial regulation and economic and political discourse, we searched for lexemes pertaining to this domain. To identify keywords, we first searched the source domain’s key corpus document Bank Secrecy Act/Anti-Money Laundering Manual (BSA/AML). The BSA/AML Manual was developed as a regulatory guidebook for institutions to use in developing their AML policies and procedures published by the Federal Financial Institutions Examinations Council.

As previously mentioned, we began by searching for keywords in context (KWIC) using the word sketch function and tagging the parts of speech (POS). We then used the thesaurus function of *SkE* to identify additional keywords. We used the corpus software Sketch Engine to generate word counts and concordances. This online linguistic analysis software allowed for identifying frequent and significant collocates by starting with a search for nouns based on key terms. Based on these search terms, we created concordance lines using KWIC view in the sketch engine; we then downloaded the results to an excel spreadsheet (for an example of source text domain mapping, see Appendix 5).

Next, we took a sample of the target domain text, analyzed each line for metaphorical patterns of lexical items, and identified the contextual meaning of each lexical item, i.e., whether it was used metaphorically or literally (Huang and Holmgren 145). We then identified the metaphorical expressions to which the lexical items belonged as metaphorical patterns, establishing groups of conceptual mappings based on metaphors instantiated by them. For example, “money” was selected as a lexical item under analysis.

A search for hits in the corpus yielded the metaphorical expression “money laundering regulations,” which was identified as a metaphorical pattern using “prevention of NN” and “fight against NN.” Adhering to Stafanowitsch (138-139), the identification of the metaphorical pattern was thus based on the semantic/syntactic frame in which the terms occur. The “NN” is the tag assigned nouns in the Sketch Engine software. Parts of speech (POS) are “tagged” or labeled to allow for identification of their placement and associated terms around them.

The glossary is organized in alphabetical order and divided into the following sections:

- Frequency of use.

- Patterns of metaphor present in different meanings of the expression.
- Notations of metaphor found in the source text and proposed translations.

In his book *Corpus-Based Approaches to Metaphor and Metonymy*, Stefanowitsch (“Words and their metaphors”) proposes three alternatives to extract metaphors from the corpus: first, to search for vocabulary (lexical items) in the source data, second, to search for lexical items in the target language data, and finally, to search in both source and target text data (291-292).

Deignan advocates that smaller corpora allow for a deeper examination of metaphors. We believe combining larger comparable corpora and samples from a smaller corpus of translations would give us a better range of data to analyze. Contrary to Deignan’s view on corpora size, Herteg asserts (“Business English” 291) that larger corpora allow for quantitative electronic quantitative examination and, thus, are more valuable to metaphor research. Other advantages of examining conceptual metaphors with corpora are access to available data, analyzing language use in context, and looking for linguistic patterns on a large scale (Herteg “Business English” 293).

As Reppen (31) points out, the question of corpus size is challenging to resolve. It is not always about a specific number of terms. However, if creating dictionaries, for example, the number of terms should be as large as tens or hundreds of millions of words. Still, if it is a question of historical texts of a specified era or author, a smaller representative corpus of the language of the subject research is sufficient for representativeness (O’Keeffe and McCarthy 32).

In general, the question of corpus size is resolved in two ways: first, if the sample is representative of the language under investigation, and second, if it is practical in terms of time constraints (O’Keeffe and McCarthy 32). Most corpora fail to be wholly representative but capture enough of a language to achieve adequate representation (ibid.). The size or number of terms is

relative to the object of the research, of the corpus design, and whether it is accurately representative (ibid.). Between 1960 and 1991, the prevailing belief was that the larger the corpus, the more valuable it was, but by the early 1990s, a movement began to recognize as well as advocate for the utility of smaller corpora (O'Keeffe and McCarthy 55). It was thus asserted that a small corpus could provide a representative and balanced view of the specific language subject under investigation (ibid.).

This research will use methods borrowed from corpus linguistics, such as applied concordances, to establish equivalences. This research will use methods borrowed from corpus linguistics, such as applied concordances, to establish equivalences. Corpus linguistic research is increasingly becoming an important method of language inquiry; Laviosa, Sardinha, Sánchez Ramos and Moreno, López-Rodríguez, Herteg (“Business English Press”), Álvarez García, Malik et al., and Mikhailov. Corpus linguistics (CL) provides an empirical approach to studying language that is in actual use. CL uses computer technology, allowing for the manipulation of data not possible with printed data and in very large volumes.

Concordancing allows researchers to look more closely at specific cultural references are expressed and how terms are translated. Another feature of CL is that it allows researchers to create word lists from specialized languages. Particularly relevant to translation studies, bilingual concordancers are used on aligned parallel corpora, as we have done in this research, and also discuss CL further in sections 4.4.-4.5. and 6.2. Wordlists allow for the production of word clusters that are measured and ranked by frequency and alphabetic lists that assist the researcher in better understanding language use (Bowker and Pearson 117). Other features of CL include automated vocabulary and glossary lists and identifying equivalents (Bowker and Pearson 138).

Still, the research is based on translation studies and is not limited to corpus linguistics research. Baker and Saldanha noted that apart from universal characteristics and norms of translation behavior, access to computerized corpora can provide us with the opportunity better to explore issues beyond the reach of small-scale studies (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). Additional definitions are “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).

A balance between large and small corpora sometimes is ideal. As Patton has pointed out, “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” (Patton 58-59).

Although some researchers, such as Patricia Rodríguez-Inés, believe that a large corpus is needed to solve certain translation issues (Rodríguez-Inés). Rodríguez-Inés (ibid.) notes that a corpus today should have the following characteristics: It is representative of the language or its variety, has defined design criteria, is typically finite, and is in an electronic format (17). The corpus of this research meets all these criteria.

We believe that the samples of original text documents produced by and within the specialized financial regulation and enforcement field focused on enforcing anti-money laundering and terrorist financing laws represent the language used in the field. The criteria defined in the selection of samples was that they had to be related to one of the organizations indicated for the topic. We chose the

original documents and their Spanish translations for their relevance and association with the named organizations.

The corpus is finite because it does not cover every document or all the language spoken or used in the domain but is a representative sample and is in electronic format. The corpus linguistics analysis provides a view of metaphorical expression use across different word classes, while a sufficiently sized corpus also broadens the empirical basis for testing hypotheses (Herteg “Business English Metaphors” 292).

Many researchers have successfully used corpora to examine metaphors. For example, Paloma Tejada Caller and Antonio Guzmán Guerra did a diachronic study of money metaphors in Greek, Tony Berber Sardinha also conducted diachronic research with a written as well as oral corpus on economic metaphors in Brazil, Pedro Fuertes-Olivera and Marisol Velasco Sacristán used a corpus composed of electronic dictionaries to analyze metaphorical nuances in accounting terms between English and Spanish (Herteg “Business English Metaphors” 292). Stender constructed a corpus of specialized economic press.

3.4. Description of the Corpus

The ideological role of Web sites, reports, and other communications is to reduce or eliminate financial crimes such as money laundering. Such communication is designed to empower stakeholders and inform and call them to act in some way after visiting Web sites or reading reports. This corpus was selected for its ideological role involving a complicated phenomenon. Ideological metaphor research has been analyzed through economic metaphors used in the Spanish and British press (Negro Alousque) and the discourse of security and crime prevention (Thibodeau et al.). However, there is little research on the role of ideological metaphors in gaining international

cooperation in preventing financial crime. The selected financial intelligence websites were created to inform officials, law enforcement officers, company officials, and other parties who are stakeholders in financial domains about money laundering prevention. We downloaded the samples from the public domain in the “about us” sections of the websites.

We attempt to explain and distinguish the discourse spoken by law enforcement and compliance agents and key stakeholders transmitted through their computer networks and the internet as well as in reports addressed to officials; the first step was to collect documents and internet sites where these communications occurred. The ideal corpus size for this doctoral research had to be representative of the language used in the regulatory field of finance, law enforcement, and security, specializing in preventing financial crimes. Samples of more specialized texts are found in the form of published annual report documents. Annual reports are directed toward experts in finance, bankers, specialized law enforcement officers, heads of state, and politicians (to name a few). Web sites offer slightly less formal and, therefore, semi-specialized communication. We suspect there will be a higher frequency of metaphors on publicly accessible Web sites.

After consulting the sources of texts and Web sites of the relevant organizations, we chose reports translated from English into Spanish on a one-to-one basis. Our understanding of a linguistic corpus conforms to the following definition: “A collection of pieces of language that are selected and ordered according to explicit linguistic criteria to be used as a sample of the language” (Sinclair 27). Corpora must fulfill specific purposes and provide necessary characteristics for validation (Martínez Egado 278). Our corpus fulfills specific purposes and provides the elements required for validation. Our corpus meets the requirement of collecting true facts about actors’ behavior in compliance with the described regulations, policies, and directives. The origin of the texts is authentic as they are

published in the public domain on official sites in use by government officials and other participants in organizations for financial crime prevention.

The economic domain is part of everyday life in society, but sometimes it changes at a “dizzying pace” (Martínez Egado 278). The collection of documents in this corpus is intended to describe the discourse in the regulatory financial field specializing in preventing financial crime. One facet of the economic-financial discourse in the corpus is chronology.

FinCorpAlin is the main corpus of this examination and is a parallel bilingual unidirectional English-to-Spanish corpus that is aligned and consists of 30 documents and their translations. Therefore, the texts of this corpus are limited to eleven years between 2010 and 2021. In the list that follows we marked in color to better distinguish between documents.

- 1.enhanced followup Perú en_es
- 2.MER Dominican Republic en_es
- 3.enhanced follow up Honduras en_es
- 4.MER followup Jamaica en_es
- 5.MER Haiti en_es
- 6.FATF barbados follow up rpt en_es
- 7.follow up rpt costa rica en_es
- 8.MER Islas Caymanes en_es
- 9.mer bermuda en_es
- 10 MER Mexico en_es
- 11.MER uruguay en_es
- 12.follow up reprt guatemala en_es
- 13.follow up reprt Panama en_es
- 14.MER turks y caicos en_es
- 15.MER columbia en_es
- 16.followup reprt Nicaragua en_es
- 17.follow up reprt Cuba en_es
- 18.egmond Plenary en_es
- 19.Business email fraud en_es
- 20.Egmont ocultacion de propiedad en_es
- 21.Egmont FIU principales of exchange en_es
- 22.Exec summary FIU operational indep en_es
- 23.Egmont FIU operation.Independence and Autonomy.en_es
- 24.Egmont grp FIU charter en_es
- 25.Operationally indep Self Assess checklist en_es
- 26.Egmont Support and Compliance process en_es
- 27.Copy of en_es EU doc aligned
- 28.en_es AML manual alineado
- 29.ML of serious tax crimes en_es
- 30.BSA.AML manual alineados

Figure 1. Listing of 1:1 translated documents from English to Spanish (Author's own elaboration)

3.4.1. The Compiling and Development of the Custom Corpus

The process of compiling and developing a custom corpus is a formative activity because it allows investigators to select and evaluate texts at a deeper level than if they were to use previously created corpora. As Mikhailov affirms, compiling custom corpora is a “very important skill for translators” (224). Our custom corpus provides a critical tool for researchers that aim to examine specialized language such as financial regulatory and compliance that is not captured by large,

language for general purpose corpora. In the following section we discuss the documents that we selected to analyze.

3.4.1.1. Documents that Make up the Unidirectional Translated Corpus

We chose guidance, evaluation, and reporting documents originating in English from internationally recognized organizations. Regulators consider these organizations as authorities in the field, including governmental and non-governmental organizations and private conglomerations regularly issued to prevent, detect, prosecute, and deter financial crimes. This research also consists of two comparable corpora representing more than 60 documents from 28 organizations and their websites in both English and Spanish, specifically regarding reducing or eliminating financial crime such as money laundering. The comparable corpora offer a bilingual analysis of source texts in the related discourse with which to analyze the translated texts. The corpora consist of public documents from the websites of the financial crime prevention agencies of 17 Spanish-speaking countries and the United States, the European Union, the Cayman Islands, Barbados, the Turks and Caicos Islands, and Jamaica. We chose the latter four because they participate in international organizations with specific financial crime prevention purposes and received evaluation reports in English and Spanish on their financial crime prevention status. For practical reasons of limited time, we have focused on a sample that covers sufficient territory dealing with the phenomenon examined.

The first document in the bilingual corpus is the Bank Secrecy Act-Anti-Money Laundering Manual (BSA-AML) published by the Federal Financial Institutions Examination Council (FFIEC). The BSA-AML was available in the public domain with a Spanish translation dated 2010; no specific author or translator was listed.

Next, we use reports published on FATF-GAFI (FATF or *Groupe d'action financière*, GAFI for its French acronym) and publicly available websites. FATF-GAFI plays a crucial role in global financial regulation (Gálvez Bravo 49). The reports are evaluations made by member states of the FATF-GAFI organization. They are called Mutual Evaluation Reports (MER). The reports consist of a compliance assessment with peer groups of members to assess how a country has complied with FATF recommendations. They describe and analyze the system to prevent financial crime (MER FATF: 2021).

FATF follow-up reports

FATF follow-up reports analyze progress in resolving compliance deficiencies identified in the mutual evaluation report or MER. All countries monitored participate in regular follow-up reports.

Enhanced follow-up reports

Follow-up procedures involve what is called an enhanced process of evaluation (MER FATF: 2021). An enhanced follow-up report is based on the FATF rules that apply to members with having been found to have compliance deficiencies. Such deficiencies could be related to overall effectiveness or technical-related compliance issues with their Anti-money laundering-counter terrorist finance (AML-CFT) systems.

Egmont group reports

A series of reports published in English and translated into Spanish downloaded from the Egmont Group website begins with The Egmont Group Charter, dated July 2013, and drafted on May 30, 2019. The following reports are included: 1) Principles of exchange between financial intelligence units, 2) Tools and practices for investigating the laundering of proceeds of corruption, 3) Public bulletin money laundering of tax crimes-July 2020, 4) The Egmont group of financial intelligence

units support and compliance June 12, 2015, 5) Understanding the autonomy and independence of financial intelligence units October 2018, 6) executive summary autonomy and independence of financial intelligence units. The final document is an Anti-money laundering manual in both English and Spanish, obtained from an anonymous remittance company operating in Spain.

Directive of the European Parliament - 2018 - 6th AML Directive (EU)

Number 2018-1673 of the European Parliament and of the Council of 23 October 2018 on combating money laundering by criminal law. This document is designed to close loopholes in the law and sanction money laundering activity throughout the European Union. In addition, the new framework enables cooperation between law enforcement and judicial officials to prevent money laundering and terrorist financing.

The corpus of this doctoral thesis consists of numerous entities that issue communications through reports, reports, and recommendations to eliminate money laundering and the subsequent financing of terrorism. The institutions are public, private, international, and national. The range of institutions is extensive, as are their publications on the phenomenon that is the focus of this research. To further elaborate on the scope of these organizations, the following provides additional background on each organization and the extent to which it is involved in anti-money laundering efforts.

Once the texts were introduced into Sketch Engine, the program combined them and created by default what is, in effect, a super text consisting of two subcorpora. Before further exploration into the corpus, we should present the statistics of both subcorpora.

Wordlist FinCorpAlin EN		Wordlist FinCorpAlin ES	
Word	Frequency ?	Word	Frequency ? ↓
the	87,842	de	112,214
of	49,084	la	59,678
and	40,043	y	37,979
to	35,809	el	33,610
in	21,966	en	30,932
a	18,083	los	29,900
for	13,475	las	29,140
is	12,185	que	27,300
that	11,764	a	24,887
with	9,658	del	17,085
or	12,766	se	16,824
are	9,405		

Figure 2. Top positions of Wordllst in FinCorpAlinEN (left) and FinCorpAlinES (right) (Author's own elaboration)

Organizations that comprise the comparable corpora are presented in the following sections: 3.4.1.2. and 3.4.1.3. We selected these organizations for their actions involving financial regulation and compliance and promoting anti-money laundering policy internationally and on a national level. Most of the organizations examined have policies that seem to embrace multilingualism although our focus will be on English and Spanish, we have seen French also is prominent, especially with the first organization listed in the following section.

3.4.1.2. International Institutions

1. The Financial Action Task Force (FATF)/GAFI (GAFI is the French acronym referenced in the Spanish texts as opposed to the FATF).
2. The United Nations or UN.
3. The Organization for Economic Co-operation and Development (OECD).
4. Secretariate of the Commonwealth (United Kingdom)
5. Basel Committee on Banking Supervision (BCBS).
6. The Egmont Group.
7. The International Monetary Fund and World Bank.
8. Council of Europe (CoE).
9. Inter-American Drug Abuse Control Commission (CICAD) of the Organization for American States (OAS).
10. International Police Organization-INTERPOL.
11. MoneyVAL of the Council on Europe.
12. Wolfsberg Group of International Financial Institutions.
13. Federación latinoamericana de bancos FELABAN.
14. International Association of Insurance Supervisors.
15. International Organization of Securities Commissions.
16. International Federation of Accountants.
17. International Chamber of Commerce.

3.4.1.3. National Institutions

1. Ministerio de Hacienda.
2. Agencia Estatal de Administración Tributaria.

3. Comisión de Prevención de Blanqueo de Capitales e Infracciones Monetarias y su Servicio Ejecutivo COPBLAC.
4. Órgano Centralizado de Prevención del Consejo General del Notariado OCP.
5. Ministerio de Justicia.
6. Ministerio de Interior.
7. Comisión Especial de Prevención del Blanqueo de Capitales del Consejo de la Abogacía.
8. Instituto de Expertos en Prevención de Blanqueo de Capitales y Financiación del Terrorismo INBLAC.
9. Asociación Española de Sujetos Obligados en Prevención del Blanqueo de Capitales ASEBLAC.
10. El Servicio Ejecutivo de la Comisión de Prevención del Blanqueo de Capitales e Infracciones Monetarias (Sepblac).
11. Secretariate of the Commonwealth
12. (U.S.) Federal Financial Institutions Examination Council (FFIEC)

The variety of agencies involved in the fight against money laundering is wide. To provide additional support for understanding the basis for their inclusion, we provided some background information on the nature and scope of laws. First, the United Nations was established in October of 1945 after the Second World War and now includes 193 countries as members, with the United States headquarters in New York and Europe in Geneva, Switzerland (Gálvez Bravo 47), another in Vienna, Austria, and the other in Nairobi, Kenya (“Main Bodies” United Nations).

The structure of the United Nations consists of six central bodies formed in 1945 by its founding charter; the General Assembly, the Security Council, the Economic and Social Council, the Trusteeship Council, the International Court of Justice, and the United Nations Secretariat (“Main

Bodies” United Nations). The General Assembly is the chief deliberative, policy-making, and representative body of the United Nations. All 193 member states participate in the Assembly. The Security Council, as its name implies, has primary responsibility for international peace and security. Fifteen members govern it, with five permanent and ten non-permanent members (ibid.). The Economic and Social Council is the main body in planning, programming, and coordinating economic and social activities. It has 54 members elected by the General Assembly and serves 3-year terms (ibid.). The Trusteeship Council has seven member states that ensure preparedness for independence and self-governance of 11 territories under its command. The International Court of Justice is the principal judicial body of the United Nations, located in The Hague, Netherlands; it serves to resolve legal matters and issue rulings under international law (ibid.).

The Secretariat is the official administrative leader representing the model ideology of the United Nations and serves as a spokesperson to advocate for the world's vulnerable peoples. The Secretariat has a 5-year renewable term of office (“Main Bodies” United Nations). Its principal function is maintaining international peace and security; through its various branches, it issues reports and resolutions for its member countries to follow. For example, the United Nations published its Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances in 1988 at the Vienna Convention, which was established as the first resolution to require member states to treat money laundering as a crime (Gálvez Bravo 48).

Other resolutions included in 2000, the United Nations Convention against Transnational Organized Crime or Palermo Convention, expanded the scope of money laundering beyond the proceeds or profits of drug trafficking to encompass all crimes (ibid.). In December 1999, the International Convention for the Suppression of the Financing of Terrorism was issued, which considered the financing of terrorism not limited to money laundering. In 2003 it published the United

Nations Convention Against Corruption, which strengthens and promotes the prevention of corruption (ibid.).

Two organizations were established under the conventions: The United Nations Office on Drugs and Crime was formed in 1997. Its headquarters are in Vienna, and its objective is to collaborate among international entities to help avoid legal loopholes against money laundering and terrorist financing (ibid.). Another organization known by its acronym IMOLIN, International Money Laundering Information Network, was established in 1998. IMOLIN is a branch of the same United Nations office previously mentioned, also headquartered in Vienna; it consists of an internet network to support public and private institutions and governments in preventing money laundering (ibid.).

The Organization for Economic Co-operation and Development (OECD) was established in Paris on April 16, 1948, as the European Organization for Economic Co-operation. Still, it changed its name in 1960 to the one which we know this organization today (Gálvez Bravo 49). The OECD consists of 34 countries and has 21 articles in its 1960 preamble dealing with economic development such as sustainable growth, employment levels, and contributions to world trade. The member countries are often referred to as “the rich man's club” (ibid.), and their agreements are intended to be unanimous; however, non-compliant members are not obligated to follow the decisions or recommendations set forth (ibid.). In 2000, some countries were denounced in an OECD publication for not being cooperative against money laundering and terrorist financing (ibid.).

Secretariate of the Commonwealth

The Secretariat of the Commonwealth was established in 1965 and is based in the United Kingdom. It represents a partnership of countries with the United Kingdom that promote democracy, human rights, peace, the rule of law, and free trade. They cooperate in providing technical assistance

and developing shared values (Gálvez Bravo 2014). Thus, the organization assists member countries in complying with FATF recommendations against money laundering (Gálvez Bravo 2014).

The Federal Financial Institutions Examination Council

The Federal Financial Institutions Examination Council is a U.S. body composed of several agencies. It has the power to set regulations and standards and issue reports to the order of the board of governors of the Federal Reserve Bank of the United States (FED). The FFIEC website, featured a number of source text documents in English translated into Spanish in pdf format during the time of our initial document search from mid-2021 until approximately May of 2022.

Basel Committee on Banking Supervision

The Basel Committee on Banking Supervision (BCBS) was established in 1975 as an international forum of central banks of countries belonging to the G-10. Its main objective is to create regulations on controlling banks with international transactions (Gálvez Bravo 2014). The committee published the Declaration of Principles on Preventing the Criminal Use of the Banking System for Money Laundering, also known as the “Basel Declaration,” in 1988, which was accepted by most FATF member countries (Gálvez Bravo 2014).

Egmont Group

The group is a forum consisting of members of the Financial Intelligence Units of a group of countries collaborating against financial crimes. It was established in 1995 after its first meeting in Brussels at the Egmont Palace. Its purpose is to communicate and exchange information related to anti-money laundering efforts (Gálvez Bravo). Currently, the group has 166 members from Financial Intelligence Units (FIUs). The group provides a platform for the secure exchange of intelligence and

expertise in anti-money laundering and counter-terrorist financing efforts (“Organization and Structure” Egmont Group).

International Monetary Fund and the World Bank

The World Bank helps and promotes development in alleviating poverty worldwide and provides loans and technical assistance where needed (Gálvez Bravo). It issued the Anti-Money Laundering and Combating the Financing of Terrorism Reference Guide in 2006 (Gálvez Bravo 2014). The international monetary fund promotes financial stability as well as monetary cooperation among countries around the world. It also promotes sustainable economic growth intending to reduce poverty. Founded in 1944, it has 190 member countries and 24 executive directors (International Monetary Fund: 2016). Both organizations collaborate with the United Nations and the FATF with territorial delegations to create evaluation methods per the special recommendations of the FATF around the financing of terrorism (Gálvez Bravo).

Council of Europe and European Union

The Council of Europe is separate from the European Union, although its works in cooperation (Council of the European Union, European Union). A collaboration between European countries founded in 1949 in Strasbourg, France, the Council of Europe is an organization dedicated to culture and education, as well as the defense of human rights and the rule of law (Council of Europe). In 1980, the Council of Ministers of the Council of Europe approved specific rules against money laundering by Recommendation number 80 (Gálvez Bravo), which established certain measures on transferring and concealing money of criminal origin (Jiménez Sanz). The European Union, for its part, approaches the problem of money laundering from the perspective of working to reduce

organized crime and the financing of terrorism by acting against illicit proceeds resulting from criminal activity (Gálvez Bravo).

Inter-American Drug Abuse Control Commission of the Organization of American States (CICAD of the Organization of American States)

Developed in association with the Organization of American States in 1986, CICAD is a political forum for member states whose purpose is addressing drug problems (Gálvez Bravo). It is a consultative and advisory body of the Organization of American States for member states to discuss and solve problems (OAS). CICAD began anti-money laundering efforts in 1990 by forming a group of experts on money laundering, and in 1999 the anti-money laundering section was created (“CICAD: Anti-Money Laundering”¹).

The comparable corpus in Spanish (FinCorpCompES) includes the book *Combate del lavado de activos desde el sistema judicial* by (Blanco Corder, Caparrós and Zaragoza). According to the Organization of American States’ website, the Inter-American Development Bank financed the first edition. Uruguay financed the second in 2003 and Venezuela in 2007. The authors provided guidance for CICAD’s anti-money laundering efforts and provided analysis from a legal perspective in the face of dynamic changes in Latin America and internationally. The book is used in training activities that include investigations, investigative techniques, and mock trials (“CICAD: Anti-Money Laundering”).

The comparable corpus in English (FinCorpCompEN) includes the book *Money*

¹ Available at www.cicad.oas.org/Main/Template.asp?File=/lavado_activos/pubs/combate_eng.asp.

Laundering and Illicit Financial Flows: Following the Money and Value Trails, Cassara, John. Independently Published in 2020, the text examines historical and novel money laundering methodologies from a law enforcement perspective. The book is available on Amazon.com and has received 140 reviews 71% of whom gave it a 5-star rating. Additionally, it has been listed as “A fascinating read” by Peter Wild of the journal ACAMS Today, The Magazine for Career-minded Professionals in the Anti-Money Laundering Field: <https://www.acamstoday.org/a-fascinating-read-on-aml-and-illicit-financial-flows/>. This book is also listed in the top 10 books to read on AML/CFT on several sites including <https://amluae.com/>. John has also published other books on the subject with Potomac Books, Red Cell, and Wiley Publishing. More information on his works can be found at johncassara.com. Case studies are provided, and views and analyses are offered by a former United States Treasury Special Agent who investigated firsthand the money laundering phenomenon for over 30 years. We believe the text provides typical language used in the field.

Interpol or International Criminal Police Organization

Interpol, or the International Police Organization, has 194 countries cooperating against crime by collaborating through technical and operational support in various situations (The International Criminal Police Organization - Interpol). The organization began in 1914 when police officers and lawyers from 24 countries met to discuss how best to identify and capture fugitives (ibid.). That meeting led to the founding of the International Criminal Police Commission organization created in 1923, and in 1956 updated its name to International Criminal Police Organization-INTERPOL (ibid.).

In 1983, INTERPOL began focusing on money laundering by creating a police division called FOPAC (Fondos Derivados del crimen-Fonds Provenant d'Activités Criminelles) (Gálvez Bravo). This division is a collaboration between Interpol member countries to investigate capital or assets

originating from organized crime (ibid.). It should be noted that Interpol collaborates with Europol in an inter-agency network or Camden Assets Recovery Inter-Agency Network (CARIN) to confiscate illicit activities' proceeds (ibid.). We found the INTERPOL website in Spanish as well as references to suborganizations, but we did not find translated documents on the website.

Money VAL

MoneyVAL is a committee of experts that evaluates measures against money laundering and terrorist financing. It is a permanent body of the Council of Europe that aims to advise on compliance with and implement international standards against money laundering and terrorist financing (Council of Europe). MoneyVAL was created in 1997 by the Council of Europe to evaluate and improve anti-money laundering measures in European member states (Gálvez Bravo).

Wolfsberg Group of International Financial Institutions

Founded in Switzerland in 2000, the group consists of thirteen global private banks to develop measures to manage financial risks related to money laundering and terrorist financing and “know your customer” regulations (“Mission” The Wolfsberg Group²). The group of banks published a set of principles to prevent money laundering as well as terrorist financing (Gálvez Bravo).

Latin American Federation of Banks FELABAN

FELABAN was founded in 1965 in Mar de la Plata, Argentina, as a non-profit organization with associations from 19 countries and more than 623 participating banks and financial institutions in Latin America (Federación Latinoamericana de Bancos FELABAN³). It should be noted that in

² Available at www.wolfsberg-principles.com/about/mission.

³ Available at <https://www.felaban.net/felaban>.

1996 it developed the “Declaration on the Prevention of the Misuse of the Financial System in the Laundering of Assets derived from Drug Trafficking and other illicit activities,” which was approved by the Committee that year (Gálvez Bravo 59). In addition to the FELABAN website in Spanish, all of the FELABAN publications available in the public domain are in Spanish including media publications, reports, legislative information, etcetera. We did not find documents translated into English from FELABAN.

International Association of Insurance Supervisors

The association was established in 1994 in Switzerland to develop and maintain safe, fair, and stable markets for the protection and benefit of policyholders and contribute to global financial stability (International Association of Insurance Supervisors). In 2004 it published the report *Anti-Money Laundering and Combating the Financing of Terrorism*, which expresses the measures to be adopted to better manage vulnerabilities in the sector (Gálvez Bravo).

International Organization of Securities Commissions

The International Organization of Securities Commissions was founded in 1983 as an international body that brings together securities regulators to set standards in the securities sector (IOSCO⁴). It has 229 members that regulate 95% of the world's securities markets (IOSCO). Two fundamental documents of the organization: first in 2004, with *Principles on the client and beneficial owner identification*, and second in 2005, *Anti-Money Laundering Guidance on Collective Investment Schemes* (Gálvez Bravo).

International Federation of Accountants

⁴ Available at <https://www.iosco.org/>.

The International Federation of Accountants was founded in 1977 in Munich, Germany, at the World Congress of Accountants, starting with 63 members in 51 countries and has grown to 180 members in 135 countries today (IFAC⁵). Its mission is to strengthen the profession in protecting the public interest through developing high-quality standards and setting standards on ethics, auditing, and accounting (IFAC: 2021, Gálvez Bravo). In 2004 it published a report, *Anti-Money Laundering, 2nd edition*, which guides accountants to recognize and implement anti-money laundering measures (Sylph: 2004).

International Chamber of Commerce

The International Chamber of Commerce was founded in Paris in 1919, after the First World War, to facilitate business, peace, prosperity, and opportunities worldwide (History - ICC - International Chamber of Commerce, Gálvez Bravo). In 1981, the chamber formed the Commercial Crime Services (CCS) unit (History - ICC - International Chamber of Commerce: 2021, Gálvez Bravo 2014). It should be noted that the chamber consults with the United Nations, the International Monetary Fund, and the International Bank, among others (Gálvez Bravo).

Ministry of Finance/Ministerio de Hacienda

The Ministry of Finance is part of Spain's central administration. It recommends and executes government policies regarding public finance, manages budgets and expenditures, and collects and prevents tax fraud (Gálvez Bravo).

Spanish State Agency of Tax Administration

⁵ Available at <https://www.ifac.org/>.

The State Agency of Tax Administration was established in 1992 under the Ministry of Economy and Finance and is responsible for effectively implementing the state tax system and customs (Agencia Tributaria: 2019). Its mission is to implement the state tax system, including maintaining data on taxation and financial activity domestically and internationally (Gálvez Bravo 2014). Its name in Spanish is *La Agencia Estatal de Administración Tributaria* or (AEAT in its Spanish acronym). Under the AEAT are two organizations; the National Fraud Investigation Office (ONIF), founded in 2004, and the Regional Anti-Money Laundering Center (CRAB in its Spanish acronym), created in 2007 (Gálvez Bravo).

Commission for the Prevention of Money Laundering and Monetary Offenses and its Executive Service COPBLAC

Formed by Royal Decree 2391/1980, the Commission is responsible for coordinating and managing activities related to preventing and investigating financial crimes (Gálvez Bravo). COPBLAC is a coordination of compliance with anti-money laundering laws through cooperation with the Bank of Spain and the Spanish Comisión Nacional del Mercado de Valores or (CNMV in its Spanish acronym).

Centralized Prevention Body of the General Council of Notaries General OCP

Notarial assistance has been essential in preventing money laundering offenses (Prevention and Punishment of Money Laundering⁶). The General Council of Notaries established the Centralized Body for the Prevention of Money Laundering (OCP) in December 2005 to direct the collaboration of notaries on the subject (Prevention and Punishment of Money Laundering). The organization by

⁶ Available at <https://www.notariado.org/portal/prevenci%C3%B3n-del-blanqueo-de-capitales>.

its Spanish name, *Órgano Centralizado de Prevención del Blanqueo de Capitales* (OCP), analyzes data collected by all notaries to identify patterns that may signify specific functions (Gálvez Bravo).

Ministry of Justice (Ministerio de Justicia)

The Ministry of Justice is the body of the Spanish Government responsible for preparing, directing, and implementing the Government's policy on justice matters (The Minister of Justice: 2020). It should be noted that the Ministry has representatives of the FATF and the Ministry of Economy, among others (Gálvez Bravo). The Ministerio de Justicia's website is mostly in Spanish but offers seven additional language options, English, Italian, Euskera, German, Catalan,

Valencian, Galician, and French. When we attempted to download publications in other languages, we found some titles were translated but the document itself was in Spanish.

Ministry of the Interior (Ministerio del Interior)

The Ministry of the Interior protects citizens' rights through the Security Forces and Corps (Gálvez Bravo). The Ministry assists and collaborates with other bodies in the fight to prevent money laundering and has also formed specialized teams to investigate money laundering (Gálvez Bravo). The Ministerio del Interior's website is in Spanish and offers four additional language options, English, Galician, Euskera, and Catalá. There are some documents translated and downloadable in these languages, but the majority of documents are in Spanish.

Public Prosecutor's Office (Ministerio Fiscal)

The Public Prosecutor's Office is integral to the Administration of Justice. However, it does not submit to the Judicial Power but the Executive Power, whose mission is to promote justice (Gálvez Bravo). The Prosecutor's Office is the one that receives suspicious transaction reports from Sepblac

and forms specialized groups to conduct investigations into money laundering (Gálvez Bravo). The Ministerio's website is exclusively in Spanish with a host of downloadable documents, reports, press releases, etcetera, all in Spanish. There did not appear to be any translations available in other languages.

Special Commission for the Prevention of Money Laundering of the Bar Association Council (Comisión Especial de Prevención del Blanqueo de Capitales del Consejo de la Abogacía)

The Council of the Spanish Attorneys General, in compliance with Law 10/2010, of April 28, formed the Special Commission for the Prevention of Money Laundering in 2006 (Prevención Blanqueo Capitales - Abogacía Española, Consejo General; see Gálvez Bravo). Its function is to resolve questions and provide guidance on money laundering. The Commission has drafted and issued recommendations to comply with the "Law 10/2010, of April 28, on the Prevention of Money Laundering and Terrorist Financing" (Gálvez Bravo 73). The Abogacía Española website is primarily in Spanish but offers five other language options, English, Catalá, French, Galician, and Euskara but states that the translations are "automatic" thus it appears to be linked to machine or computer assisted translation technology that did not function when we attempted to use it.

Institute of Experts in the Prevention of Money Laundering and Terrorist Financing INBLAC (*Instituto de Expertos en Prevención de Blanqueo de Capitales y Financiación del Terrorismo INBLAC*)

The Institute is a non-profit organization in Spain created in 2013 to bring together professionals and experts in the field (INBLAC⁷). The committee has fourteen members representing companies and associations who aim to provide space to collaborate and improve communication to prevent money laundering (Gálvez Bravo). INBLAC's website was exclusively in Spanish as were the associated documents, news media, reports, etcetera).

Spanish Association of Parties Obligated to Prevent Money Laundering ASEBLAC
(Asociación Española de Sujetos Obligados en Prevención del Blanqueo de Capitales ASEBLAC)

The Association complemented the efforts of INBLAC and was formed in 2014 in Valencia and consists of external experts and obligated parties that include a national network to promote the fight against money laundering (Gálvez Bravo). It aims to bring together professionals, those in the insurance field, teachers, compliance officers as well as researchers (ASEBLAC: 2021). The ASEBLAC website is exclusively in Spanish and all documents published in Spanish (i.e., reports, media, etcetera).

Sepblac

The Executive Service of the Commission for the Prevention of Money Laundering and Monetary Offenses. *Sepblac* is Spain's Financial Intelligence Unit and is the supervisory authority in the prevention of money laundering and terrorist finance. *Sepblac* was formed in 1993 (Sepblac 2022). The Sepblac website is mostly in Spanish but offers five additional language options, Valencian, Euskera, Galician, and Catalan and well as English. Documents are available in English for download in English including activity reports, internal control recommendation reports, and

⁷ Available at <https://inblac.org/quienes-somos/>.

legislative updates. The legislative information and updates were available for download in Spanish and English.

All of the preceding organizations have played important roles in anti-money laundering and most are relatively new organizations that have adopted policy and procedures that are also relatively new since money laundering initiatives first promoted by United States policy. We selected these organizations as representative of international and national communication patterns, terminology, and expressions used in financial regulation and compliance. In the next section we discuss the typology of our corpus.

3.4.2. Corpus Typology

The corpus is a parallel, unidirectional bilingual corpus with EN-ES directionality. It was processed and stored in Sketch Engine under FinCorp, composed of two monolingual corpora in English and Spanish. The two languages were aligned using Wordfast Aligner by segments and paragraphs to observe the translations better. Sketch Engine allowed for processing the large samples of both languages to identify what is typical and frequent and what might be considered outside ordinary language use. For the parallel unidirectional English to Spanish corpus, we chose our documents carefully to use only genre specific reports and communications that were translated from English to Spanish. The Bank Secrecy Act-Anti Money Laundering Manual and the FATF Mutual Evaluation Reports make up most of our texts which we ensured each were 1:1 translations. We first downloaded these documents from the corresponding websites in portable document format (pdf). This presented an initial challenge because we could not upload the documents to the *Wordfast* text aligner in this format. This required installing the *GlobalLink* translation software on our PC to convert the documents to a compatible format. After converting the documents to the *GlobalLink*

Package format, then converted them to *Microsoft Excel* to be compatible for automatic alignment. After processing the automatic alignment, we downloaded the documents for manual revision. Due to the size of this project we it took considerable time to conduct the manual audit of texts and make revisions paragraph by paragraph. Once this manual aligning process was completed, we were able to upload the texts to Sketch Engine. Sketch Engine processing then allowed for tagging parts of speech, key word in context (KWIC), and concordance analysis.

The following figure illustrates the corpora of this research. Its directionality is English to Spanish as indicated. The unidirectional English-to-Spanish aligned corpus is represented in the first two blocks as FinCorpENAlin and FinCorpESAlin. The following two subcorpora, FinCorpCompEN and FinCorpCompES, are comparable, larger corpora in English and Spanish, providing additional data for the subject language. The typology of the corpora is synchronic as the subject language is primarily contemporary and developed during the last 30-50 years. More time would be needed for a diachronic analysis for the data to be meaningful for a historical study of the language of money laundering in English and Spanish.

FinCorp (FinCorpENAlin, FinCorpESAlin, FinCorpCompEN, FinCorpCompES)

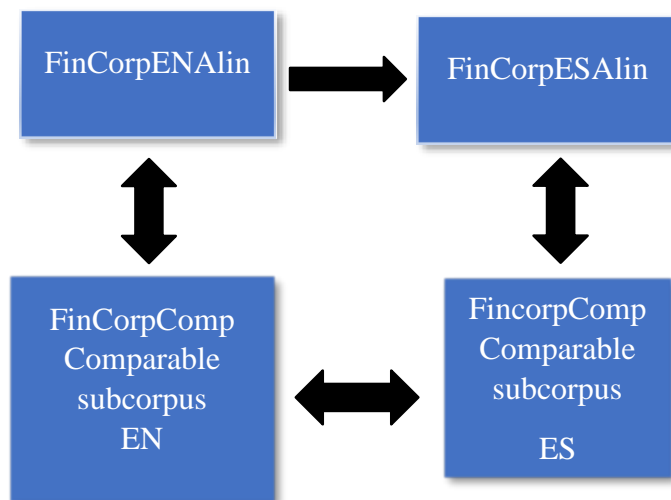


Figure 3. Illustration of bilingual English to Spanish Corpus and subcorpora (Author's own elaboration)

3.4.3. Analysis of the Corpus

We selected the original documents and their translations from financial analysis organizations of Spanish-speaking countries, the United States, and several other participating countries. We carefully selected mutual evaluation reports translated into Spanish from English, starting with the *Bank Secrecy Act/Anti-money Laundering Manual (BSA/AML)* translated from English into Spanish, and several other related documents; then, we chose to use the Sketch Engine tool for automatic data processing. We considered Wordsmith but decided to use Sketch Engine because of its availability and because it offered a user-friendly interface that allowed us to create and manipulate the bilingual parallel corpus. The data was analyzed from 29 electronic texts beginning with concordance reports and frequency of terms. Using the online tool, *Wordfast Aligner*, the bilingual corpora were aligned from English to Spanish and organized by paragraph to facilitate comparison.

The Concordancer allows several word search options in the selected corpora. It also offers Word Sketch, which analyzes grammatical and lexical collocations per word. Word Sketch automatically summarizes a word's behavior on a page. In addition, it allows for lists of words with their frequency of occurrence, the syntactic patterns and statistical relevance of lemmas, the comparison of syntactic patterns of two lemmas, and thesaurus creation of words that have semantic relationships (Kilgarriff et al. "The Sketch Engine").

3.4.4. The Analysis Software: *Sketch Engine*

Many text processing and analysis programs are available, many of them free of charge. For this work, we selected the Sketch Engine program for its reputation as a well-known program in language studies and is made available to the Universidad de Salamanca community. The tool,

developed by Lexical Computing Ltd, assists in comparisons, collocations, and context research (Kocjančič 154). Additionally, it is regularly used by major publishers such as Oxford University Press, Collins, and Cambridge University Press, among others worldwide (Hill). Sketch Engine offers several analysis functions, such as a concordancer that provides search options for chosen words and the Word Sketch program that analyzes lexicon and grammatical collocations. It also provides WebBootCat, allowing users to develop corpora by searching website data.

WebBootCat is an online version of a tool called BootCaT (Bootstrap Corpora and Terms from the Web) that allows users to create corpora from websites (Kocjančič 159). The corpora are constructed first by defining keywords, second by retrieving web pages, third by retrieving texts from selected pages, and by annotation and analysis by lemmatization of the corpus through the TreeTagger (annotation tool) (Kocjančič 160). The WebBootCat tool was created by translators who often resorted to the Internet to clarify questions not resolved by dictionaries (Kocjančič 159).

English documents and Web sites, as well as Spanish Web sites and their original text documents, were entered into the comparable corpora of the two languages. We applied texts from the websites utilizing WebBootCat, then added texts which are samples from the websites of FATFA, MoneyVal, and the financial intelligence units listed by entering web page addresses (URLs) of the organizations above as well.

3.4.5. Data Collection

The source texts and their translations were aligned from English to Spanish and uploaded to Sketch Engine for analysis. Two comparative subcorpora, FinCorpCompEN and FinCorpCompES, whereas source texts are non-translated texts that supplement the parallel corpus, which contains texts in English translated into Spanish. We believed we would find certain expressions are metaphorized

to elicit emotional reactions, though we also felt the U.S.-centric language would influence the Spanish translation. We also thought that images and concepts of U.S. origin influence the formation of metaphors in the financial field. Finally, we believed there might be some conceptual divergence and inconsistency in translation between Spanish and English in exceptionality (in this case, “money laundering”). The effect of source-language-centered metaphor translations is hypothesized to diminish clarity in transmitting concepts and attitudes about financial crimes across the interlingual language barrier.

To begin this study, we focused on two texts and their translations. The first document in the bilingual corpus is the Bank Secrecy Act-Anti-Money Laundering Manual (BSA-AML) published by the Federal Financial Institutions Examination Council (FFIEC) and labeled for this study as FinCorpBSA EN/ES. The Federal Financial Institutions Examination Council is a U.S. body composed of several agencies. It has the power to set regulations and standards and issue reports to the order of the board of governors of the Federal Reserve Bank of the United States (FED). The BSA-AML was available in the public domain together with a Spanish translation. The second document was an anti-money laundering manual (AML) translated from English into Spanish by an anonymous money remittance company operating in Madrid, Spain. The translated documents had no translators listed. We then compared translated terms to the comparative subcorpora FinCorpAlinES.

3.4.6. Data Analysis

Corpus data has gained great acceptance and has been considered a reliable source to better understand language (Mikhailov 224). We begin our discussion of the data analysis of our corpus by outlining the efficiency of the sample, the validity and reliability of the data. We follow this with a brief discussion on the research limitations and potential future opportunities.

3.4.6.1. Sample Efficiency, Validity, and Reliability of the Data

The data that makes up the corpus comes from a sample representative of current communications about financial regulation and crime prevention, which is the focus of this doctoral thesis. The experts' language in the corpus texts provides a realistic view of a specialized language that has not been previously examined in the comparative translation of English to Spanish. Additionally, the texts we selected were all translations from English source texts and available in the public domain on the internet from select institutions.

3.4.6.2. Research limitations

As Kim and Zhu (2004 79) assert, “all research methods have difficulties, weaknesses, and blind spots.” There are also challenges in working with anonymous translations across cultures and countries and deciding which language patterns to emphasize. It is important to note that this research focuses on translation studies. We establish that terminology and specialized translation are linked, so one is necessary for the other (Cabré “La terminología” 2). When examining specialized texts, it should be noted that there are levels of specialization that are classified by the characterization of the participants involved in the communication. Cabré (“Textos especializados” 13) demonstrates a range of levels offered by L. Hoffman (1987), who classifies terminology by its level of abstraction from very low to very high (ibid.).

The highest-level uses “artificial symbols for elements and relations” in its linguistic form (13). It is found in primarily theoretical basic sciences, which also points out that the communications are from scientist to scientist in the same field (ibid.). The participants in communication have a great deal to do with the evolution of terminology since its linguistic form requires adaptation to their field of consumption. Economic and financial language belong to academic fields and tends to use higher levels of abstraction in communication. However, due to the need to reach a greater public, language

and expression have overcome restrictions designed only for experts and adapted to reach a more significant public (Álvarez García 283).

In some cases, this causes a kind of interference by way of general language terms, structures, and other characteristics such as “inflation,” “exterior debt,” “unemployment,” and “barriers to importation,” which are common terminology (ibid.). When we choose to apply some terms and exclude others to use in professional settings, in a sense, we are giving life to ideas by way of language. As stated by (Martínez), it is necessary to consider not only the communicative context of language but the socio-cognitive needs of the speakers as well (2). The translated texts of our bilingual corpus were all translated anonymously which limited some information as to the translator’s choice of strategy. We chose to research a specialized area of language in a synchronic fashion though a longer, diachronic investigation might provide better insight to change and evolution of this language and more generalizability.

3.5. Chapter Summary

In Chapter three, we presented the methodology of this research project in 3.1., beginning with the thematic and semantic aspects of the corpus texts in Section 3.2., then outlining the methodology for identifying metaphors in Section 3.3. We then proceeded to describe the corpus and its composition of specialized texts in Section 3.4. and elaborated on the organizations examined concerning those texts in Section 3.4.2. Next, in Section 3.4.3., we discussed the corpus typology, followed by an analysis in Section 3.4.4. In Section 3.4.5., we presented and discussed the analysis software *Sketch Engine*, followed by a discussion of the data collection methodology in 3.4.6. Finally, we offered an analysis of the results in Section 3.4.7.

CHAPTER 4 – RESULTS AND ANALYSIS

In this chapter we begin with a discussion on the types of metaphors extracted from our corpus FinCorpAlin and the translation strategies applied. We provide a brief discussion on the identified domains in the corpus texts followed by specific translation strategies. First, we begin with discussing the translation strategy of omitting or paraphrasing metaphorical concepts. Second, we examine replacement of metaphorical concepts in the target translations. Third, we discuss retention of metaphorical concepts in the translations, fourth, we provide a brief discussion of translating metaphorical concepts by modifying the metaphor in the target language. We then briefly discuss metaphorical loss and terminological problems as well as provide some examples from the corpus texts. Next, we discuss the conceptual domains previously researched followed by the extraction of metaphors and shared domains in both source and target texts.

In Section 4.6.1. through 4.6.29, we provide metaphor examples, discussion and analysis as well as the presentation of the parallel concordances extracted from the bilingual corpus. This provides the reader with a realistic view into the language as it is used in the field. In Section 4.7., we provide a brief discussion on conceptual metaphor types followed by frequencies of lexicalized phrases. Finally, we provide a brief discussion of the results.

4.1. Types of Metaphors Extracted

Metaphors are often considered alive or lexicalized/fossilized, or dead. They are living metaphors because they shape our conception of things. Those that have become everyday words are deemed to have become lexicalized. A living metaphor refers to metaphors that retain a sense of

novelty and can be modified as they have yet to become lexicalized. New or novel metaphors require the receptor of the communication to activate prior knowledge and concepts to interpret them.

Lexicalized metaphors are often not even considered because they are so widely used and so ingrained in the perceptions of speakers. Additionally, lexicalized metaphors are sometimes not considered metaphors because they are so widely used. For instance, the finance term *liquidate* is an example of a fossilized metaphor. The term is so widely used it has become part of regular speech involving money matters in selling assets, thereby converting them into cash. The context of finance is required for interpretation that you are not making something into a *liquid*. Instead, the concept refers to converting one thing, the asset, into another, more tangible one, the cash we associate with *liquid*.

Baran (2004) asserts that lexicalized metaphors can be classified into three categories: terms that belong to a specific type of semantics, e.g., business strategies. Second, according to the term's meaning, most refer to geographical, biological (cellular production), or those derived from the basis of physics (atomized trial). Third, the type of motivational value of the term manifested in form, color, consistency, or movement (Loma-Osori 316 [Author's own translation]).

Arrese (25) states the categories most frequently researched in the field of metaphors are:

1. Health and disease
2. Natural events and disasters
3. Events around artifacts and constructions
4. Wars and clashes
5. Sports, games, and entertainment
6. Actions and situations of living beings

Health and medical metaphors proliferate in economic texts. Russo (118) affirms “economic jargon is very compatible with medical discourse.” Medical terminology often relies on warlike terminology in the language of disease treatment. For instance, we *fight* or *combat* illnesses. These terms are so ingrained in the language that they are almost imperceptible and have become lexicalized.

The following table is Author’s own elaboration based on the one proposed by Arrese (ibid.) and contains the domains investigated by other authors. In many metaphor studies, researchers attempt some type of categorization of the main conceptual metaphors and as noted by Arrese, use some classification to differentiate “between three types of metaphors, orientational, ontological and structural” (24).

Aliakbari and Khosravian (2013)	Colors – ontological (evaluative conceptualizations of black, green, white, red, and yellow).
Brandstetter (2015)	Path (horizontal movements), Ladder (vertical movements), container. Constellation metaphors (sport, personification, construction, medicine, nature, military).
Peebles (2012), Tomoni (2012)	Money (money is a drug, system of values, social boundary construction, i.e., money as dirty or clean), Money is liquid/medication, water, flows.
Flusberg et al. (2018)	War (political campaigns are battles, disease eradication is a battle, and the war against crime, drugs, and poverty).
Fraile Vicente (2007)	The economy is a machine, a liquid, a human body, daily life, nature, a game, a conflict/war, and a competition.
Herteg et al. (2016)	Animal behavior characteristics transferred to human beings and institutions (nominal).
Li and McGregor (2009)	Colors – ontological (evaluative conceptualizations of black, green, white, red, and yellow).
Herrera-Soler and White (2012)	Blood and water circulation.
Reijnierse et al. (2015)	Crime is a beast or a virus.
Rojo López and Orts Llopis (2010)	Great chain of being (Object, Building, Natural force, Supranatural force, Human behavior, Illness, Celebration, Living being, Machine) Path-scheme (Verticality, Source-path-goal, Journey, Container) Event (War, Competitive game, Show business, Medieval tournament).
Rossi (2014, 2017)	Genetic material is a code; finance is a game, animals, cartography, gastronomy.
Simon (2002)	Terrorism is war, a crime.
Spencer (2012)	Stain, shadow, light, and dark.

Thibodeau et al. (2017)	Geographic (United States government as swampland, i.e., political excess, stagnation, and corruption)
Thibodeau and Boroditsky (2011)	Crime is a beast or a virus. Waves, surges, sprees, crime is an epidemic, beast, virus.

Table 9. Source domains of conceptual metaphors proposed by various scholars (Author's own elaboration of (Arrese 25))

The previous table shows the conceptual metaphors from the source text analyzed in the present investigation. Each row shows a domain form different conceptual metaphor. For instance, according to Table 9, Money has been conceptualized as either a *liquid* as seen in Peebles, and Tomoni. Or *financial crime* is an *enemy* that must be *fought* in Thibodeau and Boroditsky.

Some domains are only used with a single source domain, whereas others are used with multiple source domains. *War*, *health* and *behavior*, *grading*, *accountability*, and *school* metaphors have very similar source domains because both are frequently referred to whenever the source texts mention the threat and challenges associated with regulating and adjudicating financial crime. The following table illustrates both target and source domains recurrent in FinCorpAlin.

Target Domain	Source Domain
Money	Water, organic substance, liquid
Financial Crime	Enemy
War	Enemy, applied force, opponent
Construction	Building, tools, materials, architecture
Health	Medicine, disease, cure, immunity
Behavior, grading, accountability, and school	Punishment, remedial, corrective, examination

Table 10. Recurrent target and source domains in FinCorpAlin (Author's own elaboration)

We will address the conceptual metaphors in Table 11 in this section. The top 10 source domains in the source text documents are illustrated in the following table.

Source domain	Instances of occurrence
Behavior, grading, accountability, and school	2,093
Weight metaphors	2,003
Construction-architecture	1,927
War metaphors	1,791
Cleansing-bleaching	1,126
Music metaphors	1,121
Sports, games, hunting	790
Family metaphors	644
Vehicle metaphors	599
Parts of the body	456

Table 2. Top 10 source domains and instances of occurrence (Author's own elaboration)

The top domains reflect the evaluative nature of the communications with the leading “behavior, grading, accountability and school” type domains. Also related to the evaluation is measurement seen with weight metaphors followed by construction-type metaphors. We see the ideological domain of War as the domain in fourth place for the highest number of occurrences. Next, we see cleansing followed by music, sports, games and hunting, then family, vehicle and body parts metaphors. In the next section we discuss translation strategies of these lexicalized metaphors.

4.2. Translation Strategies

A target-oriented approach was applied to this research as Deignan recommended that scholars not merely take a source text-only approach when analyzing metaphor translations. This approach revealed examples of non-metaphorical expressions replaced with metaphorical expressions; thus adding a conceptual metaphor was non-existent in the source text. This approach revealed non-metaphoric expressions translated from the source text as metaphoric expressions. It also revealed a certain expressional intensification in the target text. Such a phenomenon can be missed by researchers focusing only on metaphorical expression in the source text that may or may not correspond with the target text.

We identified the following translation procedures in the target texts:

1. Metaphor was retained using the same conceptual metaphor and equivalent expression.
2. Metaphor was replaced using a different conceptual metaphor and metaphorical expression in the target text.
3. Metaphor was modified using the same conceptual metaphor, but a different metaphorical expression.
4. Metaphor was/paraphrased or metaphorical expression was omitted or changed to a non-metaphorical expression.
5. Metaphor was added where there was no metaphorical expression was also a procedure identified.
6. Metaphor intensification was a procedure identified in certain domains.

Additionally, much of what we know regarding metaphors can be attributed to cognitive linguistics from the point of view of Temmerman, Mandelblit, Kövecses, Sinha, and others in Chapter 3, Sections 3.3. and 3.5 of this research, we discuss the translation of metaphors from this viewpoint.

We adopted Stender’s approach to better classify metaphors in FinCorpAlin, applying the four types of metaphorical expression in cross-linguistic variation as proposed by Deignan et al. (354) which are as follows:

- 1) Complete equivalence between metaphorical concept and linguistic expression,
- 2) same metaphorical concept but a different linguistic expression,
- 3) both languages use different metaphorical concepts and,
- 4) words and expressions have similar literal meanings but have different metaphorical meanings.

We thought this approach was appropriate for analyzing our corpus-based translation research as it has been previously applied by established researchers such as Alice Deignan, Professor of Applied Linguistics at Leeds University has written extensively on metaphor research as well as others metaphor scholars. In the next section we discuss the domains we identified in FinCorpAlin.

4.2.1. Identified Domains

The following table provides data on target domain metaphors and instances of occurrence. We found many similarities between English and Spanish but also some divergences which seem to indicate different emphases in metaphorical expression. For example, we found over 400 more occurrences of war metaphors in Spanish compared to the source texts, as seen in Table 11.

Target domain	Instance of occurrence
Construction-architecture	4526
Guerra/War	2255
Cleansing-bleaching	1793

Weight metaphors	1463
Behavior, grading, accountability, and school metaphors.	2203
Theater/show business	807
Partes del cuerpo (body parts)	689
Motor vehicles	585
Physics, chemicals, and natural sciences	534
Agricultural-botanical	443

Table 3. Top 10 target domains and instances of occurrence (Author's own elaboration)

Construction and *architecture* are the most frequent source domain in the Spanish texts at 4526 compared to 1927 in the English source texts. The second most frequent domain in the source texts is *Guerra/War*, with 2255 occurrences compared to the target texts of 1791. The third most frequent source domain is *cleansing/bleaching*, with 1793 occurrences in the target text compared to 1126 in the source texts. Due to space limitations and time constraints, analyzing other key domains frequently appearing in the corpus, such as *health*, the *state as a person*, *living organisms*, *pressure*, *weights*, and *colors* were impossible. Thus, our focus will be on the top four domains. The top four also seem to show a relationship to money laundering, the main topic of our research.

Some examples of the top four lexicalized metaphors by frequency are in the domain of *war*, such as *strategy*, where the equivalent was 362 occurrences in the entire corpus, as well as *fight* (246) and *combat* (117). Conceptual metaphors associated with war were also found in recent studies regarding problems in metaphor use by Kerbel regarding national security, Brooks (“How Everything Became War”), and even more recently by Vargas-Sierra and Moreno-Sandoval. The conceptual metaphors for legal compliance strategies as war strategies are illustrated in the examples in Table 21 in Section 5.7.1.

Gražytė and Maskaliūnienė identified war metaphors with expressions such as *fight* and *strategy* (74), as did Eriksson. The present study also identified warfare metaphors with expressions such as *fight* and *strategy*. As Lakoff and Johnson (“Metaphors” 34) asserted, this source domain can justify political and economic activities because the target domain is perceived as a dangerous threat. In Lakoff and Johnson’s example, *inflation is an adversary* that influences how we think and act towards it (ibid.).

Like English, Spanish conceptualization of problems is framed as detrimental to health, peace, and safety. The phrases indicate the shared conceptual metaphor as the enemy and thus refer to activities that imply confrontation. Moreover, the expressions indicate metaphorical concepts with war connotations. Among the most common procedures in the target, text was *retained metaphor*, *added metaphor*, *paraphrased metaphor*, or *intensified metaphor*. By “retaining” the source text conceptual metaphor, the concept is transferred from the source domain to the target domain using the direct equivalent metaphorical expression. Transfer of direct equivalents is evident in text segment examples in Table 21, where the term *strategy* is manifested from the *war against money and terror finance*, which is retained in the target text in Spanish.

4.2.2. Omitted/Paraphrased Metaphorical Concepts

The procedure of omitting or paraphrasing describes when a source text metaphorical expression has been rendered into an expression that is not metaphorical, whereby the source conceptual metaphor is omitted. We detected 327 omitted/paraphrased expressions in the target text, thereby removing the source metaphor. The source domain of *financial institutions are trees*. The metaphorical expression *branch* in (Table 44) is not retained in the Spanish target text, and a non-metaphorical expression was implemented instead with *sucursal*. The ontological divergence

between source and target domain is revealed in that the Spanish institutions have *children (filiales)* in instances where subsidiaries are used in the source text and *sucursales (helpers)* where the source expression is a branch.

Filial is based on the conceptual metaphor of the family for which the target text in Spanish has a strong cultural orientation. Interestingly, the target text adds a metaphor using the adjective *filiales*, where the source text terms are subsidiaries in 115 instances. *Filial* means “pertaining to or relating to the child” (*Diccionario de la Lengua Española* 2022 [Author’s own translation]). The expression *subsidiary* is used 134 times and means that which “assists; supplementary. Chiefly of a thing: that serves to help, assist, or supplement; providing assistance or supplementary supplies; (also) auxiliary, tributary, supplementary” (*Oxford English Dictionary*).

4.2.3. Replaced Metaphorical Concepts

A replaced metaphorical expression means the conceptual metaphor and the expression from the source text are replaced with a new metaphorical expression and concept in the target text. There were 1,089 metaphors identified as replaced. An example of this can be seen in the following Table 13 which are the results of a parallel concordance of the term strawman in English and Spanish.

<p>Shell companies, a legal person presents false or inconsistent documents and misuse of legal persons by strawmen</p>	<p>Sociedades pantalla, personas jurídicas que presentan documentos falsos o inconsistentes y uso indebido de personas jurídicas por parte de testaferros</p>
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Table 4. Strawman with testaferro and shell with screen (Author’s own elaboration)

The metaphorical expression *strawman*, manifested from the conceptual domain of *fake criminal organizations are made of straw*, is replaced with a new metaphorical expression *testaferro*,

manifested from *fake criminal organizations are heads of iron* in the Spanish target text. Some examples of this are the use of the term *strawman* in English, which is rendered as *testaferro* in the target text, and shell companies that become *pantallas* (screens) in the target text. *Strawman* means literally “a figure made of straw” according to *Oxford English Dictionary*, however; the use of strawman in the context of the discourse analyzed fits more with the implied conceptual metaphor of a “man of straw that looks like a man but is not really what he appears to be” as in the sense of false pretense attested in 1946 in “The authorities only got the Rumanian captain and his crew, who couldn't give away much as all their dealings had been with straw men under assumed names” (*Oxford English Dictionary*). In this sense, false names conceal criminal actors' true identities.

The preferred metaphor in Spanish is *testaferros*, used 43 times in the target text. *Testaferros*, a loan word from Italian, means *cabeza de hierro* or head of iron, “a person who lends their name in contract, claim or business, that belongs to another person” (“Testaferro” *Diccionario de la Lengua Española* [Author’s own translation]). *Testaferros* is used for multiple variations in the English corpus: *front, frontmen, strawman, straw owner*.

4.2.4. Retained Metaphorical Concepts

The most used translation procedure identified in the target texts was retaining the metaphorical expression and the conceptual metaphor. Retaining meant that conceptual metaphors such as *money is a liquid* and *war against crime* were present in both the source and the target texts. By *retaining* the source text, conceptual metaphor is transferred from the source domain to the target domain using the metaphorical expression that is its direct equivalent. Examples of retaining are evident in Section 4.2.4.1., where the metaphorical expression flow, manifested from *money is a liquid*, is retained in the target text in Spanish with the term *flujo*. Charteris-Black (“Critical

metaphor”) and Popescu also found *money is a liquid* present in economic and business texts. The following table is the parallel concordance of the English and Spanish texts using the key word *flow*.

Financial intelligence received from UCREF was used to follow the money flow and identify information on individuals	La inteligencia financiera, que se recibió de UCREF, se utilizó para seguir el flujo de dinero e identificar información sobre los individuos
The role of the Cayman Islands as a major financial center and the significant flow of funds through the jurisdiction	Tanto el papel de las Islas Caimán como un centro financiero importante como el flujo significativo de fondos a través de la jurisdicción
This does not only impact the flow of information from reporting entities to the FRA but also between the FRA and other competent authorities	Esto no sólo afecta el flujo de información desde los sujetos obligados hasta la FRA, sino también entre la FRA y las demás autoridades competentes.
Consequently, the ACC's operations which falls outside the efficient and coordinated flow of information within the law enforcement community is, impeded	Como resultado, las operaciones del ACC se ven obstaculizadas – son operaciones que quedan fuera del flujo eficiente y coordinado de la información dentro de la comunidad del orden público

Table 5. *Metaphors of Money and information as Liquid (Author’s own elaboration)*

The preceding text segments show money and funds *flowing like water*. We also see the same is true for information. *Information can flow* in different ways, be coordinated and efficient, or be impeded. *Information flows like water* to the law enforcement community. The notion of *flow* appears to be positive just as water must flow to move from one place to another. Information flows ensure that critical data has not stopped flowing. However, we can see in the above parallel concordance between the English and Spanish corpus texts that when information *flow* is not efficient or coordinated it can impede or hinder the law enforcement community. In the next section we discuss how the translation strategy applied was that of modifying the metaphorical concept.

4.2.5. Modified Metaphorical Concepts

A modified metaphor approach is similar to retaining, except that the source text metaphorical expression is changed to a different metaphor in the target text while retaining the same concept. There were 141 metaphors identified as modified using a different metaphorical expression. An example of the expression *red flag* and its modified translation in the target texts follow in the parallel concordance using the key word *red flag*.

Provide guidance to the financial sector on how to identify TF red flags and suspicious transactions.	Proporcionan una orientación suficiente al sector financiero en cuanto a cómo identificar las notificaciones rojas del TF.
Regarding the second deficiency identified in criterion 29.4 b) of the Honduran MER, in relation to the lack of a strategic analysis area that develops red flags and updated typologies.	En lo que concierne a la segunda deficiencia señalada en el criterio 29.4 b) del IEM de Honduras, respecto de la carencia de un área de análisis estratégico que desarrolle señales de alerta y tipologías actualizadas.

Table 6. Examples of the expression *red flags* and translations (Author's own elaboration)

The preceding table's metaphorical expression *red flag* is a manifestation of *financial crime is the enemy*. It has been changed to *notificación roja*; both expressions conceptualize the target domain as the enemy, and the conceptual metaphor is thus retained as both expressions conceptualize the target domain as the enemy. The term *red flag*, originated as “A flag of red material displayed as a sign of battle-readiness or (in extended use) defiance,” according to *Oxford English Dictionary* (“Red flag”). The term is used ten times and is modified as *señales de alerta* (17), *notificaciones rojas*, and (3) times as *alertas rojas*, but it is also translated in (4) instances in the literal *banderas rojas*. In the following section we briefly discuss metaphorical loss and terminological problems that we found in the corpus texts.

4.2.6. Examples of Metaphorical Loss and Terminological Problems.

We found variations of the expressions for money laundering that coexisted within or across the corpus documents revealing poor terminology harmonization in these financial regulatory reports. In the source text context, the expression *free flow* connotes unrestricted movement, able to move freely. The target text rendition *gratuito* connotes arbitrary or baseless sending in *envío gratuito* and demonstrates a semantic loss apart from a glaring error in translation.

to facilitate the free flow of intelligence	para facilitar el envío gratuito de inteligencia
The larger entities, including TCSPs utilize software and screen directly against the UN lists every 24 hours	Las entidades más grandes, incluidos los TCSP, utilizan el software y la pantalla directamente en las listas de las Naciones Unidas cada 24 horas

Table 7. Example of flow and screen metaphors (Author's own elaboration)

Another example identified was a screen. In this context, the source text metaphor *Screen* is meant to be a filter but is lost in the target text with the term *pantalla* in (Table 16) connotes *window* in the sense of something you look through or at (i.e., computer screen). *Screen* in a verb with the same meaning as filter or check but it has been translated as a concrete noun, the piece of hardware attached to a computer synonymous with monitor.

Flawed metaphorical concepts lead to mixed or misleading translations, thereby undermining communication. Using conceptual metaphors as a method for creating neologisms in a specialized language often derives from the transmission of the concept by way of metaphors originating in English to coin new terms in the target language (Haddad Haddad and Montero Martínez). Such as the term anti-money laundering, which appears as *antilavado* 59 times the target text and is a term that also appears in the Cervantes Institute's list of neologisms ("Antilavado de dinero" Instituto

Cervantes: Banco de Neologismos). Often, metaphors in one language become lexicalized. They have a high frequency of use to the degree that their lexicalization is transferred to the target language. This lexicalization works when the concepts are clear between both cultures, though less so when concepts are unclear or not shared. Below we show the parallel concordance from English to Spanish from using the search term *tax haven*.

Movement of funds to tax heavens , other risk jurisdictions, or not justified trade operations by legal persons	El movimiento de fondos a paraísos fiscales , otras jurisdicciones de riesgo u operaciones comerciales no justificadas por parte de personas jurídicas
Monitoring of international transfers related to tax havens (17)	Monitoreo de operaciones internacionales relacionadas con los paraísos fiscales (11)

Table 8. *Metaphors of places where taxation of capital is avoided (Author's own elaboration)*

The *tax haven* expression has been lexicalized in English and considered by some as erroneously translated as *Paraíso fiscal* or literally, fiscal paradise, which is a place where capital can avoid taxation. In 2010, Sanz Gómez asserted that *Paraíso fiscal* came from a poor translation of *tax haven*, alleging the French initially confused the translation of haven with heaven (1). Other studies have also pointed to problems with the translation (Enfedaque; González García and González Martín; González Martín). On the other hand, Peramo contends that it was not necessarily an error claiming that a more thorough historical analysis of both terms in English, *haven*, and *heaven*, refer to the same thing in accounting terminology (6-7, Hines and Rice, Murphy).

As such, both terms refer to overseas territories where the currency is not subject to taxation obligations from the place of origin. Further, the term fiscal paradise was first used in English and frequently used by the Tax Justice Network (Murphy 7). The more apt translation is *refugio fiscal*, which is used much less frequently (7 times) in the corpus data. Though Peramo asserts the terms are

not univocal. They are *fiscal paradises*, “essentially platforms for financial and commercial operations in the global markets, rather than mere money havens” (7 [Author’s own translation]). Conceptually, the term *paradise* conjures up visions where things like crime do not exist. As Hülse (ibid.) points out, if money is laundered in paradise, then a certain contradiction seems to exist in that crime is a necessary precursor to money laundering.

Nonetheless, accounting terminology in English adopted this term and has been using it since at least the early 1990s (Hines and Rice). Thus, there does not seem to be metaphorical loss from source to target text in this case. Examples of loss can be seen in less conspicuous expressions where the metaphor is replaced, changing the concept. An example of a replaced metaphor with a different metaphorical expression based on an erroneous concept can be seen in Table 16, with the source text term screen erroneously rendered as *pantalla* in the target text.

There is an opportunity for a lack of clear understanding due to the mapping between the source text domain of *money laundering*, and the target domain that uses both *blanqueo de capitales* and *lavado de dinero* interchangeably. Financial crime is expressed clearly as an *enemy* in the target domain. However, the possibility arises of confusion and some loss of metaphorical concepts in the target text from multiple expressions intending to refer to the same idea. In addition to repetitive terminological inconsistencies in expressions such as tax havens, correspondences risk being lost or weakened. Further, the preceding example illustrates how the United States’ regulatory language has shaped and influenced the ontology of financial crime prevention in the Spanish-speaking world through the transfer of some source domain ontology, such as *war*.

As previously noted, several scholars, including the Praggeljaz Group and Sardinha, agree that it can be difficult to determine a metaphor as categorizing metaphors by different fields presents

challenges. As Stender noted, we would have to conduct an etymological and historical analysis to determine the exact origin of the term that makes one consider whether it is being used as a metaphor (171).

4.3. Conceptual Domains Previously Researched.

There have been many conceptual domains examined in previous research. For example, Fraile Vicente (2007) presents diverse general conceptual domains that provide grounds for a breadth of metaphorical expression. She distinguishes between conceptual metaphors such as the economy is a machine, a *liquid*, a *human body*, *daily life*, *nature*, a *game*, a *conflict* or *war*, and *competition*. Others elaborated in Table 9 include Spencer, who discusses *terrorism is war-crime*; Reijnierse et al. elaborate on crime is a *virus-beast*; Tomoni, *money is a liquid*, and Rossi, *finance is a game*. The present research attempts to build on previous research in these domains to establish their application in international financial regulation and enforcement discourse.

4.4. Extraction of Metaphors in FinCorpAlin

It is necessary to consider the volume of metaphors found in the texts of our bilingual corpus. Metaphors are a vital characteristic of economic and financial speech. With money, regulation, and crime, we focused on the well-known classification of meanings guided by intuition and consulting Spanish and English dictionaries. This approach has been repeated by Stefanowitsch and Gries (10), who asserts “in virtually all studies of metaphor, corpus-based or not, metaphors are identified and classified based on more-or-less explicit commonsensical intuitions of the part of the researcher.” In cases where we encountered ambiguity, we consulted the dictionary for meaning while considering the context. While we elaborated on metaphor extraction in Section 3.3., we discussed challenges we faced extracting metaphors from our corpus of over one million words. Nonetheless,

we believe we were able to capture relevant data and most certainly sufficient data to analyze the specialized language we chose to investigate. In the following section we discuss shared metaphorical domains from the source and target texts of FinCorpAlin.

4.5. Shared Domains in the ST and TTs

The following table presents domains that appear to be shared between both source and target text languages.

Source text domain	Target text domain
Money	Dinero
Crime	Delitos
War	Guerra
State	Estado
Financial crime/money crimes	Delito financiero
Liquids	Líquidos
Movements of force	Movimientos de fuerza
Health	Salud
Body parts	Partes del cuerpo
Family	Familia
Colors	Colores
Education/training/grading	Formación-calificaciones
Depth	Profundidad
Architecture/construction	Arquitectura-construcción
Paranormal phenomena	Fenómena paranormal
Theater/show business	Teatro-espectáculo

Motor Vehicles	Vehículos motorizados
Sports, games, hunting	Deportes, juegos, cazamiento
Physics/Chemistry	Física/química
Nobility	Nobleza

Table 9. Shared domains in source and target texts in FinCorpAlin (Author's own elaboration)

Before discussing source and target domain mapping, it is essential to define the domain. Kövecses (“Cognitive-linguistic” 4) describes a conceptual domain as a “coherent organization of knowledge.” For instance, most people have knowledge that is coherently organized about money and time. When we try to understand time, we use the concept of money in a way that enables that understanding. A conceptual metaphor consists of two conceptual domains. Conceptual domain A is understood as conceptual domain B, whereby the first domain is marked as the target domain and the second the source. Both pairings reveal how our conceptual system is structured (ibid.).

It is important to distinguish different conceptual metaphors from metaphorical linguistic expressions, words, and expressions from language and terminology of more concrete conceptual domains. Several examples follow of common metaphorical expressions used in contemporary English. From Lakoff and Johnson (“Metaphors” 7-8):

Time is money.

I've invested a lot of time in her.

How do you spend your time these days?

You don't use your time profitably.

You're running out of time.

I lost a lot of time when I got sick.

Do you have much time left?

In the next example, we see the notion of *ideas are food*:

All this paper has in it are raw facts, half-baked ideas, and warmed-over theories.

There are too many facts here for me to digest them all.

I just can't swallow that claim.

Let me stew over it for a while.

That's food for thought.

She devoured the book.

Let's let that idea simmer on the back burner for a while. (ibid.)

Research on conceptual metaphors that conceptualize financial crime in key regulatory documents, like those in the present research, is virtually non-existent. The analytical approach of this material focuses on source and target domains and the key role in which they play. I will provide a brief overview of these metaphorical terms and discuss how stakeholders use certain metaphors in preventing, investigating, and adjudicating financial crimes. In the next section we discuss recurrent domains in our bilingual parallel unidirectional specialized corpus.

4.6. Recurrent Domains

The recurrent domains identified in FinCorpAlin are presented in the following table as previous researchers have done (Stender, Arrese, Orts and Rojo). To better organize our findings, we set some parameters around including domains and set the minimum of 10 examples of the specific metaphor in both languages as the minimum for inclusion. This approach is consistent with previous researchers such as Stender. Like other research (López and Orts Llopis, Arrese, and Stender) show, it has also been found that many metaphors can belong to more than one domain. For instance, health

metaphors often share domains with living organisms and parts of the body. We found 14,883 metaphors in the source text and 19,622 in the target text. The following table presents recurring domains by descending levels of frequency in FinCorpAlin.

Legend	Domain	Subdomain	Subdomain
1	Money	Finance	
2	Weight metaphors		
3	War	conflict	
4	State	Person	
5	Financial crime/money crimes	Animal	Virus
6	Liquids	Fluids	
7	Movements of force		
8	Health	Cedicine	Treatments
9	Body parts		
10	Family		
11	Colors		
12	Education/Training/Grading	Behavior	Accountability
13	Depth	Height	Nature
14	Architecture/Construction	Tools	Building
15	Paranormal Phenomena	Ghost (fantasma)	
16	Theater/show business	Music	Actors
17	Motor Vehicles	Mechanics	Transportation
18	Sports, Games, unting		

19	Physics/Chemistry		
20	Nobility	High-status positions	
21	Cleansing/Bleaching	Washing	

Table 10. Metaphorical areas most recurring in FinCorpAlin (Author's own elaboration)

The following terms and expressions are the most significant examples from the corpus. Next, we discuss war and fight metaphors which are prominent in the FinCorpAlin corpus texts. Both in frequency and relevance to efforts against money laundering crime, *war* and *fight* metaphors are central in communicating a sense of urgency and idealism to appeal to ensuring compliance. We explore *liquid* and *fluid* metaphors as the reference money and money movement and explore additional lexicalized metaphors in various domains as they are applied in communications related to the specialized genre of national and transnational financial regulation and compliance. In the following sections we discuss 31 different categories and provide parallel concordance samples of the texts in use, side by side, English to Spanish with the metaphorical terms highlighted. We then provide analytical discussion in each section. Allow us to begin with *war* and *fight* metaphors in FinCorpAlin.

4.6.1. War and fight metaphors

War and conflict metaphors predominate our daily language and are also present in almost all the texts in the FinCorpAlin corpus. Terms such as *combat*, *fight*, *battle*, *victims*, and many synonyms for subduing or defeating an enemy are present. The verb *disparar*, which also refers to the act of using a firearm, is not used in this way in the corpus. In the economic context, this verb is not used with an aggressive connotation; instead, it is perceived as a dynamic movement that tends to move something in a desired direction (such as positive economic indicators such as growth in Gross Domestic Product or GDP) as in a *shot* in an upward direction but never downward.

The verb *disparar* is used in the target text as translated from the English word *triggered* as “causing something to occur,” as in “investigations were triggered by [...]” In this sense, the *trigger* can be seen as the mechanism used to activate the firearm, causing the action of the *shot* or *disparo*. Segura Soto pointed out the metaphorical use of *disparar* in reference to sports, particularly soccer analyses in his research on war metaphors. The term *disparo* is also used as a noun in an economic context indicating dynamic movement in a positive direction. Stender (177) found similar usage showing *disparo* and *disparar* was used in economic texts as something that increased sharply or quickly. The following table presents an example of the term *disparo* and several other terms we will discuss in this light.

A further category of "investigations" can be triggered in cases where there are suspicions that breaches of the law may have occurred	Se puede disparar otra categoría de "investigaciones" en casos cuando hay sospecha que hayan ocurrido
This is mostly related to cross-border transactions between the two countries that enrich their databases and trigger more cases	Esto se relaciona mayormente con operaciones transfronterizas entre los dos países que enriquecen sus bases de datos y disparan más casos.
Over the past three decades, the dramatic convergence of international trade and global financial systems, as well as the rise of the internet and other forms of communication technologies	En los últimos treinta años, la drástica convergencia del comercio internacional con los sistemas financieros mundiales, así como el disparo de Internet y de otras tecnologías
This is mostly related to cross-border transactions between the two countries that enrich their databases and trigger more cases.	Esto se relaciona mayormente con operaciones transfronterizas entre los dos países que enriquecen sus bases de datos y disparan más casos
Honduras, with the support of the IDB has developed its national AML/CFT/CFP strategy	Prepare a national strategy for the prevention, control and fight against money laundering and terrorist financing

Prepare a national strategy for the prevention, control, and fight against money laundering and terrorist financing	Elaborar la estrategia nacional de prevención, control y combate en materia de lavado de activos y financiamiento al terrorismo
In addition, the same Decree states that for purposes of fighting against ML/TF	Adicionalmente, el mismo Decreto refiere que para los fines de lucha contra el LA/FT,

Table 20. Text segment examples of War metaphors in FinCorpAlin (Author's own elaboration)

The term *fight* (86) is rendered as *lucha* in (246) occurrences in the target text. In Table 20 the target text uses the verb *luchar* (fight). In contrast, the source text uses *measures* to describe the action taken against money laundering and terror financing organizations or to prevent financial crime. An example of intensification measures is rendered as *lucha* in (Table 20). The post-modifier *de lucha* is used in this segment. Using a postmodifier could be seen as a way of intensifying the expression, but it could also be seen as a way of emphasizing the warfare connotation. This finding coincides with Eriksson's (31) study of the institutional translation of conceptual metaphors in political discourse. A more direct equivalent could have been the term *medidas*, as in *medidas en contra* (measures against). Adding *de lucha* (in the battle) after the headword makes the conceptualization of measures against financial crime even more precise and more robust. While not required to understand the overall text, it reinforces the implied war connotations.

In both preceding segments, the source text uses the word *strategy*, which originated as a military term “The art or practice of planning or directing the larger movements or long-term objectives of a battle, military campaign” (“Strategy” *Oxford English Dictionary*). Although the term is often used today to refer to a plan of action, the military connotations remain. The conceptual metaphor in both languages is *money laundering*, and *terror finance is an enemy*. The following table illustrates the target text's intensification in expressing a governmental agency's name.

Those that are involved in the judicial investigations process for ML to obtain evidence, such as Bureau of Economic and Financial Crimes (BAFE)	Aquellas que están involucradas en el proceso de investigaciones judiciales del LA a fin de conseguir pruebas, tales como la Oficina de lucha contra la delincuencia económica y financiera (BAFE)
Anti-money laundering and counter-terrorist financing measures	Medidas de lucha contra el lavado de dinero y la financiación del terrorismo

Table 21. Text segment examples of intensification using post modifier *de lucha* in *FinCorpAlin* (Author's own elaboration)

Again, in four occurrences (4), we see the use of the intensification post modifier *de lucha* where the source text uses the *Bureau of Economic and Financial Crimes*. In the target text it is rendered as *la Oficina de lucha contra* (in the battle against) *la delincuencia económica y financiera*. The non-metaphorical expressions *deal with* (14), *approach* (13), and *address* (486), as well as the term *subsidiaries* (115), make up most instances where a non-metaphorical expression is replaced in the target text with a metaphorical one. Adding is a procedure where a non-metaphorical expression in the source text is replaced with a metaphorical expression in the target text, thus adding a new metaphorical concept. In the source text uses the expression *deal with*, *address*, and replaces it with the lexicalized conceptual metaphor *abordar*. In nautical terms *abordar* meant “the action and effect of boarding from one ship to another. To pass people from the boarding ship to the boarded with weapons for the purpose of *combat* or *ramming the enemy*.” (“Abordar” *Definiciona.com* [Author's own translation]). We also found evidence of *abordar* in terms of *combat* in the Real Academia Española's *Corpus Del Nuevo Diccionario Histórico* or CNDHE corpus (“Abordar”). The term is derived from the noun *abordaje*, also meaning to “move people from one ship to another with weapons to attack the enemy” (“Abordaje” *Diccionario de la Lengua Española*). Early Spanish use of the term appears to come from the French *abordage* meaning “an attack on a ship in which it is boarded” (*Oxford English Dictionary*). The lexicalized *abordar* is polysemous in modern-day use;

however, the aggressive connotation remains. An example is “una multitud de periodistas la abordó al salir [...] a crowd of journalists accosted her as she was leaving” (*Collins Spanish-English Dictionary*).

Lovón Cueva et al., highlighted the use of *abordar* and *abordaje* as warlike metaphorical references examined in their recent study, “COVID-19 and warlike metaphors: a cognitive analysis of digital news and social media” (175). Piccioni (361) additionally asserts *abordar* is a highly conventional metaphor in Spanish and alludes to a “partially automated habit” to translate the verb address as *abordar* without regard to the nouns that collocate with it. In her study, she examined the expression *abordar riesgo* and found typical verb-noun collocates were omitted such as *gestionar riesgo* (358).

The Spanish texts replace the verb address with a lexicalized metaphorical expression 486 occurrences. The most frequent conceptual metaphor added relates to *war*, *money laundering*, *terror finance is an enemy*. The following table presents parallel concordance segments for the term address, deals with, approaches, and target as translated to *abordar*.

<p>The SSF participates in events organized by the industry, where it deals with current issues as well as those in which difficulties have been detected in their implementation and those identified</p>	<p>La SSF participa en los eventos organizados por la industria, donde aborda tanto temas de actualidad como aquellos en los que se han detectado dificultades</p>
<p>This report does not address Dominican Republic's progress on effectiveness</p>	<p>Este informe no aborda el progreso de República Dominicanas obre las mejoras en su efectividad</p>
<p>The enhanced follow-up process is based on the FATF traditional policy that approaches members with significant (technical compliance or effectiveness) deficiencies</p>	<p>El seguimiento intensificado se basa en la política tradicional del GAFI que aborda a aquellos miembros con deficiencias significativas (de cumplimiento técnico o efectividad) en sus sistemas</p>

Further, neither the AGD nor any competent authority has any strategy in place to target the movement of cash	Además, ni la AGD ni ninguna autoridad competente tiene una estrategia para abordar la circulación de efectivo
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Table 11. Text segment examples of the dead metaphor *abordar* in *FinCorpAlin* (Author's own elaboration)

The term *abordar* was also rendered from the English approach or approaches on 13 occasions. Still, it was translated from address 486 times as *abordar* (300) in what appears as a salient example of a preferred usage in Spanish. Deignan et al. would likely classify this as a level four type of cross-linguistic variation where the words, in this case, address, approach, and deal with, may have similar literal meanings but differing metaphorical meanings. The target text appears to present a lexicalized metaphor where none is present in the source text. We would propose a level five to Deignan et al.'s (1997) classification, where the source and target text have similar literal meanings (we elaborate on Deignan et al.'s classification levels in Section 4.7.). Still, a metaphor is introduced or added in the translated text to present a more cogent expression.

The source text uses the term target as “an area of cash movement.” While the Spanish uses *abordar* for target, the source text also has conceptual metaphorical connotations. To target something is to “select for military attack [...], especially by aerial bombing or assault” (“Target” *Oxford English Dictionary*). The term is often used as a metaphor to describe the action of selecting as a point of attention, which is how it is expressed in the source text. Nonetheless, the connotations of war remain present. English and Spanish seem to use different metaphorical concepts in the preceding example, placing it in what Deignan et al. would classify as level three.

While other terms could have been used, such as *tratar* (to deal with, to treat) or *enfocar en* (to focus on), however, since war was one of the top three metaphorical domains, it is plausible that the translators wanted to enhance this type of conceptualization. In addition to *abordar*, we identified

other terms that could be considered additions, such as filial (discussed in Section 5.2.2.), which is added in the target text where no previous metaphor existed in the source text.

In keeping with the aggressive connotation, rescue is used when referring to money. In this same sense, money can also be surrendered. Both terms relate to the battlefield, where some soldiers are rescued while others surrender. The following table presents several examples of text segments from a parallel concordance performed in Sketch Engine.

the customer's normal range of financial transactions, early redemptions , multiple transactions.	Del rango normal de las transacciones financieras de ese cliente, rescate o redención anticipada, múltiples transacciones.
Law 19.484 provides that entities that fail to comply with the obligations may not pay profits or dividends, bailouts , breaks, or the result of the liquidation of the entity.	Ley 19.484 establece que las entidades que incumplan con las obligaciones no podrán pagar utilidades ni dividendos, rescates , recesos o el resultado de la liquidación de la entidad.
A customer borrows against the cash surrender value of permanent life insurance policies.	Pedir prestado el valor de rescate de las pólizas de seguro de vida permanentes.
Notaries are key gatekeepers in many fronts of the AML/CFT regime.	Los notarios son proveedores de fe pública fundamentales en muchos frentes del régimen ALA/CFT.
For the fulfilment of the functions of control of compliance with tax obligations and fight against tax evasion and avoidance	Para el cumplimiento de las funciones de control del cumplimiento de obligaciones tributarias y lucha contra la evasión y elusión tributaria que corresponden a la SUNAT
This group seeks to improve or establish procedures or other mechanisms (conventions, agreements, memoranda, and protocols) that allow access to and inter-institutional exchange of relevant and timely information to combat ML/TF.	Este grupo busca mejorar o establecer procedimientos u otros mecanismos (convenios, acuerdos, memorándum y protocolos) que permitan el acceso e intercambio interinstitucional de información relevante y oportuna para la lucha contra el LA/FT.
no policies or mechanism were in place to cooperate and coordinate with regards to	tampoco hubo políticas o mecanismos de cooperación y coordinación con respecto a

<p>combating proliferation financing (PF) of weapons of mass destruction.</p>	<p>la lucha contra la financiación de la proliferación (FP) de armas de destrucción en masa.</p>
<p>The fight against narcotics trafficking is further hampered by corruption.</p>	<p>La lucha contra el narcotráfico se ve obstaculizada por la corrupción.</p>
<p>Congress passed the Money Laundering Suppression Act of 1994 (MLSA), which further addressed the U.S. Treasury's role in combating money laundering.</p>	<p>el Congreso de los Estados Unidos aprobó la Ley de Supresión del Lavado de Dinero de 1994 (MLSA, por sus siglas en inglés) que consideró con más detenimiento el papel del Tesoro de los Estados Unidos en la batalla contra el lavado de dinero.</p>
<p>In addition, other global organizations are becoming increasingly involved in combating money laundering.</p>	<p>Además, otras organizaciones globales están comenzando a involucrarse cada vez más en la batalla contra el lavado de dinero.</p>

Table 12. Text segment examples of War and Rescue metaphors in FinCorpAlin (Author's own elaboration)

We can see the term *rescate* (8) used in the target text, which is an addition to the financial expression of early redemption, meaning the prepayment of a loan before its maturity date. The term *bail* comes from another conceptual metaphor in English that derives from the “nautical old French *baille* ‘bucket, pail, from Medieval Latin ‘*baiula* (aquae), literally ‘porter of water’”; thus, a bailout is to ‘leave suddenly’ (“Bailout” *Etymonline*). The connotation conveys a similarity to rescue as in the target text *rescate*. Same metaphorical concept and different linguistic expressions. Surrender (8), in English, clearly has warlike connotations evoking an enemy surrendering on the battlefield. In describing a financial product such as life insurance, the Spanish target text renders surrender as what appears to be the preferred Spanish *rescate* as opposed to the equivalent *rendición*. Another term in the source text, fronts (64), was rendered as *frentes* (4) at a much less frequent rate and is associated with frontline, a military metaphor for those having first contact with the enemy. The target text renders frontline in the literal sense; *contacto directo*. “The foremost line or part of an army or battalion [...] line of battle [...] The foremost part of the ground occupied, or in a wider sense, of the field of operations; the part next the enemy” (“Front” *Oxford English Dictionary*).

There was a high frequency in the source text of the term combat (196), while in the target text, we found fewer occurrences of the exact equivalent combater (117). Next, we see battle as *batalla*, although the preferred term is *lucha* (246). There were (86) references to fighting in English compared to *luchar*, a salient expression in Spanish.

The table below presents the number of war-related term occurrences in both the source and target texts. *Fight*, and the equivalent Spanish, *luchar*, were the most frequent terms.

English	Fight (86), battle (2), surrender (8)
Spanish	Luchar (246), batalla (2), rescate (9)

Table 13. Warlike terms in English and Spanish in FinCorpAlin (Author's own elaboration)

Results indicate that the war theme in English is similarly represented in source and target texts, in general but there seems to be a preference for *combatir* which seems to demonstrate some intensification in Spanish with over 200 occurrences compared to the English texts with only 117 occurrences of the equivalent *combat*. Conversely, there are only 42 instances of *victim* in English, while in Spanish, there are 47 instances of *victim*. Although similar usage, the Spanish texts used the term more frequently despite what might be viewed as a more offense related discourse. The following two figures illustrate lines of concordance for both *víctimas* and victims.

(lista de vigilancia de nivel 2) tienen un número significativo de víctimas además de no cumplir plenamente con los estándares requeridos
J se detectó debido a la diligencia del Gestor Patrimonial de la víctima en el banco Butterfields Bank . Sin embargo , una vez
s delincuentes comprometen las cuentas de correo electrónico de las víctimas ya sea para (1) enviar instrucciones de pago fraudulentas
en los esquemas de BEC , se suplanta la identidad de las víctimas para enviar instrucciones sobre transacciones aparentemente legítim
rometer la información y las cuentas de correo electrónico de la víctima . En primer lugar , los delincuentes acceden ilegalmente a

Figure 4. Lines of concordance for the term víctimas in FinCorpAlin in Spanish (Author's own elaboration)

public unless the judge considers that it could endanger the victims , jurors, witnesses, experts and other parties, or that the public status may
 JJ IN DT NN VVZ IN/that PP MD VV DT NNS , NNS , NNS , NNS CC JJ NNS , CC IN/that DT JJ NN MD

nts of BEC fraud, during a recent five-year period, involving victims domestically and internationally . {</s><s>ut1} 1 {ut2} These schemes
 IN NP NN , IN DT JJ JJ NN , VVG NNS RB CC RB SENT (NN) CD (NN) DT NNS

><align>{ut1}BEC schemes generally involve impersonating victims to submit seemingly legitimate transaction instructions for a financial institu
 (JJ) NP VVZ RB VV VVG NNS TO VV RB JJ NN NNS IN DT JJ NN

and combating trafficking in human beings and protecting its victims , and replacing Council Framework Decision 2002/629 / JHA (OJ L 101,
 CC VVG NN IN JJ NNS CC VVG PPZ NNS , CC VVG NP NN NP CD SYM NP (NP NP CD ,

Figure 5. Lines of concordance for the term victims in FinCorpAlin in English (Author's own elaboration)

Sketch Engine utilizes Treetagger tagset for labelling parts of speech (POS). For example, the POS tag for a coordinating conjunction is CC, a noun that is singular or mass is NN, an adverb RB, a verb VV. In Spanish, the tagsets are labeled as N for a noun, C for common or P for proper, M for masculine. For verbs, V indicates a verb which is then labeled by category as M for main, A for auxiliary, etc. (*Lexical Computing CZ*). As mentioned above, we found 42 occurrences of *victim* in English and 47 of *víctima* in Spanish in the parallel corpus texts. In our analysis of warlike metaphors in the corpus texts we also found the term *conflict diamonds*, while only a couple of references we thought it worth mentioning.

We found references to expression *conflict diamonds* in the target text rendered as *diamantes de sangre* (blood diamonds). We understand this to be an intensification of the same thing, but the source text expression of conflict, although perhaps a euphemism, does not evoke imagery of violent conflict, much less bloody. The target text metaphor *diamantes de sangre* does convey such imagery. Deignan et al. (1997) would likely classify these as level four, where there are similar literal meanings, yet the metaphorical meanings diverge to some degree.

4.6.2. Liquid and Fluid Metaphors

Another domain that is prevalent in FinCorpAlin is that of fluids and liquids. Money metaphors have often been related to the source domain of water and gas (Tomoni 206; O'Connor "Matter metaphors" 141, 210). We found the same to be true in the financial regulatory corpus texts. This domain is essential as it is used frequently to describe how money is moved in the financial system and how financial regulation influences that movement. The notion of liquidity is well known in Finance and Economics, where money that is accessible is referred to as a *liquid asset*. Stender (191) affirms the importance of this domain in economic texts during the liquidity and mortgage crises of the mid-2000s in multiple countries, including Spain.

The *money is a liquid* metaphor that appears in English and Spanish, especially when referring to economic problems and crises. As Stender (191) cited, the mortgage crisis led to what became known as a liquidity crisis in many countries. Based on the frequencies of *money is liquid* which were 99 occurrences in English and 123 occurrences in Spanish, we can see that finance primarily *flows like a liquid*, as it is likewise translated in the target text. We provide the parallel concordances for flow references which also includes *information is liquid*, in the previous tables 14 and 16, respectively. Deignan et al. would likely classify the cross-linguistic variation level as a complete equivalence between metaphorical concepts and linguistic expression. The following table provides several examples of liquid metaphors regarding assets managed by banks provided through a parallel concordance in FinCorpAlin.

It is noted that a prominent function of the Class B banks located outside of	Se observa que una función destacada de los bancos de Clase B ubicados fuera de las
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the Cayman Islands is to manage the liquidity of its group's assets.	Islas Caimán es gestionar la liquidez de los activos de su grupo.
This layer of control is focused on prudential and AML/CFT issues such as personal and institutional questionnaires, business plans and policies and procedures that are used to govern operations and manage risk, physical presence information and evidence of capital and liquidity availability, and previous track records of previous regulatory relationships.	Esta capa de control se centra en cuestiones prudenciales y ALD / CFT, tales como cuestionarios personales e institucionales, planes de negocios y políticas y procedimientos que se utilizan para gobernar operaciones y administrar riesgos, información de presencia física y evidencia de disponibilidad de capital y liquidez y registros previos. de relaciones regulatorias anteriores.
Financial impacts could include regulatory sanctions and fines, litigation expenses, the loss of business, reduced liquidity , asset seizures and freezes, loan losses, and remediation expenses.	El impacto financiero puede incluir sanciones y multas regulatorias, gastos ocasionados por litigios, pérdida de negocios, reducción en la liquidez , confiscaciones y congelamiento de activos, pérdida de préstamos y gastos de reparaciones.

Table 14. Text segment examples of liquidity metaphors in FinCorpAlin (Author's own elaboration)

In the preceding parallel concordance, we see banks as managing the degree to which assets are liquid. The degree to which assets are or become liquid is something that financial institutions must manage as they can be converted into cash. Illicit activities come at a high cost and have consequences to financial institutions, which risk having their liquidity reduced and, in turn, can lead to defaults and institutional failure. Both terms liquidity and *liquidez* essentially mean the quality of being liquid, a necessity for financial institutions. The lexicalized metaphor liquidity dates to the 1600s and derives from the Latin *liquidus* meaning “‘fluid, liquid, moist,’ figuratively ‘flowing [...] also from *liquere* ‘be fluid, related to liquid to melt, flow’” (“Liquidity” *Etymonline*). The following table presents verbs as liquids and fluids as found in FinCorpAlin.

a significant amount of the ML/TF risks seemingly associated with cross-border transactions taking in the context of the	una cantidad significativa de los riesgos del LA/FT aparentemente asociados con las transacciones transfronterizas al tener en
--	--

MVTS sector and the volume of cash that flows through that sector)	cuenta el sector de los MVTS y el volumen de efectivo que fluye por ese sector)
The NRA identified tax evasion as one of the sources of proceeds of crime that flows through the jurisdiction	La NRA identificó la evasión fiscal como una de las fuentes del producto del crimen que fluye a través de la jurisdicción
When these structures are used for illicit purposes, money may flow through multiple layers of shell companies before finally being withdrawn in cash or transferred to its final destination internationally	Cuando estas estructuras se utilizan con fines ilícitos, el dinero puede fluir por distintos niveles de las empresas ficticias hasta que en última instancia se retira o transfiere a su destino final internacional.

Table 15. Text segment examples of verbs of liquids and fluid metaphors in FinCorpAlin (Author's own elaboration)

The verb *liquidate* is polysemous and is expressed in at least three different ways in English, i.e., *settlement* (15), *winding up* (1), and *liquidate* (2). We found the verb *liquidar* (13) to be used more frequently than the direct English equivalent *liquidate* (2). Nevertheless, we found the noun *liquidez* (5) to be used an equal number of times in English, with *liquidity* (5) suggesting a similarity between English and Spanish concepts. The following figure presents the concordance for the term *flujo* in the target text.

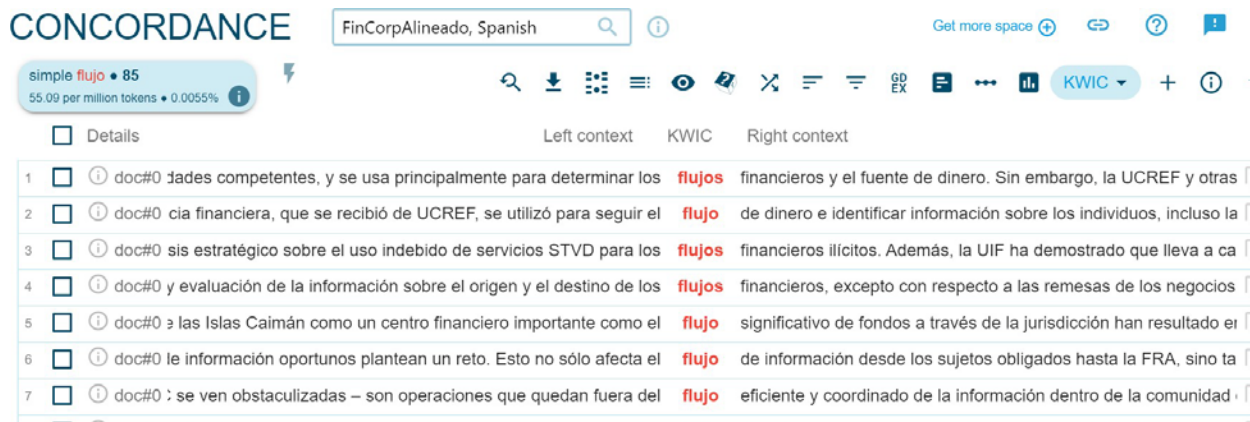


Figure 6. Concordance screen for the term *flujo* in FinCorpAlin en español (Author's own elaboration)

Flow is used to describe money and information movement as if these were *liquids* such as water or fuel. *Flow* (81) is observed as *flujo* (90), *fluida* (10), *fluye* (7), and *fluyendo* (1) in the target

text regarding money, asset, and information movement. *Flow* (10), in English or in Spanish *Fluir* (3) conceptualizes the movement of the proceeds of crime that flow through shell companies. In the top left appears the number of times the term *flujo* appears (85) in the Spanish subcorpus. In the next section we discuss metaphors found in the corpus texts relating to health, medicine and organic substances.

4.6.3. Health, Medicine, and Organic Substance Metaphors

Apart from the personifications we will discuss later, the texts treat the economy and related concepts and organisms as human bodies. As Lakoff and Johnson assert, “ontological metaphors serve various purposes” (“Metaphors” 25). One such purpose is to associate metaphorical conceptual domains such as “inflation is an entity” (“Metaphors” 26). In a more recent investigation, Liang affirmed the ontological metaphor of “the economy as a living being” (21). Like Stender’s findings (181), the texts in FinCorpAlin also address money, finance, and organizations such as parts of the human body which can suffer from sickness, be strengthened or otherwise subject to environmental manipulation. The organism metaphor refers to money, countries, and organizations, especially countries described as complying with or not complying with regulatory requirements as well as regulatory agencies’ ability to influence or enforce financial regulation and adjudication. The following table illustrates how money is referred to as *health, medicine, and organic phenomena*.

<p>There is provision for authorised access to funds that have been frozen in accordance with UNSCR 1452</p>	<p>Existe una disposición para el acceso autorizado a fondos que se han congelado de conformidad con RCSNU 1452</p>
<p>It has been noted that neither the OT Orders nor the TL provisions would apply and that the funds or other assets that were frozen would be unfrozen as soon as practicable and the person lifting the freeze would also notify the Governor as soon as is practicable.</p>	<p>Se ha observado que ni las Órdenes de OT (Territorios de Ultramar) ni las disposiciones de la TL aplicarían y que los fondos u otros activos que fueron congelados serían descongelados tan pronto como sea posible y la persona que</p>

	levanta la congelación también notificaría al gobernador tan pronto como sea posible.
No established procedures to authorise the access to funds frozen	no hay procedimientos establecidos para autorizar el acceso a los fondos congelados
This is a testimony of its desire to freeze and restraint the assets of terrorist and terrorist organisation	demuestra el deseo de congelar y restringir los activos de los terroristas y de las organizaciones terroristas
All the banks and some of the other financial institutions have reportedly de-risked currency exchange firms due to risk contagion concerns (partly because of suspicious of illegal activity by the firms or their clients).	Todos los bancos y algunas de las otras IF supuestamente han eliminado el riesgo de los de cambio de divisas debido a inquietudes relacionadas con el riesgo de contagio .
Unlike other high-value assets, the real estate market in most countries has demonstrated a strong resilience to economic fluctuations	A diferencia de otros activos de gran valor, el mercado inmobiliario de la mayoría de los países ha demostrado una fuerte resistencia a las fluctuaciones económicas
based on the nature of their businesses, require significant capital injections for start-up and operations.	basados en la naturaleza de sus negocios, requieren inyecciones significativas de capital para la puesta en marcha y las operaciones.
Deficiencies were an absence of legal framework and operational mechanism for Haiti to guard against countries with weak systems for combating ML	Las deficiencias eran una falta de marco legal y un mecanismo operacional para que Haití se protegiera de los países con sistemas débiles para combatir el LA.
The assessment team recognised the weakness in competent authorities' ability to keep data and statistics relative to crime and demonstrating effectiveness. The assessment team was informed that the MJPS is seeking to remedy this deficiency	El equipo de evaluación reconoció la debilidad en la capacidad de las autoridades competentes para mantener los datos y las estadísticas relativos a la delincuencia y demostrar su eficacia. Se le informó al equipo de evaluación que el MJPS está tratando de subsananar esta deficiencia,

Table 16. Text segment examples of health, medicine, and organic substance metaphors in FinCorpAlin (Author's own elaboration)

Money can be frozen, unfrozen, cause *contagion*, and even be injected, in the first text segment, we see the use of funds being *frozen* (148) in the source text and the equivalent *congelado* (15) in the target text. Next, we see that funds or assets can be *frozen* or *unfrozen*, *congelado* or *descongelado*. We also found *financial risk is contagion*, where suspicious financial activity concerns financial

institutions and banks. *Contagion* is defined as “the communication of disease from body to body by contact direct or mediate.” (“Contagion” *Oxford English Dictionary*). Risk *Contagion* is the effect of a person’s risky behavior on one’s willingness to take on additional risk. *Risk Contagion* is the impact of another person’s dangerous behavior on our desire to undertake more risk and is often used in describing financial markets (Bosh).

The source text defines resilience as the *real estate market is a patient* that is resilient or, in Spanish, *resistente*. Similarly, we found that capital can be *injected* into businesses to ensure their *health* by *inoculating* them. Businesses receive significant *inyecciones* of capital ensuring their ability to “come to life.” Additionally, country *regulatory systems are patients* and are *weak* or *débiles*, in Spanish, in some countries, thereby not providing sufficient protection against financial crime such as money laundering and trade finance. The term *remedy* (43) in the source text is translated as *subsanan* (22) and *remedio* (10).

In the following table, we see *deficiencies with stored information are signals of illness* as global challenges of information gathering are symptomatic of the lack of information stored by third-party service providers. In the following table the parallel concordances illustrate multiple *patient* type references.

<p>The reason why the information stored by third-party service providers is sometimes deficient is not understood and may be symptomatic of the enormous challenges associated with collecting relevant and contemporary information on a global scale.</p>	<p>No se entiende por qué a veces es deficiente la información almacenada por proveedores de servicios terceros y esto podría ser un síntoma de los grandes desafíos asociados a la recopilación de información pertinente y actualizada a escala mundial.</p>
<p>Haiti and its nationals are not immune to TF activities,</p>	<p>Haiti y sus nacionales no son inmunes a las actividades del TF</p>

<p>The Central Bank of Haiti... In October 2016, whilst undergoing recovery from a massive earthquake that occurred in 2010, the country was devastated by hurricane Matthew which caused damages equivalent to thirty-two percent of the country's GDP</p>	<p>El Banco Central de Haití... En octubre de 2016, mientras recuperaba de un terremoto masivo que sucedió en 2010, el país fue devastado por el huracán Mateo que causó daños equivalentes al treinta y dos por ciento del PIB del país.</p>
<p>Article 143 of the CCP establishes that evidence should be evaluated separately and jointly in accordance with the rules of sound criticism, except for a legal text that expressly provides for a different rule of appreciation</p>	<p>El artículo 143 del CPP establece que las pruebas serán valoradas por separado y en conjunto de acuerdo con las reglas de la sana crítica, salvo texto legal que expresamente disponga una regla de apreciación diversa.</p>
<p>THE COMMISSION FOR THE PREVENTION OF MONEY LAUNDERING AND MONETARY OFFENCES...It bears the overall responsibility for developing the prevention and fights against money laundering policy in our country.</p>	<p>LA COMISIÓN DE PREVENCIÓN DEL BLANQUEO DE CAPITALS E INFRACCIONES MONETARIAS... Es el máximo responsable del desarrollo de la política preventiva y de lucha contra el blanqueo de capitales en nuestro país.</p>

Table 17. Text segment examples of illness and prevention in FinCorpAlin (Author's own elaboration)

The country of Haiti, for example, is conceptually framed the *central bank as a patient* that is in *recovery* after a natural disaster. Next, we found the target translation adjective for criticism as *sana (healthy)* from the source text adjective *sound (solid)*, which would seem the Spanish text added a metaphorical concept as Spanish *sana* is not a direct equivalent to *sound* in English. However, *sound* is defined as “senses relating to freedom from disease; *healthy, secure, solid*” by the *Oxford English Dictionary* (“Solid”). Finally, we observe prevention translated to the equivalent preventive as *the política preventiva* or preventive policy in preventing the *malady of money laundering*. The term *preventiva* is observed to be a complete equivalence between metaphorical concept and linguistic expression, as outlined by Deignan et al.

4.6.4. Weather and Natural Disaster Metaphors

Weather and natural catastrophes influence language and have become lexicalized expressions in both languages. Natural disasters such as earthquakes affect much of the world, and metaphorical references and concepts related to them are quickly understood. For instance, the term *epicenter* and its equivalent *epicentro* in Spanish can quickly gain the attention of those listening or reading. We did not find many of these types of metaphors in our corpus but decided the ones we did find were worth mentioning. The following table presents several weather and natural disaster metaphors.

These trade and financial centres can be loosely defined as any city, which can be considered an epicentre of regional or international trade	Estos centros comerciales y financieros pueden definirse vagamente como cualquier ciudad: que puede considerarse un epicentro del comercio regional o internacional
The number and quality of SARs filed are also an excellent barometer to measure how well FIs and DNFPBs respond to trigger events that result in the application of enhanced due diligence	El número y la calidad de los ROS presentados también son un excelente barómetro para medir qué tan bien responden las IF y los APNFD a los eventos desencadenantes que resultan en la aplicación de una debida diligencia
U. S. Department of State- 2017 Investment Climate Report- Executive Summary:	Departamento de estado de los Estados Unidos-2017 Informe sobre el clima de inversión-Resumen Ejecutivo:

Table 29. Text segment examples of weather and natural disaster metaphors in FinCorpAlin (Author's own elaboration)

In the metaphors related to natural disasters, we observed the Spanish term *epicentro* used where there was no reference to earthquakes. The *Real Academia Española* defines *epicentro* as “the surface center of an area disturbed by a seismic event” (“Epicentro” *Diccionario de la Lengua Española* [Author's own translation]). A *barometer* is, according to the *Oxford English Dictionary*, “An instrument for determining the weight or pressure of the atmosphere, and hence for judging of probable changes in the weather” (“Barometer”). The equivalent in Spanish is *borómetro*, a true

cognate. The metaphorical use of SARs (Suspicious Activity Reports) is a *barometer* measuring financial institution response rates to certain events requiring increased monitoring. In essence, SAR reports are a *barometer* providing a “*measurement or reading*” to determine the *atmospheric financial conditions*.” Finally, we observed climate metaphorized as *investments are weather*. The examples in this category are a level one, complete equivalence between metaphorical concept and linguistic expression according to the Deignan et al. scale. Next, we discuss movement of force metaphors.

4.6.5. Movements of Force

Another area worth considering, although we did not see high frequency, is *movements of force*, where abstract notions are conceptualized as physical forces and motion. The following table presents several *movements of force* metaphors and their translations in the target text of FinCorpAlin.

TCSPs has been mainly driven by ML/TF considerations	Los TCSP se ha impulsado principalmente por consideraciones de LA/FT
The results of the applied audit procedures must be communicated	Los resultados que arrojen los procedimientos de auditoría aplicados deberán ser comunicados
This may prevent capital flight but will not allow for early identification of assets that should be frozen.	Esto puede impedir la fuga de capitales, pero no permitirá la identificación temprana de los activos que deben ser congelados.
The BPL is designed to be a temporary measure to prevent capital flight and allow sufficient time for the application of provisional measures by the PGR.	La LPB está diseñada para ser una medida temporaria que evite el flujo de capitales y brinde tiempo suficiente para la aplicación de medidas cautelares por parte de la PGR
The measures do not require that the application of countermeasures be proportionate with risk. Nevertheless, this was not considered to be a serious deficiency that had a significant impact on the rating assigned.	Las medidas no exigen que la aplicación de contramedidas sea proporcional a los riesgos. No obstante, esto no se consideró ser una deficiencia grave que afectó la calificación asignada

As a result of not properly addressing c.8.1 (b), this has cascading impact on c.8.1 (c) and (d) which were not addressed by Jamaica.	Como resultado de no abordar adecuadamente c.8.1(b), esto tiene un efecto dominó en c.8.1 (c) y (d) que no fueron abordados por Jamaica.
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Table 30. Text segment examples of movements of force metaphors in FinCorpAlin (Author's own elaboration)

In the preceding table, *trust* or *company service providers* are *driven* or *propelled* (*impulsados*). Results of audit procedures are *applied* or are *thrown* (*arrojen*). Capital *flies* in English, but it *escapes* (*fuga*) in Spanish. Ratings are *impacted* in English and were *affected* or *altered* in Spanish by the application or absence of countermeasures. The following example shows how noncompliance with anti-money laundering regulations *impact* ratings. The Spanish text de-metaphorizes *impact* using *afectó* and *efecto* instead. In the last example, a geographic conceptual metaphor (*cascade*) is used in English, and a game metaphor (*domino*) is the Spanish translation. The English *cascade* evokes the image of *water flowing over rocks* (which we discuss further in Section 4.7.12.). The implied metaphorical concept is that if regulatory bodies do not comply with anti-money laundering regulations; the consequence will create a *domino effect* whereby one falls, and the others follow.

This distinction would fit with Deignan et al. (1997), level three, where both languages use different metaphorical concepts. Although the game *dominó* (dominoes in English) is played worldwide, it is a very popular game in Latin America and a cultural marker showing a cultural preference in the translation. We thought it interesting that in some of the same passages, more than one metaphor might be used. For example, *flight* and *frozen* (see Table 29). Next, we explore nautical metaphors found in the corpus texts.

4.6.6. Nautical metaphors

Although not frequently, nautical references are represented in source and target texts. One reference to *safe harbor* in the source text is rendered as *puerto seguro* in the target text. Several of

the following metaphors are considered dead because their original meaning is not well known. Financial regulatory enforcement programs are *launched or embarked on*, communication and outreach programs to thwart financial crime are *launched*, and operational plans and procedures are *underway*. Safe harbors are provided for banks, institutions, and individuals following the metaphorical concept of *banks, financial institutions*, and individuals are *ships needing safe harbors*. Additionally, regulatory enforcement programs are *ships that must be launched*. The following table presents several nautical metaphors found in FinCorpAlin.

<p>A transaction includes ... any other payment, transfer, or delivery by, through, or to a bank. Safe Harbor for Banks From Civil Liability for Suspicious Activity Reporting</p>	<p>Una transacción incluye ... otros instrumentos monetarios o valores de inversión; o cualquier otro pago, transferencia o entrega realizada por un banco, a través de un banco o destinado a éste. Protección legal de los bancos contra responsabilidad civil por los informes de actividades sospechosas</p>
<p>The SUGEF amended its operational plan for 2017 to initiate the technological solution construction to register, manage, and supervise DNFBPs, which is underway.</p>	<p>La SUGEF modificó su plan operativo para el 2017, para iniciar la construcción de la solución tecnológica para poder inscribir, administrar y supervisar a las APNFD, el cual se encuentra en ejecución.</p>
<p>There are no prohibitions in cases where there is an inquiry, investigation or proceeding underway in the Cayman Islands</p>	<p>no hay prohibiciones en los casos en que haya una consulta, una investigación o un procedimiento en curso en las Islas Caimán</p>
<p>The BOJ as the supervisor for MVTs, has also embarked on a communication and outreach initiative which is designed to improve financial literacy and awareness.</p>	<p>El Banco de Jamaica (BOJ) como supervisor de MVTs también ha emprendido una iniciativa de comunicación y acercamiento destinada a mejorar la alfabetización</p>
<p>The DCI has embarked on an outreach and sensitisation programme.</p>	<p>El DCI ha lanzado un programa de divulgación y sensibilización</p>

Table 18. Text segment examples of nautical metaphors in FinCorpAlin (Author's own elaboration)

In the first example, we found a de-metaphorization in the target text from the source text's metaphorical concept of *safe harbor*. The Spanish text used the explicatory *protección legal*, or legal

protection, as the solution removing the metaphorical concept. In 10 of the 11 instances, *protección legal* was used instead of an equivalent metaphorical concept. Only in one instance was *safe harbor* included as a foreignism in the Spanish text, and this was in conjunction with citing U.S. law and written as: *Safe Harbor of the USA Patriot Act*. Another nautical metaphor used in the source text that was not carried over is the term underway. The Spanish text used several terms; *en marcha* (in operation), *realizando* (carry out), *ejecución* (execution-carry out), and *en curso* (in progress) in place of the nautical metaphor in English. Charteris-Black and Ennis (262) affirm that nautical metaphors are preferred in English. They added that nautical metaphors and those related to water movement are *geo-psychological characteristics* (ibid.) of British English. The English source text, while not British English, seems to convey the preference for these characteristics.

Similarly, the term embarked in the source text is translated in three different ways; *lanzado* (launched), *emprendido* (set forth and also to launch), and *inició* (began). The latter term, *inició*, appears to be a de-metaphorization since the term conveys no nautical reference. The first two terms could be viewed at level two by Deignan et al., same metaphorical concept but using different linguistic expressions. In the next section we discuss machinery, *motor vehicle*, and transportation-type metaphors.

4.6.7. Machinery, Motor Vehicle, and Transport Metaphors

Transportation and mechanical metaphors are present in the corpus documents offering daily life concepts that are easy to understand and relate to. In economics, consumption is viewed as the economy's *engine* (Stender 202) that, if not functioning, would leave the economy at a *standstill*. Or without the motor of finance or other activity bringing in money, nations' economies *would not go*

anywhere. The following table shows several examples of motor vehicle metaphors in both the English and Spanish texts of FinCorpAlin.

The main economic drivers of the Cayman Islands economy are tourism and financial services.	Los principales motores económicos de la economía de las Islas Caimán son el turismo y los servicios financieros.
legal professionals from numerous countries were involved in the establishment of these structures, and have asserted privilege in order to delay or frustrate the investigation	Profesionales jurídicos de distintos países que se sirvieron del secreto profesional para retrasar o frenar la investigación.
The jurisdiction should also put measures in place	La jurisdicción también debe poner en marcha medida

Table 19. Text segment examples of motor vehicle metaphors in FinCorpAlin (Author's own elaboration)

The term *leverage* is often used metaphorically in the language of the economy and finance, but it does not readily conjure up clear mental images of what it means. We found six variations in Spanish for *leverage* (23) in the corpus texts; *aprovechar*, *maximizar*, *potenciar*, *promover*, and *apalancamiento*. Examples of finance and regulatory efforts compared to motor vehicles are present in the corpus documents with terms such as a *motor* (10), *transmission* (69) to *transmisión* (109), *mecanismos* (419).

In Table 54, the terms *motores* and *drivers* seem to fit with Deignan et al.'s type two in that the same metaphorical concept, but different expressions are used. In this instance, the Spanish *motores* connote a mechanical sense that moves something from one point to another and, in English, *drivers*, which would seem to imply individuals that drive something, also producing directional movement. The term *frenar* applies a very different metaphorical concept from the English source text *frustrate*, which suggests a *psychological state* vs. a *motor vehicle mechanism* for slowing speed. In this case, the third type of Deignan et al. applies (353) in that both languages use different metaphorical concepts. In the third example, *en marcha* vs. *in place*, Deignan et al. types three and four would

apply here as the concept of *en marcha* connotes *movement* in Spanish while the English, *in place*, implies *something set* but does not convey the movement concept. Thus, the words and expressions are similar in that the literal meaning is *to put something in place* as in *to start an initiative*, however, their metaphorical meanings from English to Spanish seem to diverge. Spanish puts something *en marcha*, while in English it is *put in place*.

Metaphors of machinery and transportation, especially motor vehicles, are used as easily understandable concepts dealt with in everyday life. Yet, when specialized terminology is used, concepts can be less clear. For instance, the English term *leverage* conveys exerting some force utilizing a lever. Yet, in Spanish, the literal translation for lever is *hacer palanca* which may imply a much more literal sense of the term. In over 20 instances, the English term *leverage* was de-metaphorized in the target texts and the Spanish *aprovechar* and *potenciar* was used instead. In only 2 occurrences did we see the equivalent *apalancamiento* used. We found numerous examples that compare financial regulation with machinery as much in its description as in its functions. The following table presents examples of *machinery*, *motor vehicles*, and transportation metaphors in FinCorpAlin.

The main economic drivers of the Cayman Islands economy	Los principales motores económicos de la economía de las Islas Caimán
Anti-Money Laundering and Counter-Financing of Terrorism (AML/CFT) measures in place in the Republic of Haiti	Las medidas de antilavado de dinero y contra el financiamiento del terrorismo (ALA/CFT) en marcha en la República de Haití
The FRA for analysis and where necessary financial intelligence is disseminated by the FRA	La FRA para su análisis y, según proceda, la inteligencia financiera se circula por la FRA

The regular follow-up is the default monitoring mechanism for all countries	El seguimiento regular es el mecanismo de monitoreo predeterminado para todos los países
Retain or withhold currency	Detener o frenar efectivo
FIUs and other competent authorities have reported the use of LPP and client confidentiality to protect the disclosure of the identity of the beneficial owner of assets, which frustrates criminal investigations	Las UIF y otras autoridades competentes han informado del uso del secreto profesional y la confidencialidad del cliente para proteger la divulgación de la identidad de beneficiarios finales de bienes, lo cual frena las investigaciones penales.
This report provides a summary of the Anti-Money Laundering and Counter- Financing of Terrorism (AML/CFT) measures in place in the Republic of Haiti (hereinafter referred to as "Haiti")	Este informe resume las medidas de antilavado de dinero y contra el financiamiento del terrorismo (ALA/CFT) en marcha en la República de Haití

Table 20. Text segment examples of machinery and motor vehicle metaphors in FinCorpAlin (Author's own elaboration)

We found that state economies can have drivers for their economies, such as the Cayman Islands in the first example. But where in the source text there were drivers, in the target texts, we found *motores*. Thus, both languages use different metaphorical concepts, a level three categorization on the Deignan et al. scale. Next, in the source text, we found measures are put *in place* (5), whereas, in the target texts, they were put *en marcha* (22). The *Real Academia Española* defines *en marcha* as “making a mechanism start or function” or in English “making a mechanism start or function” (“Marcha” *Diccionario de la Lengua Española* [Author's own translation]). Next, the term disseminates in the source text is translated as *circular* in Spanish, a term with connotations of vehicular movement. We also observed the term *mecanismo* (419) in the target text as *mechanism* (421) in the source text. *Mecanismo* conveys the image of a *machine or machinery*, and its definition affirms the concept as a “group of parts of a machine in their proper place” (“Mecanismo” *Diccionario de la Lengua Española* [Author's own translation]). Next, we found the term *frenar* in

the target text, evoking a vehicle's braking system. We found multiple expressions in the source text, such as *retain*, *withhold*, and *frustrating*, all translated as *frenar*. In the source text, we found *frustration*, a psychological concept in English translated as *frenar*, in the target texts representing a different concept. Next, we discuss show business, music and gambling metaphors.

4.6.8. Show Business, Music, and Gambling

Gambling, *theater*, and *music* are recurrent lexicalized metaphors in describing economic environments and are present in financial regulation and enforcement in FinCorpAlin. Regarding *music*, we found the dead metaphor instrument used (494) times in the Spanish target texts. As Stender noted (209), the metaphor is so deep-rooted that it is rarely referred to as a musical instrument. *Rhythm*, on the other hand, is often associated with music and used as a metaphor 4 times in both the source and target texts applying *ritmo* for the terms *level* and *rate* in English.

Additionally, the theater world in the English and Spanish text in the corpus, where *roles are played* by regulators, prosecutors, and criminals. Different *scenes* or *scenarios* are depicted with *scenario* (35) and *escenario* (18) seeming to indicate a de-emphasis in the target text for *scenario*, a loan word from Italian. The following table presents several show business, music, and gambling metaphors.

<p>However, the relevant authorities have been notified of the role of the DPP in respect of designations and the urgency of those matters</p>	<p>Sin embargo, se ha notificado a las autoridades pertinentes acerca del papel del DMP con respecto a las designaciones y la urgencia de estos temas.</p>
<p>With respect to extradition in particular, both the level of specialization of staff and the existence of fluid coordination between the relevant players (Ministry of Foreign Affairs, PGR, and the judiciary) are elements that contribute to the execution of requests</p>	<p>Con respecto a la extradición en particular, el nivel de especialización del personal y la existencia de una coordinación fluida entre los protagonistas relevantes (Secretaría de Relaciones Exteriores, PGR y poder judicial)</p>

	son elementos que contribuyen a la ejecución de las solicitudes.
Nevertheless, Mexico's financial sector is rapidly integrating into the global financial system, and at a faster pace than many of its emerging market peers (especially in Latin America)	Sin embargo, el sector financiero de México se está integrando rápidamente al sistema financiero global y a un ritmo más rápido que muchos de sus pares de los mercados emergentes (especialmente en América Latina)
The 2017-2020 National Risk Strategy identified 16 core objectives, which are broadly aligned with the identified threats and vulnerabilities. Objective 1: Harmonize the legal framework against ML/TF	The 2017-2020 National Risk Strategy identified 16 core objectives, which are broadly aligned with the identified threats and vulnerabilities. Objective 1: Armonizar el marco legal contra el LA/FT
The new law obliges the Mexican states to follow suit with their own local anti-corruption systems	La nueva ley obliga a los estados mexicanos a hacer lo mismo con sus propios sistemas locales anticorrupción

Table 21. Text segment examples of show business, music, and gambling metaphors in FinCorpAln (Author's own elaboration)

In the first segment, the Director of Public Prosecutions plays a role in determining the urgency and designations of matters worth pursuing. In this sense, the *prosecutor as actor* is the conceptual metaphor equivalently transferred to the target text with *papel*. A lexicalized metaphor in wide use, the term comes from the French “*rôle* character represented by an actor” (*Oxford English Dictionary*).

In the second example, players in the English source text become *protagonistas* in the target text, changing the conceptual metaphor. The Spanish *protagonista* is defined as “the main carácter in a theatrical, literary or cinematographic work” (“Protagonista” *Diccionario de la Lengua Española* [Author's own translation]). While both cultures are sport-oriented, it was interesting to see the preference for show business over a sports-oriented concept.

The third example evokes the concept of music with *ritmo* when describing the pace of integration into the global financial system. At the same time, the source text conceptualizes the movement of integration as walking or running as in the pace. The term *pace* is defined as “The action

or manner of stepping when walking, running, or dancing; the rate at which a person or animal takes steps, or moves by stepping” (“Pace” *Oxford English Dictionary*). The translation choice of *ritmo* in Spanish evokes a musical connotation for which it is often used rather than *velocidad*; even though the concept is lexicalized, it is said: “to be the space between accents, pauses or repetitions of different durations of a musical composition” (“Ritmo”). Deignan et al. would likely classify this as a level four class of cross-linguistic variation in the relationship of concept and metaphor, where words and expressions have similar literal meanings but different metaphorical meanings.

In the fourth example, National Risk Strategy attempts to harmonize the legal framework against money laundering and terror finance. The equivalent *armonizar* is found in the target text translations, which would render a level one or complete equivalence between metaphorical concepts and linguistic expression. The previous example would be an example of a level four classification where the words and expressions share a similar meaning between English and Spanish. Yet, the English are metaphorical while the Spanish are not. In the final example of a gambling metaphor in English, that is, to follow suit, we found a demetaphorization in the target text as an omission of the concept and statement *hacer lo mismo* or, in English, to do the same. To follow suit is not univocal in that it is defined as “The prosecution of a cause, in addition to, in various card games: to play a card of the same suit as the leading card.” (*Oxford English Dictionary*).

4.6.9. Nobility and senior management

The nobility and high-status metaphors have not been widely investigated, yet we found several examples of these metaphors in FinCorpAlin. The following table illustrates those examples.

According to the authorities where no treaty or legislation covers such cooperation, requests of foreign jurisdictions are made in	Según las autoridades, cuando no hay tratado ni legislación que abarque esa cooperación, las solicitudes de las jurisdicciones
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the exercise of Jamaica's sovereign prerogative and based on comity	extranjeras se formulan en el ejercicio de la prerrogativa soberana de Jamaica y se basan en la cortesía internacional
No other types of international transactions, such as trade finance, cross- border ACH, and management of sovereign debt.	No existen otros tipos de transacciones internacionales, tales como financiación de comercio internacional, transacciones ACH transnacionales y administración de deuda soberana
FIs are required to have controls based on level of risks, and appear to be applying specific enhanced measures required by regulations, including obtaining a manager's approval before establishing the business relationship	Las IF deben tener controles según el nivel de riesgo y parecen estar aplicando medidas reforzadas específicas requeridas por la normativa, incluyendo la obtención de la aprobación de los directivos de mayor jerarquía antes de establecer la relación comercial

Table 22. Text segment examples of nobility and high-status metaphors in FinCorpAlin (Author's own elaboration)

We found the terms sovereign and govern translated in the target text as the equivalent of *soberana* and *gobernar*, respectively. There appears to be an agreement between both languages in concept and linguistic expression. The term sovereign evokes the idea of nobility and monarchical rule. The *Oxford English Dictionary* defines a sovereign as “One who has supremacy or rank above, or authority over, others; a superior; a ruler, governor, lord, or master” (“Sovereign”, *Oxford English Dictionary*). The *Real Academia Española* coincides with its definition as “one that exercises and possesses supreme authority and independence” (“Soberano, soberana” *Diccionario de la Lengua Española* [Author's own translation]). The term hierarchy (5) was salient in Spanish as *jerarquía* (32) was used much more frequently in the target text than the English conceptual preference for more specific titles such as manager, senior manager, or supervisor. The preferential tendency might indicate a cultural orientation toward nobility in Spanish. Such orientation is conceivable given the Spanish-speaking world's socio-linguistic heritage, with Spain still having an active and internationally influential monarchy. We found the term governor (240) was applied to high-status

positions in banks and financial institutions as well as organizations using nomenclature similar to *heads of state*. The term was translated consistently in the equivalent *gobernador* (246).

4.6.10. Vision metaphors

In this section, we analyze frequently recurring lexicalized metaphors related to vision. Vision metaphors are lexicalized in both English and Spanish. We often associate seeing, that is, vision, with understanding. We also associate thought with reflection, which is seen, but we must focus on understanding or thinking clearly. The following table illustrates several examples of vision metaphors identified in FinCorpAlin.

<p>The information presented in the table 15 below reflects the challenges and weaknesses in UCREF's ability to properly conduct operational analyses.</p>	<p>La información presentada en el cuadro 15 a continuación refleja los desafíos y las debilidades de la capacidad de UCREF para realizar adecuadamente los análisis operacionales</p>
<p>The Mexican authorities' main focus, as far as TF risks are concerned, is on STRs provided by FIs involving high-risk jurisdictions and the FIU analysis of its database to identify targets</p>	<p>El foco principal de las autoridades mexicanas en relación con los riesgos de FT se encuentra en los ROS emitidos por las IF que implican jurisdicciones de alto riesgo y el análisis de la UIF de su base de datos para identificar objetivos</p>
<p>The SAT reports that, in carrying out inspections, it has sought to focus on high-risk entities</p>	<p>l SAT informa que, al realizar las inspecciones, buscó focalizarse en las entidades de alto riesgo</p>
<p>The sole deficiency relates to an effectiveness issue, namely, very low number of prosecutions reflect the low priority given to ML/TF by the Police Service</p>	<p>La única deficiencia se relaciona con un problema de efectividad, a saber; un número muy bajo de juicios refleja la baja prioridad otorgada a LD / FT por el Servicio de Policía.</p>

Table 23. Text segment examples of vision metaphors in FinCorpAlin (Author's own elaboration)

We found *view* (19) and *vista* (58) as well as the terms *reflejo* (225), translated from *reflect* (180), and *foco* (25), *enfoque* (75), and *focaliza* (11), translated from the English, *focus* (360), which indicated a univocal preference in English for the concept. As mentioned by Stender (243), Spanish seems to evoke the mental image suggesting more of an association with light in her comparison with German texts. While the association with light does not seem to be salient between English and Spanish in the corpus texts, the imagery association appears to be very similar. The conceptual metaphor of *seeing clearly is understanding* is consistent with Herrera Soler's (62) finding in the Spanish economic press. Herrera Soler (ibid.) asserts that we understand negotiations in terms of an optical domain. In this type of domain, *lens* and *focus* come into play (ibid.). In this sense, we see financial crime prevention and enforcement having an optical characteristic of the Mexican regulatory authorities who focus their attention on terror finance. Without such focus, an unclear approach might be taken concerning countering terror finance and money laundering. For further discussion on clarity and obscurity see Section 4.6.17. Next, we discuss geographic, landscape, altitude and depth metaphors.

4.6.11. Geographic, Landscape, Altitude, and Depth Metaphors

In FinCorpAlin's regulatory texts, we find terminology that refers to geography, heights, and depths, such as *profundo* (26), *altura* (1), *cascade*, as previously mentioned under force metaphors (6), and *offshore* (81). In the FinCorpAlin texts, we also found terminology referring to heights, such as *cumbre* (2) or *summit* (2). In relation to high *altitude*, there were several metaphors in FinCorpAlin referring to the view from certain natural locations, such as *panorama* (15) and *overview* (4). The Spanish term *panorama* tends to refer to the present and is applied as the translation uniformly for the English source text concepts of *overview* (4), *landscape* (3), *picture* (6), and *scenarios* (2). The following figure shows a concordance using the term *panorama* in the target text.

, en cierta medida, las industrias de seguros dominan el **panorama** financiero. El Capítulo 1 contiene una visión general del sector de las instituciones sobre esos aspectos. Nuevamente, el **panorama** es menos alentador con respecto a las APNFD. Si bien el S/ tan una consideración cuidadosa si pretende reflejar un **panorama** preciso de los riesgos de LA/FT de los sectores e instituciones, las instituciones en los últimos años solamente muestran un **panorama** ligeramente mejor, especialmente cuando se considera la necesidad de que las entidades deben tener mecanismos para determinar **panoramas** de bajo riesgo y para monitorear las actividades que están fi

Figure 7. Concordance lines of the term *panorama* in FinCorpAlin (Author’s own elaboration)

We found the *panorama* concept applied to money laundering and terror finance risks, financial situations, and views of low-risk financial activity. Thus, *panorama* as a lexicalized term in English made well-known worldwide with the iPhone's capability of taking *panoramic photos*. In English, a *panorama* is often associated with vistas or photos. *Oxford English Dictionary* defines it as “a picture of a *landscape* or other *scene*” (“Panorama”). The *Real Academia Española* provides a somewhat more contemplative definition; “paisaje muy dilatado que se contempla desde un punto de observación” in English, “an extensive landscape viewed from the point of observation” (“Panorama” [Author’s own translation]). The term is thought to have been coined by painter Robert Barker to describe his paintings using the Greek derivation of *pan* (all) and *horama* (view) (“Panorama” University of Edinburgh). The following table presents several geographic, landscape, and nautical metaphors in FinCorpAlin.

It can erode the trust that information submitted by reporting entities will be kept confidential	Esto puede socavar la confianza que se tiene de que la información proporcionada
The appropriateness of the factors considered by the Cayman Islands to determine the level of its TF risk was considered along with the effectiveness of the measures implemented by the offshore sector to mitigate TF risks.	Las Islas Caimán consideraron la idoneidad de los factores para determinar el nivel de su riesgo FT, además de la eficacia de las medidas implementadas por el sector offshore para mitigar los riesgos de FT.
The Cayman Islands is also the largest jurisdictional domicile for offshore hedge funds and the second largest domicile for captive insurance entities.	Las Islas Caimán es también el mayor domicilio jurisdiccional para los fondos de cobertura offshore y el segundo mayor domicilio para las entidades de seguros cautivas
The latter definition accords with that of wire transfer in IN 16 and it does not appear that	Esta última definición es acorde con aquella de la transferencia bancaria en el IN 16 y no

<p>PSPs are considered FIs since they are not included in the list of financial businesses or DNFBPs in Schedules 1 and 2 of the AML/PTF Regs. This ambiguity cascades throughout the analysis of this Recommendation</p>	<p>parece que los PSP se consideran ser IF, ya que no están incluidos en la lista de empresas financieras ni APNFD en las Anexos 1 y 2 de los Anexos de los Reglamentos de ALD/PFT. Esta ambigüedad se ve a lo largo del análisis de esta Recomendación</p>
<p>Despite a renewed focus on the importance of timely and accurate beneficial ownership information by key bodies such as the FATF, Egmont Group, and OECD Global Forum, as well as the G20 and UK Anti-Corruption Summit, many countries have not taken sufficient steps to enhance the transparency of beneficial ownership through the effective implementation of the FATF Standards.</p>	<p>A pesar de que organismos clave como el GAFI, el Grupo Egmont y el Foro Mundial de la OCDE, así como el G20 y la Cumbre británica contra la corrupción hayan renovado su atención a la importancia de contar con información precisa y oportuna sobre los beneficiarios finales, muchos países no han tomado suficientes iniciativas para mejorar la transparencia relativa a los beneficiarios finales mediante la aplicación eficaz de las Normas del GAFI.</p>

Table 24. Text segment examples of Geographic, Landscape, and Nautical metaphors in FinCorpAlin (Author’s own elaboration)

The term *erosion* evokes the concept of the *earth falling away from a riverbank* or a *hill*, making it a compelling metaphor for something falling away; in this case, information must be kept confidential to be trusted and the *loss of trust is erosion* as it may fall away gradually. The Spanish, *socavar*, is a close equivalent but conveys active participation in *excavating or digging*, whereas the English, *erode*, happens passively as a function of nature. Next, the term offshore literally means “in a direction away from the shore” (“Offshore”), according to the *Oxford English Dictionary*. The text segments show that the offshore sector can mitigate terror finance risks. We also see that offshore hedge funds lead one to conceptualize them out at sea. According to anti-money laundering expert John Cassara, “offshore is an umbrella term. In common AML antimoney laundering] vernacular it commonly covers offshore banking, offshore trusts and company service providers, offshore business” (“China”155). Cassara further explains, while the term offshore varies by jurisdiction, it generally means a “company or firm incorporated outside the country. where it has its main offices and operations or where its principal investors reside” (“Money Laundering” 349). The target text uses the term offshore as a loan word from English.

We see in the text segment that ambiguity flows throughout the analysis (as a cascade) of what is considered a financial institution. The term cascade in English connotes the geographic phenomenon of a waterfall or water flowing from rock to rock in a downward motion. The target text omits this metaphor and replaces it with an expression of measurement, *a lo largo*. *The Oxford English Dictionary* defines a *summit* as “the topmost part of something, the apex and the highest point in a ridge or a mountain” (“Summit”). The text segment illustrates organizations' efforts to reduce financial crime, including the British anti-corruption summit at the top of a mountain. The Spanish equivalent, *cumbre*, is “the highest peak or the top of a mountain” (“Cumbre” *Diccionario de la Lengua Española* [Author’s own translation]). Deignan et al. would likely classify the cross-linguistic variation of erosion and *socavar* as a level three, as both languages used different metaphorical concepts. Cascade is demetaphorized unless we consider the expression *a lo largo* as a metaphorization for length. Summit and *cumbre* are level one equivalent in concept and expression.

4.6.12. Religion metaphors

Metaphors in religion are another area of interest that has not been widely explored. Although they do not reference religious metaphors in their study, Charteris-Black and Ennis believe religion influences Spanish because it is deeply ingrained in Spanish culture. Further, the interaction between culture and linguistic metaphor and the socio-cultural influence of religion on what they view as having a strong preference for references to the psychological state (264). The following table illustrates several religious metaphors found in FinCorpAlin.

<p>The grounds for deferral may be invoked where execution of the request might compromise or obstruct an ongoing investigation</p>	<p>Los fundamentos para el aplazamiento pueden ser invocados cuando la ejecución de la solicitud podría comprometer u obstruir una investigación en curso.</p>
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Article15 enshrines the rights to privacy and habeas data as fundamental	Artículo15, consagra los derechos a la privacidad y al habeas data como fundamentales
The MCI's authorisation process comprises a review of a business' solvency, including checks of good moral standing,	El proceso de autorización del MCI comprende una revisión de la solvencia de una empresa, incluso las verificaciones de la integridad moral

Table 258. Text segment examples of religious metaphors in FinCorpAlin (Author's own elaboration)

In FinCorpAlin we found Invoke (2), *invocar* (2), *enshrine* (3), *consagrar* (3), and *moral* (14). The term invoked is used legally, whereby certain rights can be invoked. The *Real Academia Española* defines *invocar* as “Llamar en solicitud de ayuda de manera formal o ritual,” in English “Calling for help in a formal or ritualistic manner” an act frequently observed in religious contexts. Enshrine refers to the law and is commonly associated with the sacred (“Invocar” [Author’s own translation]). The *Oxford English Dictionary* defines enshrined as “To enclose (a sacred relic, the image of a deity or saint) in a shrine; to place (a revered or precious object) in an appropriate receptacle.” (“Enshrine”). The equivalent, *consagra* in Spanish is defined in the Real Academia Española as “Hacer sagrado a alguien o algo” or in English, “Make something or someone sacred” (“Consagrar” *Diccionario de la Lengua Española* [Author’s own translation]). The last example expresses the concept of morality in that an organization has human characteristics that can be judged as moral. As we observe in the preceding table, “good moral standing” is a concept applied to a banking interface or Modified Customer Interface. This method allows third-party providers to access payment services. We believe these examples fit within level one of the four levels of cross-linguistic variation as presented by Deignan et al. We did not find a preference for religious metaphors between Spanish and English but a consistency of equivalent concepts.

4.6.13. Fashion accessories metaphors

Fashion accessory metaphors have not been widely examined and have not been an area the metaphor scholars mentioned in this thesis have recommended exploring. As pointed out by Stender (238), who also found the metaphors *abanico*, *carteras*, and *paraguas* in her investigation, it reminds us of these types of metaphors can often be overlooked without a close examination. Many of these metaphors have been lexicalized yet are frequently used in economic and financial texts. The following table presents several lexicalized fashion accessory metaphors.

Regarding the range of available sanctions	En cuanto al abanico de sanciones
Working Groups were established under the umbrella of NAMLC	Se establecieron grupos de trabajo bajo el paraguas de NAMLC
4.86 billion dollars, of which thirty percent represents credit portfolios	4.86mil_millones de dólares, de los cuales treinta por ciento representa las carteras crediticias

Table 39. Text segment examples of fashion accessory metaphors in *FinCorpAlin* (Author's own elaboration)

In the first instance, we see the Spanish metaphorical addition of *abanico* as the translation solution for the English range. The subsequent examples appear to be equivalent metaphors whereby groups come “under the umbrella” of an organization as if to keep dry or keep from overexposure to the sun. Another lexicalized metaphor is where we keep or money or investments as in *portfolios*. We refer metaphorically to keeping them in our *wallet or portfolio* when they are usually housed within financial institutions.

4.6.14. Metaphors of the “way”

Following Stender's denomination of the metaphorical domain *el camino* or *the way* in English, we examined metaphors that imply a journey from one point to another and advance in

several ways. We found that Spanish presented more synonyms, as in Stender’s thesis (235): *camino* (3), *ruta* (15), *vía* (45), *channel* (13), and *pasos* (65). The following table shows several metaphorical expressions as *the way*.

Essentially, the NAP provides a specific roadmap of the measures to be completed by key authorities to address the ML/TF risks identified	Esencialmente, el NAP proporciona una hoja de ruta específica de las medidas que las autoridades clave deben completar para abordar los riesgos del LA/FT identificados
Extradition requests are generally received by the Ministry of Foreign Affairs through the diplomatic channels	Las solicitudes de extradición se reciben generalmente por el Ministerio de Asuntos Exteriores por vía diplomática
The Ministry of Foreign Affairs is the official channel for the receipt of the UN sanctions list, and MLA and extradition requests to the MJPS	La Cancillería es la vía oficial para recibir la lista de sanciones de la ONU y las solicitudes de MLA y aquéllas de extradición al MJPS
Mexican authorities have gone to great lengths to dismantle the major criminal organizations	las autoridades mexicanas han recorrido un largo camino en el desmantelamiento de organizaciones delictivas

Table 40. Text segment examples of “the way” metaphor in FinCorpAlin (Author’s own elaboration)

In the last parallel concordance box, we see the English *great lengths* translated ineffectively as *recorrido un largo camino* in the Spanish text, we believe a more appropriate “*se han esforzado mucho*” would have been more accurate here. In regulatory finance and enforcement discourse, we found the official *plans are roadmaps* indicating the direction financial regulatory authorities should take. When criminals need to be extradited, the process requires *movement through channels* or the proper *way is the channel*, whether official or diplomatic. In the final example, we see the source text term *length* translated into *largo camino*, seemingly adding a highway metaphor where the source text concept seems to be that of measurement. In a sense, a *long highway* could also be *lengthy*, so we think Deignan et al. would classify this as a level three and perhaps level four in cross-linguistic variation. Next, we explore guardian metaphors from the corpus texts.

4.6.15. Guardian metaphors

After the incidents of September 11, 2001, financial regulation began incorporating mechanisms to address terrorist finance. These measures were developed to prevent risks of organizations obtaining funding that might lead to similar incidents. We found synonym variation between English and Spanish metaphors in that the terms *vigilar* (60) and *vigilancia* (75) were the preferred translated terms for *controlled* (38) and *surveillance* (43), respectively. The English source texts also used *monitor* (13) and *policing* (9), and *watch* (3). The following table shows some examples of these.

special investigative techniques such as controlled delivery and undercover agent,	las técnicas especiales de investigación como la entrega vigilada y el agente encubierto
The International Monetary Fund (IMF) and the World Bank have integrated AML and counter-terrorist financing issues into their financial sector assessments, surveillance , and diagnostic activities	El Fondo Monetario Internacional (IMF, por sus siglas en inglés) y el Banco Mundial han incluido AML y actividades de lucha contra la financiación de terroristas en sus análisis, vigilancia y actividades de diagnóstico de sectores financieros.
Policing and Crime Act 2017	Ley de Vigilancia y Delincuencia 2017
Addresses that appear anomalous may warrant enhanced due diligence and closer monitoring .	Las direcciones que parecen anómalas pueden merecer una diligencia debida reforzada y una vigilancia más estrecha.
As a comparison, countries on the next tier or level (Tier 2 Watch list),	Como una comparación, los países del siguiente nivel (lista de vigilancia de nivel 2)

Table 41. Text segment examples of guardian metaphors in FinCorpAlin (Author's own elaboration)

As a guardian, one is in constant vigil. The English variation of expression is notable, whereas the Spanish sticks with the preferred *vigilancia* in all cases. The Real Academia Española defines *vigilancia* as: “Cuidado y atención exacta en las cosas que están a cargo de cada uno” in English “Precise attention and care given to those things in which you are responsible” (“Vigilancia”

[Author’s own translation]). According to Deignan et al. classification scale, these should be viewed as level one. Another type of metaphor we found in the corpus texts is the packaging metaphor which we will discuss in the following section.

4.6.16. Packaging Metaphors

The term package appears six times in the source text regarding “intelligence” or “regulatory measures,” such as law amendments. As illustrated in the following table, we observed relative similarities between English and Spanish use of *packages/paquetes*.

The JIU developed an intelligence package	La JIU preparó un paquete de inteligencia
A package of regulatory amendments was issued to strengthen the preventive measures	Se emitió un paquete de enmiendas reglamentarias para fortalecer las medidas preventivas

Table 262. Text segment examples of packaging intelligence metaphors (Author’s own elaboration)

The term *intelligence* should be summarized here to give context to the present discourse. *The Oxford English Dictionary* indicates intelligence can be understood as “knowledge concerning events communicated by or obtained from another; information, news; *spec.* information of military value.” (“Intelligence”). We have found the financial regulatory discourse to coincide with expressions used in the security discourse of the United States. Such language is used in the lexicon of federal agencies in the U.S. and notably influences the translations of the target text. In the preceding example, we see intelligence as information relative to security, and *intelligence is packaged*. We also see *regulations are packaged*, as are their amendments. We believe Deignan et al. would classify these translations as a level one equivalent. In the next section we discuss metaphors of clarity and obscurity.

4.6.17. Metaphors of Clarity or Obscurity

The classification of light and darkness relates to either distorted or clear imagery. There often is a negative or positive connotation attributed to *clarity* and *obscurity* where the clear and transparent connote the positive, and the distorted and dark are viewed as unfavorable. The same findings on clarity held in Stender’s examination of economic texts were affirmed in comparing German and Spanish metaphors (226). We applied a similar analysis and found several examples of clarity and obscurity references, as illustrated in the following table.

In recent years, increased media attention given to the role of opaque ownership structures in tax evasion, money laundering, and corruption schemes	Durante los últimos años, la mayor atención que los medios han prestado a la función de las estructuras de propiedad opacas en la evasión fiscal, el blanqueo de dinero y los sistemas de corrupción
increased access to opaque legal vehicles, are all enduring challenges that will affect the availability of information on the beneficial owner	la mejora del acceso a instrumentos jurídicos opacos , constituyen retos persistentes que afectarán a la disponibilidad de la información sobre beneficiarios finales
The majority of funds from Contractor #1 was sent to its subcontractor, who channelled funds to a shadow financial scheme consisting of multiple layers of shell companies	La mayoría de los fondos del Contratista 1 se enviaron a su subcontratista, que transmitió los fondos a un sistema financiero oscuro formado por múltiples estratos de empresas ficticias
In the light of the analysis with regard to the new criteria, it is considered that the rating be maintained as Largely Compliant	A la luz del análisis con respecto a los nuevos criterios se considera que la calificación se mantenga en Mayoritariamente Cumplida.
In light of the absence of an NRA, Haiti should ensure that supervisors undertake an exercise to identify and understand ML/TF risks	A la luz de la falta de una ENR, Haití debe asegurarse de que los supervisores realicen un ejercicio para

	identificar y comprender los riesgos de LA/FT
Haiti has implemented some good measures to address the governance NPOs including to address issues of accountability and transparency of NPOs.	Haití ha implementado algunas medidas buenas para abordar la gobernanza de las OSFL, incluso para abordar los temas de la rendición de cuentas y la transparencia de las OSFL

Table 27. Text segment examples of metaphors of opacity and clarity in FinCorp Alin (Author's own elaboration)

In the discourse of regulatory finance, corruption schemes and other financial crime involving property ownership structures can be *opaque*. Additionally, legal vehicles are instruments in Spanish that are also *opaque* or *opacos*. Illegal financial schemes are *shadows* where funds are channeled. Instead of the equivalent *sombra* for the English shadow, we see the use of *oscuro* or *dark* to describe the financial system. In English, this could be analogous to the lexicalized expression of the underground internet as the *dark web*.

Except for Shadow and *oscuro*, we believe Deignan et al. (1997) level one applies to the equivalence of concepts and linguistic expressions. The light represents clarity or decisiveness in how to proceed in the case of financial regulation enforcement. Conversely, light is used to clarify or reveal a country may be seen as financially compliant by the light or luz illuminating the new criteria of the Mutual Evaluation Report. In another expression, individuals providing truthful and complete information are described as *people, and organizations are transparent*. We see the target text translation as the equivalent *transparencia*. We discuss paranormal metaphors in the following section.

4.6.18. Paranormal metaphors

The metaphor in this domain serves to indicate, in a figurative sense, the difficulty in detecting the existence of certain companies or banks as if they were *fantasmas* or *ghosts*. While there was not

a variety of this metaphor, *fantasma* (64) was salient in the Spanish texts. The English texts prefer the term *shell* (85), which does not have paranormal connotations and would seem to fall within the domain of natural sciences or organisms although the metaphor *front* is also used. The following table provides examples of usage in the source and target texts.

Licensing requirements as set out ss. 13 and 14 of the Banking and Deposit Act prevent the establishment of <i>shell</i> banks.	Requisitos de licencia establecidos en ss. 13 y 14 de la Ley de Banca y Depósitos impiden el establecimiento de bancos <i>fantasma</i>
The NRA does not specifically differentiate risks associated with different types of legal persons, although it mentions that using <i>front</i> companies is one of the most widespread ML techniques.	La ENR no diferencia de manera específica los riesgos asociados con los diferentes tipos de personas jurídicas, aunque sí menciona que el uso de compañías <i>fantasmas</i> es una de las técnicas de LA más generalizadas.
In addition, the USA PATRIOT Act prohibits accounts with foreign <i>shell</i> banks.	Además, la Ley PATRIOTA de EE. UU. prohíbe las cuentas en bancos <i>fantasmas</i> extranjeros.

Table 284. Text segment examples of Paranormal metaphors in the Spanish target text in *FinCorpAlin* (Author's own elaboration)

We found the paranormal metaphor *fantasma* in the Spanish texts translated from the English metaphorical expression of *shell* and *front* to describe illicit financial organizations. The use of these metaphors was not associated with individual criminals but collective entities such as banks or companies only. The Spanish preference for *fantasma* might indicate a preference for referencing the paranormal. However, the expression is widely lexicalized and appears in the *Diccionario de la Lengua Española* (Real Academia Española) as “Imagen de una persona muerta que, según algunos, se aparece a los vivos,” in English, “Image of a dead person who, according to some, appears to the living”. But also as “Aquello que es inexistente o falso” or in English, “that which is fake or nonexistent” (“Fantasma” [Author's own translation]). The term *fantasma* is derived from greek and latin, meaning to shine, appear, show oneself, or make oneself visible, but the term's most common use is referring to a ghost (ibid.).

4.6.19. Agriculture Metaphors

Botanical metaphors warrant attention as they are common in economic texts. In comparing the English source to the Spanish target texts, there appears to be a preference for metaphorical agricultural concepts such as *raíz* (165) over the English equivalent *root* (3). On the other hand, we found more congruence between English *growth* (18) and Spanish *crecimiento* (18), which is often associated with the domain of health relating to human growth. Stender (224) also found that Spanish economic texts reference *crecimiento* concerning health and human growth domain. It should be noted there is not a clear delineation between *human* and *plant growth*, as Hewings and Charteris-Black and Ennis (252) point out in comparisons of *agricultural/family* metaphors. Table 39 provides several examples of plant and human metaphors used together as familial references in Spanish.

Financial institutions are not required to ensure that their foreign branches and majority-owned subsidiaries apply AML/CFT measures	Instituciones financieras no bancarias, y No se exige a las instituciones financieras que aseguren que sus sucursales y filiales extranjeras de propiedad mayoritaria aplican medidas ALA/CFT
Financial institutions are not required to ensure that their foreign branches and majority-owned subsidiaries apply AML/CFT measures	No se exige a las instituciones financieras que aseguren que sus sucursales y filiales extranjeras de propiedad mayoritaria aplican medidas ALA/CFT

Table 29. Text segment examples of botanical and family metaphors in English and Spanish (Author's own elaboration)

The term *sucursal*, an adjective derived from the Latin *succursus* meaning to help, “Dicho de un establecimiento: Que, situado en distinto lugar que la central de la cual depende, desempeña las mismas funciones que esta” or in English, “an establishment situated in a different location from the central operation from which it depends and performs the same functions” (“Sucursal” [Author's own translation]). The noun *branch* is “a portion or *limb of a tree* or other plant growing out of the *stem*

or trunk, or out of one of the boughs” (“Bough” *Oxford English Dictionary*). The concept loses the tree conceptualization in the target text when it is replaced with *sucursal* as the *helper* concept.

While retention was the most used translation procedure (4,422 occurrences), replacing a conceptual metaphor with another (1,089), adding a conceptual metaphorical expression where there was none in the source text was the third most used procedure (509) followed by omission or paraphrasing (327). There seems to be some cultural loss with metaphors paraphrased or omitted instead of retained, replaced, or even modified. The following table presents agriculturally oriented metaphors expressing fruit-bearing, growth, and roots.

An example of this is the fruitful exchange of information between the UIAF of Uruguay and the FIU of Ukraine	Cabe resaltar a título de ejemplo un fructífero intercambio de información de la UIAF de Uruguay con la UIF de Ucrania
Despite the growth in GDP, government forecast as at 2018, shows a significant fiscal deficit	A pesar del crecimiento del PIB, las previsiones del gobierno al 2018, muestran un déficit fiscal significativo
Casinos are considered to be cash intensive, competitive in growth and vulnerable to criminal exploitation	Se considera que los casinos generan un alto volumen de efectivo, competitivos en términos del crecimiento y vulnerables a la explotación criminal
Police Partnership reaps reward	Colaboración policial cosecha beneficios
Following this delegation, guidance notes and FAQs were published on the FSIU website and a procedure	A raíz de esta delegación, se publicaron notas de orientación y preguntas frecuentes en el sitio web de FSIU y ahora también se encuentra un documento de procedimientos
However, very few reports arise from formation of companies which may be due to notaries' lack of appreciation of the risks	Sin embargo, muy pocos reportes surgen a raíz del establecimiento de sociedades, que puede deberse a la falta de noción de los notarios acerca de los riesgos
To prove the use of financial intelligence, Uruguay provided examples of cases that were sentenced as a result of financial intelligence provided by the UIAF.	Para comprobar el uso de inteligencia financiera, Uruguay brindó ejemplos de casos que fueron sentenciados a raíz de IIF provistos por la UIAF.

Individuals A and B received advice from an accountant about the purported benefits of international superannuation funds, and as a result , Individual A established a superannuation fund	Los individuos A y B fueron asesorados por un contador sobre los supuestos beneficios de los fondos internacionales de pensiones y a raíz de ello el individuo A creó un fondo de pensiones
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Table 30. Text segment examples of agricultural and plant metaphors in FinCorpAlin (Author's own elaboration)

We found the term growth (18) translated as *crecimiento* (18) and would fit within level one of Deignan et al. (1997), complete equivalence between metaphorical concept and linguistic expression. Reap was rendered as *cosechar*, another equivalent both conceptually and linguistically. Where we did find a salient divergence was with the Spanish term *raíz* (10) translated from the source text expressions *to arise from*, *as a result of*, and *following*. This expression would likely fit within the level three category of metaphorical concepts. However, the English expression appears non-metaphorical; thus, Spanish adds the root metaphor with *raíz*. We found the use of fruitful translated a *fructífero* in describing the exchange of information between financial intelligence units alluding to the *useful information is fruit* metaphor. We found other references to fruit in the Spanish texts seeming to indicate a preference for the culturally oriented metaphorical concept. Instead of using the equivalent term for the English result as *resultado* in Spanish, the term *fruto* is used in describing the effects of National Strategy. Additionally, *financial transactions are fruit* from the customer interaction (see Table 46) in what could also be viewed as an intensification of the source text translation.

In this regard, it is important to point out that at the time of the on-site visit, as a result of the implementation of the National Strategy, a significant part of these deficiencies had been addressed.	En ese sentido, es importante destacar que al momento de la visita in situ, fruto de la implementación de la Estrategia Nacional
However, company records will record the transfer as having originated from a customer interaction	Sin embargo, la transferencia se inscribirá en los registros de la empresa como si hubiera sido fruto de una interacción con el cliente

All FIs and TCSPs (including excluded persons) have a good understanding of the legal requirements and ramifications of tipping off.	Todo IF y TCSP (incluso las personas excluidas) tienen una buena comprensión de los requisitos legales y las ramificaciones de la revelación.
It can erode the trust that information submitted by reporting entities will be kept confidential, cast doubts on the objectivity of intelligence that gets disseminated	Esto puede socavar la confianza que se tiene de que la información proporcionada por los sujetos obligados será resguardada confidencialmente; sembrar dudas respecto de la objetividad de la inteligencia que se disemina

Table 31. Text segment examples of agricultural metaphors in FinCorpAlin (Author's own elaboration)

We found other agricultural metaphors in the target text analysis where there was a different linguistic expression and metaphorical reference in the source text. In Spanish, *sembrar*, or to plant, in English was used as *planting* instead of *casting doubts about intelligence or information* disseminated in financial regulation and money laundering prevention. The term *cast* in English evokes *throwing* something, a fishing lure, or an object. *Oxford English Dictionary* defines *cast* as “the act of casting or throwing, a throw of a missile, a bowl or another object” (“Cast”) and is comparable to movements of force as already explained above in 4.7.5. So, it follows that *distrust or doubt is thrown in English*, whereas in Spanish, it is *planted* as if it were *seed or plant that grows* and takes on a life of its own.

An expression with shared similarity in both languages was that of *ramification*, translated in the equivalent *ramificaciones* in Spanish. The *Oxford English Dictionary* defines *ramification* as “Division or distribution into branches; a manner or pattern of branching; the action or process, or an act, of branching; the state of being branched” (“Ramification”). We can see the plant reference used to in as in *a plant growing branches* or growth through *branching*.

In Spanish, the Real Academia Española defines *ramificación* as: “*División y extension de las venas, arterias o nervios, que, como ramas, nacen de un mismo principio o tronco*” or in English “Division and extension of veins, arteries or nerves, which, as branches, arise from the same principle or trunk.” (“Ramificación” [Author’s own translation]) which also reference branches or *ramas* as well as a trunk or *tronco*. In the next section we discuss body part metaphors of which there were in the top ten metaphors in both the English and Spanish corpus texts.

4.6.20. Body part metaphors

As in health, body part metaphors are used in financial regulatory texts. This section shares some association, by nature, with Section 4.7.3. on health, medicine, and organic substance metaphors. The corpus texts seem to indicate that in Spanish, there is a preference for the use of body part metaphors to a greater degree than in English. We found that the Spanish preferred to use the term *hand* or *mano* while the source text in English used other expressions such as *held* (23) and *custody* (1) in place of the term *manos*. Another frequently used metaphor is *face* in the source text (80) was translated as *enfrentar* (149) in the target text. Another frequently used body part metaphor is *órganos* (216) in the target text, whereas *organs* (8) were used much less frequently in the source text. The following table provides examples of the corpus text's use of body part metaphors. Interestingly, we found there were nearly twice as many *body part* metaphors in the Spanish compared to the English texts.

<p>Legal persons also are not given any specific timelines to notify the MCI about any changes to their ownership, directors and shareholders, therefore, some basic and BO information in the custody of the MCI</p>	<p>A las personas jurídicas tampoco se les da plazos específicos para notificar al MCI acerca de cualquier cambio en su propiedad, directores y accionistas y, por lo tanto, alguna información básica y de BO en manos del MCI</p>
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UCREF has indirect access to the financial intelligence and relevant information held by reporting entities	La UCREF tiene acceso indirecto a la inteligencia financiera y la información pertinente en manos de los sujetos obligados
Enhanced due diligence by the financial institution identified that Charity B was a wing of an UN-designated terrorist group	El proceso de diligencia debida reforzada llevado a cabo por la institución financiera detectó que la Organización benéfica B era un brazo de un grupo terrorista
The supervisory unit functions independently from the main arm of the FIU and has separate human and financial resources to execute it functions	La unidad de supervisión funciona independientemente del brazo principal de la UIF y tiene recursos humanos y financieros separados para ejecutar sus funciones.
mass and social organisations that bring together different sectors of the population	as organizaciones de masas y sociales que agrupan en su seno a distintos sectores de la población
This is particularly relevant for the sharing of suspicions and risk profiles between banks, or within multi-national banks	Esto es concretamente importante para el intercambio de perfiles sospechosos y de riesgo entre bancos o en el seno de los bancos multinacionales
It also has regulations specifying the functions of CIPLAFT as the coordinating body responsible for ensuring the efficient functioning	Asimismo, cuenta con la reglamentación que precisa las funciones de la CIPLAFT en su condición de órgano de coordinación responsable de asegurar el funcionamiento
the jurisdiction faces an ongoing challenge in its capacity to prove the acts as distinct in the eyes of the judiciary	la jurisdicción enfrenta un desafío constante en su capacidad de demostrar los actos como distintos ante los ojos del poder judicial

Table 32. Text segment examples of body part metaphors in FinCorpAlin (Author's own elaboration)

In the target text, we found what appeared to be a preference for human body parts over the English source text. The term *manos* (41) was translated into similar metaphorical expressions like a *hand* (15) and *held* (23), but we also found the term custody (1) translated as *en manos de*. The prior expression would be classified at levels three and four on the Deignan et al. scale; both languages used different metaphorical concepts, and words and expressions have similar meanings but carry different metaphorical meanings.

Another lexicalized metaphorical term that appeared to be salient in the Spanish texts was *matrix* (70), translated as *matriz* (124), seeming to indicate a preference for the female reproductive metaphor of the womb as well as *seno* (8). This presumed preference seemed to be affirmed when

conceptual metaphors were added from the source text *within* (7) and *brought together* (1) (see Table 47).

Face (80) was another widely used lexicalized metaphorical concept translated as *enfrentar* (149). In English, both *body* (123) and *organ* (8) were translated into the Spanish texts as *órgano* (216). Additionally, the *judiciary has eyes* that can see criminal acts such as money laundering as evidence is presented by jurisdictional regulatory agencies. The latter was a level one, complete equivalence between metaphorical concepts and linguistic expression (Deignan et al.). *Hand* (62) was only translated as the equivalent *mano* (11) in a small percentage of the texts. The Spanish texts preferred a non-body part metaphor of either *lado* (32) or *parte* (8), seeming to indicate a preference in English for hand metaphor over Spanish. In the case of hand metaphors, we see what level three categorization in both languages would be, according to Deignan et al. Examples of different metaphorical concepts are present, as well as level four, where the words are different, *lado* and *parte*, but have similar literal meanings in general but evoke slightly different metaphors. In the next section we discuss family and relationship metaphors.

4.6.21. Family relationship metaphors

Family member metaphors are often used in the complex relationships of organizations, companies, and systems involving economics and financial regulation. Spanish appears to favor family metaphors over English in FinCorpAlin, notably with *adoptar* with 521 occurrences compared to English source texts of 169. Stender (222) also found a similar preference for family metaphors in economic texts. The term *adopts* (521) could be considered a dead metaphor, yet it is frequently used metaphorically. We found that *adoptar* was the sole verb preferred in the Spanish target text, while the original writers of the source text used five different terms to express the concept. For example,

undertake, take, put in place, take action, and make were used. The following table presents family-type metaphors in both English and Spanish from FinCorpAlin.

This Report was adopted by the XL GAFILAT Plenary Meeting, held in Arequipa, Republic of Peru, from December 5 to 6, 2019	Este informe fue adoptado durante la XL Reunión del Pleno de Representantes del GAFILAT, celebrada los días 5 y 6 de diciembre de 2019
GAFILAT acknowledges the progress made by Dominican Republic in improving the technical compliance of Recommendations 19, 26 and 32.	El GAFILAT aprecia las medidas que Republica Dominicana ha adoptado para mejorar su cumplimiento técnico de las Recomendaciones 19, 26 y 32.
Place additional supervisory efforts to ensure that financial institutions and DNFBPs have a thorough understanding of their obligations and implement enhanced risk mitigation measures, when needed.	Incrementar esfuerzos de supervisión para garantizar que las IF y las APNFD conozcan cabalmente sus obligaciones y adopten medidas reforzadas de mitigación de riesgos, cuando sea necesario
Further, there are measures for judicial authorities to make provisional measures such as freezing on their own volition or on application of the PPO	Además, existen medidas para que las autoridades judiciales adopten medidas provisionales, tales como la congelación por su propia voluntad o a solicitud del PPO
The SAT has stated that its supervisory procedures have been effective, in that there has only ever been one identified repeat offender in terms of the enforcement actions undertaken	El SAT afirmó que sus procedimientos de supervisión fueron efectivos, dado que solamente se identificó a un solo infractor reincidente en términos de las acciones de orden público adoptadas
At the time of the conclusion of the on-site visit, Haitian authorities had not enacted any laws or put measures in place to address PF	En el momento de la conclusión de la inspección in situ, las autoridades haitianas no habían promulgado ninguna ley ni habían adoptado medidas para abordar el FP

Table 49. Text segment examples of the metaphor *adopt* in English and Spanish from FinCorpAlin (Author's own elaboration)

As previously mentioned, we found *adoptar* (521) seems salient as it was used more than twice the total number of times from the source text *adopt* (169). As illustrated in Table 48, there are a variety of instances where *adoptar* is applied from different source text expressions such as *make*, *implement*, and *undertake*. We might apply Deignan et al. level three; both languages use different metaphorical concepts. Although, *adoptar* is used as an added metaphorical concept where the English source text does not present one. Another observation was *filial* (115) to represent *subsidiary* (134). Again, the Spanish text appears to favor the term associated with family over the source text

term with no familial connotations. We also found limited examples of sister/*hermana* organization and *tutela* or guardianship. Other terms under guardianship in the source texts were *policing*, *watch*, *monitor*, and *surveillance*. *Vigilar* or *vigilancia* was used as the translation solution for all. Next, we discuss a few animal metaphors we found in the corpus texts.

4.6.22. Animal Metaphors

While we did not find any typical stock-market *bull* or *bear* references in FinCorpAlin since we focus on illegal rather than legal economic operations in FinCorpAlin. We did find references to very different kinds of animals, though not many. In economic and financial texts, two animals are often present; the *bull* represents upward market trends as it makes an upward thrust using its horns. The other, the *bear*, represents downward trends as it tends to make downward thrusts with its claws. The source and target texts referenced the *cuckoo bird* (3).

Both Spanish and English share bird metaphors, *nest*, *cuckoo*, *migrate*. *Migrar*, as we see below in the parallel concordance of the corpus texts depicts the *criminal justice system*, is an animal migrating from one point to another. The following table illustrates animal metaphors from the corpus texts in both English and Spanish.

<p>Cuckoo birds lay their eggs in the nests of other species of birds which then unwittingly take care of the eggs believing them to be their own. In a similar manner, the perpetrators of this money laundering typology seek to transfer wealth through the bank accounts of innocent third parties.</p>	<p>Los cucos ponen sus huevos en los nidos de otras especies de aves que sin ser conscientes de ello cuidan a los huevos pensando que son suyos. De forma similar, las personas que cometen este tipo de blanqueo de dinero intentan transferir el patrimonio a través de cuentas bancarias de terceros inocentes.</p>
<p>the absence of direct face-to-face contact with a professional service provider or financial institution can facilitate identity fraud, common money laundering typologies such</p>	<p>la institución financiera, lo cual puede facilitar la usurpación de la identidad, tipologías comunes de blanqueo de dinero como el smurfing y el cuckoo smurfing, y la ocultación de los beneficiarios finales</p>

as smurfing and cuckoo smurfing , and the concealment of beneficial ownership.	
The term " cuckoo smurfing " originated in Europe because of similarities between this typology and the activities of the cuckoo bird	El término cuckoo smurfing nació en Europa con motivo de las similitudes entre esta tipología de acto y las actividades del cuco
The criminal justice system is migrating from the inquisitorial system to the adversarial system	El sistema procesal penal está migrando del sistema inquisitivo al sistema acusatorio

Table 50. Text segment examples of animal metaphors in FinCorpAlin (Author's own elaboration)

Animals were not a prevalent metaphorical concept in FinCorpAlin, but we should acknowledge their use. The expression *cuckoo smurfing* is a specialized colloquial reference in the financial regulatory lexicon and, though not widely used, is a unique expression that merits some explanation. First, the term *smurfing* is a noun that, according to *Collins English Dictionary*, signifies “the activity of laundering money by conducting a large number of small transactions through banks” (“Smurfing”). The term *smurfing* is believed to be derived from Belgian comic book characters that later became a popular cartoon in the United States in the 1980s known as the *smurfs*. The *smurfs* represented, in general, a large group of small entities, and smurfing was an expression adopted to indicate using multiple smaller transactions of a significant amount of money to evade regulatory oversight (Cassara “Trade-based money”). How it works is explained in the parallel concordance text above in Table 50. Essentially, the cuckoo birds lay their eggs in the nests of other species of birds which then take care of the eggs of the other birds believing them to be their own. Similarly, the perpetrators of this type of money laundering seek to transfer wealth through the bank accounts of innocent third parties as if they were “placing their *eggs* (assets) in *nests* (bank accounts) of the “*unwitting birds*” allowing them to manage assets for the perpetrator.” Both languages similarly use bird metaphors in addition to the unique usage of the cuckoo bird metaphor to describe illicit financial behavior in what would appear to be a level one classification on the Deignan et al. (1997) scale.

4.6.23. Metaphors of colors

There were only ten more color metaphors in English compared to Spanish target texts in FinCorpAlin. *Red* is associated with alerts, and *green* gives the connotation of sanctioned, allowed, or given approval for something in the financial regulatory language of FinCorpAlin. Stender (220) also found this to be true in economic language in both German and Spanish. The following figure shows color metaphors and their translations from the source text.

Operation Anambé, Fifagate, Operation Los Cuinis, Gran Chaparral, Estafa De Los Turcos, IUE 107-171 / 2010, Cigarette Smuggling from Paraguay, Error Scam Computer, White Operation	Operación Anambé, Fifagate, Operación Los Cuinis, Gran Chaparral, Estafa De Los Turcos, IUE 107-171/2010, Contrabando de Cigarrillos desde Paraguay, Estafa por Error Informático, Operación Blanca
through interviews conducted with three of the five deposit- taking entities in Bermuda, the sources of the most prominent AML concerns were identified as illicit deposits by unscrupulous foreign and domestic PEPs, proceeds from foreign and domestic white-collar crime	A través de entrevistas realizadas con tres de las cinco entidades que captan depósitos en Bermuda, las fuentes de las preocupaciones más importantes de ALD fueron identificadas como depósitos ilícitos por PEP inescrupulosos extranjeros y nacionales, los ingresos de delitos de cuello blanco
has not been issued an alien registration receipt card, also known as a green card	no se le ha otorgado una tarjeta de recibo de registro como extranjero, también conocida como tarjeta verde
None of the jurisdictions are on FATF's blacklist .	Ninguna de las jurisdicciones se encuentra en la lista negra del GAFI
the subject, a dual citizen of a North American and a Central American country, was alleged to have been involved in a black-market currency exchange scheme	Se alegaba que el sujeto, un ciudadano con doble nacionalidad de un país de América del Norte y América Central, estaba involucrado en un esquema de cambio de divisas del mercado negro
a terrorist suspect who was subject to an INTERPOL Red Notice for terrorist offences allegedly committed in Turkey was arrested	un sospechoso terrorista –que tenía en su contra una Notificación Roja de INTERPOL por delitos terroristas presuntamente cometidos en Turquía

Table 33. Text segment examples of color metaphors in FinCorpAlin (Author's own elaboration)

While color metaphors were not widespread in the corpus texts of FinCorpAlin, they are worth mentioning for their conceptual metaphorical connotations. *White* often implies purity or what is considered good and sometimes implies cleanliness, as in *bleached white*. We see lexicalized metaphorical expressions such as *white collar* but also encounter a lesser-known use of *white* in naming an enforcement operation as *white operation* or *operación blanca* (3). In intelligence discourse, *white* can mean the opposite of clandestine; in other words, that which is open and known, as the latter might suggest. The lexicalized metaphor *blacklist* is widely understood. *Blacklists* have recently come under challenges for having pejorative racial overtones (Olagbaju and Ogunyemi 86). Nonetheless, the term *black* in finance is often referred to positively. In association with the expression originating in the United States, “*in the black*” means “*in profit; having a credit balance*” (“In the Black”, *Oxford English Dictionary*) as opposed to being “*in the red.*” It often refers to the debit side of an account as a “debt, overdraft” (“In the Red”). We found the term *grey list* was used to indicate a position on a regulatory list of increased monitoring but short of being “on the blacklist.” (Cassara [email interview]) The translation solution for *grey list* was an omission. *Black* has also been used in the intelligence world to connote clandestine or deep cover operations as *black operations* or *black ops* (Shachtman). While we did not find a wide use of *black* (6) and *negro* (7) in FinCorpAlin, most references were to the lexicalized metaphor of black market or *mercado negro* (4). We found red (54) in the expression red flag seemed to be preferred in the English source text. At the same time, the translation solutions included the Spanish translation *alerta roja* (36), *señales de alerta*, *señales de advertencia*, and *notificaciones*. We discussed *flags* and *alerts* in Section 4.2.5. The lexicalized expression *green card* was translated as an equivalent lexicalization *tarjeta verde*. The green card in the United States is a form of permanent legal residency that is required if one is attempting to become a naturalized citizen. The permanent residency card is well known as the *green card*. The

classification would seem to come under a Deignan et al. level one classification. Next, we examine metaphors related to behavior, grading, accounting, and school.

4.6.24. Behavior, Grading, Accounting, and School Metaphors.

We found several metaphors associated with school and education in financial regulatory language, such as assessments, ratings, and accounting. We found the Spanish term *prueba* (432) compared to the English *test* (253). In her analysis of economic media texts relating to contemporary economic crises, Stender (248) grouped metaphors that appeared to be used to *grade* and *evaluate the behavior* of states by other states. Stender (ibid.) found the Spanish economic press used similes of a *teacher and student relationship* that conveyed a sense of authority over other states, thereby being able to *grade, evaluate, punish, or call attention* to behavior or performance. We found similar metaphors used in financial regulatory texts. The following table provides examples of behavior, grading, and accounting metaphors.

New ratings are granted when sufficient progress is observed.	Se otorgan nuevas calificaciones cuando se observa progreso suficiente.
at this point, the examiner should revisit the initial examination plan, in order to determine whether any strengths or weaknesses identified during the review of the institution's BSA/AML compliance program warrant adjustments to the initial planned scope	En ese momento, el inspector debe tratar nuevamente el plan inicial de inspección, para determinar si se identifican fortalezas o debilidades durante el control del programa de cumplimiento BSA/AML de la institución que requieran correcciones en el campo de aplicación inicial planificado
Recommended actions for correcting this deficiency was noted in the 3rd Follow-Up Report	Acciones recomendadas para corregir esta deficiencia fueron notadas el 3o Informe de Seguimiento.
Peru addresses the deficiency identified in the mutual evaluation report relating to criterion 24.1.	Perú aborda la deficiencia señalada en el informe de evaluación mutua relativa al criterio 24.1.

Haiti sought to remedy these deficiencias with the creation of the CNLBA.	Haití trató de subsanar estas deficiencias con la creación del CNLBA
inform policy makers and guide the future work relative to identifying trends, typologies, behavioural patterns relative to ML/TF risks	informar a los responsables de políticas y orientar el trabajo futuro en relación con la identificación de las tendencias, tipologías, patrones de comportamiento relativo al riesgo de LA/FT.
Monthly reports on the behaviours of the transactions reports received by the FIU	Reportes mensuales sobre los comportamientos de los reportes de operaciones recibidos por la UIF

Table 342. Text segment examples of Grading, accounting, and school metaphors in FinCorpAlin (Author's own elaboration)

Applying the Deignan et al. classification to *ratings* (112) and *calificaciones* (119), we would place the expressions at a level one, while *adjustments* (9) and *correcciones* (7) would likely be level four as *adjustments* imply changing something but the term *correction* is only meant to properly amend something that is in error. *Behavior* (41) and *comportamiento* (48) are level-one categorizations on the Deignan et al. (1997) scale. We also found *colegio de supervisores* (9) and *colegio de abogados* (16) as translations for supervisory colleges and bar associations, respectively. We believe these fit within a level one designation of equivalence. *Tests* (253), and *pruebas* (432), revealed a preference in Spanish for using the term *prueba*. *Ratings* (112), *calificaciones* (119), as well as *remedial* (91) are translated as *correctivas* and *remediales*. Additional terminology relating to school, behavior, and grading was the term punishment (14), translated as *castigo* (14), and *deficiency* (1,018), translated as *deficiencia* (1,229), and books (45), as *libros* (56), for which there seemed to be a preference for both *libros* and *deficiencias* in the Spanish translations.

4.6.25. Physics, Chemistry, Natural Sciences, and Geometry

We also consider the domain of *physics, chemistry, and natural sciences*, represented in FinCorpAlin with 534 metaphors in Spanish and 418 in English. We found broad representation for

specialized terms such as *sólido* (147), which was salient in Spanish compared to the English source text, which used three different terms *strong* (20), *robust* (76), and *sound* (39). A reduction of variation in terms used in the target text is evident with the singular use of *sólido* instead of also using *robusto* and *fuerte*, two equivalent terms in Spanish for *robust* and *strong*, respectively. Geometrical references were also salient in the Spanish target text with *volumen* (320) compared to *volume* (213) in the English source text. The following table depicts the use of natural science metaphors.

sector and the volume of cash that flows through that sector	en el volumen de activos y productos que se ofrecen
However, another section of the legislation dilutes this autonomy by providing functions to an Administrative Board	Sin embargo, otra sección de la misma ley diluye esta autonomía al otorgarle funciones
and accelerates reaction times of the FIU	y acelera los tiempos de reacción de la UIF
the Cayman Islands has a solid and highly professional institutional framework in place with regards to AML/CFT,	Además, las Islas Caimán tienen un marco institucional sólido y altamente profesional con respecto al ALA/CFT,
Required federal banking agencies to consider a bank's AML record when reviewing bank mergers	Exigieron que las agencias bancarias federales tengan en cuenta el registro AML de los bancos en el control de las fusiones

Table 35. Text segment examples of Natural science metaphors in FinCorpAlin (Author's own elaboration)

Money, stock, banks, and even their regulation (legislation) and enforcement organizations are depicted as *substances that can be measured in volume and can flow, are diluted, are solids, and can freeze and even fuse*. The Deignan et al. classification would place all but mergers and fusions at level one, complete equivalence between metaphorical concepts and linguistic expressions. As for mergers and *fusiones*, we see what would likely qualify as a level three; both languages use different

metaphorical concepts. The Spanish *fusiones* is oriented more toward the natural sciences than the source text mergers, which implies a coming together or merging as the *Oxford English Dictionary* affirms is “the action or an act of merging; the condition of being merged” (“Merger”). The Spanish *fusión* connotes “action and effect of melting or fusing” (“Fusión” *Diccionario de la Lengua Española*), which seems to imply an application to substances or substrates that can be *fused by melting*. In the next section we discuss construction and building metaphors which were prevalent in the corpus texts.

4.6.26. Construction, Building Metaphors

Metaphors related to construction were frequently salient in FinCorpAlin’s regulatory discourse, where we found, on average, the Spanish texts showed a perceptible preference for construction-related metaphors. We included architecture-related terms as well as other construction of dwelling spaces. Many dead metaphors are commonly used but still retain a metaphorical connotation. For instance, in regulatory language, we refer to *thresholds*, *frames*, or *pillars* that have taken on a metaphorical sense when referring to otherwise abstract ideas. These concepts derive from their original meanings based on concepts familiar to many in everyday use as most of us live in buildings that were constructed.

As Stender (211) found in economic language, the economy is related to *stability* and is a *structure* that can be *damaged but also restored*. We see similar conceptual imagery in FinCorpAlin with Spanish and English cultures that show relatedness in building construction. Both cultures also share similar abstract imagery of what is a house or building and how it is constructed.

In the case of financial regulatory programs, they are reshaped or se *remodelan*. We found similar concepts of *opening and closing a door* in Spanish using (25) and English *gateway* (25). We

also found, like Stender (2016), the concept of *reform* appears more frequently in the Spanish texts (41) versus the English (30). The following table provides examples of lexicalized metaphors and their translations from source to target texts.

The Joint Intelligence Unit (JIU), comprised of the enforcement agencies (police, customs, immigration), serves as a gateway for the sharing of information at an operational level.	Además, a nivel operacional, la Unidad de Inteligencia Conjunta (JIU), integrada por las agencias del orden público (policía, aduanas, inmigración), sirve como puerta de entrada para el intercambio de información a nivel operacional.
Occasional transactions are carried out for amounts equal to or more than the regulatory threshold	transacciones ocasionales por importes iguales o superiores al umbral reglamentario
Peru will continue in the enhanced follow-up process and will continue to report to GAFILAT on the progress made to strengthen its implementation of AML/CFT measures	Perú continuará en el seguimiento intensificado y deberá seguir informando al GAFILAT sobre el progreso para fortalecer su implementación de las medidas ALA/CFT
Some of the deficiencies identified in the laws, includes, the lack of criminalisation of all types of ML activities including standalone ML and self-laundering and lack of investigative tools	Algunas de las deficiencias se identifican en las leyes, incluso la falta de tipificación de todo tipo de actividades del LA, incluso el LA independiente, el autolavado, y la falta de herramientas de investigación
These include, addressing the lack of investigative tools available	Estos incluyen abordar la falta de instrumentos de investigación

Table 36. Text segment examples of Construction and building metaphors in *FinCorpAlin* (Author's own elaboration)

Measures (553) arose as salient in the target text *medidas* (2821); although a dead metaphor, it was used much more frequently in Spanish. *Threshold* (228) in the source text is often used metaphorically, as is its Spanish equivalent, *umbral* (208). The preceding expression would meet Deignan et al. (1997) level one with equivalence in both metaphorical concept and linguistic expression. *Oxford English Dictionary* defines *threshold* as “The piece of wood, stone, or other material forming the bottom of a doorway, which is crossed in entering a house, building, or room; the sill of a doorway” (“Threshold”). The Real Academia Española affirms this definitional

equivalence; “Parte inferior o escalón, por lo común de Piedra y contrapuesto al dintel, en la Puerta o entrada de una casa” in English “the lower part or step, usually made of stone and opposed to the lintel, in the door or entrance of a house.” (“Umbral” *Diccionario de la Lengua Española* [Author’s own translation]). Another lexicalized metaphor for construction and building is a *framework* (502). The Spanish translation is the equivalent of *marco* (791). We also saw the use of *pillars* (12) and the Spanish equivalent *pilares* (12), as well as *reinforce* (26) and *reforzar* (116). Figure 6 also shows an example of the use of tools (148) and *herramientas* (98). The English use of tools as a catchphrase did not carry over on a 1:1 basis. Sometimes, the Spanish target text’s preferred translation was *instrumentos* (10), which seems to alter the conceptual metaphor from a *tool* to an *instrument*. Using Deignan et al.’s (353) classification, this would be a level three; both languages use different metaphorical concepts, as well as level four, expressions have similar literal meanings but with different metaphorical meanings. Next, we discuss sports metaphors from FinCorpAlin.

4.6.27. Sports metaphors

The domain of sports is present with similarities indicated between Spanish and English. Similar to studies of economics where *economics are competition* (Fraile Vicente, Stender), we also see metaphorical references to a competition between those enforcing financial regulation and those subject to enforcement.

We found the use of the term *plaza* (17) in our investigation, as did Stender in her investigation of economic texts. Although we did not find terminology referring to bullfighting, there were five variations of this term in English (accounts, position, market, center, and vacancy). It should be noted that previous investigations of economic texts have found references to bullfighting, a significant cultural phenomenon that is often metaphorically expressed.

English- and Spanish-speaking cultures are highly sports-oriented, lending shared concepts and expression. Both terms seem to fit within level two, with the same conceptual metaphor but a different linguistic expression. The term *ronda* (206) and, in English, *round* (201) would seem to fit with Deignan et al.’s level one, or complete equivalence between metaphorical concept and linguistic expression. The English *launched* (10), and the Spanish *lanzado* (14), meaning to *throw*, also share conceptual similarities. We found the same true for losses and the Spanish *pérdidas* as well as *goals* and the equivalent *metas*, *teams* (519), and *equipos* (556). We found some variation between the term *disparar* (4), meaning to shoot, and the source text *triggered* (4), implying an activated mechanism required to cause a shot but is a highly lexicalized term in English with colloquial connotations, such as causing one to be offended. Due to the limited number of sports metaphors in the corpus texts and limited time, we did not provide a table with parallel concordance examples for these.

4.6.28. Metaphors for Pressure

Another theme that appears in both source and target texts is that of pressure metaphors. There seems to be some similarity between the English use of *pressure* (8) and Spanish *presión* (9), whereby the notion of pressure applies to organizations and people that are “under” *pressure* to get something or act in some fashion. The following table provides some examples of *pressure* metaphors in FinCorpAlin.

This will also reduce some of the pressure from the FIU that is required to collect additional information	Esto también reducirá parte de la presión de la UIF necesaria para recabar información adicional
In this case, an individual organised a loan-fraud pyramid scheme to falsely inflate the sales and revenues of his company.	En este caso, un particular organizó un sistema piramidal de fraude de préstamos para exagerar falsamente las ventas y los ingresos de su empresa

Also, the defendant altered invoices directed to one of the entities by inflating the cost of the work	Asimismo, el acusado modificó las facturas enviadas a una de las entidades aumentando el coste de los trabajos
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Table 37. Text segment examples of pressure metaphors in FinCorpAlin (Author's own elaboration)

While there was apparent equivalence between pressure and *presión*, there seemed to be some divergence from the source text, *inflate*. In Spanish, the literal equivalent term, *inflar*, was not used; instead, a de-metaphorization was applied using *exagerar* and *aumentar*. The reason for this is that in Spanish, the term *inflar* conveys a somewhat pejorative connotation as “*exaggerate or to embellish facts, news*” and “*to fill something with air or gas*” (“*Inflar*” *Diccionario de la Lengua Española* [Author's own translation]). *Aumentar*, as translated from *inflating*, means to “give greater range, number or substance to something” (“*Aumentar*” *Diccionario de la Lengua Española* [Author's own translation]). Deignan et al. would likely classify both translations of *aumentar* and *inflar* as level four, where the words have similar meanings. Yet, the metaphorical meanings are distinct, or in the case of the target text, de-metaphorized.

This will also reduce some of the pressure from the FIU that is required to collect additional information and conducting analysis based on PGR requests	Esto también reducirá parte de la presión de la UIF necesaria para recabar información adicional y conducir análisis basados en las solicitudes de la PGR
This could put pressure on the FIU and delay the process of launching prosecutions	Esto podía ejercer presión en la UIF y dilatar el proceso de inicio de las acciones penales

Table 386. Text segment examples of pressure metaphors in FinCorpAlin (Author's own elaboration)

Inflate (4) is used in the source texts as opposed to the Spanish texts, which used *exagerar* (2) and *aumentar* (2). In the next section we discuss value and loss metaphors which also relate to Section 4.7.25., behavior, grading, accounting and school metaphors.

4.6.29. Value and Loss Metaphors

A significant aspect of regulatory agencies and those they regulate is the variation in the values assessed or assigned. In the case of FinCorpAlin, those regulated are countries, banks, financial institutions, and other entities that influence regulators and the rule of law. We consider this area sufficiently represented to include it as a separate category. The following table shows some examples from FinCorpAlin.

At the time of the on-site visit, given the complexity of these aspects, they still did not have concrete results to assess the effectiveness of these measures	Al momento de la visita in situ, dada la complejidad de estos aspectos, aun no contaban con elementos de resultados concretos que permitieran valorar la efectividad de dichas medidas.
This information was considered by the Public Prosecutor's Office as very useful in locating property and following the money trail and is positively valued by the authorities that make up the multidisciplinary groups	Esta información fue considerada por el Ministerio Público como de gran utilidad para localizar bienes y seguir la ruta del dinero, y es positivamente valorada por las autoridades que componen los grupos multidisciplinarios
In the face of financial economic activities not assessed in the NRA, there is a limitation in terms of the scope of that assessment	Ante actividades económicas financieras no valoradas en la ENR, se advierte una limitación en términos de alcance de dicha evaluación,
provisions relating to the implementation of the reduction of up to 4 VAT points for purchases made by electronic means	las disposiciones relacionadas con la instrumentación de la rebaja de hasta 4 puntos de IVA a las compras que se realizaran con medios electrónicos
Failure to comply with the requirements of 31 CFR 103.110 will result in loss of safe harbor protection for information sharing and may result in a violation of privacy laws or other laws and regulations.	La falta de cumplimiento de las exigencias de 31 CFR 103.110 derivará en la pérdida de la protección legal para el intercambio de información y puede causar una violación de las leyes de privacidad u otras normativas

Table 39. Text segment examples of value and loss metaphors in FinCorpAlin (Author's own elaboration)

If we apply the analysis of Deignan et al. (ibid.) to the expressions in Table 57, we see that *assess* and *valorar* would appear at level one; that is, complete equivalence between metaphorical

concept and linguistic expression. The effectiveness of money laundering prevention programs is assigned a value, and in this sense, “assessment is a measurement.” *Valorar* is defined as “indicating the price of something” (“Valorar” *Diccionario de la Lengua Española* [Author’s own translation]), according to the RAE. Hence, effectiveness is assigned a price but not a literal cost. In another example, we see the expression for loss as *pérdida*, in this case, a safe harbor. The subject, safe harbor, is metaphorical in the source text while it is de-metaphorized in the target text with *protección legal*.

4.7. Reflections on conceptual metaphor types (summary of observations)

As mentioned throughout the analysis of the lexicalized expressions and their translations, Deignan et al. (353) put forth that the relationship between concept (tenor) and metaphor (vehicle) can be seen from different standpoints according to language and culture. They distinguish between four classes or types of cross-linguistic variation; 1) complete equivalence between metaphorical concept and linguistic expression, 2) same metaphorical concept, different linguistic expression, 3) different metaphorical concepts in both languages, 4) words and expressions have similar literal meanings but different metaphorical meanings (354). The following attempts to summarize the domains and their classification types according to Deignan et al. (1997).

Domain	Level
War and conflict metaphors	1
Behavior, grading, accountability, and school	1
Weight metaphors	1, 2
Construction-architecture	1,2
Parts of the body	2 and 3

Movements of force	4
Cleansing-bleaching	1,3
Physics, chemicals, and natural sciences	3, 4
Music metaphors	1
Sports, games, hunting	1
Family metaphors	3, 4
Theater-Show business	1,3
Value and loss metaphors	1

Table 408. Metaphor categories in FinCorpAlin (Author's own elaboration of Stender 248)

In the analysis of each domain, we considered the lexicalized expression in context to determine which cross-linguistic classification was most fitting. To recap Deignan et al.'s levels of cross linguistic variation (354) which we provided in Section 4.6.:

- 1) Complete equivalence between metaphorical concept and linguistic expression,
- 2) Same metaphorical concept but a different linguistic expression,
- 3) Both languages use different metaphorical concepts and,
- 4) Words and expressions have similar literal meanings but have different metaphorical meanings.

We see from the table that levels 1 and 2 were the most frequently observed. We either saw complete equivalents between metaphorical concept and linguistic expression or we saw the same metaphorical concept but a different linguistic expression. We believe this may be due in part to similarities and shared values and cultural characteristics between English and Spanish cultures.

Nonetheless, we did observe instances of both languages using different metaphorical concepts and words and expressions that had similar literal meanings but divergence in metaphorical meanings. In the next section we discuss frequencies of lexicalized phrases.

4.8. Frequencies of lexicalized phrases

In the following, we show the first twelve words of the corpus; these words are the most frequent in FinCorpAlin. Word frequencies are crucial to exploring comparable corpora (Kilgriff 5). We thus present the following figure of frequency lists comparing both subcorpora of FinCorpAlinEN and FinCorpAlinES.

The frequency lists yielded similar results in the comparable corpora in both English and Spanish. Although these terms were not salient to specialized text, we found many more examples of the specialized terms found in FinCorpAlin. As noted by Gamallo Otero (1), translation research based on comparable corpora has not been as popular as that of aligned parallel corpora because it produces comparatively poor results. Otero cites parallel text accuracy for extraction of words translated to be around “99 percent” and the accuracy of comparable corpora about “72 percent.” Further, Otero states that extracting results from comparable corpora requires using “domain-specific seed expressions” (5). Additionally, precision is improved with seed expressions that can be acquired from “parallel corpora, external dictionaries, or/and bootstrapping strategies” (ibid.). While not many word translation extraction approaches are proposed using comparable corpora, seed templates can be used from parallel corpora that can be aligned with comparable texts (ibid.). The following figure illustrates the frequencies found in FinCorpAlin, our bilingual parallel corpus. Starting with English on the left we observed the term information which corresponded directly to the Spanish on the right, información. Next we observed risk corresponding to riesgo as the second most frequent term.

Next, person and persona was in third place in both English and Spanish, then we observed a divergence in term frequencies beginning with the English abbreviation ml for money laundering in fourth place. In fourth place for the Spanish text we observed autoridad. Next, we observed bank in English in fifth place and ft in Spanish as the abbreviation for financiación de terrorismo, we observed bank in sixth place in Spanish. In sixth place in English, the term was authority. In the seventh place in English, we observed company and in Spanish, medida. In eight place in English was aml, the abbreviation for antimoney laundering. In Spanish, in eighth place was caso. The ninth most frequent term in English was transaction, in Spanish, cliente. In tenth place in English was sector followed by criterion in eleventh. In Spanish, the term in tenth place was delito and sector in eleventh. Interestingly, not until the fifth place do we see ft in the Spanish texts for financiación de terrorismo. We were also surprised that neither blanqueo nor lavado showed up in the top 11 terms in frequency.

Lemma	Frequency ? ↓	Lemma	Frequency ? ↓
information	7,297	información	7,455
risk	5,914	riesgo	6,829
person	4,262	persona	4,765
ml	4,239	autoridad	4,024
bank	3,996	ft	3,755
authority	3,982	banco	3,618
company	3,606	medida	3,239
aml	3,565	caso	3,152
transaction	2,886	cliente	3,115
sector	2,819	delito	3,060
criterion	2,795	sector	2,884

Figure 8. Frequency lists in FinCorpAlinES and FinCorpAlinEN (Author's own elaboration)

The terms information and equivalent *información* appeared most frequently in both the source and target texts. The initials ml appears in the fourth place in English, while ft in Spanish for *financiación de terrorsimo* is in the fifth place. The abbreviation AML (anti-money laundering)

appears in eighth place in English. The next most frequent term was *riesgo* or risk, in English, followed by *persona* or person and *autoridad* or authority.

Next, we used Sketch Engine’s keyword list function to compare FinCorpAlin with the general reference Spanish corpus, esTenTen2018, with over 16 million terms. For further analysis of the frequencies found in FinCorpAlin, we used the Spanish Web 2018 corpus (esTenTen18) as a reference in the following figure. We note that the key words extracted were almost entirely in the form of abbreviations.

	Word	Frequency [?]		Frequency per million [?]		Relative DOCF [?]		Score [?]
		Focus	Reference	Focus	Reference	Focus	Reference	
1	cft	2,371	6,536	1,536.72	0.33	100.00%	< 0.01%	1,153.2
2	apnfd	1,674	138	1,084.97	< 0.01	100.00%	< 0.01%	1,078.4
3	ft	3,755	24,803	2,433.73	1.27	100.00%	0.03%	1,074.7
4	uif	1,703	9,042	1,103.77	0.46	100.00%	< 0.01%	756.0
5	ald	1,010	2,991	654.61	0.15	100.00%	< 0.01%	568.8
6	osfl	883	293	572.30	0.01	100.00%	< 0.01%	564.9
7	bermuda	1,003	6,215	650.07	0.32	100.00%	< 0.01%	494.3
8	egmont	826	2,231	535.36	0.11	100.00%	< 0.01%	481.5
9	bsa	879	4,326	569.71	0.22	100.00%	< 0.01%	467.5
10	enr	742	1,781	480.91	0.09	100.00%	< 0.01%	441.8
11	uiaf	710	1,814	460.17	0.09	100.00%	< 0.01%	422.1
12	ddc	737	3,916	477.67	0.20	100.00%	< 0.01%	399.0
13	aml	701	3,117	454.34	0.16	100.00%	< 0.01%	392.9

Figure 9. Frequency Comparison of FinCorpAlin with esTenTen (Author’s own elaboration)

We discovered several lexicalized metaphorical expressions with high frequencies, such as combating the financing of terrorism (CFT), and several other acronyms having the highest frequencies. Another example, while not necessarily metaphorical, is the Spanish acronym for *Actividades y Profesiones No Financieras Designadas* (APNFD) or, in English, Designated Non-Financial Businesses and Professions (DNFBP), which is a highly specialized phrase. This phrase is

followed by *financiación de terrorismo* (FT), which has some metaphorical value. The fifth most frequently appeared as *Anti-lavado de dinero* (ALD), the lexicalized phrase Anti-money laundering in English.

We found the acronymization (the process of making new words from the initial letters of the constituent phrase expression (Zapata Becerra 7-8) to have influenced the corpus text to the degree that Acronyms are often referenced as words in the source text which influenced the translated text to a large degree. For instance, *antilavado*, as referenced on page 117, and is listed as a neologism by the Cervantes Institute, appears in the target text in the form of the acronym ALD translated from anti-money laundering AML in the source texts. Other expressions like combating terror finance or CFT and Public Prosecutors Office or PPO appear to have become part of the specialized lexicon, often using only the acronym. The expression beneficial owner or BO is translated in Spanish as *beneficiario* final or BF and appears lexicalized in the corpus texts that primarily rely on the acronyms instead of spelling the expression out.

These abbreviations have become a distinctive component of specialized language and communication. They are heavily used in the specialized financial regulatory language of this investigation. They help perform both cognitive and pragmatic functions. However, as Udina (846) asserts, the variation in legal acronyms that attempt to make communication clear and concise can become confusing in emergencies and may even impede communication.

Word frequencies are crucial to exploring comparable corpora (Kilgriff 5). We thus present the following figure of frequency lists comparing both subcorpora of FinCorpAlinEN and FinCorpAlinES. In accordance with Kilgriff (5), we also produced frequency lists in our comparable

corpora FinCorpCompES and FinCorpCompEN. First, we performed a frequency by lemma in both comparable corpora below.

	Noun	Frequency [?] ↓		Noun	Frequency [?] ↓
1	fatf	41,137 ...	1	información	18,417 ...
2	information	39,571 ...	2	fecha	17,935 ...
3	risk	34,386 ...	3	interpol-un	17,890 ...
4	money	31,999 ...	4	alias	17,698 ...
5	institution	31,963 ...	5	nombre	16,269 ...
6	aml	28,358 ...	6	afghanistan	16,188 ...
7	laundering	26,907 ...	7	número	15,457 ...
8	activity	26,337 ...	8	amended	14,394 ...
9	bank	24,096 ...	9	delito	13,621 ...
10	transaction	23,578 ...	10	ley	13,593 ...
11	cft	23,303 ...	11	sep.	13,233 ...

Figure 7. Frequency lists by noun in FinCorpCompEN and FinCorpCompES (Author's own elaboration)

In FinCorpCompEN we found consistency with our bilingual corpus FinCorpAlin in the form of acronyms in the top eleven of the list, such as FATF and CFT. While we found fewer acronyms in the top eleven in FinCorpCompES, we did find SEP and INTERPOL-UN.

Due to time limitations and resources, we were unable to perform an in-depth analysis of our two comparable corpora. However, we performed frequency analyses for both comparable corpora and presented those along with the frequencies in our bilingual corpus. A frequency by lemma search in both comparable corpora yielded similar results, with articles, prepositions, and conjunctions being the most frequent in English and Spanish. The following figure illustrates frequency by lemma in the FinCorpComp comparable corpus.

Lemma	Frequency [?] ↓	Lemma	Frequency [?] ↓
1 the	510,111 ...	1 de	597,020 ...
2 of	309,556 ...	2 el	550,455 ...
3 and	296,197 ...	3 a	282,485 ...
4 to	262,100 ...	4 y	156,538 ...
5 be	218,578 ...	5 en	137,249 ...
6 a	192,476 ...	6 que	97,116 ...
7 in	168,928 ...	7 no	65,815 ...
8 for	91,039 ...	8 uno	56,322 ...
9 or	84,839 ...	9 se	50,646 ...
10 that	79,570 ...	10 ser	47,694 ...
11 on	63,506 ...	11 para	44,208 ...

Figure 8. Frequency lists by lemma in *FinCorpCompEN* and *FinCorpCompES* (Author's own elaboration)

4.9. Discussion of Results

In Chapter one, Section 1.1.1., we outlined twelve hypotheses we set out to explore. In the present section, we attempt to address each one of those hypotheses systematically.

Hypothesis 1: Because of the variety of metaphors used in the discourse analyzed, there is a possibility of slight losses in transfer between English and Spanish in the translations explored.

The null hypothesis would follow that there were no transfer losses is proven to be false. In sections 5.2.1.-5.2.3. and 5.2.6., there appears to be evidence that the null hypothesis is false. Terminological variation exists in several instances. Additionally, conceptual metaphors were different on some occasions leading to the introduction in some cases of metaphors where there was no previous one, the addition of metaphors and intensification.

Hypothesis 2: The lexicalization of metaphors in the fields of discourse analyzed presents a risk of forming misconceptions about the message of the original texts.

The null hypothesis is there are no risks of forming misconceptions about the lexicalization of metaphors from English to Spanish translation in the corpus analyzed. While we found lexicalized metaphors present throughout the corpus documents, we identified terminological variations of several of those lexicalized metaphors. The variation could potentially cause misconceptions in the message of the source texts. For instance, in Section 5.2.6., in the examples of *pantalla*, and screen, we found an apparent mistranslation. We did not find evidence for misconception in the lexicalization, per se, in the target texts. We submit the null hypothesis, in this case, is true.

Hypothesis 3: Metaphorical communication based on contextualization presents problems of uniform understanding intra and cross-culturally.

The null hypothesis that metaphorical communication based on contextualization does not present problems of uniform understanding within and across cultures is false. We found that localized contextualization of metaphorical concepts in some instances can show consistent understanding throughout and across cultures. For example, the metaphorical concept of *blanquear* and *lavar* money is often used interchangeably but has distinct legal definitions, which we discuss in Section 3.5.1. Thus, we submit that the null hypothesis, metaphorical communication based on contextualization does not cause problems of uniform understanding, is false.

Hypothesis 4: The formation of metaphors in regulatory and financial discourse is based on images and concepts of U.S. origin.

The null hypothesis that the formation of metaphors in regulatory and financial discourse is not based on images and concepts of U.S. origin is false. The concept of money laundering is primarily a U.S.-originated metaphorical concept. The subsequent regulation around it originated in the U.S. Additionally, many of the regulations and current laws related to this area show the influence of U.S.-based terminology and concepts that have been adopted and translated into equivalent or near equivalent concepts in Spanish. We, therefore, believe the null hypothesis is false based on the data presented in sections 3.5.1 and 5.2.6.

Hypothesis 5: Conceptual metaphors used in economic, financial, and regulatory security discourse in FinCorpAlin are based on cards/card games, games, and sports concepts.

The null hypothesis is that conceptual metaphors in financial and regulatory security discourse are not based on card games, games, and sports concepts. The null hypothesis is partially true because we did not find evidence of card/card game metaphors in the corpus documents. While we did not find conceptual metaphors based on cards or card games, per se, in the corpus texts, we did find conceptual metaphors of sports, games, and hunting-related concepts. For instance, in Section 5.7.28., we found both English-speaking and Spanish-speaking countries sharing sports concepts to be a common theme.

Hypothesis 6: Certain expressions are metaphorized to elicit emotional reactions.

The null hypothesis would state certain expressions are not metaphorized to elicit emotional reactions. While we do not know whether expressions were metaphorized to elicit emotional responses, we found evidence that certain metaphorical expressions were added and intensified in the target text translations into Spanish. For instance, in Section 5.7.1., we provide evidence of intensified lexicalized metaphors from the target text. It would be exceedingly difficult to prove beyond all doubt

the intended emotional reaction of metaphorized expressions. Although we believe there is sufficient evidence in the intensification to suggest the ideological intent of the metaphorized communication.

Hypothesis 7: In certain instances, the translator chooses to look for and use a metaphor already lexicalized in the target language to capture the meaning of the metaphor in the source text.

The null hypothesis states the translator chooses not to look for and use a metaphor already lexicalized in the target language to capture the meaning of the source text metaphor. We identified retention of conceptual metaphors as the most used translation strategy, followed by replacement of metaphors with a target text equivalent concept as the second most frequent translation strategy and then addition of metaphors where there were none in the source text. Retaining the metaphor with another lexicalized metaphor in the target language appears to be an effective strategy, but also adding and replacing metaphors with lexicalized expressions that convey the source text meaning in the target language as is replacing metaphors with lexicalized expressions that convey the source text meaning in the target language; For example, source text 1 (*embarked*, a nautical metaphor) is replaced by 2 (*lanzado*, a sports metaphor) and adding metaphors (*subsidiaries* to *filiales* familial metaphor).

The null hypothesis is false; instances of retained metaphorical concepts are present in sections 5.2.4. and 5.7.

Hypothesis 8: There is a conceptual divergence between English and Spanish regarding exceptionality (in our case, money laundering and terror financing).

The null hypothesis states there is no conceptual divergence between English and Spanish terms of exceptionality. There is some evidence of conceptual divergence found in the corpus texts, as

discussed in sections 3.5.1 and 5.7.1. The concept of Money laundering is expressed as *lavado de dinero*, *lavado de capitales*, *lavado de activos*; at the same time expressed as *blanqueo de dinero*, *blanqueo de capitales*, *blanqueo de activos* while the term *lavar* evokes the concept of to wash, the term *blanquear* evokes that of bleaching or whitening. Thus, out of a single expression in English, there are many when translated into Spanish. The concept of bleaching, even though it may have some relationship, goes beyond that of washing which is not a common practice in English.

Hypothesis 9: Translated conceptual metaphors in the corpus texts tend to construct the perception of reality by activating pre-existing knowledge that leads to superficial interpretations of that reality.

The null hypothesis states that translated conceptual metaphors in the corpus texts do not tend to construct a perception of reality by activating pre-existing knowledge that leads to superficial interpretations of that reality. The conceptual metaphors translated were designed to elicit action from the reader. Since the metaphors in the corpus texts often are ideological, they seem to attempt to support the reality of a struggle, conflict, or a fight to stop or prevent financial crime. For instance, in Section 5.7.1., we found some conceptual metaphors added and intensified in what could be viewed as an attempt to shape or influence the reader's reality. The null hypothesis is false.

Hypothesis 10: Concrete metaphorical articulations are subjected to gaining or losing essential effects in the reception of the target text.

The null hypothesis states that concrete metaphorical articulations are not subjective to gaining or losing important effects in the reception of the target text. It is necessary for the consolidation and dissemination of the ideology in question. As with almost all ideologies, the process of their consolidation recognizes the importance of forming allies to “fight” against a perceived and

recognized evil. First, it is necessary to convince the public (in the case of the corpus texts, key stakeholders) or to reinforce the beliefs of those already convinced that a given phenomenon “is the way it is.” Thus, describing the phenomenon and shaping it in the eyes of the reader is crucial. Such descriptions use concrete metaphorical articulations, which, when translated, are subjected to a process of gain or loss. This gain or loss has important effects on the reception of the target text (Gerome 29). The metaphorical articulations we believe produce gain where the translation strategy of adding and intensifying metaphors was present. For instance, sections 3.5.1 and 5.7 provide examples of de-metaphorization and intensification. A presumable loss was present when metaphors in the source text were omitted or significantly altered in the target text translation. The null hypothesis appears to be false.

Hypothesis 11: If metaphors are part of the language, whose development is based on culture, then the metaphorical meanings differ from culture to culture.

The null hypothesis states that if metaphors are part of the language, whose development is based on culture, the metaphorical meanings do not differ from culture to culture. We found that the metaphorical meanings in the corpus texts varied to some degree from English to Spanish. The conceptual metaphors differed regarding vehicle and ground but not necessarily in tenor. For instance, in the source text, Strawman rendered as *Testaferro* is based on the concept of a figure of straw which is the tenor for someone falsely representing something as real or legitimate. The vehicle is different in Spanish as *testaferro* is a loan word from Italian that also represents someone falsely representing as the legitimate contact. The ground, or relationship between tenor and vehicle, can be seen as similar yet different to the degree that the description of the vehicle differs yet retains the tenor of someone whose name is used in place of the real name of the owner of assets. Another example is that of a shell company in the source text that is rendered as a *fantasma* (ghost) in the target text.

The vehicle is quite different because shells are organisms, and *fantasmas* are paranormal phenomena. The ground in the source text shell conveys the meaning of something empty, yet the target text metaphor fantasma conveys a ghost with dubious existence. While the tenor for both presumes businesses that are not real, the cultural differences seem to imply that one (ghosts) is less tangible than another (shells) which exist yet are limited in their completeness. In another instance of the difference between cultures, money seems to fly in English metaphors. At the same time, it leaks (*fuga*) in Spanish, and problems or issues are addressed in English and *abordados* (attacked) in Spanish. While *abordar* is considered a dead metaphor, it carries a more aggressive connotation based on its etymology. Another pronounced difference can be seen with plant metaphor of Branches in English as the tenor for subsidiary business locations where the Spanish vehicle is family-oriented (*filiales*). The null hypothesis is false in this instance.

Hypothesis 12: Since the U.S. was the first to deem money laundering as a crime, U.S.-centric language influences Spanish translation.

The null hypothesis states that since the U.S. was the first to deem money laundering a crime, U.S.-centric language does not influence the Spanish translation of the target text. We found evidence of the influence of English in the translated texts in instances. Since the corpus texts involve specialized regulatory discourse based on U.S. law, the translations adopted a degree of foreignization in the target texts. We found multiple acronyms that were retained in the source text. For instance, BSA (Bank Secrecy Act), the Financial Crimes Enforcement Network or FinCEN, and POCL (Proceeds of Crime law). Translated expressions like *lavado de dinero* and *anti-lavado de dinero* from the English money laundering and anti-money laundering are presumably influenced by the source text expressions. Other specialized Acronyms, such as Law Sanctioning Money Laundering and Terrorist Financing (LSMLTF), are left in their source text form with explicitation in parenthesis

as the target text strategy. The null hypothesis is false; the target text and specialized language are influenced by United States Federal regulation and influence.

4.10. Chapter Summary

We begin Chapter five with a discussion of the types of metaphors extracted in section 4.1. We then present metaphor translation strategies in Section 4.2. In Section 4.2.1., we gave the identified metaphorical domains from FinCorpAlin. In sections 4.2.2-5.2.5, we proposed and analyzed several metaphor translation strategies identified in the corpus text. In Section 4.2.6., we presented examples of metaphorical loss and terminological problems. Section 4.3. offered previously researched conceptual domains related to the present research.

Next, we presented the methodology for extracting metaphors from the FinCorpAlin corpus in Section 4.4. Section 4.5. offers conceptual metaphors identified in the source text, followed by a discussion of metaphors in shared domains in both source and target texts in Section 4.6. We then discuss recurrent domains and frequencies in FinCorpAlin in Section 4.7., followed by an analysis of lexicalized metaphors extracted from the source and target texts. In sections 4.7.1.- 4.7.31., we present examples, discussion, and analysis of text segments containing lexicalized metaphors.

CHAPTER 5 – PRACTICAL APPLICATIONS

In this chapter we attempt to provide some practical applications for those who might benefit from improved communication about money laundering prevention. We address agents of enforcement and adjudication that often must serve as cultural intermediaries but may not always be cognizant of the potential language problems that may impede the best communication from English to Spanish. In Section 5.2., we provide an example of a typical investigation and in the section that follows, 5.3., we discuss intercultural mediation between policymakers and those charged with enforcement of those policies and regulations.

In Section 5.4., we attempt to provide students of translation with insightful information in the areas of corpus creation and the translation of metaphors in specialized language. We then attempt to address how practicing translators may benefit from this research. In Section 5.6., we discuss how specialized language corpora may help to build and enhance translation memories that support computer assisted and machine translation.

5.1. Agents of Enforcement and Adjudication

As a starting point, we believe the effective translation of information from English to Spanish is critical to the uniform understanding that key stakeholders are expected to perform based on the translated data. Using unequivocal terminology is a key component of effective legal and financial regulatory language. If univocal terms and expressions become polysemic in the target text post-translation, they may present an opportunity for misunderstanding. For instance, the metaphorical expression, money laundering, as we have demonstrated, is *blanqueo de capitales* in peninsular

Spain; it is also used to refer to the same conceptual metaphor of *lavado de capitales* in Spanish-speaking Latin America.

Key stakeholders such as criminal investigator, lawyers, banking executives, and others must read and understand the Federal Financial Institutions Examination Council's Bank Secrecy Act/Anti-money laundering manual. They also must read other key regulatory documents and will benefit from becoming more aware of the potential for ambiguity in their communications.

Regulatory agencies must have measures of effectiveness. Effectively communicating with those they are regulating is essential to complete their mission of preventing and penalizing financial crime successfully. Recent United States congressional hearings for the oversight of the Financial Crimes Enforcement Network (FinCEN) revealed the intricacies of understanding the effectiveness of the regulatory network as well as the anti-money laundering (AML) regime during a three-hour hearing (Anthony 2022). During the hearing, the Acting Director of FinCEN, Himamauali Das, indicated that while factual data was unavailable, he cited the Bank Secrecy Act (BSA) records had been searched by government officials "over two million times in the last five years" (ibid.). While we could not verify that number, we believe the websites and published documents, including the Spanish translations, play a key role in worldwide intercultural legal and regulatory communications. The number of times these documents have been accessed would serve as confirmation.

5.2. Example of a typical investigation

A typical case begins as follows:

A financial institution's compliance officer sees suspicious activity at the bank or institution. A customer comes into the bank with 100,000 euros in cash to deposit. Two days later, that customer comes in and wires the money to an individual in Dubai (for the purpose of example). This is a highly

unusual activity for this customer as it does not follow his normal and routine pattern of banking, deposits, and withdrawals.

1. The compliance officer at the bank sees this activity and raises concern to her supervisor, who then completes a “*comunicación de operativa sospechosa por indicio*” form F19-1 and sends it to Spain’s Financial Intelligence Unit, Servicio Ejecutivo de la Comisión de Prevención del Blanqueo de Capitales e Infracciones Monetarias o (Sepblac).
 - i. Credit institutions in Spain must submit suspicious transaction reports electronically using CTL software.
2. The F-19 is received at Sepblac. After processing, an analyst at Sepblac forwards the Suspicious Transaction Report (STR) directly to the appropriate Spanish law enforcement officer that has jurisdiction and venue over the alleged suspicious activity. Or, perhaps the law enforcement officer queries Sepblac while conducting an investigation to determine whether or not the financial intelligence unit has any information on the subject/s of his or her ongoing investigation STRs and other financial intelligence are generally used to enhance or buttress law enforcement investigations in the field by providing critical identifying data and/or a snapshot of a financial transaction. More detailed financial information is generally obtained by the investigator and magistrate by way of subpoena.
3. The concerned Spanish compliance or regulatory entity works with Sepblac officials and periodically conducts a review, audit, or “look back” to determine if the compliance team at the bank Sepblac in accordance with Article 21 of Law 10/2010 of 28 April on the prevention of money laundering and terrorist financing.

We offer a flowchart of the financial investigation process below:

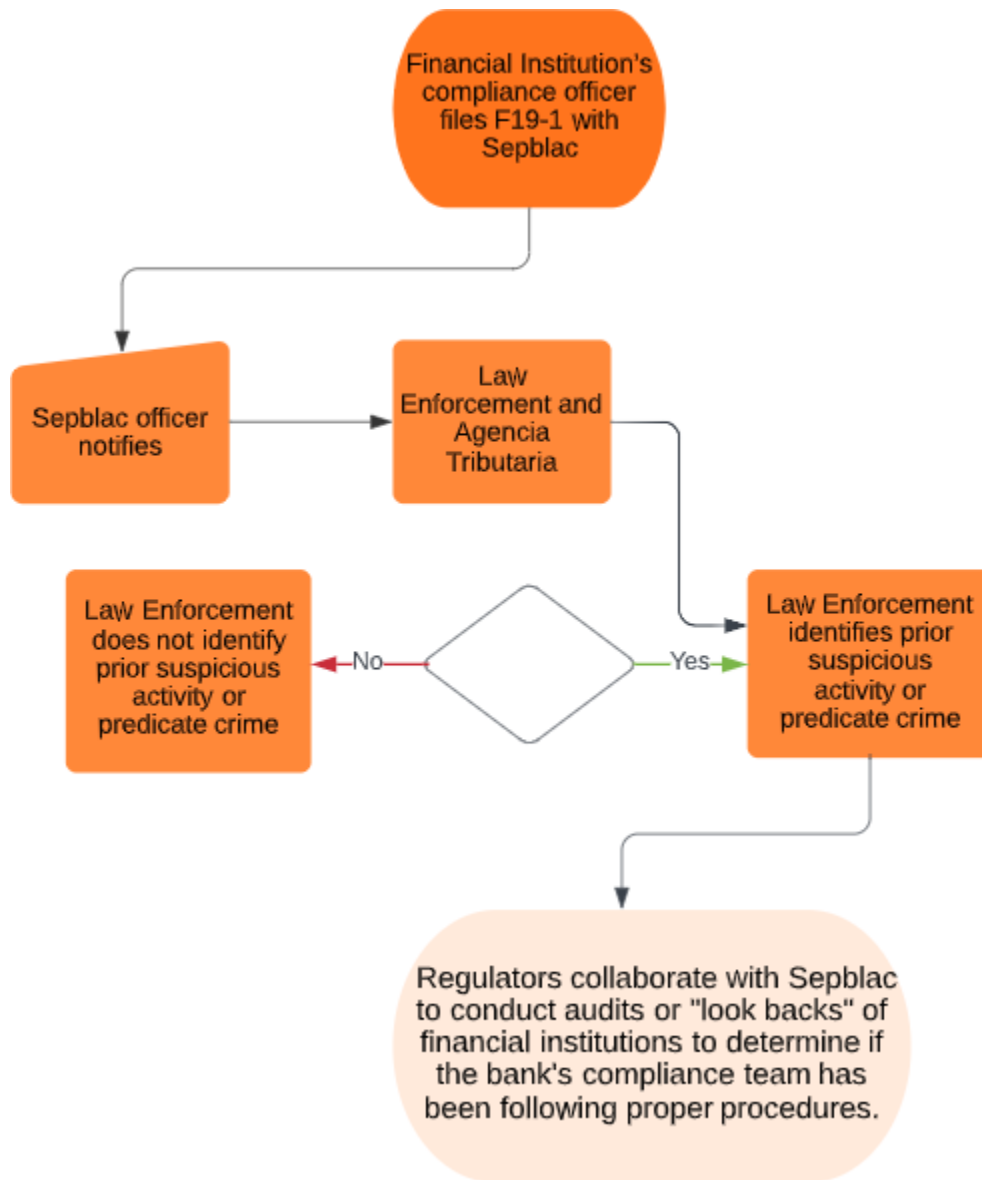


Figure 9. Financial Compliance Investigation Process Flow Chart (Cassara [email interview])

5.3. Intercultural mediation between policymaking and enforcement

The policy community grants or withholds sought-after power and social acceptance by controlling lexicon and technical knowledge (Sharman 170). AML risk ratings that determine

developing countries' competitive positions and attractiveness as places to invest have been delegated by regulators to financial firms and international banks (ibid.). The risk ratings also determine or give prospective investors the perception of "the ease with which they can use financial networks." (Sharman 170). Thus, governments are incentivized to avoid economic loss through compliance and social status conveyed by those ratings (ibid.).

Additionally, the focus on counter-money laundering has attempted to apply to developing countries, the same focus it uses on "rich-country problems" (179). For example, predicate crimes usually involve drugs and financing terrorism instead of focusing on corruption (ibid.). Sharman asserts, "AML policy provides for strengthening the campaign against corruption in the developing world" is a real opportunity to improve anti-money laundering effectiveness.

We believe that our research will serve beyond linguistic knowledge and in a practical fashion by revealing potential stumbling blocks to intercultural communication. Sharman (180) observes, based on interviews with individuals providing technical assistance in multiple countries including the Caribbean, "those tasked with fighting money laundering rarely communicate or cooperate with those fighting money laundering, and vice versa." It seems logical then that officials would benefit from increase communications, especially across languages. We know that the initial effort to overcome communication barriers has already been crossed by creating translations of the key documents in the first place. The next step to best utilizes those translations is to improve them in terms of consistency and use this research for further training to build collaborative networks between those tasked with fighting money laundering, as Sharman alludes, and those fighting it in Spanish-speaking countries. Doing so would likely help to close the "lack of ownership" issue to which Sharman refers (180).

5.4. Students of translation

We believe that students of the translation will benefit from learning to adopt a target-oriented approach in metaphor translations, thereby learning to discover how to identify translation tendencies in specialized texts, which can help the translator decide how to approach the text best. For instance, in some texts and contexts, there is a tendency to replace a non-metaphorical expression from the source text with a metaphorical expression in the target text, thus adding a conceptual metaphor in the translation. Students of translation will also benefit from working with the myriad approaches to conceptual metaphor translation. These approaches include intensification of the metaphor as well as adding metaphors. They will be able to identify how to maintain the idiomaticity of the expression from source to target texts.

In texts where intercultural similarity and metaphor variation are present, it is crucial to understand better how they interact. Research such as the current investigation is well suited for identifying, examining, and maintaining idiomaticity. Since the institutional documents comprising our corpus are equally authentic representations of the specialized discourse, using a process-oriented approach to translating conceptual metaphors will likely enhance and build awareness for identifying conceptual metaphors in the source text.

Students will benefit from learning to work with translation technologies, including corpus linguistics development and analysis. Today, translation is “a highly technologized profession” (Kenny 302). Modern translators have used various resources to compete in the translation market for some time. Such resources have included, as Kenny (302) asserts, “machine translation (MT), translation memory (TM), term banks and glossaries, and electronic dictionaries.” While these

computer assisted technology (CAT) tools are widely recognized and used in professional translation and translator training, using electronic corpora is not as well known (Mikhailov 224).

Corpora have evolved since the 1960s into what is now known as fourth-generation translation tools boasting scalable corpora stored on Web servers (Popovych et al. 308). These tools allow researchers to analyze KWIC (keywords in context) concordances, N-grams, word frequencies, collocates, and keywords (ibid.). We believe this research will provide students with a guide in building their specialized corpora, which Mikhailov asserts is “a critical skill for translators” (224). Recent survey data revealed that working with and getting familiar with corpus tools is extremely important in some university programs (ibid. 236).

We know that the growth and development of machine translation have been significant in recent years. As such, its prevalence in the translation industry has led to a push toward integration in translator training (Mellinger 2017). The use of corpora constructed for specialized translation has the dual purpose of serving as a resource for translator training and as a tool for professional translators (Zanettin 2002; Sánchez-Gijón 2009). We believe future studies can build on the framework and specialized corpus developed during this research.

Using linguistic corpora is a critical skill for translation students as it is becoming “an important means of translation practice” (Gao and Wang 3). As such, skills and knowledge needed to use corpus-assisted translation should be included in translator training and curricula (ibid.). The skills required for working with translation corpora can be divided into “corpus compilation and use of corpus information,” according to Wang (3). The first involves compiling corpora, designing them, and creating criteria for retrieval strategies and word selection. The second involves approaches and techniques for general analysis of the corpus and examples for “translation decision making” (Wang

3). Wang further asserts, “these skills should [...] be introduced to senior students in foreign language departments as an elective” (ibid.). Working with corpora can help with the acquisition of terminology and text specifications. Wang notes parallel texts are helpful for the acquisition of terms in specialized professional fields (2).

5.5. Practicing Translators

Translators need corpora for specialized texts, especially parallel, bilingual corpora. They may apply analysis for finding and checking equivalents for lexical units, grammatical constructions, idioms, and fixed phrases, translations of quotations and culturally bound items, and check register and style in the source and target texts of the specialized language (Mikhailov 227). Practicing translators could benefit from using this corpus to analyze texts in the source language and edit the target language translation. Using corpora “count among the translator’s most important aids when faced with specialized text” (Corpas Pastor 2).

Zanettin outlined the link between practicing translators and corpus linguistics. He also affirmed the relevance of corpus linguistic research to the practice of translation as well as how bilingual and parallel corpora can advance translation work (10). Al-Khalafat and Haider (132) point out the wide use of corpus linguistic techniques applied to investigating “linguistic phenomena and disciplines, including translation, discourse, lexicology, lexicography, [and] grammar” They further mention standard techniques used are “...dispersion, frequency, collocation, concordance, and keyword” searches (ibid.). A key advantage of parallel concordance for translators is that it displays both source and target text in an organized fashion showing both words and their meanings in context Al-Khalafat and Haider (132).

The contemporary translator must rely on computer hardware and software as the primary tools of the trade. The practicing translator may perform literary translation at a publisher, a technical translation at an agency, or a legal translation. In any case, computer technology allows for electronic source documents to be shared and translated digitally (Zanettin 10). Tools of the trade are also translation memories, terminology systems, and localization software (ibid.). It is to the translator's advantage to access information regarding the language, the content, and the primary ways of translating the text. Using corpora and concordancing software can help provide that access (ibid.). For this reason, Zanettin advocates for broader usage of corpora and concordance in the professional translation arena (ibid.). He further asserts "more corpus resources could and should be made more accessible to professional translators" (10).

To increase professional usage, those building corpora and producers of software ought to consider group the needs of professional translators and users of this technology. Additionally, it is necessary to incorporate training in using corpora and its resources in both continuing professional education. Corpora can be used in developing curricula for future translators (10). Potential uses for professional translators of both "monolingual target corpora, comparable bilingual corpora, and of parallel corpora" can be compared to using monolingual and bilingual dictionaries, long respected translation tools (10). However, corpora provide what dictionaries often do not by way of an "analytic approach via multiple contexts" (ibid.). Translators can also use monolingual corpora and dictionaries to verify meaning and usage for translation choices in the target context (ibid.).

Zanettin points out that large corpora, such as the BNC, etcetera, can be used as dictionaries. Smaller corpora that are specialized and bilingual can be viewed as similar to "specialized monolingual dictionaries" (ibid.). In contrast, the parallel corpus offers a repository of "translation strategies past translators" have used when dealing with similar challenges (11). Parallel

concordances can be used by translators to identify strategies used to render from source to target language Al-Khalafat and Haider (134). As for parallel corpora are then “compared to bilingual dictionaries, with a few important differences: bilingual dictionaries are repertoires of lexical equivalents or terms established by” those who develop the dictionary “which are offered as translation candidates” (11). Parallel corpora serve as repositories of the previous approaches applied by past translators and of “translation equivalents” (ibid.). Translators often must select translation candidates after assessing their appropriateness in the context of usage which can be difficult using only a bilingual dictionary that offers few examples (ibid.).

Another advantage practicing translators and translation students can take from using parallel corpora is that it provides information that most bilingual dictionaries do not. That is, parallel corpora offer “equivalences at the word level, but also non-equivalence, i.e., cases where no easy equivalent for words terms or phrases across languages” (11). Using parallel corpora provides translators with “evidence of how actual translators have dealt with this lack of direct equivalence at word level” (ibid.). Zanettin (11) offers an example in Italian-English literary translations of the word ‘edges’ typically collocating with a preposition such as” ‘around the edges, or at the edges,’” but instead was omitted:

around the edges of Gibreel Farishta’s head [...] intorno alla testa di Gibreel Farishta [...]
[...] Mrs Qureishi, too, was beginning to fray at the edges [...] anche Mrs Qureishi si stava consumando (11).

The examples show the translator “resorted to ‘zero-equivalence’ as a translation strategy; a comparative analysis level is not usually reported in bilingual dictionaries (ibid.).

Al-Khalafat and Haider (132) advocate using corpus approaches in translation for better analysis of “connotative and denotative” word meanings. Leading scholars such as Baker (in Kim and Zhu) have explored the corpus approach to translation and advocated developing corpora to “identify patterning which is specific to translated texts” (Kim and Zhu 34). Additionally, corpus work helps increase validity through verification and transparency of data (Kim and Zhu 92). As Al-Khalafat and Haider point out, corpora allow the translator to view the word in both source and translated texts within the related informational context (132). They further assert, “parallel corpora [...] are beneficial and of great importance for translators and linguists” (ibid.).

5.6. Feeder Data for Computer Assisted Translation and Translation Memories

Another practical consideration is translation technology which is an integral component of the contemporary translation and language industry. The language industry uses “all computer-aided (or-assisted) translation (CAT)” (O’Hagan 1), as well as machine translation, translation memories, and terminology management systems and tools. Such applications of corpora include tools for computer-assisted/automatic translation (CAT), translation memories, and corpus-based statistical machine translation (Zanettin 178). The need for and availability of specialized corpora will continue to grow and provide essential resources in the translation industry. With specialized texts, the gain in time and efficiency of having relevant data to reference is crucial. As Liu (2) points out, changes in the meaning behind every word and sentence can be significant. Terminological consistency in translating specialized texts will be necessary for a clear and consistent understanding of target readers.

The present research will add to the body of specialized terminology by building a translation memory on this subject. Reinke (56) asserts, “no other technology has changed the general conditions

of translation [...] as radically as TM systems have done over the past 20 years.” He further points out that “most professional translators use TM technology on a regular basis” (ibid.). Translation memories provide translators with previously translated segments of similar text by proposing a translation from the database that is considered an ‘exact match’ or ‘fuzzy match’ or a close solution to the translation segment (Reinke 55). Translation memories allow for more rapid translation of specialized texts and provide translators with consistent terminology and expression across multiple texts (ibid.). The development of translation memories originated in the 1960s by the European Coal and Steel Community (56). They used a computer system to extract terms and contexts from warehoused translations matching close lexical items (ibid.).

The first implementation of automatic retrieval of matching text occurred in the early 1980s by alps Inc., similar matching or ‘fuzzy matching’ was supported by reusing comparable sentences in commercial systems such as “IBM Translation Manager, and Trados Translator’s Workbench II” that arrived on the market in the early 1990s (58). Later, at the beginning of the millennium, client/server systems came on the scene followed by ‘cloud computing’ and ‘crow sourcing’ of today (61). Reinke (66) points out more research is needed on the integration of Translation Memories and Machine Translation noting in today’s technology the two can complement each other through batch and interactive processing. Subsequent to translation units produced by the Machine Translation system, the unidentified segments can be merged to the TM database. Through interactive processing, the translator may use the Translation when a match is not found in the Translation Memory database. The machine translation Machine system can be edited, and the final translation unit warehoused in the TM database for use again in the future (Reinke 66).

Most translated texts come from genres that are specialized and repetitive making them especially suitable CAT and document management tools (Corpas Pastor 1). Copras Pastor further

notes, “parallel corpora (TM files) may be either nonexistent or difficult to obtain” (ibid.). This supports the impetus to provide more specialized parallel corpora in under researched fields where terminology can be dynamic and new terms are regularly proposed (ibid.). Future translations can be improved by developing corpora in the specialized areas such as that of financial regulation, compliance and enforcement. Corpas Pastor (1) affirms that in the long term “building up target-language and parallel corpora in those specialized fields will improve the quality of the translated texts.” She also points out that these corpora will improve translator productivity by providing “instant access to real usage” as well as show patterns of grammar and collocation, signal equivalents not previously available in other resources and provide support regarding standards of style and text in source and target languages (Corpas Pastor 3).

Both comparable and parallel corpora allow researchers, students, and translators to better understand target language “text conventions, orthographical variants, colligational patterns and collocational profiles” of terms in the target language and their actual use as well as consistency of translation equivalents (16). They are very helpful in verifying the stability of terminology in the target language and “in outlining norms governing the translation of acronyms [...] or in digging out conceptual and encyclopedic information.” (16).

New developments in technology are facilitating the incorporation of translation memories with neural machine translation. Recently, Reheman et al. (2023) conducted research with specialized translation on the impact of neural machine translation on translation memory. They began by evaluating two datasets consisting of the “entire body of European legislation” in German-English bidirectionally, and the “United Nations Parallel Corpus (UNPC) [...] in six official languages” (Reheman et al. 2). They discovered an effective and simple method of incorporating translation memory into neural machine translation. They accomplished this by treating the translation memories

retrieved as “prompts for the translation of the input sentence by concatenating the source TM with the input sentence and generating the target token in a forced way” (Reheman et al. 5). They further claim that their method can be easily implemented and applied to “customize a TM-incorporated machine translation system for TM data on the user side” (ibid.). Increasing demand for neural machine translation NMT such as that illustrated by a “Switzerland-based boutique legal and financial translation provider” called Hieronymus and translation and technology company Tilde, (Martínez-Domínguez et al. (217). The new system called *LexMachina* was developed by tapping three types of data, parallel corpora, parallel data from legal domain websites and translation memories to provide specialized insurance and financial translation (Martínez-Domínguez et al. 219).

Parallel corpora are a critical resource for specialized translation. While monolingual components of comparable corpora can be useful, a “specialized target language corpus remains, in most cases, indispensable” (Bernardini 487). We previously discussed how parallel text translation equivalents can be extracted from MT engines and CAT tools. However, parallel corpora offer query functionality using parallel concordancers that allow translators to analyze strategies and extract in-context equivalents leveraging the work of previous translators (Bernardini 487). For example, Bernardini provides the example of the online Italian-English Cambridge dictionary using *dispositivo*, which yielded “lists apparatus, device, system, mechanism, contrivance and gear as equivalents” (488). Conversely, “the Intercorp parallel corpus” yielded mechanism as well as “arrangement as equivalents of *dispositivo*” (ibid.). These returns extracted from administrative or legal texts illustrate how dissimilar equivalents collocate “with different adjectives and nouns (*dispositivo giuridico*/legal mechanism, *dispositivo di valutazione*/evaluation arrangement)” (487).

Dispositivo/mechanism, device, and presence. As an experiment we attempted a similar operation using the term *dispositivo* in Spanish with also means mechanism as it does in Italian. First, we entered the term in the bilingual dictionary wordreference.com, yielding two results.

WordReference English-Spanish Dictionary © 2023:	
Principal Translations	
Spanish	English
dispositivo nm (mecanismo) El dispositivo de cierre funcionaba a la perfección. <i>The closing mechanism worked perfectly.</i>	mechanism, device <i>n</i>
dispositivo nm (grupo policial) El dispositivo policial impidió el acceso a los manifestantes. <i>The police presence denied access to the protesters.</i>	presence <i>n</i>

Figure 10. Entry of term *dispositivo* in *wordreference.com* (Author’s own elaboration)

We then entered the term in FinCorpAlin. Our bilingual parallel corpus confirmed how different equivalents collocated with various nouns and adjectives (*poder dispositivo*/disposal power, *dispositivo electrónico*/electronic device, *dispositivos de almacenamiento*/storage devices. The search of FinCorpAlin returned device, although not mechanism, also returned disposal as in disposal power, a specialized expression. In context, disposal is used as disposal of assets indicating “any sale, lease, transfer, issuance, assignment, or other disposition [...] of property, assets, goods or rights” (“Disposal of Assets”).

5.7. Chapter Summary

In Chapter five, we attempt to introduce several practical applications. First, in 5.1., we attempt to address how agents of enforcement and adjudication might find this research beneficial. We offer an example flow chart of a typical investigation in section 5.2. In Section 5.3 we discuss intercultural mediation between policymakers and those involved in compliance and enforcement. Section 5.4. provides translation students with valuable strategies and approaches, including

methodology for building one's own linguistic corpus. Also helpful to students is the model for using linguistic analysis software to analyze large quantities of text in future research projects. Section 5.5. addresses practicing translators we provide corpus data, terminological analysis, and translation strategies that best capture the equivalence of the source text while retaining metaphorical salience. Finally, in section 5.6., we provide a discussion of the contribution of specialized corpora to computer assisted translation and machine translation and why we believe our specialized corpora will add value in this area.

5.8. Conclusions

To assess our research, we propose outlining conclusions to this doctoral thesis. We believe we can say, in general, we have achieved our objectives as stated, while some could have been further developed. In contrast, other objectives we initially believed would be more succinct turned into much lengthier and more complex (for example, our analysis of translation strategies and our study of metaphor use in economics, finance, security, legal and regulatory discourse). Nonetheless, our original objective of analyzing the lexicalization of metaphors between English and Spanish in the financial regulation and compliance language required understanding the different characteristics of the language involved and the translation strategies.

As we initially indicated, this research is motivated by our interest in the specialized language studied and the practical need to be prepared to apply the results to teaching and translation studies. We have completed this objective since the extracted results may be useful in the translation classroom, including glossary use and corpus exploitation.

The language of financial regulation and compliance in English and Spanish languages produced for key stakeholders in financial monitoring and compliance roles has distinctive features

and characteristics. In the following section, we break down the conclusions based on the initial objectives of this research.

Objective 1: Establish a state of the issue regarding specialized languages in general and regulatory, security, and financial language in particular.

We have covered the most current and relevant theories of specialized language. We thus can affirm that specialized languages are used as tools by specialists to craft targeted communication that expresses the specialized content and influences behavior.

In defining specialized language, it is essential to consider the perspectives of a variety of disciplines keeping in mind the approach guides the purpose of the language. As affirmed by Stender (378), this involves lexicology, terminology, and translatology. There are notable similarities as well as differences between specialized and common languages (Pizarro Sánchez, Sager, Arntz, Cabré “Terminology”, Rossi, Prandi and Rossi).

Analysis of FinCorpAlin confirms that the regulatory language uses similar morphological processes for word creation as other specialized languages. Composition and affixation are prevalent in examples from FinCorpAlin. Examples include countermeasures, anti-money laundering, anti-terrorism, anti-corruption, beneficial owner, counterterrorism, and legal person.

We have also concluded that, like economic language, financial regulatory and compliance language is difficult to define given the interdisciplinary nature of texts, topics, and professions. A conclusion is supported by several scholars, such as Daintith (534), Allen, Abi-Lahoud et al. or Ceci et al.

Objective 2: To analyze the congruent and incongruent characteristics in using economic, financial, security, and regulatory language metaphors in English and Spanish among Spanish-speaking countries based on previous linguistic studies.

To further explore metaphor usage in the regulatory language in English and Spanish, we began by reviewing the most relevant and current literature. We found the most relevant research by Rossi and Prandi because of its application to metaphor translation. The following table summarizes some opinions of different researchers on the lexical and discursive characteristics of economic, financial, and regulatory language.

Serón-Ordóñez (2016)	<ul style="list-style-type: none"> • Acronyms • Metaphors • Neologisms • Abbreviations
García González (2022)	<ul style="list-style-type: none"> • Accounting terminology variation in Spanish • Acronyms
Hourani Martin and Tabares-Plascencia (2020)	<ul style="list-style-type: none"> • Verb-noun constructions • Legal phraseological units • Morphosyntactic and semantic behavior
Charteris-Black (“Critical metaphor”)	<ul style="list-style-type: none"> • Metaphors in financial texts • Liquids, Money as liquid • Natural disasters
Koller et al. (2008)	<ul style="list-style-type: none"> • Metaphors in financial texts
Ho and Cheng (2016)	<ul style="list-style-type: none"> • Emotional concepts in finance discourse • Professional ideology • Construction of organizational identities

Flusberg et al. (2018)	<ul style="list-style-type: none"> • War references in economic language • War metaphors in public discourse • War metaphors in financial texts • War in common topics of discussion (i.e., sports, politics, healthcare, relationships) • Disease, crime references
Nicaise (2010)	<ul style="list-style-type: none"> • Language and gender • Community • Ideology
Corbacho Sánchez (2007)	<ul style="list-style-type: none"> • Galicisms • Acronyms • Euphemisms • Anglicisms
Guzmán and Prieto Ramos (2021)	<ul style="list-style-type: none"> • Culture-bound Legal and regulatory terminology

Table 59. Summary of characteristics of economic, financial, and regulatory language (Author's own elaboration)

Objective 3: Describe the genre of financial regulation, compliance, and adjudication in the specialized language of the field.

This genre is difficult to define because it is multidisciplinary, involving the specialized terminology of finance, including economics, security, and legal realms. Even though some researchers such as Das and Serón-Ordóñez offer some examination of the language of finance, there is a shortage of research in the area of regulatory finance and security discourse in translation. From a cognitive linguistics standpoint, Rossi (“Creating metaphors”136) sheds some light on metaphors in her recent work, where she discusses “finance is a game” and “investors and markets and companies are animals” (Rossi “Some observations” 157). Rossi (“Some observations” 189) also discusses the evolutionary transfer of metaphors to and from different domains illustrating this with the paradigm of the English term Junk and its move from “genetics to nutrition, finance and then

research” (ibid.). We see similar terminological migration in the nautical expressions of *safe harbor*, geological metaphors such as *offshore*, and body part metaphors such as *organ*, *hand*, *face*, and *eyes*.

As noted by Calzado and Lobo and Brooks (“How Everything Became War”) in Chapter two, the language of security produces perceptions. It defines truths, often through metaphors that are intended to express regulatory abstractions and foundational ideas that attempt to explain the world based on, as Calzado and Lobo state, “fictitious truths” (7). Translating the language of finance is also an under-researched area according to Serón-Ordóñez. Additionally, few studies analyze the language of finance from a linguistic standpoint. Conversely, economic language has been examined fairly extensively by Arrese, Mirón López, Charteris-Black and Ennis, Guerrero-Ramos, and Stender.

To provide a deeper analysis of the common features of economic and financial regulatory language in English and Spanish, we started by reviewing the literature involving the most relevant research. Rossi, and Temmerman (sections 3.1. and 3.5.), helped us to analyze the lexical aspects, terminology, and phraseology of our corpus.

Objective 4: To compile a synchronic and diachronic comparison corpus of Spanish and English metaphors representative of the regulatory finance/security phenomenon.

As mentioned in chapter 4, the language of this research phenomenon is mainly contemporary, and our comparable corpora are a compilation of current communications extracted from Internet sites and reports within a 10–12-year period. The documents comprising our comparable corpora comprise discourse from the economic-financial regulation, business, and legal perspectives. Economic-financial and security discourse produced by government actors, law enforcement agents, officials, etc., directed at officials and other interested parties through reports, Internet (Web) sites, and related regulatory media serving specific ideological interests.

We selected financial intelligence Websites that inform officials, law enforcement officers and regulatory officials, company officials, and other stakeholders in financial fields regarding “money laundering and terror finance” prevention. The comparable corpora include Web sites that we thought might tend to offer slightly less formal and sometimes less specialized communications. However, we did not find that to be the case, as the metaphors extracted were mostly similar to those of the bilingual corpus reports.

Objective 5: Develop a list of the most used terminology in English and Spanish in glossary form.

While many English-Spanish glossaries exist in the legal realm, we created a bilingual dictionary specific to financial regulatory terms and expressions that will prove helpful in didactics and translation training. This glossary is presented in Appendix 1.

In describing the terminology of the financial regulatory arena, we believe that it is the sum of legal-regulatory and compliance, economic-financial terminology, and metaphors, in addition to names of organizations whose efforts are to prevent and eliminate financial crime.

Objective 6: Contrastively analyze the metaphors present in FinCorpAlin as they are used between the United States, Europe, and Latin American countries.

We were surprised by the similar metaphors we extracted from FinCorpAlin. Since Lakoff and Johnson’s seminal work on metaphors in 1980, many studies have been conducted on metaphors, including metaphors in economic language. However, fewer studies have investigated metaphor use in finance, especially regulatory-compliance finance. We should note that many mental images are similar in both English and Spanish in which similar conventions are shared, such as *downward*

economic movements are natural disasters (Charteris-Black and Ennis 263). *Good is up, bad is down* (Lakoff and Johnson “Metaphors”16). This is not always the case where some cultures have quite different models. We noted differences from English in conceptual metaphors in Spanish such as the preference for family relationship metaphors as in *filiales* and a preference for the term *adoptar* over multiple other non-family type potential terms. We also noted a difference in the physics related metaphor with the preference in Spanish for the term *sólido* (Section 4.6.25.) over multiple other potential terms to represent *strength, robustness, and soundness* of organizations, regulatory and money laundering prevention initiatives. We also found there seemed to be a preference in Spanish for agricultural-plant metaphors such as *raíz*, or *root* in English where the expression in the source text was entirely unrelated to *root*, we found the Spanish translation of *raíz* (see Section 4.6.19.).

Additionally, we found that *Bureau of Economic and Financial Crimes* (BAFE) is translated as *la Oficina de lucha contra la delincuencia económica y financiera* (BAFE), another example, Anti-money laundering and counter-terrorist financing *measures* is rendered as *medidas de lucha contra el lavado de dinero y la financiación del terrorismo*. In terms of frequency, there were over 200 references to *combatir* in Spanish while only 117 references to the equivalent term in English, **combat**.

Objective 7: Determine the frequencies of lexical phrases in Spanish and English in FinCorpAlin.

We have recorded the frequencies of terms and lexical phrases and elaborated on these in Section 4.8. We discussed several metaphorized expressions as well as recurrent acronyms in Section 4.7. We found lexicalized metaphors with high-frequency levels in both the source and target texts. We found congruence in frequency in English and Spanish for several terms, such as information,

risk, and person. Divergence was evident in the fourth most frequent term, money laundering, in English, which appeared 4,239 times. The fourth most frequent term in Spanish was *autoridad* at 4,024 occurrences, followed by *financiamiento terrorista* at 3,755. Additionally, in Figure 11, we provide a view of FinCorpAlin in comparison with general reference Spanish corpus, esTenTen2018 which produced mostly acronyms and abbreviations. We noted that abbreviations are prolific throughout the corpus texts in both English and Spanish. Also, we noted that many of the abbreviations were carried over from English as they were not translated but kept in original form.

Objective 8: Underscore the ideological role of the conceptual metaphor in the investigated field to apply it to the didactics of translation, including the application and discussion of different translation strategies.

We consider Tymoczko and the influence of ideology on translation. If we apply the Western view of the translator as an objective party standing between the source and target texts, as Tymoczko (7) points out, it would seem that the translator is not only neutral but also above, as she asserts, “history and ideology” (ibid.). Thus, we forget that translation can facilitate the values of the dominant power and cultures of the source language (ibid.). But we know that translators carry cultural biases and powerful ideologies that influence texts, especially in sensitive areas like security discourse and regulatory finance. We found the ideological overtones of the source text were carried over to the target text by way of several different translation strategies including retention, replacement, modification or omission, addition, and in some cases, intensification of conceptual metaphors in the target text (discussed in Section 4.2). As Tymoczko (181) asserts, “the ideology of translation is complex, resulting from a layering of the subject of the source text”.

Cross-cultural and ideological issues have been recurrent throughout history. For example, during the Spanish American War of 1898, the printing presses played an essential role in constructing public opinion (Calzada-Pérez 1). This type of “us” vs. “them” dichotomy was present in both the original and translated documents that contributed to prevailing stereotypes, which, as Calzada-Pérez (ibid.) points out, were ideologies “intentionally sought to raise support for a war that was to change the global order and the hegemonic discourse of the time” (ibid.). Similarities can be drawn to the attacks on the United States on September 11, 2001, which marked a watershed, and the battle cry to defeat terrorism was heard around the globe. Translators must carry forward ideologies from source to target texts to produce faithful and effective translations. Objectivity is essential, and communication has the potential to be exaggerated or confused. Being objective does not mean translators should remain neutral in their views but rather be acutely aware of exaggeration and intensification tendencies.

Objective 9: To detect new metaphors and new terms used in the field of financial regulation and compliance and to classify specific metaphors detected in the regulatory and compliance corpus texts.

We detected new usage of terms in the domains of color, cleansing and bleaching, vehicle, and parts of the body metaphors. For example, the term *antilavado* is considered a neologism that is frequently used in the field of financial regulation and compliance. Other similar terms were *blanqueo de activos*, *dinero gris*, *dinero negro*, *cuckoo smurfing*, etcetera. We also detected an abundance of acronyms (see Appendix 1).

Objective 10: To briefly describe characteristics inherent to financial regulatory-compliance discourse, such as acronyms and abbreviations, phraseological units.

The section on economic-financial language describes acronyms and abbreviations frequently in this area. We also define security acronyms as they are relevant to regulatory-compliance discourse. In the English source text documents, we found 75 acronyms, of which there were only 17 translations in Spanish. This data suggests the prevalence and preference of the English source text as it significantly influences the target text translations.

We considered research by Pérez Bereguet and Gómez de Enterría for the Spanish texts. We discovered that acronyms and abbreviations are often used to improve language efficiency and achieve fast and precise expressions (Gómez de Enterría). Before the 1990s, many terms were not widely known before a host of international financial scandals and subsequent regulatory developments. Today, special training in financial compliance is not necessary to recognize the meanings of expressions such as anti-money laundering, terror finance, and offshore accounts. The ability to identify these occurrences will prove helpful in producing equivalent and unequivocal communication via the target text. Nonetheless, lexicalized acronyms and terminological consistency will aid the specialized translator.

We have found in FinCorpAlin the characteristics of regulatory discourse in terms of foreign words concerning specialized financial vocabulary and general lexicon, such as fight and combat, with warlike connotations. These findings are consistent with other scholars; for instance, Lozano (37) found militant metaphorical expressions similar in English and Spanish. Semi-technical vocabulary is represented in both languages with terms like capital flight, surveillance, and portfolio, as well as highly technical terms such as discretionary-trust-vehicle or beneficial owner.

Prieto Ramos points out the importance of consistency and accuracy of legal terminology in translations but also highlights the challenges existing within the international institutional

translation. Preserving terminological consistency is one of those challenges, along with navigating the asymmetry of global judicial systems. Success in this area requires translators to have competency in comparative legal analysis or at least have previous expertise to detect differences and false cognates (Prieto Ramos 146).

CHAPTER 6 – ACADEMIC CONCLUSIONS

As stated in Chapter one, the motivation for this research is based on the current gap in specialized, bilingual parallel corpora pertaining to a global phenomenon: financial crime. This phenomenon presents many communication challenges due to its complexity and unique blend of language use. Add to that mix translation into Spanish, and further intercultural communications arise. In Chapter two, we discussed the translation of metaphors beginning with previously established definitions of metaphor (Lakoff and Johnson, Le Guern, Goatley, Font Saravia, Kövecses “An extended view”). We then discussed metaphor creation and lexicalization in Section 2.1.2., discussing the work of Temmerman, Temmerman and Campenhoudt, Rossi, and García Palacios. Temmerman asserts that the concept, not the term or word, is the starting point for meaning description in the traditional sense (“Questioning the univocity” 19). Temmerman and Campenhoudt (1) pointed out the critical role metaphors play in communication and intercultural transfer through translation. We believe the present research advances the understanding of financial regulatory and compliance discourse by analyzing translations in this specialized field. There is a shortage of language analysis in this area. This investigation will aid in promoting awareness of intercultural transfer by translating the language of financial regulation, compliance, and enforcement.

Our conclusion that defining metaphor remains a challenge even twenty-five centuries after its first development appears well supported (Fernández Colomer, Stender). Researchers have attempted to use diverse theoretical concepts to identify, describe, categorize, and classify metaphors (Schäffner and Shuttleworth 94). Thus, we apply metaphors which are acknowledged to have definitional challenges themselves, to abstract concepts in financial crime, such as money laundering, fiscal paradises, tax havens. Next, these expressions are mixed into the “broth” to use a cooking metaphor

of translation to a second language. It comes as no surprise, communication challenges can arise in clear understanding, especially where terminology is inconsistent.

We see the use of new terms from the shared cognitive metaphors of the source text in the domains of color, cleansing and bleaching, vehicle, and parts of the body metaphors. Rossi (“Some observations” 157) introduced the notion of metaphorical isotopies allowing for the creation of new terms from the shared cognitive metaphors of the source text. We see some association with shared cognitive metaphors in financial regulatory and compliance discourse. For instance, we found similarities in shared war metaphors relating to ‘fighting crime’ and ‘money is an organism.’ Rossi then raises the question as to what extent can those “metaphorical isotopies” that belie the specialized domain shape the concepts from which the domain consists (“Métaphores terminologiques” 63). We explore the metaphorical mapping to the target text with this in mind.

We consider the notion García Palacios (25) put forth of transfer “sub-competence,” considering a better understanding of relationships with other terms and between concepts to arrive at better translation outcomes. Section 2.2. discusses Prandi’s assertion of the “conflict approach” to understanding metaphors (“Conceptual conflicts” 7), which may flesh out other meanings or significance. This assertion is pointed out by (Rizzato 2) in discussing how interpretations of meaning take shape. The cognitive linguistic approach to understanding metaphors provides a basis for better-analyzing metaphor use and adoption.

In Section 2.6.1., we analyze Spanish terminological interpretations of legal scholars Blanco Cordero, Jiménez Sanz, and Mosteyrín Sampalo. In Section 2.6.2., we discuss translation opportunities. Section 2.6. presents the view put forth by Bastidas Canelones, who describes financial accounting and taxation as unique specialized languages. We discuss what Bastidas Canelones

describes as a certain disciplinary tension that exists between both languages related to finance. In the following section we discuss how metaphors have been used and translated in specialized texts.

6.1. Use and translation of metaphors in specialized texts.

This research advances awareness and the importance of improving the use and translation of metaphors in specialized texts. As Velasco Sacristán affirmed, the use of corpora for specialized texts is becoming a more frequently used method for dealing with a host of linguistic features (95). Using metaphor to teach translation students in Business English revealed the usefulness of metaphor translation. The students acknowledged metaphor translation as a “relevant activity as it provided them with a useful source of information of metaphorical expressions used in real business contexts” (94). We believe this investigation serves that end. It provides helpful information on metaphorical expressions in the relatively new specialized language of real regulatory, compliance, and enforcement contexts.

Concepts are understood within specialized language contexts and translated according to the translator's level of experience and understanding. Thus, the translator should have experience with and knowledge of the specialized field of financial regulation, compliance, and enforcement to translate the contextual nuances of that environment equivalently. “Concepts are only understood within the system in which they are located” (Stender 19 [Author’s own translation]). With this in mind, the translator should be aware of the dominance of English in this field and its impact on linguistic expression.

English has had a powerful influence on published scientific texts for many years and is seen as a critical vehicle for global knowledge sharing as a *lingua franca* (Lillis and Curry). With English being a dominant force within and across languages and translations, other cultures may not fully

develop their conceptualizations. Bordet (2) affirms the impact of English's economic and cultural influence in disseminating information, which risks preventing or impeding other cultures from creating their own concepts. Bordet further asserts that a particular domain loss can occur with specialized terminology. While we did not necessarily see this type of loss in the present research, we did note a distinctive dominance of expressions in English, especially regarding acronyms used as foreignization.

In sections 2.5., 2.5.1-2, we discuss how the translation of metaphors has been previously approached in specialized texts. Hatim and Mason (1990) point out such notions as considering the source text writer's worldview and motivations by the status of the source texts. We provide an example of domain loss in English and Spanish in Fuertes Olivera (82-89), and we discuss terminological incongruence in Section 2.6.1., again, with examples of dominant linguistic concepts in the area of financial crime such as money laundering at the outset of the Palermo Convention of 2000 and subsequent variation of terminology (Hourani-Martín and Tabares-Plasencia 108). Expressions of organized crime terminology in the United States became frequent and entered popular media (Lampe 104). We discuss how the lexicalized metaphor, money laundering, was coined in English (Sánchez Romero and Montealegre Callejas, Martínez 19), influencing the prominent expressions in Spanish. Legal scholars such as Blanco Cordero, Gluyas Millán, Bacigalupo and Bajo Fernández, and Mosteyrín Sampalo, provided nuanced insight into differences in the legal significance of lexicalized expressions in Spanish. We assert expressional congruence is needed where incongruences are present. While the linguistic dominance of English is not an issue per se, a risk of confusion may arise in some instances where Spanish text refers to the same metaphorical concept using different terms. Additionally, both are Western cultures with many similarities. The influence of culture in constructing models of reality is solidified and reinforced by metaphor. Lakoff

and Johnson (“Metaphors” 12) state “a culture may be thought of as providing, among other things, a pool of available metaphors for making sense of reality.”

Bastidas Canelones points out the possibility that dissimilar belief systems may cause less effective communication between them. Bastidas Canelones further asserts that the more specialized the language of the discipline, the lesser the chances are for effective communication between the language systems (69). Differences in specialized languages present additional considerations for the successful transfer of metaphor from English to Spanish. While most metaphors were transferred effectively in the corpus text examined, there was some conceptual divergence that could somewhat influence the reaction of the target reader. For instance, the Spanish texts preferred construction-architecture, theater-show business metaphors, and body part metaphors over English expressions which preferred other metaphorical vehicles or did not use metaphor. Other perceived areas of salience were a preference for agricultural metaphors and war-like metaphors in Spanish. Fuertes-Olivera and Pizarro Sánchez (46) pointed out the “dual role” of metaphors in Section 2.2.1. in that they are both conceptual and aesthetic, whereby the aesthetic value of the metaphor can help increase motivation helping users of these expressions. If the objective is to increase motivation, the value of the metaphors in the source text has accomplished chiefly this, if not introducing greater zeal in areas where intensification is evident in sections 4.1.-4.5. In the latter, what remains goes beyond a mere facsimile of conceptual metaphor. From an ontological standpoint, as Rossi asserts, conceptual projection is essentially an “ontological photocopy” (“Métaphores terminologiques” 53). From that point of view, the cognitivist movement has helped to recognize the modeling power of metaphors, such as in Timmerman’s analysis of genetic engineering compared to a geographic map (ibid.).

6.2. Corpus linguistics

Abdul Malik et al. (513) affirm that Semino asserted that corpus linguistics is “a method in language study which does not necessarily link to any specific theory.” Abdul Malik et al. (ibid.) point out researchers may use corpus linguistics in conjunction with other fields to explain language use. The present research builds on prior corpus linguistics investigations to understand the specialized language better and promote better translations from English to Spanish. The current study provides a framework for further inquiry, use, and application of corpus linguistics in academia and beyond. Section 6.2. presents our methodology for constructing our unidirectional bilingual corpus that others may follow. Custom corpora are becoming more available in recent years as technologies have evolved, as we saw in Reppen's and Mikhailov's work.

In Velasco Sacristán's study, she found that students thought the use of corpus linguistic analysis interesting and appreciated the opportunity to use new technologies in the classroom to search and discover English and Spanish metaphors (94). The present research outlines the methodology of building a custom corpus based on the previous scholarly work (Laviosa, Stender, Mikhailov) in a step-by-step fashion including the use of Sketch Engine to perform terminology searches, concordances as well as a glossary and key word in context KWIC analyses. Laviosa (284) asserts that there has been an increasing interest in “corpus-based translator training.” Laviosa advocates for the collaborative nature of the “corpus-based classroom.” Notably, the many benefits attributed to using the “unidirectional specialized parallel corpus” are discovering “norms of translational behavior at different levels of linguistic analysis as well as retrieve and examine terminological, phraseological, syntactic and stylistic equivalents” (84). The present research lays the foundational work for future inquiries of specialized texts that will serve a growing need for interdisciplinary and international congruence of terminology and metaphorical expressions. Further

research in the field of financial regulation and compliance is needed to bridge to other specialized languages such as accounting, finance, as well as national and transnational law enforcement agencies. Further understanding of communication across and among experts and non-experts has the potential to improve communication which, in turn, may improve the effectiveness of the mission of those professionals.

Abdul Malik et al. (512) point out that while corpus-based metaphor studies have seen an upward trend in recent years, several gaps are present. Many of the research studies analyzed in their investigation lacked information about the tool used to compile and analyze the corpus. Another example cited in their research was a lack of focus on under-researched areas. We address both gaps; first, we outline and discuss the linguistic analysis tool we used, Sketch Engine. Second, we selected the under-researched area of financial regulatory and enforcement language with which we built our corpus. Abdul Malik et al. (512) call for future studies to include specialized corpora developed from under-researched topics. While there is plentiful research on metaphors, little research has been conducted on translating metaphors involving financial crime regulation, compliance, and enforcement.

6.3. Corpus linguistics and teaching second languages

Not only have linguistic corpora provided a method for better understanding the specialized language they have also proved very useful for informing teaching. Burton (358) points out that early grammar teachers often mine data to find examples of incorrect language use. Modern grammar teachers began using descriptive methods for a more scientific approach to teaching English grammar. They used personal correspondence and written text samples of the observed language (ibid.). An example of this early use of corpora is Jespersen's *A Modern English Grammar on Historical*

Principles, “a personal ‘corpus’ of hundreds of sources,” which proved to be better than made-up examples (358). Later, Charles Fries developed a near equivalent to today’s “corpus-informed grammar” based on spoken English (*ibid.*). While still very small at only 250,000 words, this was before computer-assisted analyses were available. The study examined actual speech rather than literature in a descriptive, scientific approach (*ibid.*). The use of wordlists began, for example, with the “General Service List of English Words (West 1953)” (*ibid.*). Researchers in the 1930s then began to examine collocations, syntactic, and construction patterns (360). Burton (360) asserts in the first part of the twentieth century, “the idea of considering frequency data [...] was in the air” (*ibid.*). As McEnery and Costas (33) point out, “since the 1960s, electronic corpora have come to prominence as a resource used by linguists.” While primarily descriptive, early corpus analysis formed the basis for further evolution and application. For example, comparison studies have pinpointed errors in usage.

Textbooks have been analyzed in comparison with corpora to uncover errors. For example, Shortfall (in Burton) found textbook over-representation of “the active forms of the present perfect simple and continuous, at the expense of present perfect passive forms” (361). Using the Bank of English corpus, Shortfall also noted an overrepresentation of time adverbials such as *since* and *for* while others like *now* were under-represented (*ibid.*). In another example, researchers found that reported speech in textbooks did not accurately depict actual use (*ibid.*). Still, other research by Conrad, Römer, and Vandenhoeck found inconsistencies in four textbooks through corpus research on the adverb *though* as “contrast and concession” as a method to “soften disagreement between speakers” (Burton 361) which was an important usage as identified by the corpus analysis. Corpora are also used to discover new aspects of language previously unexamined or underexamined.

New findings produce data that can be used to examine new areas of specialized speech. Burton (362) points out that corpora are applied to research to build or enhance grammar descriptions, not merely critique them. We develop better descriptions by identifying areas of language not previously examined in standard grammatical reports. For example, another research study found aspects of spoken language “ellipsis, fronted topics, and tail slots all argued to be pedagogically relevant, but rarely feature in traditional ELT descriptions of language” (363). Carter and McCarthy put forth “fronted topics,” and “tail slots” allow speakers to identify elements the speaker wants to highlight or reinforce to the listener (in Burton 363). Those findings were realized through corpus work with the spoken Cambridge and Nottingham Corpus of Discourse English (CANCODE) (ibid.).

Gilquin and Granger (3) point out, “English for Specific Purposes corpora [...] allow teachers to equip students with communicative skills they need to participate in particular disciplinary contexts.” Additionally, bilingual corpora, such as ours, can assist the translation student or trainee by allowing them to view side-by-side depictions of the original and translated texts (ibid.). Viewing both texts allow for better visibility to pinpoint typical or atypical translation problems and solutions by previous expert translators (ibid.). Another aspect of corpus learning involves corpora compiling learner data to understand pedagogical trends and needs better.

Data is produced authentically by capturing what the same students create using the corpus (Granger 5). The students produce and analyze their use of the language and interlanguage features (ibid.). Learner corpora allow teachers to provide “tailor-made feedback” at individual and group levels (ibid.). Language students can learn through corpus annotation.

While raw (unannotated) corpora can be used, annotation features such as POS tagging (parts of speech), syntactic structure (parsing), and error (error-tagging) help the learner view interlanguage

features and potential corrections (Granger 5). As Lee et al. (747) point out, corpus tools should be “learner-friendly” and accessible to those with little experience using them. Kilgariff et al. (66) outline their development of Sketch Engine for Language Learners (SKELL) as “a stripped-down, non-scary version of Sketch Engine for use by learners.” Burton (5) points out that platforms that provide good data visualization help make learners more receptive to the data discovered. Using corpus data can help students better understand word association and collocation (ibid.).

Corpora can be used for teaching collocation and lexis with tasks introducing learners to “linguistic, cognitive and technical processes” (Kilgariff et al. 69). Language teachers can create learning activities using data by selecting sentences and asking if [sic specific words] can be replaced by similar words (ibid.). Kilgariff et al. (69) point out, “many mental processes are happening during such work. The student is learning the language, about language, and about using data.” A pedagogical feature of corpus use in teaching is that learners tend to better engage with specialist corpora when they have built it themselves (ibid.). Learners develop ownership of the corpus by creating it, giving them greater motivation to examine it (ibid.). Translation students benefit from learning to develop and use linguistic corpora.

In a study using the BootCaT feature of Sketch Engine, Castagnoli had translation trainees generate web corpora based on specific topics and then extract term lists to compile databases and glossaries (in Kilgariff et al. 73). The students in that study found a more significant number of relevant terms that could be extracted when domains were very specialized (ibid.). The students were assessed by preparing for a technical translation by building a web corpus in the specialized translation domain and creating a term glossary from it (ibid.). The following table presents the teaching and learning stages to incorporate corpora instruction in the Curriculum.

Step	What	When	Notes
1.	Five 10-15-minute mini-lectures on corpora and concordancing	Weeks 2-6 of the course	One conducted during each 2-hour English class
2.	General exposure to corpora	Throughout the course	Students encouraged to use concordancing during class preparation and other reading.
3.	Preliminary WebBootCat workshop	Week 8	Students practice using WBC and create a small, on-topic web corpus
4.	Corpus comparison task	Week 10	Students create a new on-topic corpus. Compare output (word sketches) from it with output from a large general corpus, such as BNC
5.	Final Project	Completed by Week 18 (final week)	Students compile a new corpus based on their own subject specialism. They answer questions about the corpus, and demonstrate understanding of corpora and WBC itself.

Table 41. Teaching and learning steps (Kilgariff et al. 74)

Besides the research on native-speaker corpora, language teaching benefits from research related to learner corpora and English language teaching textbooks (McEnery and Costas 50). Curriculum and reference books can take more accurate and detailed descriptive data from corpus-based research that then informs the content of grammar and dictionaries (ibid.). Learner corpora help provide insight into how English language learners use the language, providing indications on the processes of language learning and also contributing to “second language acquisition (SLA) research.” (McEnery and Costas 50). The following figure provides a depiction of corpora and language learning.

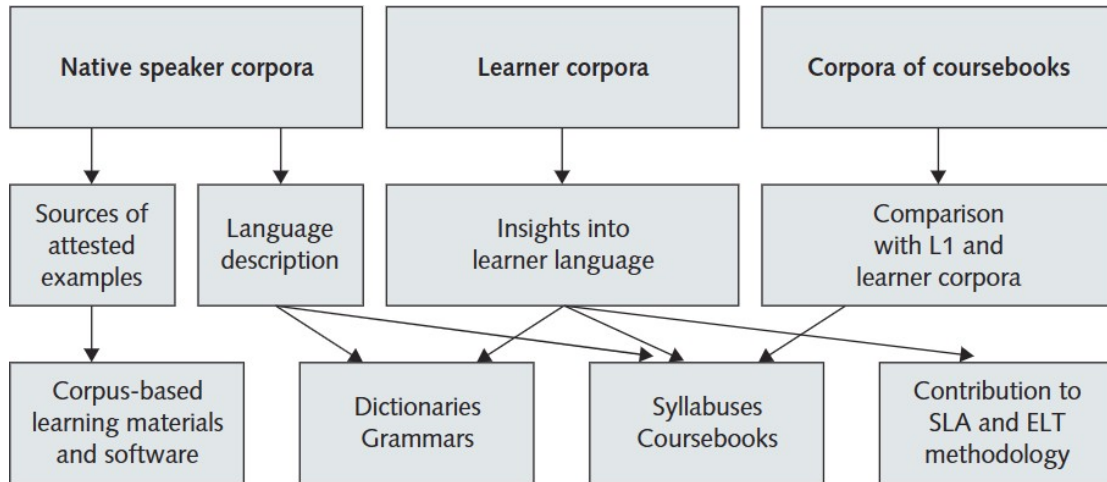


Figure 11. Corpora and language teaching (McEnery and Costas 51)

The preceding figure depicts the different corpora that inform language instruction and curriculum development and provides an outline of the “contributions corpora and corpus research” has brought to language teaching (McEnery and Costas 51). Comparing native language use in context with textbook language using corpora can help better understand instructional gaps or deficits. Analyzing these inconsistencies may prove helpful in developing and improving texts to include in teaching material (McEnery and Costas 51). Corpora are already being used to make decisions regarding dictionary content; for example, “the *Macmillan English Dictionary for Advanced Learners*, 2002” (ibid.). Additionally, analyzing textbook corpora can help flesh out the degree to which coursebook language texts influence learners’ speaking and writing (ibid.). Language corpora also offers both teachers and students a source of “attested language examples, with learners either having access to corpora and having been familiarized with corpus software or working with printouts of concordances” (ibid.). Incorporating specialized corpora into the classroom familiarizes students with the language in context as well as provides instructors Curriculum with which to solidify analytical skills in the area of interest examined.

As Szmrecsanyi and Rosseel (2) affirm regarding English linguistics, “the field seems to be moving away from the compilation and analysis of ‘representative’ corpora” (i.e., British National Corpus, BNC). There is an increasing demand for specialized corpora (ibid.). Szmrecsanyi and Rosseel further noted corpus linguistics has continued to be viewed in a positive light by more people, with concepts such as collocation becoming well-known as “collocations of a given the word are statements of the habitual or customary places of that word” (4).

6.4. Corpus linguistics for Teaching Specialized Translation

Using corpora in teaching translation will continue to grow as a method for learning specialized genres. Students working with specialized corpora will learn to develop translation sub-competencies, including enhanced subject matter expertise and “communicative and textual competence, instrumental and professional competence” (Flores Acuña 168 [Author’s own translation]). Teaching specialized translation students to work with and create ad hoc corpora to use a source of “documentary, terminological and textual information” will build student translation confidence and potential for success. Flores Acuña (169) reminds us that in a corpus-based translation class, the instructor is no longer the absolute authority; instead, the corpus that answers student questions and resolves translation problems. The instructor plays more of a facilitator role by helping students use the data provided by the corpus and applying it to the translation (ibid.).

Contemporary students are comfortable with and usually enjoy using new technologies. Beeby et al. (11) point out that students can learn to use corpora to translate (corpus based) as well as to translate using corpora (corpus driven). Using corpora as resources and corpus linguistics as methodology helps create a “sense of discovery that increases motivation and student autonomy”

(147). Teaching translation students to use information technology tools to process information in electronic form helps prepare them to take full advantage of new opportunities in the field.

BIBLIOGRAPHY

Abdul Malik, Norasyikin, et al. "Corpus-based Studies of Metaphor: An Overview." *Arab World English Journal*, vol. 13, no. 2, 2022, pp. 512–528, doi: 10.24093/awej/vol13no2.36.

Abi-Lahoud, Elie, et al. "A hermeneutic approach to solving the translation problem in designing ontologies." *Proceedings of the European Conference on Information Systems (ECIS) 2014*, Tel Aviv, Israel, June 9-11, 2014.

"Abordage." *Oxford English Dictionary*,
www.oed.com/view/Entry/483?redirectedFrom=abordage#eid. Accessed 27 Dec. 2022.

"Abordaje." *Diccionario de la Lengua Española*, Real Academia Española, dle.rae.es/abordaje. Accessed 27 Dec. 2022.

"Abordar." *Corpus del Diccionario Histórico de la Lengua Española*,
apps.rae.es/CNDHE/view/inicioExterno.view;jsessionid=EF2FD93A640ABB81C5DACE4BCB95CD2E. Accessed 1 Apr. 2023.

"Abordar." *Definiciona: Definición y etimología*, definiciona.com/abordaje. Accessed 16 Apr. 2022.

"Acronym." *Oxford Advanced Learner's Dictionary*,
www.oxfordlearnersdictionaries.com/us/definition/english/acronym. Accessed 22 June 2022.

"Adjudication." *LII / Legal Information Institute*, www.law.cornell.edu/wex/adjudication. Accessed 1 Apr. 2023.

- Alejo, Rafael. "Where does the money go? An analysis of the container metaphor in economics: The market and the economy." *Journal of Pragmatics*, vol. 42, no. 4, 2010, pp. 1137–1150, doi: 10.1016/j.pragma.2009.08.013.
- Al-Hasnawi, Ali R. "A cognitive approach to translating metaphors." *Translation Journal*, vol. 11, no. 3, 2007, n. p., 2014, from <http://translationjournal.net/journal/41metaphor.htm>. Accessed August 15.
- Aliakbari, Mohammad, and Fereshteh Khosravian. "A corpus analysis of color-term conceptual metaphors in Persian proverbs." *Procedia-Social and Behavioural Sciences*, vol. 70, 2013, pp. 11–17, doi: 10.1016/j.sbspro.2013.01.033.
- Al-Khalafat, Leen, and Ahmad S. Haider. "A Corpus-Assisted Translation Study of Strategies Used in Rendering Culture-Bound Expressions in the Speeches of King Abdullah II." *Theory and Practice in Language Studies*, vol. 12, no. 1, 2022, pp. 130–42, doi: 10.17507/tpls.1201.16.
- Allan, Keith. *The Oxford Handbook of the History of Linguistics*. 1st ed. Oxford University Press, 2013.
- Allen, Hilary. "What Is 'Financial Stability' -The Need for Some Common Language in International Financial Regulation." *Georgetown Journal of International Law*, vol. 45, 2014, pp. 929–52. Available at <https://ssrn.com/abstract=2484070>.
- Alousque, Isabel Negro. "Metaphor and ideology in the business press: the case of the Endesa takeover." *Miscelánea: A Journal of English and American Studies*, no. 43, 2011, pp. 73–86.

Álvarez García, Carmen. “Estudio del lenguaje de especialidad económico: El lenguaje del comercio internacional.” *Entreculturas: Revista de Traducción y Comunicación Intercultural*, no. 3, 2011, pp. 279–90.

———. “Translation in financial Spanish: a corpus-based study on the use of metaphor.” *Current Trends in Translation Teaching and Learning E (CTTL E)*, 2019, no. 6, pp. 331–56, <https://hdl.handle.net/11441/107757>.

Álvarez-Peralta, Miguel. “El poder de las metáforas en el periodismo económico.” *Los discursos del poder. Actas del XIV Congreso de la Asociación Española de Semiótica*, edited by Vanesa Saiz Echezarreta and Ana M^a López Cepeda, 2014, pp. 333–46.

Anthony, Nicholas. “Improving FinCEN through Oversight.”, *CATO Institute*, 29 April 2022, n.p. Available at <https://www.cato.org/blog/improving-fincen-through-oversight>.

“Anti-lavado de dinero.” Centro Virtual Cervantes. Banco de Neologismos, cvc.cervantes.es/lengua/banco_neologismos/resultados.asp?idioma=Espa%F1ol&anno=2005&radioIdioma=Espa%F1ol&anios=2005&txtbusqueda=antilavado&CG=&Tipus=&Asp_tip=&txtFont=&Font=. Accessed 24 Apr. 2023.

Arcimaviciene, Liudmila, and Sercan Hamza Baglama. “Migration, Metaphor, and Myth in Media Representations: The Ideological Dichotomy of ‘Them’ and ‘Us.’” *SAGE Open*, vol. 8, no. 2, 2018, pp. 1–13, doi:10.1177/2158244018768657.

Arntz, Reiner. “Language description and LSP teaching.” *Terminology, LSP and Translation: Studies in language engineering in honour of Juan C. Sager*, edited by Harold Somers. Benjamins Translation Library, vol. 18, 1996, pp. 109–24.

Arrese, Ángel. “Las metáforas de la crisis del euro en la prensa española.” *Communication & Society*, vol. 28, no. 2, 2015, pp. 19–38.

Bugueño Munizaga, Yuvixa, and Erich Astudillo Acevedo. “El arms length principle en el artículo 64 del código tributario.” PhD Dissertation, 2019.

“Aumentar.” *Diccionario de la Lengua Española*, Real Academia Española, dle.rae.es/aumentar?m=form. Accessed 24 Dec. 2022.

Ayres-Bennett, Wendy. “From Haugen’s codification to Thomas’s purism: assessing the role of description and prescription, prescriptivism and purism in linguistic standardisation.” *Language Policy*, vol. 19, 2020, pp. 183–213, doi:10.1007/s10993-019-09521-4.

Bachiller Martínez, Jesús María, and Esther Fraile Vicente. “Caricatura y metáfora sobre la crisis del euro en la prensa económica europea.” *Estudios de economía aplicada*, vol. 34, no. 2, 2016, pp. 441–68.

Bacigalupo, Silvina, and Miguel Bajo Fernández, eds. *Política criminal y blanqueo de capitales*. Marcial Pons, 2009.

“Bailout.” *Etymonline*, www.etmonline.com/word/bailout. Accessed 27 Dec. 2022.

Baker, Mona, and Gabriela Saldanha, eds. *Routledge Encyclopedia of Translation Studies*, 3rd ed. Taylor & Francis, 2020.

Baker, Mona. “Corpus Linguistics and Translation Studies*: Implications and applications.” *Researching Translation in the Age of Technology and Global Conflict*, edited by Kyung Hye and Yuan Zhu. Routledge, 2019, pp. 9–24.

- . “Narratives of terrorism and security: ‘Accurate’ translations, suspicious frames.” *Critical Studies on Terrorism* vol. 3, no. 3, 2010, pp. 347–64, doi: 10.1080/17539153.2010.521639.
- . “Corpora in Translation Studies: An Overview and Some Suggestions for Future Research.” *Target. International Journal of Translation Studies*, vol. 7, no. 2, 1995, pp. 223–43, doi: 10.1075/target.7.2.03bak.
- . “Corpus Linguistics and Translation Studies: Implications and Applications.” *Text and Technology: In honour of John Sinclair*, edited by Mona Baker, Gill Francis, and Elena Tognini-Bonelli, John Benjamins, 1993, pp. 233–52.
- Baran, Marek. “¿Casualidad, mero instrumento de denominación o necesidad inherente?: el porqué de las metáforas en terminología.” *Léxico especializado y comunicación interlingüística: VI Congreso de Lingüística Hispánica*, edited by Pamela Faber, Catalina Jiménez Hurtado and Gerd Wotjak. Método Ediciones, 2004, pp. 243–253.
- Barnett, Michael, and Raymond Duvall. “Power in international politics.” *International Organization*, vol. 59, no. 1, 2005, pp. 39–75, doi:10.1017/S0020818305050010.
- “Barometer.” *Oxford English Dictionary*, www.oed.com/view/Entry/15654?redirectedFrom=barometer#eid. Accessed 24 Dec. 2022.
- Bastidas Canelones, Jorge. “Tensiones disciplinares entre la Contabilidad Financiera y la Tribuciones producidas por su lenguaje especializado.” *Revista de Investigación Sigma*, vol. 8, no. 01, 2021, pp. 59–70, doi: 10.24133/sigma.v8i01.1916.

- Beeby, Allison, Pilar Sánchez-Gijón, and Patricia Rodríguez Inés, eds. *Corpus use and translating: Corpus use for learning to translate and learning corpus use to translate*. John Benjamins, 2009.
- Bennane, Yamina. “The lexicalization of acronyms in English: The case of third year EFL students, Mentouri University-Constantine.” *Revue Expressions*, no. 3, 2017, pp. 155–64.
- Bennane, Yamina, and Salah Kaouache. *Acronyms as a non-morphemic word-formation vocabulary enrichment strategy and their lexicalization in English*. Diss. Université Frères Mentouri-Constantine 1, 2010.
- Bernardini, Silvia. “How to use corpora for translation.” *The Routledge Handbook of Corpus Linguistics*, edited by Anne O’Keeffe and Michael J. McCarthy, Routledge, 2022, pp. 485–98.
- Blanco Cordero, Isidoro. *El delito de blanqueo de capitales*. 2nd ed. Aranzadi, 2002.
- “Blanquear.” *Diccionario de la Lengua Española*, Real Academia Española, dle.rae.es/blanquear. Accessed 30 Apr. 2023.
- “Blanqueo De Capitales.” *Diccionario Panhispánico Del Español Jurídico*, Real Academia Española, dpej.rae.es/lema/blanqueo-de-capitales. Accessed 4 May 2023.
- Blank, Glenn David. “Metaphors in the lexicon.” *Metaphor and Symbol*, vol. 3, no. 3, 1988, 21–36.
- Blum, Jack A., et al. *Financial Havens, Banking Secrecy and Money Laundering*. EDIT., 2008.
- Boers, Frank. “Enhancing Metaphoric Awareness in Specialised Reading.” *English for Specific Purposes*, vol. 19, no. 2, 2000, pp. 137–47, doi: 10.1016/S0889-4906(98)00017-9.

- Boquera Matarredona, María de la Encarnación. “Las metáforas en textos de ingeniería civil: estudio contrastivo español-inglés.” PhD dissertation, University of Valencia, Spain, 2005.
- Bordet, Geneviève, and Elsa Pic. “Micaela Rossi, *In rure alieno. Métaphores et termes nomades dans les langues de spécialité.*” *ASp*, no. 68, 2015, pp. 1–7, doi: 10.4000/asp.4736.
- Bordet, Geneviève. “Counteracting Domain Loss and Epistemicide in Specialized Discourse: A Case Study on the Translation of Anglophone Metaphors to French.” *Publications*, vol. 4, no. 2, 2016, p. 18. *Crossref*, doi: 10.3390/publications4020018.
- Boroditsky, Lera, James McClelland, and Paul Thibodeau. “When a bad metaphor may not be a victimless crime: The role of metaphor in social policy.” *Proceedings of the Annual Meeting of the Cognitive Science Society*, vol. 31, no. 31, 2009, pp. 809–14.
- Bosh, Donald S. “The Risk Contagion Effect.” *Headington Institute*, 7 July 2020, www.headington-institute.org/resource/the-risk-contagion-effect.
- Boubée, Carolina, et al. “Evolución histórica de las metáforas en el concepto de función.” *Acta Latinoamericana de Matemática Educativa*, edited by Gustavo Martínez, Comité Latinoamericano de Matemática Educativa A. C., 2006, pp. 22–7. Available at <http://funes.uniandes.edu.co/5308/>.
- “Bough.” *Oxford English Dictionary*, www.oed.com/view/Entry/21973?rskey=u9sLVa&result=1#eid. Accessed 3 May 2023.
- Bouman, Mark J. “The Good Lamp is the Best Police. Metaphor and Ideologies of the Nineteenth-Century Urban Landscape.” *American Studies*, vol. 32, no. 2, 1991, pp. 63–78.

- Bowker, Lynne, and Jennifer Pearson. *Working with Specialized Language: A Practical Guide to Using Corpora*. Routledge, 2002. Ebook Central, <https://ebookcentral.proquest.com/lib/jmu/detail.action?docID=178476>.
- Brandstetter, Gabriele. *Poetics of Dance: Body, Image, and Space in the Historical Avant-Gardes*. Oxford Studies in Dance Theory, Oxford, 2015.
- Brooks, Rosa. *How Everything Became War and the Military Became Everything: Tales from the Pentagon*. Simon and Schuster, 2016.
- . “Duck-Rabbits and Drones: Legal Indeterminacy in the War on Terror.” *Stanford Law and Policy Review*, vol. 25, no. 2, 2013, pp. 301–16, <http://www.amnesty.org/en/library/asset/MDE31/006/2003/en/1201e721-d6a7->.
- . *Tangled up in blue: Policing the American City*. Penguin, 2021.
- Burmakova, Elena A., and Nadezda I. Marugina. “Cognitive approach to metaphor translation in literary discourse.” *Procedia-Social and Behavioral Sciences*, vol. 154, 2014, pp. 527–33, doi: 10.1016/j.sbspro.2014.10.180.
- Burton, Graham. “What can a corpus tell us about grammar teaching materials?” *The Routledge Handbook of Corpus Linguistics*, edited by Anne O’Keeffe and Michael J. McCarthy, Routledge, 2022, pp. 358–70.
- Bustos Guadaño, Eduardo (de). *La metáfora: Ensayos transdisciplinares*. Fondo de Cultura Económica, 2000.

- Cabré, M. Teresa. “La terminología en la traducción especializada.” *Manual de documentación y terminología para la traducción especializada*, edited by Rosario Consuelo Gonzalo García and Valentín García Yebra, Arco Libros, 2004, pp. 89–125.
- . “Textos especializados y unidades de conocimiento: metodología y tipologización.” *Texto, Terminología y Traducción*, edited by Joaquín García Palacios and M. Teresa Fuentes Morán. Almar, 2002, pp. 15–36.
- . *Terminology: Theory, methods, and applications*, vol. 1. John Benjamins, 1999.
- Calzada-Pérez, María. *Apropos of ideology: Translation studies on ideology-ideologies in translation studies*. Routledge, 2014.
- Calzado, Mercedes Celina, and Ana Laura Lobo. “Riesgos, subjetividades y demandas de seguridad reflexiones para la investigación de demandas de seguridad.” *Nómadas. Critical Journal of Social and Juridical Sciences*, vol. 22, no. 2, 2009.
- Cassara, John A. “Re: FIU question.” Received by Stephen Gerome. 16 February 2023. Email Interview.
- . *China - Specified Unlawful Activities: CCP Inc., Transnational Crime and Money Laundering*. Independently published, 2023.
- . *Money Laundering and Illicit Financial Flows*. Independently Published, 2020.
- . *Trade-based money laundering: the next frontier in international money laundering enforcement*. John Wiley & Sons, 2015.

Cassela, Stefan D. “Criminal Forfeiture Procedure: 2007; The Money Laundering Statutes (18 USC Secs. 1956 and 1957).” *US Attys Bull.* 55, 2007, pp. 461, <https://heinonline.org/HOL/LandingPage?handle=hein.journals/cmlwbl43&div=38&id=&page=461>.

———. “Money Laundering Laws.” *US Attorney Bulletin*, vol. 55, no. 5, 2007, pp. 21–33.

“Cast.” *Oxford English Dictionary*, www.oed.com/view/Entry/28530?rskey=jJtNPI&result=1#eid. Accessed 2 May 2023

Ceci, Marcello, et al. “Legal patterns for different constitutive rules.” *AI Approaches to the Complexity of Legal Systems: AICOL International Workshops 2015-2017: AICOL-VI@ JURIX 2015, AICOL-VII@ EKAW 2016, AICOL-VIII@ JURIX 2016, AICOL-IX@ ICAIL 2017, and AICOL-X@ JURIX 2017, Revised Selected Papers 6*. Springer International Publishing, 2018.

Celso, Trinidad. “Fog Index.” *Corporate Finance Institute*, vol. 13, Jan. 2023. Available at corporatefinanceinstitute.com/resources/management/fog-index.

Chan, Janet. “Using Pierre Bourdieu’s framework for understanding police culture.” *Droit et société*, no. 1, 2004, pp. 327–46.

Charteris-Black, Jonathan, and Andreas Musolff. “‘Battered hero’ or ‘innocent victim’? A comparative study of metaphors for euro trading in British and German financial reporting.” *English for Specific Purposes*, vol. 22, no. 2, 2003, pp. 153–76, doi: 10.1016/S0889-4906(02)00012-1.

- Charteris-Black, Jonathan, and Timothy Ennis. "A comparative study of metaphor in Spanish and English financial reporting." *English for Specific Purposes*, vol. 20, no. 3, 2001, pp. 249–66, doi: 10.1016/S0889-4906(00)00009-0.
- Charteris-Black, Jonathan. "Critical metaphor analysis." *Corpus approaches to critical metaphor analysis*. Palgrave Macmillan, 2004, pp. 243–253, doi: 10.1057/9780230000612_12.
- . "Metaphor and vocabulary teaching in ESP economics." *English for Specific Purposes*, vol. 19, no. 2, 2000, pp. 149–65, doi: 10.1016/S0889-4906(98)00025-8.
- "CICAD: Anti-Money Laundering." *Organization of American States (OAS)*, 3 July 2012, www.cicad.oas.org/Main/Template.asp?File=/lavado_activos/pubs/combate_eng.asp.
- Cisneros-Estupiñán, Mireya, and Clarena Muñoz-Dagua. "Metaphors of War in Journalistic Media Texts about the Pandemic." *Cuadernos de Lingüística Hispánica*, vol. 38, 2021, pp. 1–15, doi: 10.19053/0121053x.
- Clemens, Samuel. "Mark Twain Quote." *A-Z Quotes*, AZQuotes, www.azquotes.com/quote/874645. Accessed 30 July 2021.
- Conrad, Susan. "Corpus variety: Corpus linguistics, language variation, and language teaching." *How to use corpora in language teaching*, edited by John McH. Sinclair. John Benjamins, 2004, pp. 67–85.
- "Consagrar." *Diccionario De La Lengua Española*, Real Academia Española, dle.rae.es/consagrar?m=form. Accessed 3 May 2023.

“Contagion.” *Oxford English Dictionary*,

www.oed.com/view/Entry/40032?redirectedFrom=contagion#eid. Accessed 24 Dec. 2022.

Corbacho Sánchez, Alfonso. “Las abreviaciones en el alemán económico empresarial y su traducción al español.” *Tradução e Comunicação*, vol. 16, 2007, pp. 17–25.

Corpas Pastor, Gloria. “Lost in specialised translation: the corpus as an inexpensive and under-exploited aid for language service providers.” *Proceedings of Translating and the Computer* 29, 2007, pp. 1–18

Cotterill, Janet. *Language and power in court: A linguistic analysis of the OJ Simpson trial*. Springer, 2003.

Council of Europe. “MONEYVAL in Brief.” *Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism*, www.coe.int/en/web/moneyval/moneyval-brief. Accessed 19 Apr. 2022.

Craig, David. “Why We Need to Talk About Financial Crime.” *World Economic Forum*, 7 Feb. 2020, www.weforum.org/agenda/2018/01/we-need-to-talk-about-financial-crime. Accessed 3 Mar. 2023.

Crawford Camiciottoli, Belinda. *Rhetoric in financial discourse: A linguistic analysis of ICT-mediated disclosure genres*. Rodopi, 2013.

Croft, William, and D. Alan Cruse. *Cognitive linguistics*. Cambridge University Press, 2004.

Cserép, Attila. “Conceptual Metaphor Theory: In defence or on the fence.” *Argumentu*, vol. 10, no. 10, 2014, pp. 261–88. Available at https://argumentum.unideb.hu/2014-anyagok/angol_kotet/cserepa.pdf.

“Cumbre.” *Diccionario de la Lengua Española*, Real Academia Española, dle.rae.es/cumbre?m=form. Accessed 3 May 2023.

Dagut, Menachem M. “Can ‘Metaphor’ Be Translated?” *Babel: Revue Internationale de la traduction/International Journal of Translation*, vol. 22, no. 1, 1976, pp. 21–33. EBSCOhost, search.ebscohost.com/login.aspx?direct=true&AuthType=cookie,ip,athens,shib&db=mlf&AN=1976302663&site=ehost-live&scope=site.

Dai, Narisa Tianjing, Clinton Free, and Yves Gendron. “Interview-based research in accounting 2000–2014: Informal norms, translation and vibrancy.” *Management Accounting Research*, vol. 42, 2019, pp. 26–38, doi: 10.1016/j.mar.2018.06.002

Daintith, Thomas Charles. “A Regulatory Space Agency?” *Oxford Journal of Legal Studies*, vol. 9, no. 4, 1989, pp. 534–46, doi: 10.1093/ojls/9.4.534, <https://heinonline.org/HOL/LandingPage?handle=hein.journals/oxfjls9&div=37&id=&page=>.

Danesi, Marcel. “Sentido, concepto y metáfora en Vico. Una óptica interpretativa de las investigaciones científicas sobre la metáfora.” Translated by Jose M. Sevilla. *Cuadernos sobre Vico*, vol. 11, no. 12, 1999, pp. 107–27.

Das, Sanjiv Ranjan. “Text and context: Language analytics in finance.” *Foundations and Trends in Finance*, vol. 8, no. 3, 2014, pp. 145–261, doi: 10.1561/05000000045.

“De cuello blanco.” Centro Virtual Cervantes: Banco De Neologismos, cvc.cervantes.es/lengua/banco_neologismos/resultados.asp?idioma=Espa%F1ol&anno=2005&radioIdioma=Espa%F1ol&anios=2005&txtbusqueda=de+cuello+blanco&CG=&Tipus=&A sp_tip=&txtFont=&Font=. Accessed 24 Apr. 2023.

“De cuello blanco.” *Diccionario Panhispánico Del Español Jurídico*, 2023, dpej.rae.es/lema/de-cuello-blanco. Accessed 30 Apr. 2023.

Deignan, Alice, et al. “Teaching English metaphors using cross-linguistic awareness-raising activities.” *ELT journal*, vol. 51, no. 4, 1997, pp. 352–360, doi: 10.1093/elt/51.4.352.

Dickins, James. “Two Models for Metaphor Translation.” *Target. International Journal of Translation Studies*, vol. 7, no. 2, 2005, pp. 227–73, doi: 10.1075/target.17.2.03dic.

“Disposal of Assets.” *Law Insider*, www.lawinsider.com/dictionary/disposal-of-assets. Accessed 3 Mar. 2023.

Drouin, Patrick, Aurélie Picton, and John Humbley, eds. *Multiple Perspectives on Terminological Variation*, John Benjamins, 2017.

Echavarría Álvarez, Josefina. “Re-thinking (in) security discourses from a critical perspective.” *Asteriskos*, vol. 1, no. 2, 2006, pp. 61–82.

Eco, Humberto. *Semiótica y filosofía del lenguaje*, Editorial Lumen, 1990.

Enfedaque, Nuria Domínguez. “El misterioso origen de la expresión ‘paraíso fiscal.’” *eXtoikos*, vol. 18, 2016, pp. 91–2.

“English Translation of ‘Abordar.’” *Collins Spanish-English Dictionary*, www.collinsdictionary.com/us/dictionary/spanish-english/abordar. Accessed 16 Apr. 2023.

“Enshrine.” *Oxford English Dictionary*, www.oed.com/view/Entry/62668?redirectedFrom=enshrined#eid5465418. Accessed 3 May 2023.

“Epicentro.” *Diccionario de la Lengua Española*, Real Academia Española, dle.rae.es/epicentro?m=form2. Accessed 24 Dec. 2022.

Eriksson, Ingrid. “*Retaining or losing the conceptual metaphor: A study on institutional translation of metaphors in political discourse from English into Swedish and Spanish.*” Master’s Thesis. University of Stockholm, 2019.

España Alba, Victor Manuel. “Blanqueo de capitales y secreto bancario.” PhD dissertation, University of Granada, 2016.

“Etymology of ‘smurfing’ for Money Laundering?” *English Language & Usage Stack Exchange*, 2023, english.stackexchange.com/questions/325240/etymology-of-smurfing-for-money-laundering. Accessed 16 Apr. 2023.

Blanco Corder, Isidoro et al. *Combate del lavado de activos desde el sistema judicial*. Tercera 3rd ed., Washington, DC., CICAD, 2007.

Faiq, Said. *Discourse in translation*. Routledge, 2019.

“Fantasma.” *Etimologías De Chile - Diccionario Que Explica El Origen De Las Palabras*,
<https://etimologias.dechile.net/>.

“Fantasma.” *Diccionario de la Lengua Española*, Real Academia Española,
dle.rae.es/fantasma?m=form. Accessed 2 May 2023.

“FATF-GAFI.ORG - Financial Action Task Force (FATF).” *Financial Action Task Force (FATF)*,
www.fatf-gafi.org. Accessed 29 Apr. 2022.

FED. “FFIEC Home Page.” *FED*, 2019, p. 1, <https://www.ffiec.gov/>. Accessed 2 May 2023.

“Filial.” *Diccionario de la Lengua Española*, Real Academia Española, dle.rae.es/filial?m=form.
Accessed 3 May 2023.

Fernández Colomer, María José. “La metáfora en español coloquial.” *Interlingüística*, no. 14, 2003,
pp. 359–74.

“Financial Crime” *Office of the Comptroller of the Currency*, www.occ.treas.gov/topics/supervision-and-examination/bank-operations/financial-crime/index-financial-crime.html. Accessed 3
Mar. 2023.

Flores Acuña, Estefanía. “Compilación de un corpus de especialidad con BootCaT para la traducción
jurídica italiano/español: el caso de un contrato de agencia.” *Onomázein*, no. 57, 2022, pp. 167–
214, doi: 10.7764/onomazein.57.09.

- Flusberg, Stephen J. et al. "War metaphors in public discourse." *Metaphor and Symbol*, vol. 33, no. 1, 2018, pp. 1–18.
- Foljanty, Lena. "Legal transfers as processes of cultural translation: on the consequences of a metaphor." *Kritische Vierteljahresschrift für Gesetzgebung und Rechtswissenschaft* 2, 2015, pp. 89–107.
- Font Saravia, Jorge. "La metáfora en Ortega y Gasset. Boletín de La Real Academia Española." PhD dissertation, University of Buenos Aires, 2004.
- Fraile Vicente, Esther. "The Relationship Between the Typical Errors in the Translation of Business Idioms and Their Lexicographical Treatment." *Revista alicantina de estudios ingleses*, no. 20, 2007, pp. 65–93.
- "Front." Oxford English Dictionary, www.oed.com/view/Entry/74915?rskey=yn2JCI&result=1#eid. Accessed 27 Dec. 2022.
- Fandrych, Ingrid. "Submorphemic elements in the formation of acronyms, blends and clippings." *Lexis. Journal in English Lexicology*, no. 2, 2008, pp. 103–21, doi: 10.4000/lexis.713.
- Fauconnier, Gilles, and Mark Turner. *The way we think: Conceptual blending and the mind's hidden complexities*. Basic books, 2008.
- Fuertes Olivera, Pedro A. "Metaphor and translation: A case study in the field of Economics." *La Traducción: Orientaciones Lingüísticas y Culturales*, edited by Purificación Fernández Nistal and José María Bravo Gonzalo. Servicio de Apoyo a la Enseñanza, 1998, pp. 79–95.

Fuertes-Olivera, Pedro A., and Sandro Nielsen. “The Dynamics of Accounting Terms in a Globalized Environment: The Role of English as Lingua Franca.” *Dynamics and Terminology: An Interdisciplinary Perspective on Monolingual and Multilingual Culture-Bound Communication*, edited by Rita Temmerman and Marc Van Campenhoudt. John Benjamins, 2014, pp. 215–34.

Fuertes-Olivera, Pedro. A., and Isabel. Pizarro Sánchez. “Translation and similarity-creating metaphors in specialized languages.” *Target*, vol. 14, 2002, pp. 43–73.

“Fusión.” *Diccionario De La Lengua Española*, Real Academia Española, dle.rae.es/fusi%C3%B3n%20?m=form. Accessed 2 May 2023.

Gálvez Bravo, Rafael. *Los Modus Operandi En Las Operaciones de Blanqueo de Capitales*. 1st ed. Bosch, 2014.

Gamallo Otero, Pablo. “Learning bilingual lexicons from comparable English and Spanish corpora.” *Proceedings of Machine Translation Summit XI: Papers*. 2007, n.p.

Gao, Tingting, and Xiaoyi Wang. “The construction of computer-aided translation teaching platform based on corpus.” *Journal of Physics: Conference Series*, vol. 1648, no. 3. IOP Publishing, 2020.

García Palacios, Joaquín. “La competencia neológica especializada en el estudio y la actuación sobre la neología terminológica 1.” *Revue française de linguistique appliquée*, vol. 14, no. 2, 2009, pp. 17–30, doi: 10.3917/rfla.142.0017.

García-Izquierdo, Isabel, and Tomás Conde. “Investigating specialized translators: Corpus and Documentary sources.” *Ibérica*, no. 23, 2012, pp. 131–57.

“Gestalt.” *Oxford English Dictionary*,

<https://www.oed.com/view/Entry/77951?redirectedFrom=gestalt#eid>. Accessed 11 April 2023.

Gibbs Jr, Raymond W., ed. *The Cambridge handbook of metaphor and thought*. Cambridge University Press, 2008.

Gilmour, Nicholas, and Tristram Hicks. “2: The war on dirty money is mostly being lost in translation.” *The War on Dirty Money*, edited by Gilmour, Nicholas, and Tristram Hicks. Policy Press, 2023, pp. 30–41, doi: 10.51952/9781447365143.ch002.

Gilquin, Gaëtanelle, and Sylviane Granger. “Using data-driven learning in language teaching.” *The Routledge Handbook of Corpus Linguistics*, edited by Anne O’Keeffe and Michael J. McCarthy. Routledge, 2022, pp. 430–42.

Gluyas Millán, Ricardo. “Reseña: La investigación del lavado de dinero.” *Revista Venezolana de Ciencias Sociales*, vol. 8, no.1, 2004, n.p.

Goatley, Andrew. *The Language of Metaphors*. Routledge, 1997.

Gómez de Enterría, Josefa. “Neología y préstamo en el vocabulario de la economía.” *Anuario de Estudios filológicos*, vol. 15, 1992, pp. 97–106.

Gómez-Ferri, Javier Gómez. “Qué hacen las metáforas en la ciencia: Un panorama reflexivo sobre la metáfora en la economía.” *Laguna. Revista de Filosofía*, no. 4, 1997, pp. 57–75.

- González García, María Candelaria, and Daniel González Martín. “Los paraísos fiscales.” PhD Dissertation, University of La Laguna, Spain, 2016.
- González Martín, José Mauro. “¿Son realmente efectivas las listas negras contra los paraísos fiscales?” *Anduli: Revista Andaluza de Ciencias Sociales*, no. 19, 2020 pp. 1–33. doi: 10.12795/anduli.2020.i19.01.
- González, Daniela Soledad. “Una revisión de la teorización sobre la metáfora en el tratado I de La metáfora viva de Paul Ricoeur.” *Lengua y habla*, no. 18, 2014, pp. 29–39.
- Goodwin, Charles. “Professional Vision.” *American Anthropologist*, vol. 96, no. 3, 1994, pp. 606–33. *JSTOR*, www.jstor.org/stable/682303. Accessed 19 July 2021.
- Gražytė, Rasa, and Nijolė Maskaliūnienė. “Translation of conceptual metaphor in the legal discourse of EU White Papers.” *Vertimo studijos*, no. 2, 2009, pp. 71–87.
- Grossman, Edith. *Why Translation Matters*. Yale University Press, 2010.
- Guénette, Marie-France. “Economic and financial translation: key factors for successful training.” *Translation Matters*, vol. 4, no. 2, 2022.
- Guerrero-Ramos, Gloria. “El préstamo lingüístico, uno de los principales procedimientos de creación neológica.” *Quaderns de Filologia-Estudis Lingüístics*, no. 18, 2013, pp. 115–30.
- Gutiérrez Gata, Sara. “Estudio contrastivo inglés-español de metáforas conceptuales sobre la crisis del covid-19 en el periodismo económico.” Master’s Dissertation, Universitat Oberta de Catalunya, 2021.

- Guzmán, Diego, and Fernando Prieto Ramos. “Assessing legal terminological variation in institutional translation: The case of national court names in the human rights monitoring procedures of the United Nations.” *Translation and Translanguaging in Multilingual Contexts*, vol. 7, no. 2, 2021, pp. 224–47.
- Haddad Haddad, Amal and Silvia Montero-Martínez. “COVID-19: A Metaphor-based Neologism and Its Translation into Arabic.” *JCOM*, 2020, vol. 19, no. 5, pp. 1–21, doi: 10.22323/2.19050201.
- Halliday, Michael Alexander Kirkwood, and James R. Martin. *Writing science: Literacy and discursive power*. Taylor & Francis, 2003.
- Hansen, Kristian Bondo. “Financial contagion: problems of proximity and connectivity in financial markets.” *Journal of Cultural Economy*, vol. 14, no. 4, 2021, pp. 388–402, doi: 10.1080/17530350.2021.1879211.
- Hart, Kathleen Robin, and John H. Long. “Animal Metaphors and Metaphorizing Animals: An Integrated Literary, Cognitive, and Evolutionary Analysis of Making and Partaking of Stories.” *Evolution: Education and Outreach*, vol. 4, no. 1, 2011, pp. 52–63.
- Hatim, Basil and Ian Mason, *Discourse and the Translator*. Longman, 1990.
- Herrera Arrando, José Vicente. “Seguridad y Ciudadanía en la España Democrática. La Policía de Proximidad como ética aplicada.” PhD Dissertation, University of Valencia, Spain, 2018. Repositori de Ontingut Lliure, <https://roderic.uv.es/handle/10550/65359>.

- Herrera-Soler, Honesto, and Michael White, eds. *Metaphor and Mills: Figurative language in business and economics. Introduction*, vol. 19. De Gruyter Mouton, 2012.
- Herteg, Maria-Crina, et al. "Economic metaphors in business English." *International Conference 3rd Global Conference on Linguistics and Foreign Language Teaching, LINELT*, 2016, pp. 1–6.
- Herteg, Maria-Crina. "Corpus-Based Approach to the Conceptualisation of the Economy in Business English Press." *The Journal of Linguistic and Intercultural Education*, vol. 12, no. 3, 2019, pp. 73–174, doi: 10.29302/iolie.2019.12.3.5.
- . "A Corpus-Based Approach to Business English Metaphors." *Annales Universitatis Apulensis, Series Philologica*, vol. 16, no. 2, 2015, pp. 289–302, <https://www.ceeol.com/search/article-detail?id=412815>.
- Hewings, Ann. "Aspects of the language of economics textbooks." *The language of economics: The analysis of economic discourse*, edited by Tony Dudley-Evans and Willie Henderson. Modern English Publications in association with The British Council, 1990, pp. 29–42.
- Hill, John. *The Impact Made by UK Academic Computer Science Research*, 2013 <http://www.doc.ic.ac.uk/~mss/ImpactReport.pdf>.
- Hines Jr, James R., and Eric M. Rice. "Fiscal paradise: Foreign tax havens and American business." *The Quarterly Journal of Economics*, vol. 109, no. 1, 1994, pp. 149–82.
- Ho, Janet, and Winnie Cheng. "Metaphors in financial analysis reports: How are emotions expressed?" *English for Specific Purposes*, no. 43, 2016, pp. 37–48.

Hope, Sr, Kempe Ronald. "Channels of Corruption in Africa: Analytical Review of Trends in Financial Crimes." *Journal of Financial Crime*, vol. 27, no. 1, Jan. 2020, pp. 294–306. EBSCOhost, doi: 10.1108/JFC-05-2019-0053.

Hourani-Martín, Dunia, and Encarnación Tabares-Plasencia. "Morphosyntactic and Semantic Behaviour of Legal Phraseological Units. A Case Study in Spanish Verb-Noun Constructions About Money Laundering." *Terminology. International Journal of Theoretical and Applied Issues in Specialized Communication*, vol. XXVI, no. 1, 2020, pp. 108–31.

Huang, Mimi, and Lise-Lotte Holmgreen, eds. *The Language of Crisis: Metaphors, frames, and discourses*, vol. 87. John Benjamins Publishing Company, 2020.

Hülse, Rainer. "In Paradise: Metaphors of Money-Laundering Brighten up the Dark Side of Globalization." *Metaphors of Globalization*, edited by Markus Kornprobst, Vincent Pouliot, Nisha Shah, and Ruben Zaiotti. Palgrave Macmillan, 2008, pp. 98–113, doi: 10.1057/9780230590687_7.

"In The Black." *Oxford English Dictionary*, <https://www.oed.com/view/Entry/19670?rskey=rzuTdU&result=2&isAdvanced=false#eid202086937>. Accessed 9 Jan. 2023.

"In The Red." *Oxford English Dictionary*, www.oed.com/view/Entry/160134?redirectedFrom=in+the+red#eid26342208. Accessed 9 Jan. 2023.

"Inflar." *Diccionario de la Lengua Española*, Real Academia Española, dle.rae.es/inflar?m=form. Accessed 24 Dec. 2022.

“Intelligence.” *Oxford English Dictionary*,

www.oed.com/search?searchType=dictionary&q=intelligence&_searchBtn=Search. Accessed

16 Apr. 2023.

“Invocar.” *Diccionario de la Lengua Española*, Real Academia Española,

dle.rae.es/invocar?m=form. Accessed 16 Apr. 2023.

“Isotopy.” *Oxford Reference*,

www.oxfordreference.com/display/10.1093/oi/authority.20110803100013391;jsessionid=673

[6A1F36B394D0EBF4A4D1D4B5BC7FB](http://www.oxfordreference.com/display/10.1093/oi/authority.20110803100013391;jsessionid=6736A1F36B394D0EBF4A4D1D4B5BC7FB). Accessed 25 Jan. 2023.

Jiménez Sanz, César. “El blanqueo de capitales.” Universidad Rey Juan Carlos. Facultad de Derecho.

Departamento de Derecho Privado, 2009.

Joris, Willem, et al. “The Euro Crisis in Metaphors and Frames: Focus on the press in the Low

Countries.” *European Journal of Communication*, vol. 29, no. 5, 2014, doi:

10.1177/0267323114538852.

Kaitian, Lu. “Metáforas en la enseñanza del español a alumnos chinos: propuestas didácticas para

mejorar la conciencia y competencia metafórica.” *Artículos del II Congreso de Español como*

Lengua Extranjera en Asia-Pacífico, 2011, pp. 329–46. Available at [http://cvc.cervantes.](http://cvc.cervantes.es/ensenanza/biblioteca_ele/publicaciones_centros/pdf/manila_2011/23_aplicaciones_03.pdf)

[es/ensenanza/biblioteca_ele/publicaciones_centros/pdf/manila_2011/23_aplicaciones_03.pdf](http://cvc.cervantes.es/ensenanza/biblioteca_ele/publicaciones_centros/pdf/manila_2011/23_aplicaciones_03.pdf).

Accessed 13 Sep. 2016.

Kamal, Wisam Saad, and Abeer Hussein Abid. “La metáfora en el discurso político. Los artículos de

Lluís Bassets como ejemplo / Metaphor in Political Discourse Press Articles by Louis Bassets

as A Model.” *Journal of the College of Languages (JCL) Mağallaġ kulliyyaġ al-luġāt*, no. 44, 2021, pp. 188–22.

Kelling, George L. “Crime and Metaphor: Toward a New Concept of Policing.” *City Journal*, Autumn 1991. Available at <http://www.city-journal.org/article01.php?aid=1577>.

Kelling, George L., and James Q. Wilson. “Broken windows.” *Atlantic monthly*, 249.3, 1982, pp. 29–38.

Kennedy, Graeme. *An Introduction to Corpus Linguistics London: Studies in language*. Routledge, 1998.

Kenny, Dorothy. “The ethics of machine translation.” *New Zealand Society of Translators and Interpreters Annual Conference 2011, 4-5 June, Auckland, 2011*.

Kerbel, Josh and National Intelligence University. “The Metaphor Is the Message: Reconsidering Word Use for Today’s Security Environment.” *Catalyst*, 2017. Available at ni-u.edu/wp/wp-content/uploads/2021/08/NIUShortKerbel2.pdf.

Kerbel, Josh. “The Dead Metaphors of National Security.” *Defense One*, 2018. Available at www.defenseone.com/ideas/2018/05/dead-metaphors-national-security/147887.

Kilgarriff, Adam, et al. “Corpora and language learning with the Sketch Engine and SKELL.” *Revue française de linguistique appliquée*, vol 20., no. 1, 2015, pp. 61–80.

———. “The Sketch Engine: Ten Years On.” *Lexicography*, vol. 1, no. 1, 2014, pp. 7–36, doi: 10.1007/s40607-014-0009-9.

- Kim, Kyung Hye, and Yifan Zhu, eds. *Researching Translation in the Age of Technology and Global Conflict: Selected Works of Mona Baker*. Routledge, 2019.
- Kocjančič, Polonca. "Internet y los recursos lingüísticos para la lengua española: diccionarios y corpus." *Verba Hispanica*, vol. 17, no. 1, 2009, pp. 145–64, doi: 10.4312/vh.17.1.145-164.
- Koller, Veronika, et al. "Using a semantic annotation tool for the analysis of metaphor in discourse." *Metaphorik*, vol. 15, no. 1, 2008, pp. 141–60.
- Kövecses, Zoltán. "Standard and extended conceptual metaphor theory." *The Routledge Handbook of Cognitive Linguistics*. Routledge, 2021, pp. 191–203.
- . "An extended view of conceptual metaphor theory." *Review of Cognitive Linguistics*. Published under the auspices of the Spanish Cognitive Linguistics Association, vol. 18, no. 1, 2020, pp. 112–30.
- . "Levels of metaphor." *Cognitive Linguistics*, vol. 28, no. 2, 2017, pp. 321–347, doi: 10.1515/cog-2016-0052.
- . *Metaphor: A practical introduction*. Oxford University Press, 2010.
- . "Introduction: Cultural variation in metaphor." *European Journal of English Studies*, vol. 8, no. 3, 2004, pp. 263–274, doi: 10.1080/1382557042000277386.
- . "Cognitive-linguistic comments on metaphor identification." *Language and Literature: International Journal of Stylistics*, vol. 11, no. 1, 2002, pp. 74–8, doi: 10.1177/096394700201100107.

- Kübler, Natalie, et al. "Teaching Specialised Translation Through Corpus Linguistics: Translation Quality Assessment and Methodology Evaluation and Enhancement by Experimental Approach." *Meta*, vol. 63, no. 3, 2018, pp. 807–25, doi: 10.7202/1060174ar.
- La Berge, Leigh Claire. "The rules of abstraction: methods and discourses of finance." *Radical History Review*, no. 118, 2014, pp. 93–112. doi: 10.1215/01636545-2349133.
- Lakoff, George, and Mark Johnson. *Metaphors We Live By*. University of Chicago Press, 1980/2003.
- . "*Metáforas de la vida cotidiana. 1980.*" Translated by Carmen González Marín, Cátedra, 1986.
- Lakoff, George. "The contemporary theory of metaphor." *Metaphor and Thought*, edited by Andrew Ortony. Cambridge University Press, 1993, pp. 202–51.
- Lampe, Klaus. "Not a Process of Enlightenment: The Conceptual History of Organized Crime in Germany and the United States of America." *Forum on Crime and Society*, vol. 1, no. 2, 2001, pp. 99–145.
- Lexical Computing CZ s.r.o. "Spanish FreeLing Part-of-speech Tagset | Sketch Engine." Sketch Engine, 26 Oct. 2017, www.sketchengine.eu/spanish-freeling-part-of-speech-tagset. Accessed 16 Apr. 2023.
- Li, Lan, and Lucy McGregor. "Colour Metaphors in Business Discourse". *Language for Professional Communication: Research, Practice and Training*, vol. 11, edited by Vijay Khumar Bhatia, Winnie Cheng, Bertha Du-Babcock, and Jane Lung, 2009, pp. 11–24.
- "Liquidity." *Etymonline*, www.etymonline.com/word/liquidity#etymonline. Accessed 2 May 2023.

- Larson, Mildred L. *Meaning-based translation: A guide to cross-language equivalence*. University press of America, 1984.
- Laviosa, Sara. "Corpora." *Handbook of Translation Studies*, edited by Yves Gambier and Luc Van Doorslaer. John Benjamins, 2010, pp. 80–6.
- Le Guern, Michel. *La Metáfora y la Metonimia*. Translated by Augusto de Gálvez-Cañero. Cátedra, 1985.
- Lea, Stephen E. G., and Paul Webley. "Money: Metaphors and motives." *The Psychological Science of Money*, edited by Erik Bijleveld and Henk Aarts. Springer, 2014, pp. 21–35.
- Lee, Hansol, Mark Warschauer, and Jang Ho Lee. "The effects of corpus use on second language vocabulary learning: A multilevel meta-analysis." *Applied Linguistics*, vol. 40, no. 5, 2019, pp. 721–53.
- Leezenberg, Michiel. "Metaphor and Context." *Contexts of Metaphor*, edited by Michiel Leezenberg. Brill, 2001, pp. 149–250, doi: 10.1163/9780585473932_006.
- Levy, Jill Meryl. *Take Command of Your Writing: A Comprehensive Guide to More Effective Writing*. Firebelle Productions, 1998.
- Liang, Songman. "A Corpus-Based Study on Conceptual Metaphors in the Finance & Economics Column of The Economist." *International Journal of English Language Studies*, vol. 3, no. 8, 2021, pp. 14–26, doi: 10.32996/ijels.2021.3.8.3.

- Liberman, Anatoly. “The Last Shot at American Idioms.” *Oxford University Press’s Academic Insights for the Thinking World*, 4 Sept. 2019, blog.oup.com/2019/09/last-shot-american-idioms.
- Lillis, Theresa, and Mary Jane Curry. “10 English, Scientific Publishing and Participation in the Global Knowledge Economy.” *English and Development. Multilingual Matters*, edited by Elizabeth J. Erling and Philip Seargeant, 2013, pp. 220–42, doi: 10.21832/9781847699473-014.
- “Liquidity.” *Etymonline*, www.etymonline.com/word/liquidity. Accessed 20 April 2023.
- Liu, Junjun. “Usability of Computer-Aided Translation Software Based on Deep Learning Algorithms.” *Advances in Multimedia*, 2022, doi: 10.1155/2022/9047053.
- Lizcano, Emmánuel. *Metáforas que nos piensan: Sobre Ciencia, Democracia y otras Poderosas Ficciones*, Ediciones Bajo Cero, 2006.
- Llewellyn, Sue, and Markus J. Milne. “Accounting as codified discourse.” *Accounting, Auditing & Accountability Journal*, vol. 20, no. 6, 2007, pp. 805–24, doi: 10.1108/09513570710830254.
- Loma-Osorio Fontecha, Marciana. “La metáfora como recurso de producción léxica en la metalengua de la economía en español e inglés.” Universidad Carlos III de Madrid. Grupo de Investigación “Lorenzo Hervás”, no. 20, 2011, pp. 311–25.
- López Zurita, Paloma. “Economic Anglicisms: Adaptation to the Spanish Linguistic System.” *Ibérica. Revista de la Asociación Europea de Lenguas para Fines Específicos*, vol. 10, no. 1, 2005, pp. 91–114.

- López, Ana María Rojo, and María Ángeles Orts Llopis. “Metaphorical Pattern Analysis in Financial Texts: Framing the Crisis in Positive or Negative Metaphorical Terms.” *Journal of Pragmatics*, vol. 42, no. 12, 2010, pp. 3300–13, doi: 10.1016/j.pragma.2010.06.001.
- Lovón Cueva, Marco Antonio, et al. “La COVID-19 y la metáfora bélica: un análisis cognitivo en los diarios digitales y las redes sociales.” *Boletín de la Academia Peruana de la Lengua*, no. 70, 2021, pp. 155–96.
- Lozano Franco, Ángel. *Traducción del lenguaje económico sobre la crisis del euro en la prensa europea (inglés-español)*. Dissertation, University of Valladolid, 2015.
- Luarsabishvili, Vladimer. “La traducción de la metáfora—una reflexión del traductor.” *Revista de Investigación Lingüística*, vol. 19, 2016, pp. 251–68.
- MacDonald, Malcolm N., et al. “Critical Approaches to Security Discourse.” *The Discourse of Security: Language, Illiberalism and Governmentality*, edited by Malcolm N. MacDonald and Duncan Hunter. Springer, 2019, pp. 57–83.
- Maci, Stefania M., and Michele Sala, eds. *Corpus Linguistics and Translation Tools for Digital Humanities: Research Methods and Applications*. Bloomsbury, 2022.
- Madinger, John. *Money Laundering: A Guide for Criminal Investigators*, 3rd ed., Routledge, 2011.
- “Main Bodies.” United Nations. 2014, <https://www.un.org/en/about-us/main-bodies>. Accessed 2 May 2023.

Mandelblit, Nili. “The cognitive view of metaphor and its implications for translation theory.” *Translation and meaning*, Part 3, edited by Marcel Thelen and Barbara Lewandowska-Tomaszczyk. Hogeschool Maastricht, 1995, pp. 483–95.

“Marcha.” *Diccionario de la Lengua Española*, Real Academia Española, dle.rae.es/marcha?m=form. Accessed 23 Dec. 2022.

Marco, Josep, and Heike Van Lawick. “Using corpora and retrieval software as a source of materials for the translation classroom.” *Corpus Use and Translating: Corpus use for learning to translate and learning corpus use to translate*, edited by Allison Beeby, Patricia Rodríguez-Inés and Pilar Sánchez-Gijón 2009, pp. 9–28.

Martín Martín, Jacinto, et al. *Los lenguajes especiales: (lenguaje juridico-administrativo, lenguaje científico-técnico, lenguaje humanístico, lenguaje periodístico y publicitario, lenguaje literario)*. Comares, 1996.

Martínez Egido, José Joaquín. “Creation of a text corpus on the economic-financial discourse in Spanish: Preambles for the study of lexis modalization.” *Procedia - Social and Behavioral Sciences*, vol. 95, 2013, pp. 276–83.

Martínez, José Mateo. “El Lenguaje de Las Ciencias. I.” *Las Lenguas Profesionales y Académicas*, edited by Enrique Alcaraz Varó, José Mateo Martínez and Francisco Yus, 1st ed. Ariel, 2007, pp. 191–203, <https://www.researchgate.net/publication/258697746>.

Martínez, Julio César. “El Delito de Blanqueo de Capitales.” PhD Dissertation, Universidad Complutense de Madrid, 2017.

- Martínez-Domínguez, Rubén, et al. “Customized Neural Machine Translation Systems for the Swiss Legal Domain.” *Proceedings of the 14th Conference of the Association for Machine Translation in the Americas*, vol. 2, 2020, pp. 217–23.
- Martini, Alice. “The Construction of the Discourse on ‘Terrorism’.” *POLITIKON: The IAPSS Journal of Political Science*, vol. 30, 2016, pp. 92–105, doi: 10.22151/politikon.30.6.
- Mason, Zachary J. “CorMet: a computational, corpus-based conventional metaphor extraction system.” *Computational linguistics*, vol. 30, no. 1, 2004, pp. 23–44, doi: 10.1162/089120104773633376.
- McEnery, Tony, and Andrew Wilson. *Corpus Linguistics*. Edinburgh University Press, 1996.
- McEnery, Tony, and Gabrielatos Costas. “English Corpus Linguistics.” *The Handbook of English Linguistics*, edited by Bas Aarts, April McMahon, and Lars Hinrichs. Blackwell, 2006, pp. 33–71.
- “Mecanismo.” *Diccionario de la Lengua Española*, Real Academia Española, dle.rae.es/mecanismo?m=form. Accessed 23 Dec. 2022.
- Medina Reguera, Ana, and Alice Stender. “Siglas, acrónimos y abreviaturas en la prensa especializada económica en alemán y español.” *Onomázein*, no. 5, 2019, pp. 94–113.
- Meerts, Clarissa. “Security: Concepts and Definitions.” *Encyclopedia of Security and Emergency Management*, edited by Lauren R. Shapiro and Marie-Helen Maras, Springer, 2018, pp. 1–3.

Mellinger, Christopher D. “Translators and machine translation: knowledge and skills gaps in translator pedagogy.” *The Interpreter and Translator Trainer*, vol. 11, no .4, 2017, pp. 280–293.

MER FATF. “Mutual Evaluations.” *TAFT*, <https://www.fatf-gafi.org/en/publications/Mutualevaluations/More-about-mutual-evaluations.html>. Accessed 01 May 2023.

“Merger.” *Oxford English Dictionary*, www.oed.com/view/Entry/116763?rskey=i2Q5qv&result=1#eid. Accessed 2 May 2023.

“Metáfora.” *Diccionario de La Lengua Española*, Real Academia Española, dle.rae.es/met%C3%A1fora. Accessed 22 July 2021.

Meyer, Ingrid, et al. “Metaphorical Internet terms: A conceptual and structural analysis.” *Terminology. International Journal of Theoretical and Applied Issues in Specialized Communication*, vol. 4, no. 1, 1997, pp. 1–33.

Mikhailov, Mikhail. “Text corpora, professional translators and translator training.” *The Interpreter and Translator Trainer*, vol. 16, no. 2, 2022, pp. 224–46, doi: 10.1080/1750399X.2021.2001955.

Mirón López, Luis María. *La información económica: concepto, características y marco*. PhD Dissertation, Madrid, Universidad Complutense de Madrid, 1998.

“Mission.” The Wolfsberg Group, 2018, www.wolfsberg-principles.com/about/mission. Accessed 2 May 2023.

- Mohatlane, Edwin J. “The End Justifies the Means: A Functionalist Approach to Translation.” *Journal of Communication*, vol. 4, no. 2, 2013, pp. 79–88.
- Morín Rodríguez, Adela, and Ángela Castellano Alemán. “La lexicalización pro siglas: un fenómeno lingüístico en auge.” *El Guiniguada*, vol. 1, no. 3, 1992, pp. 89–95.
- Mosteyrín Sampalo, Ricardo. “El blanqueo de capitales y el delito de fraude fiscal”. PhD Dissertation, Madrid, Universidad Nacional de Educación a Distancia UNED, 2017.
- Murphy, Richard. “Fiscal Paradise or Tax on Development? What is the Role of the Tax Haven?” *Tax Research Limited and the Tax Justice Network*, 2005. Available at https://www.taxjustice.net/cms/upload/pdf/Fiscal_paradise.pdf. Accessed 26 June 2022.
- Nacey, Susan, et al. “MIPVU in multiple languages.” *Metaphor Identification in Multiple Languages: MIPVU Around the World*, vol. 22, edited by Susan Nacey, Aletta G. Dorst, Tina Krennmayr, and Gudrun Reijniere. John Benjamins, 2019, pp. 1–21, doi: 10.1075/cecr.22.01nac.
- Nakhasi, Smriti S. “Western Unionizing the Hawala? The Privatization of Hawalas and Lender Liability.” *Northwestern Journal of International Law & Business*, vol. 27, no. 2, 2007, pp. 475–96.
- Nicaise, Laurent. “On going beyond the literal: Translating metaphorical conceptualizations in financial discourse.” *Meta*, vol. 56, no. 2, 2011, pp. 407–23.
- Newburn, Tim, and Trevor Jones. “Symbolizing Crime Control: Reflections on Zero Tolerance.” *Theoretical Criminology*, vol. 11, no. 2, 2007, pp. 221–43, doi:10.1177/1362480607075849.

Newmark, Peter. "A textbook of translation." Prentice-Hall International, 1988.

O'Connor, Kathleen Therese. "Money and finance as solid, liquid, and gas in Spanish." *Metaphor and Symbol*, vol. 13, no. 2, 1998, pp. 141–57, doi: 10.1207/s15327868ms1302_4.

Octavia, Errisha Resty. *An Analysis of Metaphor Translation Strategy In "The Fault in Our Stars"*
By John Green. Salatiga, UKSW, 2015. Master's Thesis,
<https://repository.uksw.edu//handle/123456789/10592>.

"Offshore." *Oxford English Dictionary*,
www.oed.com/view/Entry/130727?rskey=q4bder&result=2#eid. Accessed 3 May 2023.

O'Hagan, Minako, ed. *The Routledge Handbook of Translation and Technology*. Routledge, 2019.

O'Keeffe, Anne, and Michael McCarthy, eds. *The Routledge Handbook of Corpus Linguistics*.
Routledge, 2010.

Olagbaju, Oladotun Opeoluwa, and Kehinde Olufemi Ogunyemi. "Subtle racism in English language:
A socio-semiotic analysis of black-prefixed English lexicons." *Englisia: Journal of Language,
Education, and Humanities*, vol. 8, no. 2, 2021, pp. 84–93.

"Organization and Structure - Egmont Group." Egmont Group, 11 Feb. 2022,
egmontgroup.org/about/organization-and-structure. Accessed 2 May 2023.

Ortiz de Zarate Aguirrebeña, Amaya. "La metáfora y la incertidumbre informacional." PhD
Dissertation, Universidad Complutense de Madrid, 2002.

- Orts Llopis, M. “El género textual en dos culturas jurídicas: análisis pretraductológico de las decisiones judiciales en inglés y en español” *Revista de llengua i dret. Journal of Language and Law*, no. 67, 2017, pp. 220–36, doi: 10.2436/rld.i67.2017.2882.
- “Pace.” *Collins English Dictionary*, www.collinsdictionary.com/dictionary/english/pace. Accessed 2 May 2023.
- “Pace.” *Oxford English Dictionary*. www.oed.com/view/Entry/135779?rskey=wiVspk. Accessed 2 May 2023.
- “Panorama.” *Collection: Panorama of Edinburgh From Calton Hill | University of Edinburgh Archive and Manuscript Collections*, archives.collections.ed.ac.uk/repositories/2/resources/511. Accessed 16 Apr. 2023.
- “Panorama.” *Diccionario De la Lengua Española*. Real Academia Española, dle.rae.es/panorama?m=form. Accessed 16 Apr. 2023.
- Patton, Michael Quinn. *How To Use Qualitative Methods Inin Evaluation*, vol. 4, Sage, 1987.
- Peebles, Gustav. “Filth and lucre: The dirty money complex as a taxation regime.” *Anthropological Quarterly*, vol. 85, no. 4, 2012, pp. 1229–56.
- Peramo, Juan Carlos. “Tax Havens, Offshore Wealth and Tax Evasion. An Estimate for Spain (1980-2013).” *Papeles de Europa*, vol. 29, no. 1, 2016, pp. 1–30, doi: 10.5209/rev_PADE.2016.v29.n1.54073.
- Pérez Berenguel, José Francisco. “Glosario de errores comunes en la traducción económica y financiera.” *I AIETI: Actas del I Congreso Internacional de la Asociación Ibérica de Estudios*

de Traducción e Interpretación. Granada 12-14 de Febrero de 2003, edited by Ricardo Muñoz Martín. AIETI, vol. 2, 2003, pp. 619–28.

Piccioni, Sara. “What can Metaphor Tell us about the Language of Translation?” *Procedia-Social and Behavioral Sciences*, vol. 95, 2013, pp. 354–62.

Pizarro Sánchez, Isabel. *Análisis y traducción del texto económico inglés-español*. Netbiblo, 2010.

Planelles Iváñez, Montserrat. “La metáfora como fuente de creación léxica en el lenguaje publicitario del turismo en francés y en español.” *Çédille, revista de estudios franceses*, no. 10, 2014, pp. 305–18.

Popescu, Teodora. “Metaphorical Conceptualisations of Money in English and Romanian Business Press.” *The Journal of Linguistic and Intercultural Education*, vol. 10, no. 1, 2017, pp. 153–174.

Popovych, Nataliya, et al. “Corpus-Based Concept Translation.” *ICT in Translator’s Work*, 2020, pp. 306–14.

Pragglejaz Group. “MIP: A method for identifying metaphorically-used words in discourse.” *Metaphor and Symbol*, vol. 22, no. 1, 2007, pp. 1–40.

Prandi, Michele. *Conceptual conflicts in metaphors and figurative language*. Routledge, 2017.

———. “Translating metaphors.” *Language Across Languages: New Perspectives on Translation*, edited by Emanuele Miola and Paolo Ramat. Cambridge Scholars Publishing, 2015, pp. 83–104.

- . “A plea for living metaphors: Conflictual metaphors and metaphorical swarms.” *Metaphor and Symbol*, vol. 27, no. 2, 2012, pp. 148–70.
- . “Typology of Metaphors: Implications for Translation.” *Mutatis Mutandis: Revista Latinoamericana de Traducción*, vol. 3, no. 2, 2010, pp. 304–32.
- Prandi, Michele, and Micaela Rossi, eds. *Researching Metaphors: Towards a Comprehensive Account*. Taylor & Francis, 2022.
- Prieto Ramos, Fernando, and Giorgina Cerutti. “Terminological hybridity in institutional legal translation: A corpus-driven analysis of key genres of EU and international law.” *Terminology* vol. 29, no. 1, 2023, pp. 45–77.
- Prieto Ramos, Fernando. “Translating legal terminology and phraseology: Between inter-systemic incongruity and multilingual harmonization.” *Perspectives*, vol. 29, no. 2, 2021, pp. 175–83, doi: 10.1080/0907676X.2021.1849940.
- . “The use of corpora in legal and institutional translation studies: Directions and applications.” *Translation Spaces*, vol. 8, no. 1, 2019, pp. 1–11, doi: 10.1075/ts.00010.pri.
- “Protagonista.” *Diccionario De La Lengua Española*, Real Academia Española, dle.rae.es/protagonista%20?m=form. Accessed 2 May 2023.
- Punter, David. *Metaphor: The new critical idiom*. Routledge, 2007.
- Rabadán, Rosa. “La inequivalencia: ¿imposibilidad o límites?”. *Equivalencia y traducción. Problemática de la equivalencia transléctica inglés-español*. León: Universidad de León, 1991, pp.109–72.

“Ramificación.” *Diccionario De La Lengua Española*. Real Academia Española,
dle.rae.es/ramificaci%C3%B3n%20?m=form. Accessed 2 May 2023.

“Ramification.” *Oxford English Dictionary*,
www.oed.com/view/Entry/157806?redirectedFrom=ramification#eid. Accessed 2 May 2023.

“Red Flag.” *Oxford English Dictionary*.
www.oed.com/view/Entry/160299?rskey=mLx5iA&result=1&isAdvanced=false#eid.
Accessed 3 May 2023.

Refinitiv “Revealing the true cost of financial crime -2018 survey report: focus on sub-SaharanAfrica”, 2018. Available at
https://www.refinitiv.com/content/dam/marketing/en_us/documents/reports/true-cost-of-financial-crime-sub-saharan-focus.pdf. Accessed 12 Jan. 2019.

Regan Jr, Milton C. “Citizens, Suspects, and Enemies: Examining Police Militarization.” *Texas National Security Review*, Winter 2020/2021.

Reheman, Abudurexiti, et al. “Prompting Neural Machine Translation with Translation Memories.” *11th International Joint Conference on Natural Language Processing, ACL/IJCNLP 2021, (Volume 2: Short Papers)*, Association for Computational Linguistics, *arXiv preprint arXiv:2301.05380*, 2023, pp. 368–74.

Reijnierse, W. Gudrun, et al. “How viruses and beasts affect our opinions (or not): The role of extendedness in metaphorical framing.” *Metaphor and the Social World*, vol. 5, no.2, 2015, pp. 245–63, doi: 10.1075/msw.5.2.04rei.

- Reinke, Uwe. "State of the art in translation memory technology." *Language Technologies for a Multilingual Europe*, edited by George Rehm, Daniel Stein, Felix Sasaki, and Andreas Witt, Language Science Press, 2018, pp. 55–84.
- Reppen, Randi. "Building a corpus: What are the key considerations?" *The Routledge Handbook of Corpus Linguistics*, edited by Anne O’Keeffe, and Michael McCarthy, 2010, pp. 31–7.
- Ricœur, Paul. *The Rule of Metaphor: the creation of meaning in language*. Psychology Press, 2003.
- Riedemann, Karin and M. Isabel Diéguez. "La traducción de metáforas: ¿un acto de rebeldía permanente?" *Onomázein*, no. 4, 1999, pp. 345–69.
- Rigaud Peixoto, Rafaela AJR. "The Interface between Specialized Translation and Institutional Translation: A Selection of Candidate Terms Validated by Aeronautical Meteorology Corpora." *Applied Corpus Linguistics*, vol. 3, no. 2, doi: 10.1016/j.acorp.2023.100051.
- "Ritmo." *Diccionario De La Lengua Española*, Real Academia Española, dle.rae.es/ritmo?m=form. Accessed 2 May 2023.
- Rizzato, Ilaria. "Conceptual Conflicts in Metaphors and Pragmatic Strategies for Their Translation." *Frontiers in Psychology*, vol. 12, 2021, pp. 1–8, doi: 10.3389/fpsyg.2021.662276.
- Rodríguez Márquez, Maria de Montserrat. "Patterns of translation of metaphor in annual reports in American English and Mexican Spanish." PhD Dissertation, University of Surrey, 2010.
- Rodríguez-Inés, Patricia. "Uso de corpus electrónicos en la formación de traductores (inglés-español-inglés)." PhD Dissertation, Universitat Autònoma de Barcelona, 2015.

- Rojo López, Ana María, María Ángeles Orts Llopis. “Metaphorical Pattern Analysis in Financial Texts: Framing the Crisis in Positive or Negative Metaphorical Terms.” *Journal of Pragmatics*, vol. 42, no. 12, 2010, pp. 3300–13, doi: 10.1016/j.pragma.2010.06.001.
- Römer, Ute. “Corpus research and practice: What help do teachers need and what can we offer?” *Corpora and Language Teaching*, edited by Karin Aijmer. John Benjamins, 2009, pp. 83–98.
- Romero, Esther, and Belén Soria. “Metáforas y convención.” *Revista de Filosofía*, vol. 7, no. 12, 1994, pp. 383–402.
- Rossi, Micaela. “Creating metaphors in specialised languages: Choice criteria for the success of metaphorical terms.” *Researching Metaphors: Towards a Comprehensive Account*, 1st ed., edited by M Prandi and Michaela Rossi, Routledge, 2022, pp. 132–47, doi: 10.4324/9781003184041.
- . “Some observations about metaphors in specialised languages.” *Metaphor in Communication, Science and Education*, edited by Francesca Ervas, Elisabetta Gola, and Maria G. Rossi. De Gruyter Mouton, 2017, pp. 151–68.
- . *In Rure Alieno. Métaphores et Termes Nomades dans les Langues de Spécialité*. Peter Lang, 2015.
- . “Métaphores terminologiques : fonctions et statut dans les langues de spécialité.” *SHS Web of Conferences*, vol. 8. *EDP Sciences*, 2014, pp. 713–24.

- . “Terminologies et comparaison interculturelle : évolutions de quelques métaphores conceptuelles dans le domaine du droit de la famille.” *Publifarum*, no. 18, 2013, n. p.
- Ruiz de Gauna, Clara Ruiz de. “Delaware, el estado que tiene más empresas que ciudadanos.” *Expansión*, vol. 16, 2022, www.expansion.com/empresas/2019/03/09/5c82d1b922601d92138b45c7.html. Accessed 10 Feb. 2023.
- Ruiz Vadillo, Enrique. “El blanqueo de capitales en el ordenamiento jurídico español. Perspectiva actual y futura.” *Boletín de información del Ministerio de Justicia* 1641, 1992, pp. 4277–91.
- Russo, Adriana. “Vulnerabilidad y contagio en el lenguaje de la economía.” *Actas del III Congreso El español, lengua de traducción*, vol. 12, 2008, pp. 117–34.
- Sager, Juan C. “Text types and translation.” *Text Typology and Translation*, edited by Anna Trosborg, Benjamins Translation Library 26. John Benjamins, 1997, pp. 25–42.
- Samaniego Fernández, Eva. *Diseño y Aplicación de Un Marco de Análisis de La Traducción de La Metáfora*. PhD Dissertation, Universidad de Alicante, 2000.
- . *La traducción de la metáfora*. Univ. de Valladolid, Secretariado de Publicaciones e Intercambio Científico, 1996.
- Sánchez-Gijón, Pilar. “Developing documentation skills to build do-it-yourself corpora in the specialised translation course.” *Corpus use and translating. Corpus use for learning to translate and learning corpus use to translate*, edited by Allison Beeby, Patricia Rodríguez-Inés and Pilar Sánchez-Gijón. John Benjamins, 2009, pp. 109–27.

Sánchez Ramos, María del Mar and Francisco J. Vigier Moreno. “Using Corpus Management Tools in Public Service Translator Training: An Example of its Application in the Translation of Judgments.” *New Perspectives on Teaching and Working with Languages in the Digital Era*, edited by Antonio Pareja-Lora, Cristina Calle-Martínez and Pilar Rodríguez-Arancón, Research-publishing.net, 2016, pp. 375.

Sánchez Romero, Cecilia, and Franco Montealegre Callejas. “Lavado de dinero y activos provenientes de actividades ilícitas aspectos doctrinarios y normativos.” *Revista de Derecho*, vol. 4, 2003, pp. 145–86.

Sansó-Rubert, Daniel. “La internacionalización de la delincuencia organizada: análisis del fenómeno.” *UNISCI Discussion Papers*, vol. 9, 2005, pp. 43–61.

Sanz Gómez, Rafael. “Aclarando conceptos: paraísos fiscales”, 2010, <https://indvbio.wordpress.com/2010/01/13/paraisosfiscales/>.

Sardinha, Tony Berber. “Collocation lists as instruments for metaphor detection in corpora.” *DELTA: Documentação de Estudos em Lingüística Teórica e Aplicada*, vol. 22, no. 2, 2006, pp. 249–74, doi: 10.1590/S0102-44502006000200002.

Schäffner, Christina, and Mark Shuttleworth. “Metaphor in translation: Possibilities for process research.” *Target. International Journal of Translation Studies*, vol. 25, no. 1, 2013, pp. 93–106, doi:10.1075/target.25.1.08shu.

Schäffner, Christina. “Umbrellas and firewalls: Metaphors in debating the financial crisis from the perspective of translation studies.” *Tradurre Figure/Translating Figurative Language*, edited

by Donna Rose Miller and Enrico Monti, Centro di Studi Linguistico-Culturali (CeSLiC), Bologna, 2014, pp. 69–84.

Seabra Lopes, Daniel. “Financial regulation.” *A Handbook of Economic Anthropology*, edited by James G. Carrier, 2022, pp. 473–86.

Segura Soto, Gustavo Adolfo. “Prepara, apunta, dispara... fusila al portero. La metáfora bélica en el fútbol.” *Káñina*, vol. 33, no. 4, 2009, pp. 67–74.

Semino, Elena. “‘Not soldiers but fire-fighters’ –Metaphors and Covid-19.” *Health communication in an Age of COVID-19*, vol. 36, no. 1, 2021, pp. 50–8, doi: 10.1080/10410236.2020.1844989.

“Sepblac.” *Sepblac*. 11 October 2022, <https://www.sepblac.es/en/abt-sepblac/>. Accessed 1 April 2023.

Serón-Ordóñez, Inmaculada. “Financial translation, a neglected field: The case of the Key Investor Information document.” *Translation and translanguaging in multilingual contexts*, vol. 2, no.1, 2016, pp. 5–25.

Shachtman, Noah. “Pentagon’s Black Budget Tops \$56 Billion.” *WIRED*, 1 Feb. 2010.

“Solid.” *Oxford English Dictionary*, www.oed.com/view/Entry/185128?rskey=Kp7knK&result=7#eid. Accessed 3 May 2023.

“Sovereign.”, *Oxford English Dictionary*, www.oed.com/view/Entry/185332?rskey=PaTnv7&result=1#eid. Accessed 3 May 2023.

“Strategy.” *Oxford English Dictionary*,

www.oed.com/view/Entry/191319?rskey=NnP9vG&result=1#eid. Accessed 3 May 2023.

“Strawman.” *Oxford English Dictionary*,

www.oed.com/view/Entry/98053931?redirectedFrom=strawman#eid. Accessed 3 May 2023.

“Sucursal.” *Diccionario de la Lengua Española*, Real Academia Española,

dle.rae.es/sucursal?m=form. Accessed 3 May 2023.

“Summit.” *Oxford English Dictionary*,

www.oed.com/view/Entry/193987?rskey=apcYQP&result=1#eid. Accessed 3 May 2023.

“Subsidiary.” *Oxford English Dictionary*,

www.oed.com/view/Entry/193008?redirectedFrom=subsidiary#eid. Accessed 3 May 2023.

Szmrecsanyi, Benedikt, and Laura Rosseel. *English Corpus Linguistics: The Current State-of-the-Art, and a Critical Appraisal*. Katholieke Universiteit Leuven, 2019.

“Target.” *Oxford English Dictionary*,

www.oed.com/view/Entry/197836?rskey=pNUOa7&result=1&isAdvanced=false#eid.

Accessed 27 Dec. 2022.

Tejada Caller, Paloma, and Antonio Guzmán Guerra. “From barter to coin: Shifting cognitive frames in Classical Greek economy.” *Metaphor and Mills: Figurative Language in Business and Economics*, edited by Honesto Herrera-Soler and Michael White. De Gruyter Mouton, 2012, pp. 27–48, doi: 10.1515/9783110274585.27.

Temmerman, Rita. *Towards New Ways of Terminology Description: The Sociocognitive Approach*. John Benjamins, 2000.

———. “Questioning the univocity ideal. The difference between socio-cognitive Terminology and traditional Terminology.” *HERMES-Journal of Language and Communication in Business*, vol. 18, 1997, pp. 51–90.

Temmerman, Rita, and Marc Van Campenhoudt, eds. *Dynamics and terminology: An interdisciplinary perspective on monolingual and multilingual culture-bound communication.*, vol.16. John Benjamins, 2014.

“Testaferro.” *Diccionario De La Lengua Española*, Real Academia Española, dle.rae.es/testaferro?m=form. Accessed 3 May 2023.

Thibodeau, Paul et al. “The Metaphor Police: A Case Study of the Role of Metaphor in Explanation.” *Psychonomic Bulletin & Review*, vol. 24, no. 5, 2017, pp. 1375–86.

Thibodeau, Paul H., and Lera. Boroditsky. “Metaphors We Think With: The Role of Metaphor in Reasoning.” *PLoS ONE*, vol. 6, no. 2, 2011, p. e16782, doi: 10.1371/journal.pone.0016782.

“Threshold.” *Oxford English Dictionary*, www.oed.com/view/Entry/201234?rskey=9Sm1jm&result=1#eid. Accessed 2 May 2023.

“To Follow Suit.” *Oxford English Dictionary*, www.oed.com/view/Entry/193718?redirectedFrom=follow+suit#eid1388957099. Accessed 3 May 2023.

Tomoni, Bianca. "Using Money Metaphors in Banking Discourse: Three Possible Scenarios." *Metaphor and the Social World*, vol. 2, no. 2, 2012, pp. 201–32, doi: 10.1075/msw.2.2.04tom.

Tondini, Bruno. "Blanqueo de capitales y lavado de dinero: su concepto, historia y aspectos operativos." *Centro Argentino de Estudios Internacionales*, vol. 38, 2006, https://www.researchgate.net/publication/5004935_Blanqueo_de_capitales_y_lavado_de_dinero_su_concepto_historia_y_aspectos_operativos.

Toury, Gideon. *Los estudios descriptivos de traducción y más allá: Metodología de la investigación en Estudios de Traducción*, 1st ed. Cátedra, 2004.

———. "The nature and role of norms in translation." *Descriptive translation studies and beyond*, by Gideon Toury, vol. 4. John Benjamins, 1995, pp. 53–69.

Tricás Preckler, Mercedes Tricás. *Manual de traducción: francés-castellano*. Gedisa, 1995.

Tymoczko, Maria. "Ideology and the Position of the Translator in What Sense is a Translator 'In Between'?" *Apropos of Ideology: Translation studies on ideology-ideologies in translation studies*, edited by Maria Calzada-Pérez, Routledge, 2014, pp. 182–200.

———. *Enlarging Translation, Empowering Translators*. Routledge, 2014.

Udina, Natalia. "Pragmatic and Cognitive Aspects of Abbreviations and Acronyms in Law Discourse." *Proceedings of INTCESS 2021*, 8th, pp. 846–50. Available at https://www.ocerints.org/intcess21_e-publication/papers/127.pdf.

“Umbral.” *Diccionario De La Lengua Española*, Real Academia Española,
dle.rae.es/umbral?m=form. Accessed 2 May 2023.

Unger, Brigitte, and Daan Van der Linde. *Research Handbook on Money Laundering*. Edward Elgar
2013.

Urbaneja Cillán, Jorge. “Acciones contra el blanqueo de capitales en el marco latinoamericano y
caribeño.” *Anuario de la Facultad de Derecho*, vol. 29, 2011, pp. 197–236.

“Valorar.” *Diccionario De La Lengua Española*, Real Academia Española,
dle.rae.es/valorar?m=form. Accessed 2 May 2023.

Van den Broeck, Raymond. “The Limits of Translatability Exemplified by Metaphor Translation.”
Poetics Today, vol. 2, no. 4, 1981, pp. 73–87.

Vandenhoeck, Tim. “The Past perfect in corpora and EFL/ESL materials.” *Research in Language
(RiL)*, vol. 16, no.1, 2018, pp. 113–33, doi: 10.2478/rela-2018-0005.

Vargas-Sierra, Chelo, and Antonio Moreno-Sandoval. “War and health metaphors in financial
discourse: The case of ‘Letter to Shareholders’ in annual reports.” *Metaphor in Economics and
Specialised Discourse*, edited by José Mateo and Francisco Yus. Peter Lang, 2021, pp. 41–71.

Vázquez-Ayora, Gerardo. *Introducción a la traductología: curso básico de traducción*. Georgetown
University Press, 1977.

Velasco Sacristán, Marisol. “A translation approach to metaphor teaching in the LSP classroom:
sample exercises from a Business English syllabus.” *Ibérica, Revista de la Asociación Europea
de Lenguas para Fines Específicos*, vol. 17, 2009, pp. 83–98.

- . “Metaphor and ESP: metaphor as a useful device for teaching L2 business English learners.” *Ibérica. Revista de la Asociación Europea de Lenguas para Fines Específicos*, vol. 10, 2004, pp. 115–31.
- Vegara Fabregat, Laura. “Traducción y metáfora: Estudio de metáforas cognitivas del Tribunal Supremo de los Estados Unidos”. *Quaderns: revista de traducció*, 2015, no. 22, pp. 325–46, <https://raco.cat/index.php/QuadernsTraduccio/article/view/294276>.
- “Vigilancia.” *Diccionario de la Lengua Española*, Real Academia Española, dle.rae.es/vigilancia?m=form. Accessed 3 May 2023.
- Vinay, Jean-Paul, and Jean Darbelnet. *Comparative Stylistics of French and English: A Methodology for Translation*, vol. 11. Amsterdam, John Benjamins, 1995.
- Walters-York, L. Melissa. “Metaphor in accounting discourse.” *Accounting, Auditing & Accountability Journal*, vol. 9, no. 5, 1996, pp. 45–70, doi: 10.1108/09513579610367242.
- Wheatley, Joseph. “Ancient Banking, Modern Crimes: How Hawala Secretly Transfers the Finances of Criminals and Thwarts Existing Laws.” *University of Pennsylvania Journal of International Economic Law*, vol. 26, no. 2, 2005, pp. 347–78.
- Xu, Zhanghong H. *Metaphor Understanding: A Pragma-Cognitive Approach*. Science Press, 2007.
- Zanettin, Federico. “Corpora in translation practice.” *Language resources for translation work and Research*, 2002, pp. 10–14.
- . “Corpora in translation.” *Translation: A multidisciplinary approach*, edited by Juliane House, Springer, 2014, pp. 178–99.

Zapata Becerra, Argenis A. *Handbook of general and applied linguistics*. Trabajo de Ascenso sin publicar. Escuela de Idiomas Modernos, Universidad de Los Andes, 2000.

Zhang, Xin. “Development and Critiques of Conceptual Metaphor Theory.” *Theory and Practice in Language Studies*, vol. 11, no. 11, 2021, pp. 1487–91, doi: 10.17507/tpls.1111.18.

Zhou, Jiangrong. “Estudio cognitivo de la metáfora y metonimia del eufemismo lingüístico de ‘morir’ en chino y español: análisis contrastivo y su aplicación en ELE.” PhD Dissertation, Universidad Complutense de Madrid, 2018.

APPENDIX

Appendix 1. Glossary of acronyms and terms from FinCorpAlin

Glossary of acronyms and terms from FinCorpAlin	
TF terror finance	FT financiamiento terrorista
CFT combating the financing of terrorism	Contra financiamiento de terrorismo
DNFBP in English is Designated Non-Financial Businesses and Professions	APNFD= Actividades y Profesiones No Financieras Designadas
FIU in English for Financial Intelligence Unit	UIF; unidad de inteligencia financiera
AML or anti-money laundering	ALD; or antilavado de dinero
NPO or nonprofit organizations	OSFL is Organización sin fines de lucro
BSA= bank secrecy act	BSA in Spanish preceded by the explicitory phrase; Ley de supervisión bancaria/ley de secreto bancario/ley de servicios bancarios
NRA National risk assessment	ENR; evaluación nacional de riesgos
(FIAU) Financial Information and Analysis Unit	UIAF; Unidad de Información y Análisis Financiero
CDD or customer due diligence	DDC; debida diligencia del cliente
(UIAF) Financial Information and Analysis Unit	(UIAF) Unidad de Información y Análisis Financiero
(TCI) Turks and Caicos Islands	(TCI) las Islas Turcas y Caicos
(FI) Financial Institutions	(IF) Instituciones financieras
(FATF) Financial Action Task Force	(GAFI) Groupe d'action financière
(UCREF) Central Financial Intelligence Unit (uses its Haitian French Acronym)	(UCREF) La Unidad Central de Información Financiera
(MER) Mutual Evaluation Report	(IEM) Informe de Evaluación Mutua

(BMA) Bermuda Monetary Authority	(BMA) la Autoridad Monetaria de Bermuda
(TCSP) Trust or Company Service Providers	(TCSP) los Proveedores de Servicios Societarios y Fiduciarios (retains Eng. acronym: Trust or Company Service Providers)
(ML) Money laundering	(LD) Lavado de dinero
(FSC) Financial Services Commission	(FSC) la Comisión de Servicios Financieros (retains Eng. acronym)
(UNSCRs) United Nations Security Council Resolutions	(RCSNU) las Resoluciones pertinentes del Consejo de Seguridad de las Naciones Unidas
(FCU) Financial Crimes Unit	(FCU) Comisión de Servicios Financieros (Eng. Acronym)
(FRA) Financial Reporting Authority	(FRA) Autoridad de reportes financieros (Eng. Financial Reporting Authority)
(OFAC) Treasury's Office of Foreign Assets Control	(OFAC) Oficina para el Control de Activos Extranjeros (Eng. Office of Foreign Assets Control)
Suspicious transactions reports (STRs)	(ROS) reportes de operaciones sospechosas
(SENACLAFT) National Anti-Money Laundering and Counter-Terrorism Financing Secretariat	(SENACLAFT) Secretario Nacional de la Secretaría Nacional para la Lucha contra el Lavado de Activos y el Financiamiento del Terrorismo
Public Prosecutor's Office (MP)	(FGN) Fiscalía General de la Nación
Office of the Director of Public Prosecutions (ODPP)	(ODPP) Ministerio Publico Eng. Office of the Director of Public Prosecutions) or DMP Director del Ministerio Público (DMP),
Money Service Business (MSB)	(MSB) Negocios de servicios monetarios MSB (money service business)
National Risk Assessment (NRA)	(NRA) evaluación nacional de riesgos
(AMLR) Anti-Money Laundering and Prevention of Terrorist Financing Regulations	(AMLR) Reglamentos antilavado de dinero
(CSP) Corporate service provider	(CSP) proveedores de servicios corporativos (Eng. Company service providers)
(TFS) targeted financial sanctions	Sanciones financieras dirigidas (TFS)

(FinCEN) Financial Crimes Enforcement Network	(FinCEN) Red de Lucha contra Delitos Financieros (Eng. Financial Crimes Enforcement Network)
(POCL) Proceeds of Crime Law	(POCL) Ley contra los activos del crimen (Eng. Proceeds of Crime law)
Law Sanctioning Money Laundering and Terrorist Financing (LSMLTF)	(LSMLTF) Law Sanctioning Money Laundering and Terrorist Financing (LSMLTF);
(SFC) Financial Superintendent of Colombia	(SFC) Superintendencia Financiera de Colombia
(MLA) Mutual legal assistance	(MLA) la asistencia judicial mutua
(BO) Beneficial Owner	(BF) Beneficiario final
(PEP) Politically Exposed Persons	(PEP) Personas Expuestas Políticamente
(SAR) Suspicious Activity Report	Reporte de Actividad Sospechosa (RAS)
(PPO) Public Prosecutors Office	la Fiscalía PPO
(PTF) Prevention of Terrorist Financing	(PFT) Prevención de financiamiento del terrorismo
(RCIPS) Royal Cayman Islands Police Service	La Policía Real de las Islas Caimán RCIPS
(BNI) bearer's negotiable instruments	instrumentos negociables al portador (INP)
(TFS) targeted financial sanctions	sanciones financieras dirigidas (SFD)
(POCR) Proceeds of Crime Regulations	Reglamento del Producto del Delito (POCR)
(PIOCA) Proceeds and Instrumentalities of Crime Act	(PIOCA) Ley del Producto e Instrumentos del Delito
(ACH) automated clearing house	Transacciones de compensación automatizada (ACH)
(GAFILAT) Financial Action Task Force of Latin America	(GAFILAT) Grupo de Acción Financiera de Latinoamérica
(BSA/AML) Bank Secrecy Act/Ant-money laundering manual (also encountered Bank Services Act, Banking Supervision Act)	(BSA/AML) Manual de Inspección BSA/AML del FFIEC (Ley de Supervisión Bancaria (BSA), Ley de Servicios Bancarios
FFIEC Federal Financial Institutions Examination Council	Consejo Federal de Inspección de Instituciones Financieras (FFIEC)

(ROC) Registrar of Companies	Registro de Empresas (ROC)
(FRA) Financial Reporting Authority	Autoridad de reportes financieros (FRA por sus siglas en inglés)
(ECDD) Enhanced Customer Due Diligence	debida diligencia reforzada (DDR)
(SoRE)Superintendente de Bienes Raíces	Superintendent of Real Estate (SoRE)
(DiHVG) Dealers in high valued goods	Distribuidores de bienes de alto valor (DiHVG)
(MLRO) Money laundering reporting officers	Oficiales de Reportes del Lavado de Dinero (MLRO)
(PSP) Payment service provider	Proveedores de servicio de pago (PSP)
(ACC) Anti-Corruption Commission	Comisión anticorrupción (ACC por sus siglas en inglés)
(CIMA) Cayman Islands Monetary Authority	Autoridad monetaria de las Islas Caimán (CIMA)
(MOU) Memoranda of Understanding	memorandos de entendimiento (MOUs)
National Anti-Money Laundering Committee (NAMLC)	Comité Nacional Antilavado de Dinero (NAMLC)
The Receiving Depository Financial Institution (RDFI)	La Institución Financiera de Depósitos Recibidos (RDFI)
(IAT) International ACH Transfers	transacciones ACH internacionales (IAT)
Originating Depository Financial Institution (ODFI)	Institución Financiera de Depósitos Remitente (ODFI)
National Tax and Customs Office (DIAN)	DIAN Dirección de Impuestos y Aduanas Nacional
Ministry of Information and Communication Technologies (MINTIC)	Ministerio de Tecnologías de la Información y las Comunicaciones (MINTIC)
Money value transfer services (MVTs)	los servicios de transferencia de dinero o de valores (MVTs)
Board of Transparency and Public Ethics (JUTEP)	Junta de Transparencia y Ética Pública (JUTEP)
National Superintendence of Public Registries (SUNARP)	Superintendencia Nacional de los Registros Públicos (SUNARP)

Bureau of Finance and Economic Affairs (BAFE) English translation of French Bureau de affaires financières et économiques	Oficina de lucha contra la delincuencia económica y financiera (BAFE)
Foreign terrorist fighters (FTFs)	Combatientes terroristas foráneos (FTF)
Bermuda= British territory administered as dependent nation	Bermuda: territorio dependiente en el extranjero más antiguo del Reino Unido
Egmont= Egmont Group, a consortium of financial intelligence agencies	Grupo Egmont: un órgano de 155 UIF que ofrecen una plataforma para el intercambio seguro de pericia e inteligencia financiera a fin de combatir el LA/FT
On-site	In situ- Spanish uses the Latin term for on-site “in situ”
NAP National Action Plan	
Modified Customer Interface (MCI)	
FIS (Financial Institution Superintendency).	SUGEF Superintendencia General de Entidades Financieras
MJPS (Ministry of Justice and Public Security)	Ministerio de Justicia y Seguridad Pública (MJPS)
Discretionary trust (ordinary trust vehicle)	fideicomiso discrecional es el fideicomiso ordinario
Arm’s length transaction: if two unrelated companies trade with each other across international boundaries, there is generally a negotiation on price, resulting in a fair or market- driven charge that is acceptable for tax purposes (Cassara “Money Laundering” 339)	Transacción entre partes independientes: Arm’s Length Principle, Principio que regula los precios de transferencia y que busca igualar la tributación que enfrentan empresas relacionadas y la de empresas independientes (Bugueño Munizaga and Astudillo Acevedo 2019).
Alternative remittance activity	Actividad de transmisión alternativa
Asia Pacific Group	Grupo de Asia y el Pacífico
Trade-based money laundering (TBML)	Lavado de dinero a través de transacciones (TBML)
(BMPE) Black market peso Exchange: trade-based money laundering scheme in Columbia (Cassara “Money Laundering” 340).	Cambio de “pesos” en el mercado negro (BMPE)
Bulk cash smuggling	contrabando de efectivo en grandes cantidades

Capital Flight	flujo, fuga, liquidación de capitales
Currency or Monetary Instruments (CMIR)	Moneda o instrumentos monetarios (CMIR, por sus siglas en inglés)
Cryptocurrencies	Criptomonedas
Currency Transactions Reports (CTRs)	informes de transacciones monetarias (CTR)
Delaware corporation: Companies and wealthy individuals can use Delaware to avoid paying some taxes in other states. So there's a thing called the Delaware Loophole, which essentially enables companies to avoid paying state corporate income tax where they earn the revenue	Una sociedad constituida en Delaware: Delaware es punto de referencia para las empresas LLC (un híbrido entre sociedad limitada, colectiva y empresa conjunta), que solo pagan impuestos en Estados Unidos si tienen negocio o socios en el país. Por otra parte, las empresas radicadas en Delaware pueden operar de manera anónima a través del agente encargado de crear la compañía (Gauna).
FATF 40	las 40 Recomendaciones del GAFI
FSRB	las organizaciones de base regional estilo GAFI
hawala: a simple method and centuries-old broker system based on trust. Found throughout South Asia, Middle East Africa, and the Americas (Cassara "Money Laundering" 345).	Hawala: un método de transmisión de valores monetarios que es utilizado en algunas partes del mundo para realizar remesas, la mayoría de las veces realizadas por personas que desean enviar dinero de forma legítima a familiares que se encuentran en su país de origen
ICE: Immigration Customs Enforcement	Servicio de Inmigración y Control de Aduanas (ICE)
International Narcotics Control Strategy Report (INCSR)	INCSR: Estrategia Internacional para el Control de Narcóticos
informal value transfer system (IVTS)	sistema informal de transferencia de valor (IVTS, por sus siglas en inglés)
Integration: the last stage of the money laundering process.	Integración: La etapa final del delito de lavado de activos es sacar el dinero para que pueda usarse sin llamar la atención de las autoridades policiales o tributarias.
Internal Revenue Service (IRS)	Servicio de Impuestos Internos (IRS)
Know Your Customer (KYC)	KYC Know Your Customer (Conozca a su cliente)

Layering: involves moving funds around the financial system, often in a complex series of transactions to create confusion and complicate the paper trail.	Transformación: La segunda fase del proceso de lavado de dinero es la transformación, que consiste en trasladar fondos por todo el sistema financiero, con frecuencia a través de una compleja serie de transacciones para crear confusión y complicar el rastreo documental
Money Service Business (MSB): any individual or business that engages in accepting and transmitting funds by any means.	Negocio de Servicios Monetarios (MSB)
Non-Government Organizations (NGOs)	Organizaciones no gubernamentales (ONG)
Office of Foreign Assets Control (OFAC)	Oficina para el Control de Activos Extranjeros de EE. UU. (OFAC)
Offshore: a company or firm incorporated outside the country where it has its main offices and operations or where its principal investors reside (Cassara “Money Laundering” 349).	Extraterritorial: clientes no residentes o extraterritoriales
Over-invoicing: when money launderers and those involved with value transfer, trade fraude, and illicit finance misrepresent goods or services on an invoice (Cassara “Money Laundering” 349).	Fijación irregular de precios
parallel banking (also known as Informal Value Transfer Systems): refers to any system, mechanism or network that transfers money for the purposes of making an equivalent amount payable to a third party in another geographic area (Cassara “Money Laundering” 348).	banca paralela: Una organización de banca paralela existe cuando por lo menos un banco estadounidense y una institución financiera extranjera son controlados directa o indirectamente por una misma persona o grupo de personas con estrecha relación comercial entre sí o que actúan en forma conjunta, sin estar sujetos a la supervisión
Placement: The first and most vulnerable stage of laundering money	Colocación: La fase inicial y más vulnerable del lavado de dinero
Shadow financial scheme: when banks and non-bank financial institutions lend money outside of lending norms and safeguards (Cassara “Money Laundering” 350).	Sistema financiero oscuro/opaco
Shell company/bank	Compañía o banco de Fachada/pantalla/fantasma
Front company	Empresas ficticias

Smurfing/structuring: a money laundering technique that involves splitting a large bank deposit into smaller deposits to evade government reporting requirements	Smurfing: la práctica que consiste en utilizar distintos particulares o cuentas para llevar a cabo operaciones con miras a evitar levantar sospechas o a eludir el cumplimiento de requisitos en materia de informes sobre operaciones en divisas
Cuckoo smurfing: originated in Europe because of similarities between this typology and the activities of the cuckoo bird. Cuckoo birds lay their eggs in the nests of other species of birds which then unwittingly take care of the eggs believing them to be their own. In a similar manner, the perpetrators of this money laundering typology seek to transfer wealth through the bank accounts of innocent third parties	Cuckoo smurfing: término que nació en Europa con motivo de las similitudes entre esta tipología de acto y las actividades del cuco. Los cucos ponen sus huevos en los nidos de otras especies de aves que sin ser conscientes de ello cuidan a los huevos pensando que son suyos. De forma similar, las personas que cometen este tipo de blanqueo de dinero intentan transferir el patrimonio a través de cuentas bancarias de terceros inocentes.
Task Force	Grupo de Trabajo
United Nations Office on Drugs and Crime (UNODC)	Oficina de las Naciones Unidas contra la Droga y el Delito (ONUDD)
Underground banking	Operaciones bancarias clandestinas
Value Added Tax	Impuesto sobre el Valor Añadido
World Customs Organization (WCO)	Organización Mundial de Aduanas (OMA)



CQL money (nouns modified by "money") • 354
2,109.04 per million tokens • 0.21%



Details

Left context KWIC Right context

1	ternational Organizations(x1)E-1(ph2) </s><s> {ph1}Appendix F: </s><s> Money Laundering and Terrorist Financing "Red Flags" (2010). </s><s> F-1 </s>
2	also provides guidance on identifying and controlling risks associated with money laundering and terrorist financing. </s><s> The manual contains an overv
3	ulatory violations, if warranted, and provide evidence useful in prosecuting money laundering and other financial crimes. </s><s> The Money Laundering Co
4	n Act (FCUA), which sections apply equally to banks of all charters, 4 The Money Laundering Control Act of 1986 precludes circumvention of the BSA requir
5	e role of the U.S. Treasury. </s><s> Two years later, Congress passed the Money Laundering Suppression Act of 1994 (MLSA), which further addressed the
6	194 (MLSA), which further addressed the U.S. Treasury's role in combating money laundering . </s><s> In April 1996, a Suspicious Activity Report (SAR) wa
7	ected criminal violation of federal law or a suspicious transaction related to money laundering activity or a violation of the BSA. </s><s> In response to the S
8	ir further clarification. </s><s> Increased the civil and criminal penalties for money laundering . </s><s> 5 The USA PATRIOT Act expanded the AML progra
9	re are various multilateral government bodies that support the fight against money laundering and terrorist financing. </s><s> Refer to Appendix E ("Internat
10	ctions, and credit unions, but also nonbank financial institutions, such as money services businesses , casinos, brokers/dealers in securities, futures comm
11	al institutions to establish an AML compliance program that guards against money laundering and terrorist financing and ensures compliance with the BSA a
12	ram." </s><s> Banks should take reasonable and prudent steps to combat money laundering and terrorist financing and to minimize their vulnerability to the
13	tions have damaged their reputations and have been required to pay civil money penalties for failing to implement adequate controls within their organizati
14	the {bx1}Interagency Statement on Enforcement of Bank Secrecy Act/Anti- Money Laundering Requirements (ex2){Interagency Enforcement Statement) is k
15	ages 147 to 156 and 157 to 159, respectively, for guidance. </s><s> {bx1} Money Laundering and Terrorist Financing(ex2) </s><s> The BSA is intended to
16	ons that make up that system from the abuses of financial crime, including money laundering , terrorist financing, and other illicit financial transactions. </s>
17	ndering, terrorist financing, and other illicit financial transactions. </s><s> Money laundering and terrorist financing are financial crimes with potentially deve
	have financial means and access to the financial system. </s><s> In both money laundering and terrorist financing, criminals can exploit loopholes and oth

18	
19	doc#0 ntain effective AML programs that address the ever-changing strategies of money launderers and terrorists who attempt to gain access to the U.S. financial
20	doc#0 ough, banks and other financial institutions, </s><s> Refer to Appendix F (" Money Laundering and Terrorist Financing 'Red Flags' ") for examples of suspicious
21	doc#0 ancing 'Red Flags'") for examples of suspicious activities that may indicate money laundering or terrorist financing. </s><s> Money Laundering </s><s> Mon
22	doc#0 oney laundering or terrorist financing. </s><s> Money Laundering </s><s> Money laundering is the criminal practice of processing ill-gotten gains, or "dirty"
23	doc#0 "cleaned" so that they appear to be proceeds from legal activities. </s><s> Money laundering generally does not involve currency at every stage of the launc
24	doc#0 olve currency at every stage of the laundering process. </s><s> Although money laundering is a diverse and often complex process, it basically involves th
25	doc#0 i, or purchasing a series of monetary instruments (e.g., cashier's checks or money orders) that are then collected and deposited into accounts at another loc
26	doc#0 e. </s><s> {bx1}Layering. </s><s> {ex2} </s><s> The second stage of the money laundering process is layering, which involves moving funds around the fir
27	doc#0 </s><s> {bx1}Integration. </s><s> {ex2} </s><s> The ultimate goal of the money laundering process is integration. </s><s> Once the funds are in the finan
28	doc#0 eeking, which is generally the motivation for most crimes associated with money laundering . </s><s> Terrorism is intended to intimidate a population or to
29	doc#0 al and other logistical items needed to commit terrorist acts. </s><s> Thus, money laundering is often a vital component of terrorist financing. </s><s> Terror
30	doc#0 al employment. </s><s> Although the motivation differs between traditional money launderers and terrorist financiers, the actual methods used to fund terror
31	doc#0 ted transactions may not be complex. </s><s> {bx1}Criminal Penalties for Money Laundering , Terrorist Financing, and Violations of the BSA{ex2} </s><s>
32	doc#0 , Terrorist Financing, and Violations of the BSA{ex2} </s><s> Penalties for money laundering and terrorist financing can be severe. </s><s> A person convic
33	doc#0 ering and terrorist financing can be severe. </s><s> A person convicted of money laundering can face up to 20 years in prison and a fine of up to \$500,000.
34	doc#0 56 and 1957, the U.S. Department of Justice may bring criminal actions for money laundering that may include criminal fines, imprisonment, and forfeiture ac
35	doc#0 i) or (j), or special measures imposed under 31 USC 5318A, faces criminal money penalties up to the greater of \$1 million or twice the value of the transactio
36	doc#0 321, the federal banking agencies and FinCEN, respectively, can bring civil money penalty actions for violations of the BSA. </s><s> Moreover, in addition to
37	doc#0 or violations of the BSA. </s><s> Moreover, in addition to criminal and civil money penalty actions taken against them, individuals may be removed from ban
38	doc#0 </s><s> Filing errors for SARs, CTRs, and CTR exemptions. </s><s> Civil money penalties issued by or in process from FinCEN. </s><s> Law enforcement
39	doc#0 raphic locations unique to the bank, </s><s> Although attempts to launder money , finance terrorism , or conduct other illegal activities through a bank can e

40	doc#0 phic locations may be more vulnerable or have been historically abused by money launderers and criminals. </s><s> Depending on the specific characterist
41	doc#0 • Certain products and services offered by banks may pose a higher risk of money laundering or terrorist financing depending on the nature of the specific pr
42	doc#0 y instruments in this context include official bank checks, cashier's checks, money orders , and traveler's checks. </s><s> Refer to the expanded overview s
43	doc#0 lies(ex2) </s><s> Although any type of account is potentially vulnerable to money laundering or terrorist financing, by the nature of their business, occupatio
44	doc#0 l below: </s><s> Foreign financial institutions, including banks and foreign money services providers (e.g., casas de cambio{bx1}, {ex2}currency exchanges
45	doc#0 ices providers (e.g., casas de cambio{bx1}, {ex2}currency exchanges, and money transmitters). </s><s> Nonbank financial institutions (e.g., money service
46	doc#0 ges, and money transmitters), </s><s> Nonbank financial institutions (e.g., money services businesses ; casinos and card clubs; brokers/dealers in securitie
47	doc#0 orts on Terrorism(ex6). </s><s> Jurisdictions determined to be "of primary money laundering concern " by the Secretary of the Treasury, and jurisdictions su
48	doc#0 sdictions or countries monitored for deficiencies in their regimes to combat money laundering and terrorist financing by international entities such as the Fin
49	doc#0 al entities such as the Financial Action Task Force (FATF). </s><s> Major money laundering countries and jurisdictions identified in the U.S. Department of
50	doc#0 sed rulemaking and final rules accompanying the determination "of primary money laundering concern ," and imposition of a special measure (or measures) (
51	doc#0 <s> {bx1} {ph2} {ph3}26(ex4) The INCSR, including the lists of high-risk money laundering countries and jurisdictions, may be accessed on the U.S. Depa
52	doc#0 1 the 1999 National Money Laundering Strategy and were conceived in the Money Laundering and Financial Crimes Strategy Act of 1998 as a means of con
53	doc#0 w enforcement efforts at the federal, state, and local levels in high intensity money laundering zones . </s><s> A listing of these areas can be found at {ph1}{
54	doc#0 ave policies, procedures, and processes in place to protect against risks of money laundering and terrorist financing (12 CFR 208.63 and 12 CFR 326.8). </s
55	doc#0 ustomers, entities, and geographic locations) more vulnerable to abuse by money launderers and criminals; provide for periodic updates to the bank's risk pr
56	doc#0 i, services, customers, entities, and geographic locations, and the potential money laundering and terrorist financing risks associated with those activities, </s
57	doc#0 taining an effective BSA/AML compliance program. </s><s> Examples of money laundering activity and suspicious activity monitoring and reporting can ar
58	doc#0 itivities; training for the loan department should provide examples involving money laundering through lending arrangements, </s><s> Banks should docume
59	doc#0 ave policies, procedures, and processes in place to protect against risks of money laundering and terrorist financing (12 CFR 211.24(i)(1) and 12 CFR 326.8
60	doc#0 ies, and new rules and regulations. </s><s> Coverage of different forms of money laundering and terrorist financing as it relates to identification and exampl
61	doc#0 1 a person, such as check cashing, funds transfer, or the sale of a check or money order . </s><s> Any account that the bank acquires, </s><s> This may inc

62	doc#0 s> ACCOUNT – To help the government fight the funding of terrorism and money laundering activities , federal law requires all financial institutions to obtain
63	doc#0 processes for all customers, particularly those that present a higher risk for money laundering and terrorist financing. </s><s> The objective of CDD should t
64	doc#0 r Risk </s><s> Management should have a thorough understanding of the money laundering or terrorist financing risks of the bank's customer base. </s><s>
65	doc#0 nce for Higher-Risk Customers(ex2) </s><s> Customers that pose higher money laundering or terrorist financing risks present increased exposure to banks
66	doc#0 assesses the bank uses to identify customers that may pose higher risk for money laundering or terrorist financing. </s><s> Determine whether the bank pro
67	doc#0 ability to utilize financial information to combat terrorism, terrorist financing, money laundering , and other financial crimes. </s><s> Examiners and banks sh
68	doc#0 has reason to suspect that the transaction: </s><s> May involve potential money laundering or other illegal activity (e.g., terrorism financing). </s><s> {bx1
69	doc#0 structuring through the purchase of cashier's checks, official bank checks, money orders , or traveler's checks in amounts of \$3,000 to \$10,000. </s><s> A
70	doc#0 y should be reviewed before implementation to identify any gaps (common money laundering techniques or frauds) that may not have been addressed. </s>
71	doc#0 a </s><s> Banks are required to report suspicious activity that may involve money laundering , BSA violations, terrorist financing,61 and certain other crimes
72	doc#0 ated to investigate or confirm the underlying crime (e.g., terrorist financing, money laundering , tax evasion, identity theft, and various types of fraud). </s><s>
73	doc#0 s. </s><s> Similarly, if any other suspected violation – such as an ongoing money laundering scheme – requires immediate attention, the bank should notify
74	doc#0 eports. </s><s> Determine whether the reports capture all areas that pose money laundering and terrorist financing risks. </s><s> Examples of these report
75	doc#0 s> The regulations established procedures for information sharing to deter money laundering and terrorist activity. </s><s> On February 5, 2010, FinCEN ar
76	doc#0 pt2)85(ph3) (ep4)law enforcement agency investigating terrorist activity or money laundering may request that FinCEN solicit, on its behalf, certain informati
77	doc#0 of engagement or reasonably suspected engagement in terrorist activity or money laundering for each individual, entity, or organization about which the law
78	doc#0 ably suspected" based on credible evidence of engaging in terrorist acts or money laundering , </s><s> Moreover, FinCEN advises that inclusion on a sectio
79	doc#0 in order to identify and report activities that may involve terrorist activity or money laundering . </s><s> Section 314(b) also provides specific protection from
80	doc#0 information may be used only to identify and, where appropriate, report on money laundering and terrorist activities; to determine whether to establish or ma
81	doc#0 at the financial institution suspects may involve possible terrorist activity or money laundering . </s><s> The procedures to ensure confidentiality will be cons
82	doc#0 ctions of this manual for additional discussions and procedures on specific money laundering risks for purchase and sale of monetary instruments activities.(
83	doc#0 monetary instruments (e.g., bank checks or drafts, including foreign drafts, money orders , cashier's checks, and traveler's checks) in exchange for currency.

84	doc#0 instruments in amounts of less than \$10,000 is a common method used by money launderers to evade large currency transaction reporting requirements, </
85	doc#0 ctions of this manual for additional discussions and procedures on specific money laundering risks for purchase and sale of monetary instruments activities.<
86	doc#0 or sales of bank checks or drafts including foreign drafts, cashier's checks, money orders , and traveler's checks for currency in amounts between \$3,000 and
87	doc#0 l sections of this manual for discussions and procedures regarding specific: money laundering risks for funds transfer activities.{ </s><s> ex2} </s><s> Funds
88	doc#0 l sections of this manual for discussions and procedures regarding specific: money laundering risks for funds transfer activities.{ </s><s> ex2} </s><s> Verify
89	doc#0 t account recordkeeping, and due diligence programs to detect and report money laundering and suspicious activity.{ </s><s> ex2} </s><s> {bx1}Refer to t
90	doc#0 the manual for discussions and examination procedures regarding specific: money laundering risks associated with foreign correspondent accounts.{ </s><s>
91	doc#0 03.185. </s><s> Additional discussions and procedures regarding specific: money laundering risks for foreign correspondent banking activities, such as bulk
92	doc#0 relationship within ten days of receipt of notice, it could be subject to a civil money penalty of up to \$10,000 per day until the correspondent relationship is ter
93	doc#0 e bank to detect and report, on an ongoing basis, any known or suspected money laundering activity conducted through or involving any correspondent acco
94	doc#0 to EDD (refer to "Enhanced Due Diligence" below). </s><s> Assessing the money laundering risks presented by each such foreign correspondent account. <
95	doc#0 ent account reasonably designed to detect and report known or suspected money laundering activity , including a periodic review of the correspondent acco
96	doc#0 most appropriately directed at those accounts that pose a more significant money laundering risk . </s><s> Any other person organized under foreign law th
97	doc#0 iness of, and is readily identifiable as, a currency dealer or exchanger or a money transmitter . </s><s> The bank's due diligence program should provide fo
98	doc#0 effective due diligence program, therefore, should be a stratification of the money laundering risk of each foreign correspondent account based on the bank's
99	doc#0 ad by the Secretary of the Treasury as warranting special measures due to money laundering concerns . </s><s> If such an account is established or mainte
100	doc#0 pt4} </s><s> Conduct enhanced scrutiny of such account to guard against money laundering and to identify and report any suspicious transactions in accou
101	doc#0 j to the foreign bank's anti-money laundering program to assess the risk of money laundering presented by the foreign bank's correspondent account. </s><
102	doc#0 ough the correspondent account in a manner reasonably designed to detect money laundering and suspicious activity. </s><s> {bx1} {ph2} {ph3}115{ex4} An
103	doc#0 ake reasonable steps to obtain information relevant to assess and mitigate money laundering risks associated with the foreign bank's correspondent account
104	doc#0 ion of the bank's general due diligence program as posing a higher risk for money laundering . </s><s> Such measures may include any or all of the eleme
105	doc#0 most appropriately directed at those accounts that pose a more significant money laundering risk , </s><s> Accordingly, where a bank is required or otherwi

106	doc#0	nt account recordkeeping, and due diligence programs to detect and report money laundering and suspicious activity.{ </s><s> ex2} </s><s> {bx1}Refer to t
107	doc#0	the manual for discussions and examination procedures regarding specific money laundering risks associated with foreign correspondent accounts.{ </s><s>
108	doc#0	account is subject to EDD (31 CFR 103.176(a)(1)). </s><s> Assessing the money laundering risks presented by the foreign correspondent account (31 CFR
109	doc#0	ent account reasonably designed to detect and report known or suspected money laundering activity , including a periodic review of the correspondent acco
110	doc#0	d to: </s><s> Detect and report, on an ongoing basis, known or suspected money laundering activity . </s><s> Perform periodic reviews of correspondent a
111	doc#0	ting enhanced scrutiny of foreign correspondent accounts to guard against money laundering and to identify and report any suspicious transactions in acco
112	doc#0	j to the foreign bank's anti-money laundering program to assess the risk of money laundering presented by the foreign bank's correspondent account (31 CFR
113	doc#0	ugh the correspondent account in a manner reasonably designed to detect money laundering and suspicious activity (31 CFR 103.176(b)(1)(ii)). </s><s> Ob
114	doc#0	ude reasonable steps to obtain information relevant to assess and mitigate money laundering risks associated with the foreign correspondent bank's correspo
115	doc#0	aintained for foreign financial institutions other than foreign banks (such as money transmitters or currency exchangers), as appropriate. </s><s> From the c
116	doc#0	ict enhanced scrutiny of any accounts held by such banks to guard against money laundering and report suspicious activity. </s><s> Determine whether suc
117	doc#0	foreign banks and, if so, obtain information relevant to assess and mitigate money laundering risks associated with the foreign bank's correspondent account
118	doc#0	ments to implement policies, procedures, and controls to detect and report money laundering and suspicious activity through private banking accounts estab
119	doc#0	the manual for discussions and examination procedures regarding specific money laundering risks associated with private banking.{ </s><s> ex2} </s><s> F
120	doc#0	reasonably designed to enable the bank to detect and report instances of money laundering through such accounts. </s><s> In addition, section 312 mand
121	doc#0	that are reasonably designed to detect and report any known or suspected money laundering or suspicious activity conducted through or involving any privat
122	doc#0	count, and to file a SAR, as appropriate, to report any known or suspected money laundering or suspicious activity conducted to, from, or through a private b
123	doc#0	rally be able to detect, report, and take appropriate action when suspected money laundering is occurring with respect to these accounts, even in cases whe
124	doc#0	ments to implement policies, procedures, and controls to detect and report money laundering and suspicious activity through private banking accounts estab
125	doc#0	the manual for discussions and examination procedures regarding specific money laundering risks associated with private banking.{ </s><s> ex2} </s><s> [
126	doc#0	ols are reasonably designed to detect and report any known or suspected money laundering or suspicious activity conducted through or involving any privat
127	doc#0	ted purpose and expected use of the account, as needed, to guard against money laundering and to report any known or suspected money laundering or su

128	doc#0	, to guard against money laundering and to report any known or suspected money laundering or suspicious activity conducted to, from, or through a private b
129	doc#0	tions, classes of international transactions, or types of accounts of primary money laundering concern . </s><s> Section 311 provides the Secretary of the T
130	doc#0	the Treasury with a range of options that can be adapted to target specific money laundering and terrorist financing concerns. </s><s> Section 311 is imple
131	doc#0	1, financial institution, class of transactions, or type of account is of primary money laundering concern . </s><s> The statute also provides similar procedure
132	doc#0	ancial institution, class of transactions, or type of account that is of primary money laundering concern . </s><s> It is important to note that, while a jurisdic
133	doc#0	ion, class of transactions, or type of account may be designated of primary money laundering concern in an order issued together with a Notice of Proposed
134	doc#0	sed rulemaking and final rules accompanying the determination "of primary money laundering concern ," and imposition of a special measure(s) pursuant to s
135	doc#0	ancial institution, class of transactions, or type of account that is of primary money laundering concern . </s><s> The statute contains minimum information r
136	doc#0	ancial institution, class of transactions, or type of account that is of primary money laundering concern . </s><s> Information Relating to Certain Payable Thr
137	doc#0	ancial institution, class of transactions, or type of account that is of primary money laundering concern may be required (f) to identify each customer (and rep
138	doc#0	ancial institution, class of transactions, or type of account that is of primary money laundering concern may be required to: (f) identify each customer (and rep
139	doc#0	ancial institution, class of transactions, or type of account that is of primary money laundering concern . </s><s> The imposition of this measure can prohibit
140	doc#0	institution, class of transactions, or type of account is no longer of primary money laundering concern . </s><s> In addition, special measures imposed agai
141	doc#0	cesses in place at all their branches and offices to protect against risks of money laundering and terrorist financing.{ </s><s> ph5}{bpt6}156{ph7} {ept8}AM
142	doc#0	file from that of the same product or service offered in the U.S. bank (e.g., money services businesses are regulated in the United States; however, similar e
143	doc#0	cesses in place at all their branches and offices to protect against risks of money laundering and terrorist financing. </s><s> In this regard, foreign branche
144	doc#0	located in higher-risk geographic locations may be vulnerable to abuse by money launderers . </s><s> To address this concern, the U.S. bank's policies, pr
145	doc#0	lity of management at the foreign branch or office to protect the entity from money laundering or terrorist financing. </s><s> The availability of the foreign bra
146	doc#0	ass whether the controls are adequate to reasonably protect the bank from money laundering and terrorist financing. </s><s> On the basis of a review of MI
147	doc#0	ervisor. </s><s> The foreign financial institution will be subject to different money laundering rules and regulations and a different supervisory oversight stru
148	doc#0	1 foreign parallel financial institution in a number of ways. </s><s> The key money laundering concern regarding parallel banking organizations is that the U.
149	doc#0	ass whether the controls are adequate to reasonably protect the bank from money laundering and terrorist financing. </s><s> Determine whether there are a

150	doc#0 payable through activities because these activities are more vulnerable to money laundering . </s><s> If the bank engages in any of these activities, exami
151	doc#0 parallel banking relationships, particularly those that pose a higher-risk for money laundering . </s><s> Determine whether the bank's system for monitoring
152	doc#0 acted on behalf of the respondent's customer, may be higher risk, </s><s> Money laundering risks can be heightened when a respondent bank allows its cus
153	doc#0 nt banks. </s><s> This is not to imply that such activities necessarily entail money laundering , but these direct currency shipments should be appropriately r
154	doc#0 ess whether the controls are adequate to reasonably protect the bank from money laundering and terrorist financing. </s><s> From a review of MIS and inte
155	doc#0 uments controlled by the same person for large deposits of cashier's checks, money orders , or similar instruments drawn on other banks in amounts under \$10
156	doc#0 lines as U.S. banks; therefore, these foreign institutions may pose a higher money laundering risk to their respective U.S. bank correspondent(s). </s><s> In
157	doc#0 hether the controls are adequate to reasonably protect the U.S. bank from money laundering and terrorist financing. </s><s> From a review of MIS and inte
158	doc#0 stitution account relationships, particularly those that pose a higher risk for money laundering . </s><s> If the U.S. bank has a standardized foreign correspo
159	doc#0 irect or indirect bulk shipments of currency risk becoming complicit in money laundering or terrorist financing schemes. </s><s> In recent years, the sn
160	doc#0 es, the foreign financial institution will ship the cash to its central bank or a money center bank in the foreign country in which the cash letter instrument origi
161	doc#0 at distinguishes relationships and transactions that present a higher risk of money laundering or terrorist financing. </s><s> Risk assessment processes sho
162	doc#0 Originators and intermediaries, particularly those that pose a higher risk for money laundering or terrorist financing. </s><s> If the bank has a standardized a
163	doc#0 es located in or shipping from, jurisdictions that may pose a higher risk for money laundering and terrorist financing, or that participate in businesses that ma
164	doc#0 t financing, or that participate in businesses that may pose a higher risk for money laundering and terrorist financing. </s><s> Preferably on an unannounced
165	doc#0 olar drafts are legitimate; however, drafts have proven to be vulnerable to money laundering abuse . </s><s> Such schemes involving U.S. dollar drafts cou
166	doc#0 udent bank account, </s><s> Once the currency is in bank draft form, the money launderer can more easily conceal the source of funds, </s><s> The abilit
167	doc#0 ceeds to a bank draft at a foreign financial institution makes it easier for a money launderer to transport the instrument either back into the United States or
168	doc#0 nto the United States or to endorse it to a third party in a jurisdiction where money laundering laws or compliance are lax, </s><s> In any case, the individual
169	doc#0 ess whether the controls are adequate to reasonably protect the bank from money laundering and terrorist financing. </s><s> Determine whether policies ad
170	doc#0 tutions. </s><s> Law enforcement authorities have stated that the risk of money laundering and other illicit activities is higher in PTAs that are not adequat
171	doc#0 ervention by U.S. banks, may facilitate unsound banking practices, including money laundering and related criminal activities, </s><s> The potential for facilita

172	doc#0	ndering and related criminal activities. </s><s> The potential for facilitating money laundering or terrorist financing, OFAC violations, and other serious crime
173	doc#0	us activity. </s><s> Inability to ensure that the PTAs are not being used for money laundering or other illicit purposes. </s><s> Payable Through Accounts —
174	doc#0	ass whether the controls are adequate to reasonably protect the bank from money laundering and terrorist financing. </s><s> Determine whether: </s><s> C
175	doc#0	Examples of factors that may be used include: jurisdiction; bank secrecy or money laundering haven ; products, services, and markets; purpose; anticipated a
176	doc#0	AML structures. </s><s> The monetary instruments involved are frequently money orders , traveler's checks, and bank checks that usually have one or more
177	doc#0	ass whether the controls are adequate to reasonably protect the bank from money laundering and terrorist financing. </s><s> From a review of MIS and inte
178	doc#0	ounts that are opened without face-to-face contact may be a higher risk for money laundering and terrorist financing for the following reasons: </s><s> More
179	doc#0	nade check and monetary instrument processing (e.g., traveler's checks or money orders) more efficient. </s><s> In broad terms, RDC allows a bank's cust
180	doc#0	> Risk Factors </s><s> RDC may expose banks to various risks, including money laundering , fraud, and information security. </s><s> Fraudulent, sequent
181	doc#0	lulent, sequentially numbered, or physically altered documents, particularly money orders and traveler's checks, may be more difficult to detect when submit
182	doc#0	</s><s> This challenge is increased as foreign correspondents and foreign money services businesses are increasingly using RDC services to replace pouc
183	doc#0	ass whether the controls are adequate to reasonably protect the bank from money laundering and terrorist financing. </s><s> From a review of MIS and inte
184	doc#0	s coupled with the lack of identification of the IVTS participants may attract money launderers and terrorists. </s><s> IVTS also pose heightened BSA/AML c
185	doc#0	transfers can be used in the placement, layering, and integration stages of money laundering . </s><s> Funds transfers purchased with currency are an exa
186	doc#0	ayering of transactions. </s><s> Banks should consider all three stages of money laundering when evaluating or assessing funds transfer risks. </s><s> Ba
187	doc#0	sufficient to detect suspicious trends and patterns typically associated with money laundering . </s><s> Institutions should have processes for managing cor
188	doc#0	ass whether the controls are adequate to reasonably protect the bank from money laundering and terrorist financing. </s><s> From review of MIS and intern
189	doc#0	orized by applicable law to accept deposits or is in the business of issuing money orders or transferring funds. </s><s> The classification will depend on wh
190	doc#0	s> ACH transactions can be used in the layering and integration stages of money laundering . </s><s> Detecting unusual activity in the layering and integra
191	doc#0	ons. </s><s> Banks should consider the layering and integration stages of money laundering when evaluating or assessing the ACH transaction risks of a p
192	doc#0	ass whether the controls are adequate to reasonably protect the bank from money laundering and terrorist financing. </s><s> From review of MIS and intern
193	doc#0	hey also offer individuals without bank accounts an alternative to cash and money orders . </s><s> As an alternate method of cross-border funds transmittal

194	doc#0	intractual agreement has been established, </s><s> Money laundering , terrorist financing, and other criminal activity may occur through the purchase of multiple cards under aliases. </s><s> In the placement phase of money laundering , because many domestic and offshore banks offer cards with
195	doc#0	of lower or higher BSA/AML risk, </s><s> Higher potential money laundering risk associated with prepaid cards results from the anonymity of
196	doc#0	controls are adequate to reasonably protect the bank from money laundering and terrorist financing. </s><s> From a review of MIS and internal
197	doc#0	requirements. </s><s> As a result, some processors may be vulnerable to money laundering , identity theft, fraud schemes, and illicit transactions or transactions
198	doc#0	entertainment businesses. </s><s> Payment processors pose greater money laundering and fraud risk if they do not have an effective means of verifying
199	doc#0	controls are adequate to reasonably protect the bank from money laundering and terrorist financing. </s><s> From a review of MIS and internal
200	doc#0	processor relationships, particularly those that pose a higher risk for money laundering . </s><s> Determine whether the bank's system for monitoring
201	doc#0	of monetary instruments in order to provide a broader assessment of the money laundering risks associated with this activity. { </s><s> ex2} </s><s> Monetary
202	doc#0	instruments provided by banks and include cashier's checks, traveler's checks, and money orders . </s><s> Monetary instruments are typically purchased to pay for
203	doc#0	exchange of monetary instruments at the placement and layering stages of money laundering can conceal the source of illicit proceeds. </s><s> As a result,
204	doc#0	of monetary instruments in order to provide a broader assessment of the money laundering risks associated with this activity. { </s><s> ex2} </s><s> Review
205	doc#0	Assess whether controls are adequate to reasonably protect the bank from money laundering and terrorist financing. </s><s> From the volume of sales and
206	doc#0	control," pages 157 to 159, for guidance. </s><s> {bx1} {ph2} {ph3}202{ex4} Money launderers are known to identify the ownership or source of illegal funds through
207	doc#0	compliance program requirements, </s><s> {bx1}Risk Factors{ex2} </s><s> Money laundering and terrorist financing risks arise because the bank may not know
208	doc#0	deposit broker could represent a range of clients that may be of higher risk for money laundering and terrorist financing (e.g., nonresident or offshore customers)
209	doc#0	controls are adequate to reasonably protect the bank from money laundering and terrorist financing. </s><s> From a review of MIS and internal
210	doc#0	relationships, particularly those that pose a higher risk for money laundering . </s><s> Determine whether the bank's system for monitoring
211	doc#0	of privately owned ATMs are particularly susceptible to money laundering and fraud, </s><s> Operators of these ATMs are often included in
212	doc#0	, many privately owned ATMs have been involved in, or are susceptible to, money laundering schemes , identity theft, outright theft of the ATM currency, and
213	doc#0	to various risks, including reputation and credit risk. </s><s> Money laundering can occur through privately owned ATMs when an ATM is replicated
214	doc#0	legitimate business transactions. </s><s> Consequently, all three phases of money laundering (placement, layering, and integration) can occur simultaneously

216	doc#0 g (placement, layering, and integration) can occur simultaneously, </s><s> Money launderers may also collude with merchants and previously legitimate ISC
217	doc#0 stances under which a nonbank owner and operator of an ATM would be a money services business for the purposes of the Bank Secrecy Act and its imple
218	doc#0 ss whether the controls are adequate to reasonably protect the bank from money laundering and terrorist financing, </s><s> From a review of MIS and inte
219	doc#0 · NDIP portfolios managed and controlled directly by clients pose a greater money laundering risk than those managed by the bank or by the financial service
220	doc#0 e bank. </s><s> For customers that management considers higher risk for money laundering and terrorist financing, more stringent documentation, verificat
221	doc#0 ss whether the controls are adequate to reasonably protect the bank from money laundering and terrorist financing, </s><s> If applicable, review contractu
222	doc#0 y identifies and monitors NDIP, particularly those that pose a higher risk for money laundering . </s><s> Determine how the bank includes NDIP sales activit
223	doc#0 pply to a limited range of products that may pose a higher risk of abuse by money launderers and terrorist financiers, </s><s> A covered product, for the pur
224	doc#0 hed a strategic analytical report that provides information regarding certain money laundering trends , patterns, and typologies in connection with insurance p
225	doc#0 x1}Risk Factors(ex2} </s><s> Insurance products can be used to facilitate money laundering . </s><s> For example, currency can be used to purchase one
226	doc#0 x10}{ph11}{ept12}. </s><s> {bx1}Risk Mitigation(ex2} </s><s> To mitigate money laundering risks , the bank should adopt policies, procedures, and proces
227	doc#0 ss whether the controls are adequate to reasonably protect the bank from money laundering and terrorist financing, </s><s> Review the contracts and agre
228	doc#0 isfers, and international affiliates. </s><s> {bx1}Risk Factors(ex2} </s><s> Money laundering risk can arise in concentration accounts if the customer-identif
229	doc#0 ss whether the controls are adequate to reasonably protect the bank from money laundering and terrorist financing, </s><s> From a review of MIS and inte
230	doc#0 {ex2} </s><s> The involvement of multiple parties may increase the risk of money laundering or terrorist financing when the source and use of the funds are
231	doc#0 lack of transparency can create opportunities in any of the three stages of money laundering or terrorist financing schemes. </s><s> These schemes could
232	doc#0 s of the CIP regulations, </s><s> For loans that may pose a higher risk for money laundering and terrorist financing, including the loans listed above, the ba
233	doc#0 al reports on trends and patterns relating to mortgage loan fraud as well as money laundering through commercial and residential real estate. </s><s> Refer
234	doc#0 ss whether the controls are adequate to reasonably protect the bank from money laundering and terrorist financing, </s><s> From a review of MIS and inte
235	doc#0 ctivities, it can be susceptible to documentary fraud, which can be linked to money laundering , terrorist financing, or the circumvention of OFAC sanctions or
236	doc#0 x4} Refer to the Financial Action Task Force's report on {bx5}Trade Based Money Laundering , {ex6}June 23, 2006, at {ph7}{bpt8}{bx9}
237	doc#0 y hiding the identity of the purchasing party, and thus increasing the risk of money laundering and terrorist financing, </s><s> {bx1}Risk Mitigation(ex2} </s>

238	doc#0 ous activity. </s><s> {bx1} {ph2} {ph3}219{ex4} Refer to {bx5}Trade Based Money Laundering . {ex6}June 23, 2006, at {ph7}{bpt8}{bx9}
239	doc#0 issist the financial industry in reporting instances of suspected trade-based money laundering . </s><s> The advisory contains examples of "red flags" based
240	doc#0 SARs that FinCEN and law enforcement believe may indicate trade-based money laundering . </s><s> In order to assist law enforcement in its effort to targ
241	doc#0 /s><s> In order to assist law enforcement in its effort to target trade-based money laundering (TBML) and black market peso exchange (BMPE) activities, Fi
242	doc#0 ess whether the controls are adequate to reasonably protect the bank from money laundering and terrorist financing. </s><s> Evaluate the adequacy of the
243	doc#0 uspicious or unusual activities, particularly those that pose a higher risk for money laundering . </s><s> Determine whether the bank's system for monitoring
244	doc#0 r services (e.g., real estate management, closely held company oversight, money management) . </s><s> The fees charged are ordinarily based on asset t
245	doc#0)Risk Factors{ex2} </s><s> Private banking services can be vulnerable to money laundering schemes , and past money laundering prosecutions have dem
246	doc#0 anking services can be vulnerable to money laundering schemes, and past money laundering prosecutions have demonstrated that vulnerability. </s><s> Th
247	doc#0 s' {pn1}{bp2}224{ph3} {ep:4}outlined, in part, the following vulnerabilities to money laundering : </s><s> Private bankers as client advocates. </s><s> Power
248	doc#0 processes can help protect banks from becoming conduits for or victims of money laundering , terrorist financing, and other financial crimes that are perpetra
249	doc#0 ent to which the customer's business history presents an increased risk for money laundering and terrorist financing. </s><s> This factor should be consider
250	doc#0 ant jurisdiction is internationally recognized as presenting a greater risk for money laundering or, conversely, is considered to have robust AML standards. <
251	doc#0 ess whether the controls are adequate to reasonably protect the bank from money laundering and terrorist financing. </s><s> From a review of MIS reports
252	doc#0 s private banking relationships, particularly those that pose a higher risk for money laundering . </s><s> Determine whether the bank's system for monitoring
253	doc#0 ><s> Other related business lines. </s><s> As in any account relationship, money laundering risk may arise from trust and asset management activities. </s
254	doc#0 EP), doing business with or located in a jurisdiction designated as "primary money laundering concern " under section 311 of the USA PATRIOT Act, or matc
255	doc#0 ess whether the controls are adequate to reasonably protect the bank from money laundering and terrorist financing. </s><s> Review the bank's procedures
256	doc#0 set management relationships, particularly those that pose a higher risk for money laundering . </s><s> Determine how the bank includes trust and asset ma
257	doc#0 ess whether the controls are adequate to reasonably protect the bank from money laundering and terrorist financing. </s><s> From a review of MIS and inte
258	doc#0 anks as conduits for their illegal activities, including corruption, bribery, and money laundering . </s><s> However, not all PEPs present the same level of risk
259	doc#0 Ps may be lower risk and some may be higher risk for foreign corruption or money laundering . </s><s> Banks that conduct business with dishonest PEPs fa

260	doc#0 cial owner's countr(ies) of residence and the level of risk for corruption and money laundering associated with these jurisdictions. </s><s> Obtain information
261	doc#0 : adequate to reasonably protect the bank from being used as a conduit for money laundering , corruption, and terrorist financing. </s><s> Review the proce
262	doc#0 PEP relationships, particularly those that pose a higher risk for corruption, money laundering , and terrorist financing. </s><s> Determine whether the bank
263	doc#0 ess whether the controls are adequate to reasonably protect the bank from money laundering and terrorist financing. </s><s> Identify senior management's
264	doc#0 nd foreign consulate accounts, particularly those that pose a higher risk for money laundering . </s><s> Determine whether the bank's system for monitoring
265	doc#0 nent advisers, mutual funds, hedge funds, or commodity traders). </s><s> Money services businesses (MSB) ,{ </s><s> ph1}{bpt2}251{ph3}{ept4} </s><s>
266	doc#0 dealers or exchangers; (2) check cashers; (3) issuers of traveler's checks, money orders , or stored value; (4) sellers or redeemers of traveler's checks, mon
267	doc#0 oney orders, or stored value; (4) sellers or redeemers of traveler's checks, money orders , or stored value; and (5) money transmitters. </s><s> There is a th
268	doc#0 s or redeemers of traveler's checks, money orders, or stored value; and (5) money transmitters . </s><s> There is a threshold requirement for businesses in
269	doc#0 s diversity, some NBFIs may be lower risk and some may be higher risk for money laundering . </s><s> Banks that maintain account relationships with NBF
270	doc#0 ount relationships with NBFIs may be exposed to a higher risk for potential money laundering activities because many NBFIs: </s><s> Lack ongoing custom
271	doc#0 :sources most appropriately to those accounts that pose a more significant money laundering risk . </s><s> The following factors may be used to help identi
272	doc#0 -<s> If a bank's risk assessment indicates potential for a heightened risk of money laundering or terrorist financing, it will be expected to conduct further due
273	doc#0 ><s> {bx2} {ph2} {ph3}253{ex4} Refer to 31 CFR 103.125 (requirement for money services businesses (MSBs) to establish and maintain an anti-money laur
274	doc#0 stored value transactions); 31 CFR 103.29 (requirement for MSBs that sell money orders , traveler's checks, or other monetary instruments for currency to ve
275	doc#0 isment of the risks of a particular MSB relationship indicates a lower risk of money laundering or other illicit activity, a bank is not routinely expected to perfor
276	doc#0 -<s> If a bank's risk assessment indicates potential for a heightened risk of money laundering or terrorist financing, the bank will be expected to conduct furth
277	doc#0 ustomers purchasing groceries may not present the same level of risk as a money transmitter specializing in cross-border funds transfers. </s><s> Therefor
278	doc#0 => If the bank determines that the MSB customer presents a higher level of money laundering or terrorist financing risk, EDD measures should be conducted
279	doc#0 ess whether the controls are adequate to reasonably protect the bank from money laundering and terrorist financing. </s><s> From review of MIS and intern
280	doc#0 procedures, and processes in place for accounts opened or maintained for money services businesses (MSB) to: </s><s> Confirm FinCEN registration, if re
281	doc#0 hat presents third-party risk, the bank could be more vulnerable to potential money laundering abuse . </s><s> Some potential examples of abuse could inclu

282	doc#0	ass whether the controls are adequate to reasonably protect the bank from money laundering and terrorist financing. </s><s> From a review of MIS and inte
283	doc#0	and out of the NGO can be complex, making them susceptible to abuse by money launderers and terrorists. </s><s> The U.S. Treasury issued guidelines to
284	doc#0	ass whether the controls are adequate to reasonably protect the bank from money laundering and terrorist financing. </s><s> From a review of MIS and inte
285	doc#0	business entities for legitimate reasons, but the entities may be abused for money laundering and terrorist financing. </s><s> (bx1)Domestic Business Entiti
286	doc#0	risks.{ </s><s> ph5)(bpt6)260(ph7) (ept8)Shell companies can be used for money laundering and other crimes because they are easy and inexpensive to fo
287	doc#0	of managing those risks. </s><s> Refer to FIN-2006-G014, (bx1)Potential Money Laundering Risks Related to Shell Companies(ex2) , November 2006, at (p
288	doc#0	erious vulnerability that can make some shell companies ideal vehicles for money laundering and other illicit financial activity. </s><s> In some state jurisdic
289	doc#0	nsurance companies. </s><s> Two foreign entities that can pose particular money laundering risk are international business corporations (IBC) and Private In
290	doc#0	establishing foreign business entities, creating an opportune environment for money laundering . </s><s> International Business Corporations </s><s> IBCs a
291	doc#0	hat information NIS must share about the owners of a legal entity. </s><s> Money launderers have also utilized NIS to hide their identities. </s><s> By hiring
292	doc#0	essment(ex6), December 2005. </s><s> (bx1)Risk Factors(ex2) </s><s> Money laundering and terrorist financing risks arise because business entities ca
293	doc#0	entiaity surrounding some business entities may be exploited by criminals, money launderers , and terrorists. </s><s> Verifying the grantors and beneficial o
294	doc#0	asures, and supervision; and the range of permissible activities all increase money laundering risk . </s><s> While business entities can be established in mc
295	doc#0	egitimate purposes, some shell companies have been used as conduits for money laundering , to hide overseas transactions, or to layer domestic or foreign
296	doc#0	g the establishment of a business entity for a new or existing customer, the money laundering risk to the bank is typically mitigated. </s><s> Because the bar
297	doc#0	ass whether the controls are adequate to reasonably protect the bank from money laundering and terrorist financing. </s><s> Review the policies and proce
298	doc#0	ness; however, some aspects of these businesses may be susceptible to money laundering or terrorist financing. </s><s> Common examples include, but
299	doc#0	k Factors(ex2) </s><s> Some businesses and entities may be misused by money launderers to legitimize their illicit proceeds. </s><s> For example, a crim
300	doc#0	ould direct their resources to those accounts that pose the greatest risk of money laundering or terrorist financing. </s><s> The following factors may be us
301	doc#0	ass whether the controls are adequate to reasonably protect the bank from money laundering and terrorist financing. </s><s> From a review of MIS and inte
302	doc#0	I CFR 103.29 -- "Purchases of Bank Checks and Drafts, Cashier's Checks, Money Orders and Traveler's Checks" </s><s> Sets forth the requirements that fi
303	doc#0	n of Money Services Businesses" </s><s> Sets forth the requirements for money services businesses to register with the U.S. Treasury/FinCEN. </s><s> </

304	doc#0	forcement authorities and financial institutions to deter terrorist activity and money laundering . </s><s> 31 CFR 103.110 – "Voluntary Information Sharing A
305	doc#0	formation sharing among financial institutions to deter terrorist activity and money laundering . </s><s> 31 CFR 103.120 – "Anti-Money Laundering Program
306	doc#0	ly designed to prevent the insurance company from being used to facilitate money laundering or financing of terrorist activity, </s><s> 31 CFR 103.176 – "Du
307	doc#0	i to enable the financial institution to detect and report known or suspected money laundering activity conducted through or involving any correspondent acco
308	doc#0	that are reasonably designed to detect and report any known or suspected money laundering or suspicious activity conducted through or involving any privat
309	doc#0	or suspected violation of federal law, a suspicious transaction relating to a money laundering activity , or a violation of the BSA, </s><s> National Credit Uni
310	doc#0	if suspected violation of federal law or a suspicious transaction related to a money laundering activity or a violation of the BSA, </s><s> This section applies
311	doc#0	(A) (December 2005) </s><s> The MLTA is a government-wide analysis of money laundering in the United States, </s><s> The MLTA offers a detailed analy
312	doc#0	ering in the United States, </s><s> The MLTA offers a detailed analysis of money laundering methods , ranging from well- established techniques for integra
313	doc#0	· Advisories – FinCEN issues advisories to financial institutions concerning money laundering or terrorist financing threats and vulnerabilities, for the purpose
314	doc#0	ement actions – FinCEN issues releases involving the assessment of civil money penalties against financial institutions for systemic noncompliance with the
315	doc#0	es the following publications: </s><s> Forty Recommendations to Combat Money Laundering and Terrorism </s><s> Special Recommendations Against Te
316	doc#0	ehicles, Including Trust and Company Service Providers </s><s> Complex Money Laundering Techniques – Regional Perspectives Report </s><s> (bx1)Th
317	doc#0	ge, </s><s> An issuer, redeemer, or cashier of traveler's checks, checks, money orders , or similar instruments, </s><s> An operator of a credit card system
318	doc#0	n of funds, including any person who engages as a business in an informal money transfer system or any network of people who engage as a business in fac
319	doc#0	· Appendix E:(ex6) </s><s> (bx1)International Organizations(ex2) </s><s> Money laundering and terrorist financing can have a widespread international imp
320	doc#0	nd terrorist financing can have a widespread international impact, </s><s> Money launderers have been found to transfer funds and maintain assets on a gl
321	doc#0	and challenging process, </s><s> Most countries support the fight against money laundering and terrorist funding; however, because of the challenges in cr
322	doc#0	body established for the development and promotion of policies to combat money laundering and terrorist financing, </s><s> The FATF has developed reco
323	doc#0	financing, </s><s> The FATF has developed recommendations on various money laundering and terrorist financing issues published in the "FATF Forty Rec
324	doc#0	ther global organizations are becoming increasingly involved in combating money laundering . </s><s> The International Monetary Fund (IMF) and the Wor
325	doc#0	9/44636171.pdf(ex4)(ph5)(ept6), </s><s> Appendix F:(ex6) </s><s> (bx1) Money Laundering and Terrorist Financing "Red Flags"(ex2) </s><s> The followi

326	doc#0 ving are examples of potentially suspicious activities, or "red flags" for both money laundering and terrorist financing. </s><s> Although these lists are not all
327	doc#0 e not all-inclusive, they may help banks and examiners recognize possible money laundering and terrorist financing schemes. </s><s> Management's prime
328	doc#0 s, rather than on determining whether the transactions are in fact linked to money laundering , terrorist financing, or a particular crime. </s><s> The following
329	doc#0 al purpose. </s><s> {bx1}Potentially Suspicious Activity That May Indicate Money Laundering {ex2} </s><s> Customers Who Provide Insufficient or Suspici
330	doc#0 ng transfers of funds are received, or deposits are made using checks and money orders . </s><s> Almost immediately, all or most of the transfers or depos
331	doc#0 isistent with normal activities. </s><s> A large volume of cashier's checks, money orders , or funds transfers is deposited into, or purchased through, an acco
332	doc#0 of business. </s><s> Payments for goods or services are made by checks, money orders , or bank drafts not drawn from the account of the entity that made
333	doc#0 A customer uses multiple currency equivalents (e.g., cashier's checks and money orders) from different banks and money services businesses to make insu
334	doc#0 valents (e.g., cashier's checks and money orders) from different banks and money services businesses to make insurance policy or annuity payments. </s><s>
335	doc#0 then counted. </s><s> Customer purchases a number of cashier's checks, money orders , or traveler's checks for large amounts under a specified threshold
336	doc#0 d promotion of policies, both at national and international levels, to combat money laundering and terrorist financing. </s><s> {bx1} {ph2} {ph3}269{ex4} {bx
337	doc#0 any one bank on any single day in order to constitute structuring. </s><s> Money launderers and criminals have developed many ways to structure large an
338	doc#0 s or commingled with the deposits of an otherwise legitimate business, any money laundering scheme that begins with a need to convert the currency procee
339	doc#0 10,000 CTR filing threshold; use currency to purchase official bank checks, money orders , or traveler's checks with currency in amounts less than \$10,000 (e
340	doc#0 r parallel banking relationships, including procedures relating to higher-risk money laundering activities . { </s><s> ept2} </s><s> {bpt1}Such policies and pro
341	doc#0 ><s> Politically exposed persons (PEP), export or import business owners, money transmitters , Private Investment Companies (PIC), financial advisers, offs
342	doc#0 rivate Investment Companies (PIC), financial advisers, offshore entities, or money managers (when an intermediary is acting on behalf of customers). </s><s>
343	doc#0 list of politically exposed persons (PEP), export or import business owners, money transmitters , Private Investment Companies (PIC), financial advisers, offs
344	doc#0 rivate Investment Companies (PIC), financial advisers, offshore entities, or money managers (when an intermediary is acting on behalf of customers).{ </s><s>
345	doc#0 in instrumental in enabling law enforcement to initiate or supplement major money laundering or terrorist financing investigations and other criminal cases. <
346	doc#0 es, stocks, mutual funds, insurance policies, traveler's checks, bank drafts, money orders , credit or debit cards, prepaid cards, and digital currency business
347	doc#0 actions within the last five years) by OFAC, including notice letters, or civil money penalties , with evidence that the bank addressed the issues and is not at

348	doc#0	account, </s><s> Checks in Excess of \$100 </s><s> Each check, draft, or money order drawn on the bank or issued and payable by it that is in excess of \$1
349	doc#0	bank must maintain a record of each bank check or draft, cashier's check, money order , or traveler's check for \$3,000 or more in currency. </s><s> If the pu
350	doc#0	'4(ex2) (ph3){ph4}This statement does not address the assessment of civil money penalties for violations of the BSA or its implementing regulations, </s><s>
351	doc#0	s (i) highly suspicious activity creating a significant potential for unreported money laundering or terrorist financing, (ii) patterns of structuring to evade report
352	doc#0	e of highly suspicious activity creating a significant potential for unreported money laundering or terrorist financing in the institution. </s><s> However, other
353	doc#0	critical to the United States' ability to utilize financial information to combat money laundering , terrorist financing, and other financial crimes. </s><s> The re
354	doc#0	r </s><s> Suspicious transactions of \$5,000 or more that involve potential money laundering or BSA violations. </s><s> The SAR must be filed within 30 da

16	doc#0 1	las sanciones civiles y penales por lavado de dinero . </s><s> 5 La Ley PATRIOTA de los EE	DA0FF0 NCFP000 AQ0CP00 CC AQ0CP00 SP NCMS000 SP AQ0CP00 SP NCMS000 NPFS000 NPCS000 SP DA0MP0 NPCN00
17	doc#0	revistan " interés principal en cuanto al lavado de dinero " . </s><s> Facilitaron el acceso a los registr	VMIP3P0 Fe NCMS000 AQ0CS00 SP RG SP NCMS000 SP NCMS000 VMIS3P0 DA0MS0 NCMS000 SP DA0MP0 NCMP
18	doc#0 e	apoyan la lucha contra el lavado de dinero y la financiación del terrorismo . </s><s> Consulte	:N00 VMIP3P0 DA0FS0 NCF000 SP DA0MS0 NCMS000 CC DA0FS0 NCF000 SP NCMS000 Fp VMM03S0 DA0
19	doc#0 e	AML que proteja contra el lavado de dinero y el financiamiento del terrorismo y asegure el	P NPMS000 PR0CN00 VMSP3S0 SP DA0MS0 NCMS000 CC DA0MS0 NCMS000 SP NCMS000 CC VMSP3S0 DA0MS0
20	doc#0	razonables y prudentes para combatir el lavado de dinero y el financiamiento del terrorismo . y minimizar así	AQ0CP00 CC AQ0CP00 SP VMN0000 DA0MS0 NCMS000 CC DA0MS0 NCMS000 SP NCMS000 Fc CC VMN0000 RG

Appendix 4. “Comunicación de operativa sospechosa por indicio” (F19-1)

COMUNICACIÓN DE OPERATIVA SOSPECHOSA POR INDICIO (F19-1) (Artículo 18 de la Ley 10/2010)

Sujeto obligado	
Número de documento identificativo del sujeto obligado	
Nombre del representante	
Referencia de la comunicación	
Fecha de la comunicación	

Identificación de los intervinientes en las operaciones

Conocimiento de los intervinientes en las operaciones

Descripción de las operaciones

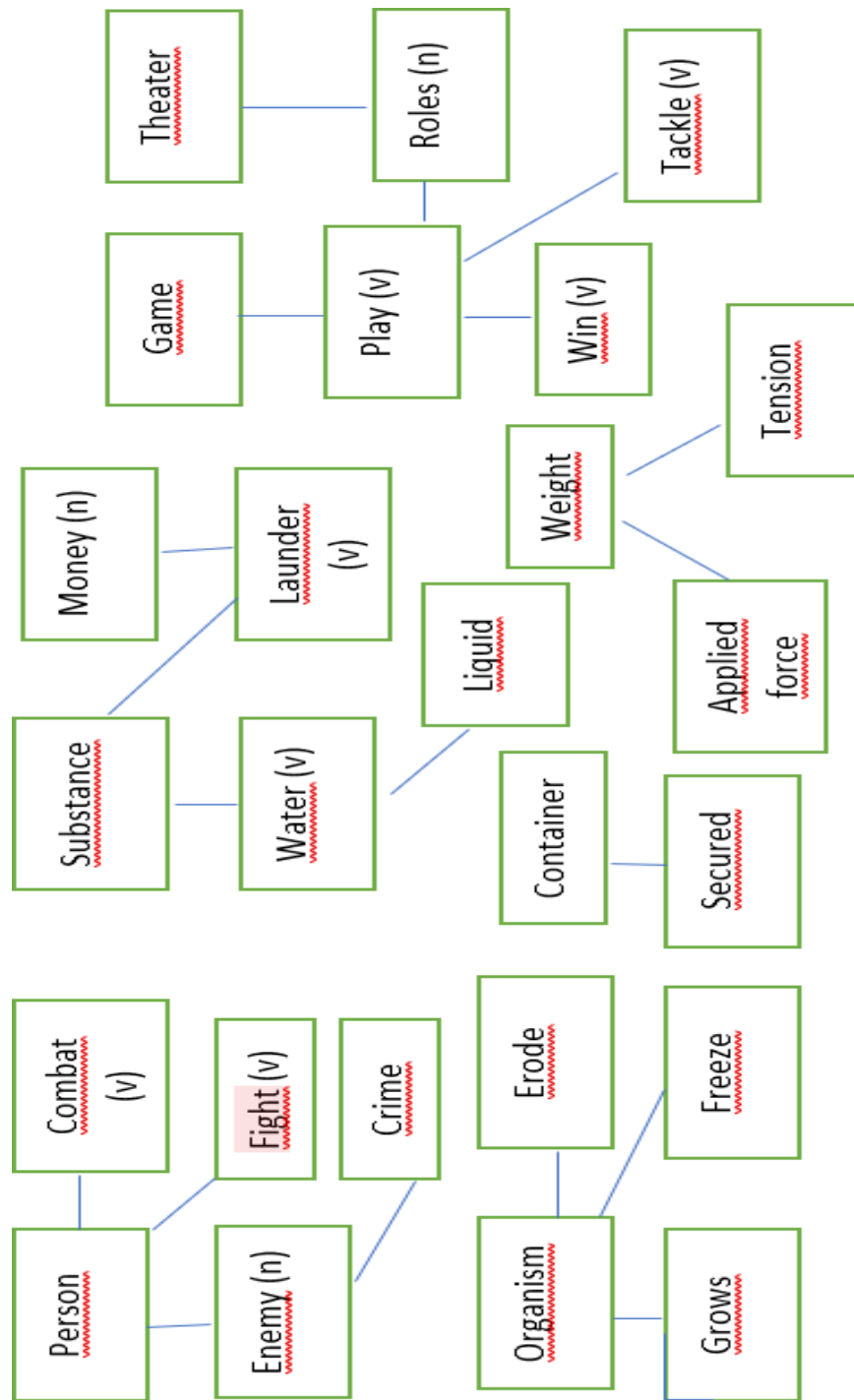
Indicios de blanqueo de capitales

Gestiones y comprobaciones realizadas

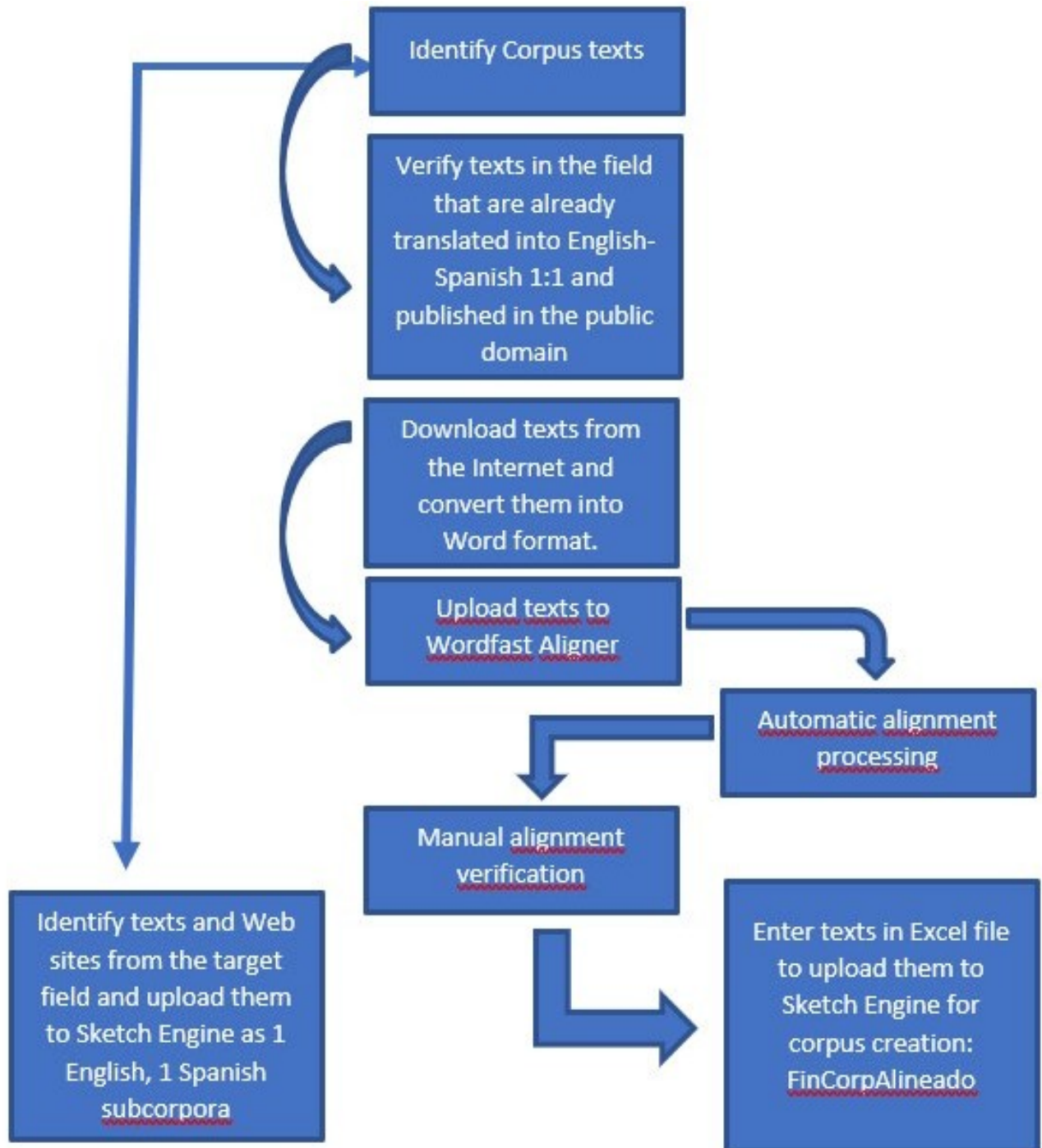
Documentación remitida (relación de documentos que se adjuntan)

El representante

Appendix 5. Source domains used to conceptualize target domains



Appendix 6. Corpus Build Process of FinCorpAlin



Appendix 7. "FDIC SARS Report"

<h2 style="margin: 0;">Suspicious Activity Report</h2> <p style="margin: 0;">July 2003 Previous editions will not be accepted after December 31, 2003</p>		1
		FRB: FR 2230 OMB No. 7100-0212 FDIC: 6710/06 OMB No. 3084-0077 OCC: 8010-9,8010-1 OMB No. 1557-0180 OTS: 1601 OMB No. 1550-0003 NCUA: 2382 OMB No. 3133-0094 TREASURY: TD F 90-22.47 OMB No. 1506-0001
ALWAYS COMPLETE ENTIRE REPORT (see instructions)		
1 Check box below only if correcting a prior report. <input type="checkbox"/> Corrects Prior Report (see instruction #3 under "How to Make a Report")		
Part I Reporting Financial Institution Information		
2 Name of Financial Institution		3 EIN
4 Address of Financial Institution		5 Primary Federal Regulator
6 City	7 State	8 Zip Code
		a <input type="checkbox"/> Federal Reserve d <input type="checkbox"/> OCC b <input type="checkbox"/> FDIC e <input type="checkbox"/> OTS c <input type="checkbox"/> NCUA
9 Address of Branch Office(s) where activity occurred <input type="checkbox"/> Multiple Branches (include information in narrative, Part V)		
10 City	11 State	12 Zip Code
		13 If institution closed, date closed
14 Account number(s) affected, if any		Closed?
a	<input type="checkbox"/> Yes <input type="checkbox"/> No	c
b	<input type="checkbox"/> Yes <input type="checkbox"/> No	d
Part II Suspect Information <input type="checkbox"/> Suspect Information Unavailable		
15 Last Name or Name of Entity		16 First Name
		17 Middle
18 Address		19 SSN, EIN or TIN
20 City	21 State	22 Zip Code
		23 Country
24 Phone Number - Residence (include area code)		25 Phone Number - Work (include area code)
26 Occupation/Type of Business	27 Date of Birth	28 Admission/Confession?
	MM / DD / YYYY	a <input type="checkbox"/> Yes b <input type="checkbox"/> No
29 Forms of Identification for Suspect:		
a <input type="checkbox"/> Driver's License/State ID	b <input type="checkbox"/> Passport	c <input type="checkbox"/> Alien Registration
d <input type="checkbox"/> Other		
Number	Issuing Authority	
30 Relationship to Financial Institution:		
a <input type="checkbox"/> Accountant	d <input type="checkbox"/> Attorney	g <input type="checkbox"/> Customer
b <input type="checkbox"/> Agent	e <input type="checkbox"/> Borrower	h <input type="checkbox"/> Director
c <input type="checkbox"/> Appraiser	f <input type="checkbox"/> Broker	i <input type="checkbox"/> Employee
		j <input type="checkbox"/> Officer
		k <input type="checkbox"/> Shareholder
		l <input type="checkbox"/> Other
31 Is the relationship an insider relationship?		32 Date of Suspension, Termination, Resignation
a <input type="checkbox"/> Yes b <input type="checkbox"/> No		MM / DD / YYYY
If Yes specify: c <input type="checkbox"/> Still employed at financial institution		
d <input type="checkbox"/> Suspended		
e <input type="checkbox"/> Terminated		
f <input type="checkbox"/> Resigned		

Part V Suspicious Activity Information Explanation/Description

3

Explanation/description of known or suspected violation of law or suspicious activity.

This section of the report is critical. The care with which it is written may make the difference in whether or not the described conduct and its possible criminal nature are clearly understood. Provide below a chronological and complete account of the possible violation of law, including what is unusual, irregular or suspicious about the transaction, using the following checklist as you prepare your account. If necessary, continue the narrative on a duplicate of this page.

- a Describe supporting documentation and retain for 5 years.
- b Explain who benefited, financially or otherwise, from the transaction, how much, and how.
- c Retain any confession, admission, or explanation of the transaction provided by the suspect and indicate to whom and when it was given.
- d Retain any confession, admission, or explanation of the transaction provided by any other person and indicate to whom and when it was given.
- e Retain any evidence of cover-up or evidence of an attempt to deceive federal or state examiners or others.

- f Indicate where the possible violation took place (e.g., main office, branch, other).
- g Indicate whether the possible violation is an isolated incident or relates to other transactions.
- h Indicate whether there is any related litigation; if so, specify.
- i Recommend any further investigation that might assist law enforcement authorities.
- j Indicate whether any information has been excluded from this report; if so, why?
- k If you are correcting a previously filed report, describe the changes that are being made.

For Bank Secrecy Act/Structuring/Money Laundering reports, include the following additional information:

- l Indicate whether currency and/or monetary instruments were involved. If so, provide the amount and/or description of the instrument (for example, bank draft, letter of credit, domestic or international money order, stocks, bonds, traveler's checks, wire transfers sent or received, cash, etc.).
- m Indicate any account number that may be involved or affected.

Tips on SAR Form preparation and filing are available in the SAR Activity Review at www.fincen.gov/pub_reports.html

Paperwork Reduction Act Notice: The purpose of this form is to provide an effective and consistent means for financial institutions to notify appropriate law enforcement agencies of known or suspected criminal conduct or suspicious activities that take place at or were perpetrated against financial institutions. This report is required by law, pursuant to authority contained in the following statutes. Board of Governors of the Federal Reserve System: 12 U.S.C. 324, 334, 611a, 1844(b) and (c), 3105(c) (2) and 3106(a). Federal Deposit Insurance Corporation: 12 U.S.C. 93a, 1818, 1881-84, 3401-22. Office of the Comptroller of the Currency: 12 U.S.C. 93a, 1818, 1881-84, 3401-22. Office of Thrift Supervision: 12 U.S.C. 1463 and 1464. National Credit Union Administration: 12 U.S.C. 1766(a), 1786(q). Financial Crimes Enforcement Network: 31 U.S.C. 5318(g). Information collected on this report is confidential (5 U.S.C. 552(b)(7) and 552a(k)(2), and 31 U.S.C. 5318(g)). The Federal financial institutions' regulatory agencies and the U.S. Departments of Justice and Treasury may use and share the information. Public reporting and recordkeeping burden for this information collection is estimated to average 30 minutes per response, and includes time to gather and maintain data in the required report, review the instructions, and complete the information collection. Send comments regarding this burden estimate, including suggestions for reducing the burden, to the Office of Management and Budget, Paperwork Reduction Project, Washington, DC 20503 and, depending on your primary Federal regulatory agency, to Secretary, Board of Governors of the Federal Reserve System, Washington, DC 20561; or Assistant Executive Secretary, Federal Deposit Insurance Corporation, Washington, DC 20429; or Legislative and Regulatory Analysis Division, Office of the Comptroller of the Currency, Washington, DC 20219; or Office of Thrift Supervision, Enforcement Office, Washington, DC 20552; or National Credit Union Administration, 1775 Duke Street, Alexandria, VA 22314; or Office of the Director, Financial Crimes Enforcement Network, Department of the Treasury, 2070 Chain Bridge Road, Vienna, VA 22182. The agencies may not conduct or sponsor, and an organization (or a person) is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Suspicious Activity Report Instructions

Safe Harbor Federal law (31 U.S.C. 5318(g)(3)) provides complete protection from civil liability for all reports of suspicious transactions made to appropriate authorities, including supporting documentation, regardless of whether such reports are filed pursuant to this report's instructions or are filed on a voluntary basis. Specifically, the law provides that a financial institution, and its directors, officers, employees and agents, that make a disclosure of any possible violation of law or regulation, including in connection with the preparation of suspicious activity reports, "shall not be liable to any person under any law or regulation of the United States, any constitution, law, or regulation of any State or political subdivision of any State, or under any contract or other legally enforceable agreement (including any arbitration agreement), for such disclosure or for any failure to provide notice of such disclosure to the person who is the subject of such disclosure or any other person identified in the disclosure".

Notification Prohibited Federal law (31 U.S.C. 5318(g)(2)) requires that a financial institution, and its directors, officers, employees and agents who, voluntarily or by means of a suspicious activity report, report suspected or known criminal violations or suspicious activities may not notify any person involved in the transaction that the transaction has been reported.

In situations involving violations requiring immediate attention, such as when a reportable violation is ongoing, the financial institution shall immediately notify, by telephone, appropriate law enforcement and financial institution supervisory authorities in addition to filing a timely suspicious activity report.

WHEN TO MAKE A REPORT:

1. All financial institutions operating in the United States, including insured banks, savings associations, savings association service corporations, credit unions, bank holding companies, nonbank subsidiaries of bank holding companies, Edge and Agreement corporations, and U.S. branches and agencies of foreign banks, are required to make this report following the discovery of:
 - a. **Insider abuse involving any amount.** Whenever the financial institution detects any known or suspected Federal criminal violation, or pattern of criminal violations, committed or attempted against the financial institution or involving a transaction or transactions conducted through the financial institution, where the financial institution believes that it was either an actual or potential victim of a criminal violation, or series of criminal violations, or that the financial institution was used to facilitate a criminal transaction, and the financial institution has a substantial basis for identifying one of its directors, officers, employees, agents or other institution-affiliated parties as having committed or aided in the commission of a criminal act regardless of the amount involved in the violation.
 - b. **Violations aggregating \$5,000 or more where a suspect can be identified.** Whenever the financial institution detects any known or suspected Federal criminal violation, or pattern of criminal violations, committed or attempted against the financial institution or involving a transaction or transactions conducted through the financial institution and involving or aggregating \$5,000 or more in funds or other assets, where the financial institution believes that it was either an actual or potential victim of a criminal violation, or series of criminal violations, or that the financial institution was used to facilitate a criminal transaction, and the financial institution has a substantial basis for identifying a possible suspect or group of suspects. If it is determined prior to filing this report that the identified suspect or group of suspects has used an "alias," then information regarding the true identity of the suspect or group of suspects, as well as alias identifiers, such as drivers' licenses or social security numbers, addresses and telephone numbers, must be reported.
 - c. **Violations aggregating \$25,000 or more regardless of a potential suspect.** Whenever the financial institution detects any known or suspected Federal criminal violation, or pattern of criminal violations, committed or attempted against the financial institution or involving a transaction or transactions conducted through the financial institution and involving or aggregating \$25,000 or more in funds or other assets, where the financial institution believes that it was either an actual or potential victim of a criminal violation, or series of criminal violations, or that the financial institution was used to facilitate a criminal transaction, even though there is no substantial basis for identifying a possible suspect or group of suspects.
 - d. **Transactions aggregating \$5,000 or more that involve potential money laundering or violations of the Bank Secrecy Act.** Any transaction (which for purposes of this subsection means a deposit, withdrawal, transfer between accounts, exchange of currency, loan, extension of credit, purchase or sale of any stock, bond, certificate of deposit, or other monetary instrument or investment security, or any other payment, transfer, or delivery by, through, or to a financial institution, by whatever means effected) conducted or attempted by, at

or through the financial institution and involving or aggregating \$5,000 or more in funds or other assets, if the financial institution knows, suspects, or has reason to suspect that:

- i. The transaction involves funds derived from illegal activities or is intended or conducted in order to hide or disguise funds or assets derived from illegal activities (including, without limitation, the ownership, nature, source, location, or control of such funds or assets) as part of a plan to violate or evade any law or regulation or to avoid any transaction reporting requirement under Federal law;
- ii. The transaction is designed to evade any regulations promulgated under the Bank Secrecy Act; or
- iii. The transaction has no business or apparent lawful purpose or is not the sort in which the particular customer would normally be expected to engage, and the financial institution knows of no reasonable explanation for the transaction after examining the available facts, including the background and possible purpose of the transaction.

The Bank Secrecy Act requires all financial institutions to file currency transaction reports (CTRs) in accordance with the Department of the Treasury's implementing regulations (31 CFR Part 103). These regulations require a financial institution to file a CTR whenever a currency transaction exceeds \$10,000. If a currency transaction exceeds \$10,000 and is suspicious, the institution must file both a CTR (reporting the currency transaction) and a suspicious activity report (reporting the suspicious or criminal aspects of the transaction). If a currency transaction equals or is below \$10,000 and is suspicious, the institution should only file a suspicious activity report.

2. **Computer Intrusion.** For purposes of this report, "computer intrusion" is defined as gaining access to a computer system of a financial institution to:

- a. Remove, steal, procure, or otherwise affect funds of the institution or the institution's customers;
- b. Remove, steal, procure or otherwise affect critical information of the institution including customer account information; or
- c. Damage, disable or otherwise affect critical systems of the institution.

For purposes of this reporting requirement, computer intrusion does not mean attempted intrusions of websites or other non-critical information systems of the institution that provide no access to institution or customer financial or other critical information.

3. A financial institution is required to file a suspicious activity report no later than 30 calendar days after the date of initial detection of facts that may constitute a basis for filing a suspicious activity report. If no suspect was identified on the date of detection of the incident requiring the filing, a financial institution may delay filing a suspicious activity report for an additional 30 calendar days to identify a suspect. In no case shall reporting be delayed more than 60 calendar days after the date of initial detection of a reportable transaction.

4. This suspicious activity report does not need to be filed for those robberies and burglaries that are reported to local authorities, or (except for savings associations and service corporations) for lost, missing, counterfeit, or stolen securities that are reported pursuant to the requirements of 17 CFR 240.17f-1.

HOW TO MAKE A REPORT:

1. Send each completed suspicious activity report to:

Detroit Computing Center, P.O. Box 33980, Detroit, MI 48232-0980

2. For items that do not apply or for which information is not available, leave blank.
3. If you are correcting a previously filed report, check the box at the top of the report (line 1). Complete the report in its entirety and include the corrected information in the applicable boxes. Then describe the changes that are being made in Part V (Description of Suspicious Activity), line k.
4. **Do not include any supporting documentation with the suspicious activity report.** Identify and retain a copy of the suspicious activity report and all original supporting documentation or business record equivalent for five (5) years from the date of the suspicious activity report. All supporting documentation must be made available to appropriate authorities upon request.
5. If more space is needed to report additional suspects, attach copies of page 1 to provide the additional information. If more space is needed to report additional branch addresses, include this information in the narrative, Part V.
6. Financial institutions are encouraged to provide copies of suspicious activity reports to state and local authorities, where appropriate.

POC

Help

Save

Import

Refresh

Appendix 8. “Communication of Authorized Person (F22-6)”

SEPBLAC

Servicio Ejecutivo de la Comisión de
Prevención del Blanqueo de Capitales
e Infracciones Monetarias

UNOFFICIAL TRANSLATION FOR INFORMATION PURPOSES ONLY
Spanish version of Form F22-6 available at www.sepblac.es must be used instead.

COMMUNICATION OF AUTHORIZED PERSON (F22-6)

The person whose details are shown at “details of the representative”, as representative to the Executive Service of the obliged subject mentioned at “details of obliged subject”, authorizes the person whose details are shown at “details of the authorized person” to sign on its behalf any written or communication addressed to the Executive Service that must be submitted owing to its condition as representative.

Details of obliged subject

Type of Id ¹	No. of Id
Name / Business name	
1 st surname ²	2 nd surname ²
Type of obliged subject ³	

Details of the representative

Type of Id ¹	No. of Id
Name	Sumames

Details of the authorized person

Type of Id ¹	No. of Id
Name	
1 st surname	2 nd surname
Address ⁴	
State	Province
Town	Postcode
Telephone	Fax
E-mail	
Position	

Details of the ceasing authorized person (if so)

Type of Id ²	No. of Id
Name	Sumames
Type of Id ²	No. of Id
Name	Sumames

20

Representative signature

Authorized person signature

¹ CIF, DNI/NIF, Pasaporte, NIE, etc.

² To be provided only if the obliged subject is a natural person.

³ Among those listed in article 2.1 of Law 10/2010.

⁴ Working address of the authorized person.

For each authorized or empowered person and obliged subject (up to a maximum of two people per entity), the following documents shall be submitted:

1. Form F22-6 duly completed and signed by both the representative and the authorized person.
2. Documentation sufficiently accrediting the signature of the authorized person (e.g. copy of a valid id).

All documents shall be sent in hard copy to the following address:

Sepblac
Calle Alcalá, 48
28014 Madrid Spain

This authorization extends exclusively to the scope indicated in the first paragraph of the previous page and has an indefinite duration. Its revocation or termination for any reason shall be immediately communicated to the Executive Service by means of a written document signed by the representative, taking effect since the reception of the communication by the aforementioned institution.



UNOFFICIAL TRANSLATION



**VNiVERSiDAD
D SALAMANCA**

PROGRAMA DE DOCTORADO EN CIENCIAS SOCIALES
(LÍNEA DE INVESTIGACIÓN EN TRADUCCIÓN Y MEDIACIÓN INTERCULTURAL)

**La traducción de metáforas lexicalizadas en la comunicación
interlingüística e intercultural acerca de la seguridad
financiera: Un análisis de corpus con textos en inglés y español
sobre el blanqueo de capitales**

Tesis doctoral de

STEPHEN COLEMAN GEROME

Director

DR. DANIEL LINDER MOLÍN

2023



VNiVERSIDAD D SALAMANCA

PROGRAMA DE DOCTORADO EN CIENCIAS SOCIALES
(LÍNEA DE INVESTIGACIÓN EN TRADUCCIÓN Y MEDIACIÓN INTERCULTURAL)

TÍTULO: The Translation of Lexicalized Metaphors in Interlinguistic and Intercultural Communication of Financial Security Discourse: A Corpus-Based Analysis of English and Spanish Texts about Money Laundering

AUTOR: Stephen Coleman Gerome

DIRECTOR: Dr. Daniel Linder Molin

DEPARTAMENTO: Traducción e Interpretación

Vº Bº

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SALAMANCA, 2023

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1. Introducción

En el ámbito de la seguridad pública, la reglamentación y el cumplimiento de la normativa, las principales partes interesadas de distintos orígenes lingüísticos utilizan el inglés como lengua de contacto para interactuar con sus homólogos, los medios de comunicación, el público y las partes interesadas a fin de garantizar el cumplimiento de la normativa. Muchos utilizan metáforas específicas para referirse a las amenazas a la seguridad. La delincuencia financiera es uno de los principales factores de la mayoría de los delitos transnacionales en general y tiene un gran alcance. La delincuencia financiera es un fenómeno global, ya sea de la trata de blancas, la prostitución, las víctimas de la guerra contra las drogas o el trabajo infantil en todo el mundo (Craig). La delincuencia financiera supone un coste social y económico considerable para las personas a las que afecta (ibid.). No obstante, no se entiende bien ni se reconoce su existencia, con la que muchos “interactúan diariamente sin ser conscientes de ello” (nuestra traducción, ibid.).

La delincuencia financiera puede surgir sin que la gente se percate, como “personas que lavan su coche en el aparcamiento de un supermercado y no se quedan con nada de su sueldo” (ibid.). “Los delitos financieros tienen un efecto perjudicial en todos los ciudadanos y en la seguridad nacional (Delitos Financieros | OCC). Además, “Los delitos financieros afectan a todos, y conocer su verdadera magnitud y sus efectos devastadores es de vital importancia” (Hope 301) En su reciente libro, *The War on Dirty Money* (La guerra contra el dinero sucio), Gilmour and Hicks describen la comunicación actual sobre el tema de esta manera: “el significado de palabras sencillas causa problemas serios, incluso graves” (30) cita con acierto al traductor Kimon Friar: “Incluso la palabra más sencilla nunca puede traducirse con su equivalente exacto a otro idioma [...]”. Dado que Fray traduce poesía llena de emoción, subjetividad y matices, uno podría pensar que la

traducción jurídica es más objetiva. Sin embargo, abogados de todo el mundo discuten sobre el significado de las palabras en sus lenguas maternas (Gilmour and Hicks).

Una comunicación más eficaz es fundamental para que quienes regulan su prevención, quienes participan en iniciativas de cumplimiento, las fuerzas de seguridad y el público en general puedan reconocerla y prevenirla mejor. Al haber trabajado estrechamente con funcionarios y agentes de esta comunidad y haber participado en muchos de los procesos relativos a las comunicaciones, me resulta fascinante observar cómo utilizan y lexicalizan las metáforas en el habla y la correspondencia, incluidas las traducciones e interpretaciones entre el inglés y el español a través de diversos países hispanohablantes. Hasta la realización de esta investigación, se ha estudiado muy poco la traducción de metáforas en el lenguaje especializado del cumplimiento y la aplicación de la normativa financiera.

Mi interés por la importancia de las lenguas en la investigación y el enjuiciamiento de delitos comenzó a principios de la década de 2000. En aquella época, trabajaba como lingüista e intérprete judicial de español e inglés para el Tribunal de Distrito de los Estados Unidos del Distrito Oeste de Virginia. Dado que trabajé con la Fiscalía de los Estados Unidos en el mismo distrito y con agentes de la Administración para el Control de Drogas, interpreté muchas sesiones de declaraciones para investigar y enjuiciar una empresa criminal transnacional. Me intrigó cómo el lenguaje desempeñaba un papel crucial en las relaciones entre todos los involucrados en el proceso de justicia penal. Cada vez me resultaba más intrigante cómo los investigadores rastreaban el dinero para descubrir actividades ilegales. A mediados de la década de 2000, conocí a un exagente de la CIA y agente especial del Departamento del Tesoro de Estados Unidos, quien sería mi mentor para comprender el complejo fenómeno del blanqueo de capitales. Recientemente, he participado en casos de blanqueo de capitales y delincuencia transnacional mientras

asistía a la Fiscalía de los Estados Unidos. En esos casos, puedo atestiguar la sensibilidad y la importancia de la pérdida y la ganancia en el uso del lenguaje.

El presente estudio comienza a establecer esa laguna en la investigación al ofrecer una radiografía sincrónica del lenguaje hablado actualmente en ese ámbito. Aunque algunos han abordado la traducción de metáforas en contabilidad Fuertes-Olivera y Nielsen, Dai et al., todavía queda mucho por investigar en este campo. Otras personas han analizado las metáforas financieras y la traducción; Charteris-Black y Ennis, Charteris-Black y Musolff, Guénette, Soieraj, Hansen y Schaffner, entre otros. Otros han estudiado la traducción de metáforas y el Derecho, como Gražytė, López y Orts, Vespesiani, Foljanty, Fabregat, Faiq y Prieto Ramos. Sin embargo, no examinaron la traducción del lenguaje específico del cumplimiento y la aplicación de la normativa financiera, ni analizaron específicamente la direccionalidad de la traducción del inglés al español.

Asimismo, he sido testigo, en varias ocasiones, de cómo la comunicación ha fracasado o ha resultado ineficaz. Una gran cantidad de la comunicación, tanto en inglés como en español, es metafórica. Como lo demuestra Abdul y otros en su resumen de “El poder persuasivo (y manipulador) de la metáfora” de Da Silva, “[l]a metáfora es también una herramienta excelente para difundir ideología, expresar emociones y comunicar propósitos morales” (513) Pero en la traducción de una lengua a otra, esas comunicaciones a veces se alteran intencionadamente o no.

El objetivo de este estudio es ampliar el corpus de conocimientos sobre la traducción de metáforas y sus efectos emocionales, así como conocer no solo qué conceptos conmueven al lector, sino también cómo afectan a la comunicación. Asimismo, se pretende analizar, aunque sea de manera superficial, las investigaciones existentes para

comprender de mejor manera la metaforización de la comunicación. Por último, esta investigación pretende contribuir a los conocimientos actuales sobre el uso y la traducción de metáforas en lenguajes especializados. La traducción de metáforas suele requerir una lexicalización y adaptación similares a la lengua de destino durante la comunicación intercultural para una mejor comprensión y aplicación práctica.

2. Resumen de la tesis doctoral

En el segundo capítulo se examina el marco teórico. El apartado 2.2 examina el origen de las metáforas, que incluyen las definiciones que se ofrecen, su creación y lexicalización, así como su influencia en la aplicación de la ley y su cumplimiento. En la sección 2.4 a continuación, se analizan las metáforas a través del marco de la lingüística cognitiva. En la sección 2.5 examinamos y discutimos el uso de la metáfora en economía y finanzas. En la sección 2.6 analizamos las oportunidades y soluciones de traducción de acuerdo con Dagut, Van den Broeck, Newmark, Toury (“The nature and role of norms”), Madelblit, Cabré “La terminología”, Stender, Temmerman y Campenhoudt, Preckler, y Dickins. En la sección 2.7 analizamos la traducción de las metáforas financieras y económicas.

En el tercer capítulo, se presenta la metodología de este proyecto de investigación en la sección 3.1, comenzando con los aspectos temáticos y semánticos de los textos del corpus en la sección 3.2, para después esbozar la metodología de identificación de metáforas en la sección 3.3. A continuación, describimos el corpus, los pasos que tomamos para componerlo de textos especializados en la sección 3.4, y detallamos las organizaciones examinadas en relación con esos textos en la sección 3.4.2. A continuación, en la sección 3.4.3, se analiza la tipología del corpus, seguida de un análisis en la sección 3.4.4. En la sección 3.4.5, se presenta y discutirá el software de análisis

lingüístico Sketch Engine que hemos utilizado en esta investigación. En la sección siguiente se examina la metodología de recolección de datos en 3.4.6. Finalmente, ofrecemos un análisis de los resultados en la sección 3.4.7.

En el capítulo cinco comenzamos a analizar los diversos tipos de metáforas extraídos en la sección 4.1, comparándolos con los hallazgos de investigadores precedentes. A continuación, se presentan las estrategias de traducción de metáforas en la sección 4.2. Se presenta en la sección 4.2.1 los dominios metafóricos identificados por FinCorpAlin. Según las secciones 4.2.2-5.2.5, planteamos y analizamos diversas estrategias de traducción de metáforas identificadas en el texto del corpus. En la sección 4.2.6 se presentan ejemplos de pérdida metafórica y problemas terminológicos. En la sección 4.3 se presentan los campos conceptuales investigados previamente y relacionados con la presente indagación.

A continuación, se muestra la metodología para extraer metáforas del corpus FinCorpAlin en la sección 4.4. La sección 4.5 presenta las metáforas conceptuales identificadas en el texto fuente, seguidas de un análisis de las metáforas en dominios compartidos tanto en el texto fuente como en el texto meta en la sección 4.6. En la sección 4.7 analizamos los dominios y frecuencias recurrentes en FinCorpAlin, seguidos de un análisis de las metáforas lexicalizadas extraídas de los textos de partida y de llegada. En las secciones 4.7.1- 4.7.31, se presentan ejemplos, discusión y análisis de segmentos de texto que contienen metáforas lexicalizadas.

En el quinto capítulo, se presentan varias aplicaciones prácticas. En primer lugar, en el apartado 5.1, tratamos de analizar la forma en que los agentes de ejecución y adjudicación podrían encontrar beneficiosa esta investigación. En la sección 5.2 se presenta un diagrama de flujo de una investigación típica. En la sección 5.3 se estudia la

mediación intercultural entre los responsables políticos y los interesados en el cumplimiento y la aplicación. La sección 5.4 brinda a los estudiantes de traducción valiosas estrategias y enfoques, incluyendo la metodología para construir el propio corpus lingüístico. También es útil para los estudiantes el modelo de uso del software de análisis lingüístico para analizar grandes volúmenes de texto en futuros proyectos de investigación. En la sección 5.5 nos dirigimos a los traductores en activo y les proporcionamos datos de corpus, análisis terminológico y estrategias de traducción que captan mejor la equivalencia del texto de origen al tiempo que conservan la saliencia metafórica. Finalmente, en la sección 5.6, examinamos la contribución de los corpus especializados a la traducción asistida por ordenador y a la traducción automática, y explicamos por qué creemos que nuestros corpus especializados aportarán un valor añadido en este ámbito.

Como se señala en el capítulo uno, la motivación de esta investigación se basa en la actual falta de corpus paralelos especializados y bilingües relativos a un fenómeno global: la delincuencia financiera. Este fenómeno presenta una gran cantidad de retos de comunicación debido a su complejidad y a la mezcla única de usos lingüísticos. Si se añade la traducción al español a esa mezcla, se generan otras comunicaciones interculturales. En el segundo capítulo, analizamos la traducción de metáforas comenzando con definiciones anteriores de metáfora (Lakoff y Johnson “Metaphors”, Le Guern, Goatley, Font Saravia, Kövecses “Levels of metaphor”) A continuación, analizamos la creación de metáforas y la lexicalización en la sección 2.1.2, discutiendo el trabajo de Temmerman, Temmerman y Campenhoudt, Rossi y García Palacios. Temmerman sostiene que el concepto, y no el término o la palabra, es el punto de partida para la descripción del significado en el sentido tradicional. (Temmerman “Questioning the univocity” 19). Temmerman y Campenhoudt (1) destacaron el papel importante que

tienen las metáforas en la comunicación y la transferencia intercultural a través de la traducción. Esta investigación contribuye a la comprensión del discurso de la regulación y el cumplimiento financieros mediante el análisis de las traducciones en este campo especializado. Existen escasos análisis lingüísticos en este ámbito. Esta investigación contribuirá a fomentar la concienciación sobre la transferencia intercultural a través de la traducción del lenguaje de la regulación financiera, el cumplimiento y la aplicación.

Parece bien respaldada la conclusión de que definir la metáfora sigue siendo un reto incluso veinticinco siglos después de su primer desarrollo (Fernández Colomer, Stender). Los investigadores han intentado utilizar diversos conceptos teóricos para identificar, describir, categorizar y clasificar las metáforas (Schäffner y Shuttleworth 94) En este sentido, aplicamos metáforas que en sí mismas plantean problemas de definición a conceptos abstractos de la delincuencia financiera, como el blanqueo de capitales, los paraísos fiscales, los paraísos fiscales que poca gente entiende. A continuación, estas expresiones se mezclan en el “caldo”, utilizando una metáfora culinaria de la traducción a una segunda lengua. No es sorprendente que puedan surgir problemas de comunicación que dificultan una comprensión clara, especialmente cuando la terminología es incoherente.

Rossi (“Métaphores terminologiques” 157) introdujo la noción de isotopías metafóricas que permiten la creación de nuevos términos a partir de las metáforas cognitivas compartidas del texto original. Se observa el uso de nuevos términos a partir de las metáforas cognitivas compartidas del texto fuente en los ámbitos del color, la limpieza y el blanqueamiento, el vehículo y las metáforas de las partes del cuerpo. Observamos cierta relación entre las metáforas cognitivas que se utilizan en el discurso de la regulación y el cumplimiento financiero. Encontramos, por ejemplo, semejanzas entre las metáforas bélicas compartidas sobre la “lucha contra el crimen” y “el dinero es

un organismo”. Rossi plantea la cuestión de hasta qué punto las metáforas contradictorias que contradicen el dominio especializado pueden dar forma a los conceptos que lo componen (“Métaphores terminologiques” 63) A continuación, exploramos la correspondencia metafórica con el texto meta teniendo esto en cuenta.

Tenemos en cuenta la noción que Palacios (25) plantea de “subcompetencia” de transferencia, teniendo en cuenta una mejor comprensión de las relaciones con otros términos y entre conceptos para alcanzar mejores resultados de traducción. En la sección 2.2 se examina la afirmación de Prandi del "enfoque de conflicto" para comprender las metáforas (Prandi “Conceptual conflicts” 7), que pueden dar lugar a otros significados o significantes. Esta aseveración señala (Rizzato 2) al referirse a cómo se configuran las interpretaciones del significado. El enfoque lingüístico cognitivo de la comprensión de las metáforas brinda una base para analizar mejor su uso y adopción.

A continuación, se examinan las interpretaciones terminológicas españolas de los juristas Blanco Cordero, Jiménez Sanz, González, y Mosteyrín Sampalo. En la sección 2.6.2, se mencionan las oportunidades de traducción. Sección 2.6 presenta la opinión que Canelones ha defendido, que describe la contabilidad financiera y la fiscalidad como lenguajes únicos y especializados. Nos referimos a lo que Canelones describe como una cierta tensión disciplinar entre ambos lenguajes relacionados con las finanzas.

3. Conclusiones sobre el uso y traducción de metáforas en textos especializados

Esta investigación contribuye a mejorar la concienciación y la importancia de mejorar el uso y la traducción de metáforas en los textos especializados. Como señala Sacristán, el uso de corpus de textos especializados se está convirtiendo en un método

cada vez más utilizado para abordar diversos rasgos lingüísticos (95). El uso de la metáfora para enseñar a traducir a estudiantes de inglés comercial mostró la utilidad de la traducción metafórica. El resultado de la encuesta reveló que los estudiantes reconocieron que la traducción de metáforas era una “actividad relevante, ya que les proporcionaba una fuente de información útil sobre expresiones metafóricas utilizadas en contextos empresariales reales” (94). Pensamos que esta investigación cumple ese objetivo. Proporciona información útil acerca de las expresiones metafóricas en el lenguaje especializado relativamente nuevo de los contextos reales de regulación, cumplimiento y aplicación.

Los conceptos se comprenden en contextos lingüísticos especializados y se traducen de acuerdo al nivel de experiencia y comprensión del traductor. De este modo, el traductor debe poseer experiencia y conocimientos en el campo especializado de la regulación financiera, el cumplimiento y la ejecución para traducir de forma equivalente los matices contextuales de ese entorno. “Los conceptos solo se entienden dentro del sistema en el que se encuentran” (traducción propia de Stender 19). Al tener esto en cuenta, el traductor debe ser consciente del dominio del inglés en este campo y de su influencia en la expresión lingüística.

El inglés ha tenido una gran influencia en los textos científicos publicados durante muchos años y se considera un medio fundamental para el intercambio mundial de conocimientos como lengua franca (Lillis y Curry). Como el inglés es una fuerza dominante dentro de las lenguas y las traducciones, es posible que otras culturas no desarrollen sus conceptualizaciones de manera completa. Bordet (2) sostiene el impacto de la influencia económica y cultural del inglés en la difusión de la información, lo que supone un peligro para otras culturas que creen sus propios conceptos. Bordet también sostiene que puede surgir una pérdida de dominio particular con terminología

especializada. No obstante, en la presente investigación no se ha apreciado este tipo de pérdida, sí se ha apreciado un predominio distintivo de las expresiones en inglés, especialmente en lo que respecta a los acrónimos utilizados como extranjerización.

Como se ha mencionado previamente, en las secciones 2.5, 2.5.1-2 se analiza cómo se ha tratado la traducción de metáforas en textos especializados. Hatim y Mason apuntan a nociones tales como la consideración de la cosmovisión y las motivaciones del autor del texto fuente por el estatus de los textos fuente. En Fuertes Olivera (82-89) proporcionamos un ejemplo de pérdida de dominio en inglés y español, y analizamos la incongruencia terminológica en la sección 2.6.1, con ejemplos de conceptos lingüísticos dominantes en el ámbito de la delincuencia financiera, como el blanqueo de capitales al principio de la Convención de Palermo de 2000 y la posterior variación de la terminología (Hourani-Martín y Tabares-Plasencia 108). Las expresiones de la terminología del crimen organizado en Estados Unidos se hicieron frecuentes y surgieron en los medios de comunicación populares (Lamp 104). Examinamos cómo la metáfora lexicalizada, *money laundering*, se acuñó en inglés (Romero y Callejas, César), influyendo en las expresiones destacadas en español. Los juristas como Blanco Cordero, Mosteyrín Sampalo y Millán aportaron matices sobre las diferencias en el significado jurídico de las expresiones lexicalizadas en español. Sostenemos que la congruencia expresiva es necesaria cuando existen incongruencias. Aunque el dominio lingüístico del inglés no es un problema en sí, existe el riesgo de que el texto español se refiera al mismo concepto metafórico utilizando términos diferentes. Además, ambas culturas occidentales presentan muchas similitudes.

Canelones indica la posibilidad de que sistemas de creencias disímiles provoquen una comunicación menos eficaz entre ellos. Canelones afirma además que cuanto más especializado es el lenguaje de una disciplina, menor es la posibilidad de una

comunicación eficaz entre los sistemas lingüísticos de la disciplina (69). Las diferencias en los lenguajes especializados presentan otros factores adicionales para el éxito de la transferencia de metáforas del inglés a español. A pesar de que la mayoría de las metáforas se transfirieron con eficacia en el corpus de textos examinados, hubo algunas diferencias conceptuales que pudieron influir de algún modo en la reacción del lector destinatario. Según ejemplos, los textos españoles prefirieron las metáforas de construcción-arquitectura, negocio de espectáculos teatrales y de partes del cuerpo a las expresiones inglesas. Otras áreas de interés percibidas fueron la preferencia por las metáforas agrícolas y las metáforas bélicas en español. Pizzero Sánchez (46) señaló el “doble papel” de las metáforas en la sección 2.2.1, ya que son tanto conceptuales como estéticas. Por lo tanto, el valor estético de la metáfora puede contribuir a aumentar la motivación ayudando a los usuarios de estas expresiones. Si el objetivo es aumentar la motivación, el valor de las metáforas del texto fuente lo ha conseguido principalmente, si no introdujo un mayor celo en las áreas en las que la intensificación es evidente en las secciones 4.1-4,5. En este último caso, lo que queda es más allá de una simple representación de una metáfora conceptual. Según Rossi (“Métaphores terminologiques” 53), desde un punto de vista ontológico, la proyección conceptual es esencialmente una “fotocopia ontológica”. Desde esa perspectiva, el movimiento cognitivista ha contribuido a reconocer el poder de las metáforas para modelar, como en el análisis de Timmerman de la ingeniería genética comparada con un mapa geográfico (ibid.)

4. Lingüística de corpus

Según Abdul Malik et al. (513), Semino afirmó que la lingüística de corpus es “un método en el estudio del lenguaje que no se vincula necesariamente a ninguna teoría específica”. Abdul Malik et al. (ibid.) indican que los investigadores pueden utilizar la

lingüística de corpus junto con otros campos para explicar el uso de la lengua. La presente investigación se fundamenta en estudios anteriores de lingüística de corpus para comprender de manera más eficaz el lenguaje especializado y fomentar unas mejores traducciones del inglés al español. La presente investigación proporciona un marco para futuras investigaciones, usos y aplicaciones de la lingüística de corpus en el mundo académico y fuera de él. La sección 6.2 presenta nuestra metodología para construir un corpus bilingüe unidireccional que otros pueden seguir. Los corpus personalizados están cada vez más disponibles en los últimos años debido a la evolución de las tecnologías, como se muestra en los trabajos de Reppen y Mikhailov.

En el estudio de Sacristán, se descubrió que los estudiantes consideraban interesante el uso del análisis lingüístico de corpus y apreciaban la posibilidad de utilizar las nuevas tecnologías en el aula para buscar y descubrir metáforas en inglés y español (94). La presente investigación presenta la metodología de construcción de un corpus personalizado basado en el trabajo académico previo (Laviosa, Stender, Mikhailov) de manera paso a paso, incluyendo el uso de Sketch Engine para realizar búsquedas terminológicas, concordancias, así como un glosario y análisis KWIC de palabras clave en contexto. Esta investigación establece los fundamentos para futuras investigaciones de textos especializados que sirvan a una creciente necesidad de congruencia interdisciplinaria e internacional de la terminología y las expresiones metafóricas.

Abdul Malik et al. (512) indican que, aunque los estudios sobre metáforas basados en corpus han experimentado una tendencia al aumento en los últimos años, existen diversas lagunas. Muchos de los estudios analizados en su investigación carecían de datos sobre la herramienta empleada para compilar y analizar el corpus. Otra cuestión mencionada en su estudio fue la falta de atención a áreas poco estudiadas. En primer lugar, analizamos y comentamos la herramienta de análisis lingüístico que utilizamos,

Sketch Engine. En segundo lugar, seleccionamos el área poco investigada del lenguaje de regulación y ejecución financiera con el que creamos nuestro corpus. Abdul Malik et al. (512) solicitan que los estudios futuros incluyan corpus especializados elaborados a partir de temas poco investigados. A pesar de que existen diversos estudios sobre las metáforas, apenas se ha estudiado la traducción de las metáforas relacionadas con la regulación, el cumplimiento y la aplicación de la delincuencia financiera.

5. Lingüística de corpus y enseñanza de segundas lenguas

Los corpus lingüísticos no solo han brindado un método para comprender mejor el lenguaje especializado, sino que también han resultado muy útiles para fundamentar la enseñanza. Burton (358) indica que los primeros profesores de gramática suelen extraer datos para encontrar ejemplos de uso incorrecto de la lengua. Los profesores de gramática moderna comenzaron a utilizar métodos descriptivos para proporcionar un enfoque más científico a la enseñanza de la gramática inglesa. Se utilizaron cartas personales y muestras de texto escrito de la lengua observada (ibid.). Una ilustración de este uso temprano de los corpus es la obra de Jespersen *A Modern English Grammar on Historical Principles*, “un ‘corpus’ personal de cientos de fuentes”, que demostró ser más eficaz que los ejemplos inventados (358). Más tarde, Charles Fries elaboró una gramática casi similar a la actual “gramática informada por corpus”, basada en el inglés hablado (ibid.). Aunque sigue siendo muy pequeño (sólo 250.000 palabras), fue antes de que existiera el análisis asistido por ordenador. La investigación examinó el discurso real en lugar de la literatura con un enfoque descriptivo y científico (ibid.). La utilización de listas de palabras se inició, por ejemplo, con la “General Service List of English Words (West 1953)” (ibid.). Desde 1930, los investigadores comenzaron a examinar las colocaciones y los patrones sintácticos y de construcción (360). Burton (360) sostiene que en la primera parte

del siglo XX, "la idea de considerar los datos de frecuencia... estaba en el aire" (ibid. Como señalan McEnery y Gabrielatos (33), "desde la década de 1960, los corpus electrónicos han adquirido importancia como recurso utilizado por los lingüistas". Aunque en un principio fueron predominantemente descriptivos, los primeros análisis de corpus establecieron las bases para su posterior evolución y aplicación. Por ejemplo, los estudios comparativos han identificado errores de uso.

Se han examinado los libros de texto en comparación con el corpus para detectar errores. Por ejemplo, Shortfall (en Burton) encontró una sobreexposición en los libros de texto de "las formas activas del presente perfecto simple y continuo, a expensas de las formas pasivas del presente perfecto [...]" (361). Al analizar el corpus del *Bank of English*, Shortfall también observó una mayor presencia de adverbios temporales como "since" y "for a while", mientras que otros como "now" estaban subrepresentados (ibid.). En otro ejemplo, los investigadores descubrieron que el vocabulario que aparecía en los libros de texto no reflejaba con exactitud el uso real (ibid.). Incluso otros estudios de Conrad, Römer y Vandenhoek encontraron incoherencias en cuatro libros de texto a través de la investigación de corpus sobre el adverbio, aunque como "contraste y concesión" como método para "suavizar el desacuerdo entre los hablantes" (Burton 361), que era un uso esencial según lo identificado por el análisis de corpus. Los corpus también se utilizan para descubrir nuevos aspectos de la lengua que no se hayan examinado previamente o que se hayan examinado de forma insuficiente.

Los nuevos descubrimientos generan datos que pueden usarse para analizar nuevas áreas del habla especializada. Burton (362) indica que los corpus se aplican a la investigación para construir o mejorar las descripciones gramaticales, no solo para criticarlas. Hemos elaborado mejores descripciones identificando áreas del lenguaje que no se han examinado previamente en los informes gramaticales estándar. Por ejemplo, en

otro estudio de investigación se hallaron aspectos de la lengua hablada, como “la elipsis, los temas frontales y los espacios de cola, todos ellos considerados relevantes desde el punto de vista pedagógico, pero que rara vez aparecen en las descripciones lingüísticas tradicionales” (363). Carter y McCarthy proponen temas frontales, y los temas de cola permiten a los oradores identificar los elementos que el orador desea destacar o reforzar ante el oyente (ibid.). Los resultados se obtuvieron mediante el trabajo de corpus con el corpus hablado por Cambridge y Nottingham Corpus of Discourse English (CANCODE) (ibid.).

Graner (3) indica que “los corpus de inglés con fines específicos [...] permiten a los profesores proporcionar a los alumnos las habilidades comunicativas que necesitan para participar en contextos disciplinares concretos”. Asimismo, los corpus bilingües, como el nuestro, pueden ser de ayuda a los estudiantes o aprendices de traducción al permitirles ver representaciones paralelas de los textos original y traducido (ibid.). Al visualizar ambos textos, se pueden detectar mejor los problemas de traducción típicos y atípicos, así como las soluciones de los traductores expertos anteriores (ibid.). Otra característica del aprendizaje a través de corpus es la recopilación de datos de los estudiantes para comprender mejor las tendencias y necesidades pedagógicas.

Los datos se generan de forma auténtica al capturar lo que los mismos alumnos crean utilizando el corpus (Granger 5). Los estudiantes producen y analizan su uso de la lengua y los rasgos interlingüísticos (ibid.). Los corpus de aprendizaje permiten a los docentes ofrecer un “retroalimentación personalizada” a nivel individual y de grupo (ibid.). Los estudiantes de idiomas pueden aprender a través de la anotación de los corpus.

Aunque se puede usar corpus en bruto (sin anotar), los etiquetados POS (partes de la oración), la estructura sintáctica (análisis sintáctico) y el error (etiquetado de errores)

ayudan al alumno a ver las características interlengua y las posibles correcciones (Granger 5). Según Lee et al. (747), las herramientas de corpus deben ser “fáciles de aprender” y accesibles para aquellos con escasa experiencia en su uso. Kilgariff et al. (66) señalan su desarrollo de Sketch Engine for Language Learners (SKELL) como “una versión despojada y no tenebrosa de Sketch Engine para uso de los estudiantes”. Burton (5) indica que las plataformas que proporcionan una buena visualización de los datos contribuyen a que los estudiantes sean más receptivos a los datos descubiertos. El uso de los datos de corpus puede ayudar a los alumnos a comprender mejor la asociación y la colocación de palabras (ibid.).

Los corpus se pueden utilizar para enseñar la colocación y el léxico con tareas que introduzcan a los alumnos en “procesos lingüísticos, cognitivos y técnicos” (Kilgariff et al. 69). Los docentes de lenguas pueden elaborar actividades de aprendizaje mediante la selección de frases y la formulación de preguntas acerca de si [sic palabras específicas] pueden ser sustituidas por términos equivalentes (ibid.). Kilgariff et al. (69) indican que son muchos los procesos mentales que se producen durante ese trabajo. El estudiante está estudiando el lenguaje, la teoría del lenguaje y el uso de los datos. Una de las características pedagógicas del uso de corpus en la enseñanza es que los alumnos tienden a comprometerse mejor con los corpus especializados cuando los han construido ellos mismos (ibid.). Al crearlo, los alumnos se sienten más propietarios del corpus, lo que les brinda mayor motivación para analizarlo (ibid.). Los estudiantes de traducción se benefician de aprender a elaborar y usar corpus lingüísticos.

Castagnoli utilizó la función BootCaT de Sketch Engine en un estudio en el que se utilizó la función BootCaT de Sketch Engine, e hizo que aprendices de traducción generaran corpus web basados en temas específicos y, a continuación, extrajeran listas de términos para compilar bases de datos y glosarios (Kilgariff et al. 73). Los estudiantes de

ese estudio hallaron un número más elevado de términos relevantes que podían extraerse cuando los dominios eran muy específicos (ibid.). Los estudiantes fueron evaluados para prepararse para una traducción técnica mediante la construcción de un corpus web en el ámbito especializado de la traducción y la creación de un glosario de términos a partir de él (ibid.).

6. Conclusiones

Proponemos esbozar las conclusiones de esta tesis doctoral para evaluar nuestra investigación. Creemos poder afirmar que, en general, hemos logrado los objetivos establecidos, aunque algunos podrían haberse desarrollado más. A diferencia de otros objetivos que inicialmente creíamos más complejos, resultaron mucho más largos y complejos (por ejemplo, nuestro análisis de las estrategias de traducción y el uso de metáforas en el discurso económico, financiero, de seguridad, jurídico y normativo). No obstante, nuestro objetivo original de analizar la lexicalización de metáforas entre el inglés y el español en el lenguaje de la regulación y el cumplimiento financiero requería comprender las diversas características del lenguaje implicado y las estrategias de traducción.

Como se mencionó al principio, esta investigación está motivada por nuestro interés en la lengua especializada estudiada y por la necesidad práctica de estar preparados para aplicar los resultados a la enseñanza y a los estudios de traducción. Hemos concluido este objetivo, ya que los resultados obtenidos pueden ser útiles en el aula de traducción, incluyendo un glosario y la explotación del corpus.

El lenguaje de las regulaciones y el cumplimiento financiero en inglés y español elaborado para los principales interesados en funciones de supervisión y cumplimiento

financiero tiene unas características y rasgos distintivos. A continuación, se presentan las conclusiones que se fundamentan en los objetivos iniciales de esta investigación.

El objetivo 1 es establecer una perspectiva de los lenguajes especializados en general, y el lenguaje normativo, de seguridad y financiero en particular.

Hemos tratado de cubrir las teorías más actuales y relevantes del lenguaje especializado. En consecuencia, podemos afirmar que los especialistas utilizan los lenguajes especializados como herramientas para elaborar una comunicación específica que exprese el contenido especializado e influya en el comportamiento.

Al momento de definir el lenguaje especializado, es fundamental tener en cuenta las perspectivas de diversas disciplinas, ya que el enfoque guía el objetivo del lenguaje. Como afirma Stender (378), esto requiere lexicología, terminología y traductología. Como señalan Pizarro, Sager, Arntz, Cabré (“Terminology”), Rossi, Prandi y Rossi, existen notables semejanzas, así como diferencias, entre los lenguajes especializados y los comunes.

El análisis de FinCorpAlin confirma que el lenguaje normativo se sirve de procesos morfológicos para la formación de palabras similares a las que utilizan otros lenguajes especializados. Como se muestra en los ejemplos de FinCorpAlin, la composición o adición predomina y la afijación. Algunos ejemplos son, en inglés: *countermeasures*, *anti-money laundering*, *anti-terrorism*, *anti-corruption*, *beneficial owner*, *counterterrorism*, and *legal person*. En español significan: contramedidas, la lucha contra el blanqueo y lavado de dinero, la corrupción, el beneficiario efectivo, la lucha contra el terrorismo y la persona jurídica.

Hemos llegado a la conclusión de que, al igual que el lenguaje económico, la regulación financiera y el cumplimiento son difíciles de definir, dada la naturaleza interdisciplinaria de los textos, los temas y las profesiones. Una conclusión respaldada por varios estudiosos, como Daintith (534, Allen, Abi-Lahoud, Ceci, Marcello, et al.)

Objetivo 2: Analizar las características congruentes e incongruentes en el uso de metáforas del lenguaje económico, financiero, de seguridad y normativo en inglés y español entre los países hispanohablantes a partir de estudios lingüísticos previos.

En la tabla 58 se presenta un resumen de las características del lenguaje económico, financiero y normativo.

El objetivo 3 es describir el género de la regulación financiera, el cumplimiento y la adjudicación utilizando el lenguaje especializado del campo.

Para comprender mejor el uso de metáforas en el lenguaje normativo en inglés y español, comenzamos examinando la bibliografía más relevante y actual. Seleccionamos las investigaciones más relevantes de Rossi y Prandi debido a su aplicación a la traducción de metáforas. Este género es difícil de definir debido a que es multidisciplinar e implica la terminología especializada de las finanzas, incluyendo los ámbitos de la economía, la seguridad y el derecho. Aunque algunos investigadores como Das y Serón-Ordóñez ofrecen algunos exámenes sobre el lenguaje de las finanzas, existe una escasez de investigación en el área de las finanzas reguladoras y el discurso de seguridad en la traducción. Rossi (“Creating metaphors” 136) señala algo de luz sobre las metáforas en su reciente trabajo, en el que se menciona que “las finanzas son un juego” y que “los inversores y los mercados y las empresas son animales” (Rossi “Creating metaphors”

157). Rossi (“Some observations”189) también analiza la transferencia evolutiva de metáforas entre diferentes dominios, ilustrándolo con el paradigma del término inglés “junk” y su paso de “la genética a la nutrición, las finanzas y luego la investigación” (ibid.). Se observa una migración terminológica similar en las expresiones náuticas de puerto seguro, con metáforas geológicas como el mar dentro, y metáforas de partes del cuerpo como el órgano, la mano, la cara y los ojos.

Como se indicó en el capítulo dos, Calzado and Lobo (2009) y Brooks (“How Everything Became War”) indican que el lenguaje de la seguridad produce percepciones. A menudo, define verdades mediante metáforas que pretenden expresar abstracciones normativas e ideas fundacionales que tratan de explicar el mundo a partir de, como afirman Calzado and Lobo, “verdades ficticias” (7). Según Serón-Ordóñez, la traducción del lenguaje de las finanzas es un ámbito poco estudiado. Asimismo, pocas investigaciones analizan el lenguaje de las finanzas desde una perspectiva lingüística. En contraste, el lenguaje económico ha sido analizado con gran cuidado; por Arrese, Mirón López, Charteris y Black, Guerrero-Ramos y Stender.

Para analizar los rasgos comunes del lenguaje normativo económico y financiero en inglés y español, empezamos revisando la bibliografía con las investigaciones más relevantes. Los trabajos de Rossi y Temmerman nos han permitido analizar, desde sus respectivas perspectivas, los aspectos léxicos, la terminología y la fraseología de nuestro corpus.

Objetivo 4: Recopilar un corpus de comparación sincrónica y diacrónica de metáforas españolas e inglesas representativas de la regulación de las finanzas y la seguridad.

Como se indica en el capítulo 4, el lenguaje de este fenómeno de investigación es fundamentalmente contemporáneo, y nuestros corpus comparables son una recopilación de comunicaciones actuales extraídas de sitios de Internet e informes en un periodo de 10-12 años. Los documentos que conforman nuestros corpus comparables incluyen discursos desde las perspectivas de la regulación económica-financiera, empresarial y jurídica. Discurso económico-financiero y de seguridad elaborada por actores gubernamentales, agentes de la ley, funcionarios, etc., dirigido a funcionarios y otras partes interesadas a través de informes, sitios de Internet y medios normativos afines al servicio de intereses ideológicos específicos.

Seleccionamos páginas web de inteligencia financiera que brinden información a funcionarios, agentes de la ley y funcionarios reguladores, funcionarios de empresas y otras partes interesadas en el ámbito financiero sobre la prevención del blanqueo de capitales y la financiación del terrorismo. Los corpus comparables incluyen sitios web que pensamos que podrían tender a ofrecer comunicaciones menos formales y a veces menos especializadas. No obstante, nos pareció que no era así, dado que la mayoría de las metáforas extraídas eran similares a las de los informes del corpus bilingüe.

Para el corpus bilingüe, recopilamos textos que representan el ámbito del discurso regulador de las finanzas y la seguridad en una radiografía de la comunicación actual en el área. Recopilamos textos fuente y sus traducciones 1:1, elaboramos un corpus bilingüe y extrajimos metáforas en ambos idiomas. Los documentos del corpus provienen directamente de los organismos reguladores, incluyendo las organizaciones internacionales de cooperación creadas para prevenir la delincuencia financiera.

Objetivo 5: Crear un glosario de los términos más utilizados en inglés y español.

A pesar de que existen numerosos glosarios inglés-español en el ámbito jurídico, hemos elaborado un glosario bilingüe específico de términos y expresiones de regulación financiera que será útil para la docencia y la formación de traductores. Se adjunta el glosario en el anexo 1. Al describir la terminología del ámbito de la regulación financiera, pensamos que se trata de la suma de la terminología jurídico-normativa y de cumplimiento, económico-financiera, metáforas y nombres de organizaciones cuyos esfuerzos son prevenir y eliminar la delincuencia financiera.

Objetivo 6: Analizar de manera contrastiva las metáforas presentes en FinCorpAlin, de la misma manera en que se utilizan entre Estados Unidos, Europa y los países latinoamericanos.

Nos sorprendió que las metáforas extraídas de FinCorpAlin fueran similares. Desde la obra fundamental de Lakoff y Johnson sobre las metáforas en 1980, se han realizado numerosos estudios sobre las metáforas, entre ellos las metáforas en el lenguaje económico. No obstante, son menos los estudios que han estudiado el uso de metáforas en las finanzas, especialmente en las que están relacionadas con el cumplimiento de la normativa. Debemos señalar que muchas imágenes mentales son similares tanto en inglés como en español, en las que se comparten convenciones parecidas, como por ejemplo LOS MOVIMIENTOS ECONÓMICOS HACIA ABAJO SON DESASTRES NATURALES (Charteris Black y Ennis 263). LO BUENO ESTÁ ARRIBA, LO MALO ESTÁ ABAJO (Lakoff y Johnson “Metaphors” 16). No obstante, esto no es siempre así, puesto que algunas culturas tienen modelos bastante distintos.

El objetivo 7 es establecer las frecuencias de frases léxicas en español e inglés en FinCorpAlin.

En la sección 5.9, registramos las frecuencias de los términos y frases léxicas y las sometemos a análisis. En la sección 5.9 también se señalan diversas expresiones metaforizadas, así como siglas recurrentes. Encontramos metáforas lexicalizadas con un alto nivel de frecuencia tanto en los textos de origen como en los de destino. Encontramos una concordancia en la frecuencia de varios términos en inglés y español, tales como información, riesgo y persona. La divergencia era evidente en el cuarto término más habitual en inglés, *money laundering*, que aparecía 4.239 veces. El cuarto término más común en español fue autoridad, con 4.024 apariciones, seguido de financiación terrorista, con 3.755. Como se muestra en la figura 11, también ofrecemos una comparación de FinCorpAlin con el corpus español general de referencia, esTenTen2018.

Objetivo 8: Analizar el papel ideológico de la metáfora conceptual en el campo investigado para aplicarlo a la didáctica de la traducción, incluyendo la aplicación y discusión de diferentes estrategias de traducción.

Tomamos en consideración la investigación realizada por Tymoczko (2014) y la influencia de la ideología en la traducción. Si consideramos la visión occidental del traductor como un elemento que se sitúa entre los textos de partida y de llegada, como señala Tymoczko (2007), parecería que el traductor no es neutral ni está por encima, como afirma Tymoczko, de “la historia y la ideología” (7). De este modo, olvidamos que la traducción puede reflejar los valores del poder y las culturas dominantes de la lengua original (ibid.). No obstante, estamos conscientes de que los traductores son susceptibles a los prejuicios culturales e ideologías poderosas que influyen en los textos, especialmente en ámbitos sensibles como el discurso de seguridad y la normativa financiera. Se comprobó que las connotaciones ideológicas del texto de partida se trasladaban al texto de llegada a través de diversas estrategias de traducción: retención, sustitución, modificación u omisión, adición y, en algunos casos, intensificación de

metáforas conceptuales en el texto de llegada (analizadas en la sección 5.2). Como sostiene Tymoczko (2014), “la ideología de la traducción es compleja, como resultado de una estratificación del tema del texto de origen” (181).

A lo largo de la historia, los problemas interculturales e ideológicos han sido una constante. Como, por ejemplo, durante la Guerra Hispanoamericana de 1898, las imprentas desempeñaron un papel fundamental en la formación de la opinión pública (Calzada-Pérez 1). Este tipo de dicotomía “nosotros” frente a “ellos” estaba presente tanto en los documentos originales como en los traducidos, contribuyendo a que prevalecieran los estereotipos, que, como señala Calzada-Pérez (ibid.), eran ideologías “intencionadamente destinadas a recabar apoyos para una guerra que iba a cambiar el orden global y el discurso hegemónico de la época” (ibid.). Se pueden establecer similitudes con los atentados del 11 de septiembre de 2001 en Estados Unidos, que supusieron un punto de inflexión, y el grito de guerra para derrotar al enemigo del terrorismo se oyó en todo el mundo. Los traductores deben trasladar las ideologías de los textos de origen a los de destino para elaborar traducciones fieles y eficaces. La objetividad es fundamental, y la comunicación puede ser excesiva o confusa. El ser objetivo no significa que los traductores deban permanecer neutrales en sus opiniones, sino que sean muy conscientes de las tendencias a la exageración y la intensificación.

Objetivo 9: Identificar de manera breve las características esenciales del discurso sobre el cumplimiento de la normativa financiera, tales como acrónimos y abreviaturas, unidades fraseológicas.

La sección sobre lenguaje económico-financiero describe siglas y abreviaturas habituales en este ámbito. De igual modo, se definieron los acrónimos de seguridad en la medida en que fueron relevantes para el discurso sobre el cumplimiento de la normativa.

En los documentos de texto fuente en inglés, se hallaron 75 siglas, de las cuales solamente había 17 traducciones al español. Estos datos indican la prevalencia y preferencia del texto de origen inglés, lo que tiene una influencia significativa en las traducciones del texto de destino.

Con respecto a los textos en español, nos hemos basado en las investigaciones de Pérez Bereguet y Gómez de Enterría. Se descubrió que los acrónimos y las abreviaturas tienden a mejorar la eficacia del lenguaje y logran expresiones rápidas y precisas (Gómez de Enterría). Antes de la década de 1990, muchos términos no eran muy conocidos debido a una serie de escándalos financieros internacionales y la posterior evolución de la norma. En la actualidad, no es necesario una formación especial en cumplimiento financiero para reconocer el significado de expresiones como “antilavado de dinero”, “financiación del terrorismo” y “cuentas extraterritoriales”. La capacidad de reconocer estas ocurrencias será útil para generar una comunicación equivalente e inequívoca a través del texto meta. A pesar de ello, los acrónimos lexicalizados y la coherencia terminológica ayudarán al traductor especializado.

En FinCorpAlin hemos hallado las características del discurso normativo en lo que respecta a los extranjerismos, en el vocabulario financiero especializado y el léxico general, tales como lucha y combate, con connotaciones bélicas. Estos resultados concuerdan con los de otros investigadores; por ejemplo, Lozano et al. (37) hallaron expresiones metafóricas militares similares en inglés y español. El vocabulario semitécnico se representa en ambas lenguas con términos como fuga de capitales, vigilancia y cartera, y términos muy técnicos como vehículo fiduciario discrecional o beneficiario efectivo.

Prieto Ramos (2020) señala la importancia de la coherencia y la precisión de la terminología jurídica en las traducciones, pero también señala los retos que existen en la traducción institucional internacional. Uno de esos desafíos es establecer la coherencia terminológica, junto con atravesar la asimetría de los sistemas judiciales mundiales. El éxito en este campo requiere que los traductores sean competentes en el análisis jurídico comparado o, al menos, tengan experiencia previa para detectar diferencias y falsos cognados (Prieto Ramos 146).

Como se indica en el capítulo uno, la motivación de esta investigación se basa en la actual falta de corpus paralelos especializados y bilingües relativos a un fenómeno global: la delincuencia financiera. Este fenómeno presenta numerosos retos en lo que respecta a la comunicación debido a su complejidad y a la peculiar combinación de usos lingüísticos. Si se añade la traducción al español a esa mezcla, surgen más desafíos de las comunicaciones interculturales. En el capítulo dos, analizamos la traducción de metáforas, comenzando con definiciones previamente establecidas de metáfora (Lakoff y Johnson, Le Guern, Goatley, Font Saravia, Kövecses “Levels of metaphor”). A continuación, examinamos la creación de metáforas y la lexicalización en la sección 2.1.2, discutiendo los trabajos de Temmerman, Temmerman y Campenhoudt, Rossi y García Palacios. Temmerman sostiene que el concepto, y no el término o la palabra, es el elemento fundamental para la descripción del significado en el sentido tradicional (Temmerman “Questioning the univocity” 19). Temenhoudt y Campenhoudt (1) señalaron el papel esencial que desempeñan las metáforas en la comunicación y la transferencia intercultural a través de la traducción. Consideramos que esta investigación progresa en la comprensión del discurso de la regulación y el cumplimiento financieros a través del análisis de las traducciones en este campo especializado. Existe una carencia de análisis lingüísticos en este campo. Esta investigación contribuirá a fomentar la

concienciación sobre la transferencia intercultural a través de la traducción del lenguaje de la regulación financiera, el cumplimiento y la aplicación.

La conclusión de que definir la metáfora sigue siendo un desafío incluso veinticinco siglos después de su primer desarrollo parece estar bien respaldada (Fernández Colomer 2003, Stender 2016). Los investigadores han tratado de utilizar diversos conceptos teóricos para identificar, describir, categorizar y clasificar las metáforas (Schäffner y Shuttleworth 94). Así, utilizamos metáforas que, en sí mismas, suponen dificultades para definir conceptos abstractos de la delincuencia financiera, como el blanqueo y lavado de dinero, los paraísos fiscales o los paraísos fiscales que poca gente entiende. A continuación, estas expresiones se mezclan en el “caldo”, debido a que se utiliza una metáfora culinaria para traducir una segunda lengua. No es sorprendente que puedan surgir problemas de comunicación que dificultan una comprensión clara, especialmente cuando la terminología es incoherente.

Rossi (157) introdujo la noción de isotopías metafóricas que permiten la creación de nuevos términos a partir de las metáforas cognitivas compartidas del texto original. Se observa el uso de nuevos términos a partir de las metáforas cognitivas que se comparten en el texto fuente en los ámbitos del color, la limpieza y el blanqueamiento, el vehículo y las metáforas de las partes del cuerpo. Existe una cierta asociación con las metáforas cognitivas que se comparten en el discurso de la regulación y el cumplimiento financieros. Por ejemplo, encontramos diferencias en las metáforas bélicas compartidas en cuanto a la “lucha contra el crimen” y “el dinero es un organismo”. Rossi plantea, entonces, la cuestión de hasta qué punto esas “isotopías metafóricas” que desmienten el dominio especializado pueden conformar los conceptos que lo componen (63). Analizamos la relación metafórica con el texto meta teniendo esto en cuenta.

Contemplamos la noción de subcompetencia de transferencia que plantea Palacios (25), considerando una mejor comprensión de las relaciones con otros términos y entre conceptos para llegar a mejores resultados de traducción. En la sección 2.2 se examina la afirmación de Prandi del “enfoque de conflicto” para comprender las metáforas (Prandi “Conceptual conflicts” 7), que pueden dar lugar a otros significados o significantes. Esta afirmación se señala (Rizzato 2) al referirnos a cómo toman forma las interpretaciones del significado. El enfoque lingüístico cognitivo de la comprensión de las metáforas brinda una base para analizar mejor su uso y adopción.

En el apartado 2.6.1, analizamos las interpretaciones terminológicas de los juristas Blanco Cordero, Jiménez Sanz y Mosteyrín Sampalo. Según la sección 2.6.2, se mencionan las oportunidades de traducción. En la sección 2.6 se presenta la opinión defendida por Canelones, quien describe la contabilidad financiera y la fiscalidad como lenguajes únicos y especializados. Nos referimos a lo que Canelones describe como una cierta tensión disciplinar entre ambos lenguajes relacionados con las finanzas.

6.1. Uso y traducción de metáforas en textos especializados

Esta investigación contribuye al aumento de la concienciación y la importancia de mejorar el uso y la traducción de las metáforas en los textos especializados. Como señala Sacristán, el uso de corpus de textos especializados se está convirtiendo en un método cada vez más utilizado para abordar una gran variedad de rasgos lingüísticos (95). Se reveló la utilidad de la traducción metafórica para enseñar a traducir a estudiantes de inglés comercial. Los alumnos reconocieron que la traducción de metáforas era una “actividad relevante, ya que les proporcionaba una fuente de información útil sobre expresiones metafóricas utilizadas en contextos empresariales reales” (94). Consideramos que esta investigación cumple con ese objetivo. Proporciona información útil acerca de

las expresiones metafóricas en el lenguaje especializado relativamente nuevo de los contextos reales de regulación, cumplimiento y ejecución.

El entendimiento de los conceptos se realiza en contextos lingüísticos especializados y se traducen en función del nivel de experiencia y comprensión del traductor. De este modo, el traductor debe poseer experiencia y conocimientos en el campo especializado de la regulación financiera, el cumplimiento y la ejecución para traducir de forma equivalente los matices contextuales de ese entorno. “Los conceptos solo se entienden dentro del sistema en el que se encuentran” (traducción propia de Stender 19). Teniendo esto presente, el traductor debe ser consciente del dominio del inglés en este campo y de su influencia en la expresión lingüística.

El inglés ha ejercido una influencia considerable en los textos científicos publicados durante muchos años y se considera una herramienta esencial para el intercambio mundial de conocimientos como lengua franca (Lillis y Curry). Como el inglés es una fuerza dominante dentro de las lenguas y las traducciones, es posible que otras culturas no desarrollen sus conceptualizaciones de manera completa Bordet (2). El impacto de la influencia económica y cultural del inglés en la difusión de la información es relevante, lo que supone el riesgo de impedir o dificultar que otras culturas creen sus propios conceptos. Bordet también sostiene que puede darse una pérdida de dominio particular con la terminología especializada. A pesar de que en la presente investigación no se ha apreciado este tipo de pérdida, sí se aprecia un predominio distintivo de las expresiones en inglés, especialmente en lo que respecta a los acrónimos utilizados como extranjerización.

En las secciones 2.5, 2.5.1-2, analizamos cómo se ha abordado previamente la traducción de metáforas en textos especializados. Hatim y Mason apuntan a conceptos

como la consideración de la visión del mundo y las motivaciones del autor del texto fuente por el estatus de los textos fuente. Ofrecemos un ejemplo de pérdida de dominio en inglés y español en Fuertes Olivera (82-89). La sección 2.6.1 analiza la incongruencia terminológica, de nuevo, con ejemplos de conceptos lingüísticos dominantes en el ámbito de la delincuencia financiera, como el blanqueo de capitales al comienzo de la Convención de Palermo de 2000 y la posterior variación de la terminología (Hourani-Martín y Tabares-Plasencia 108). Las expresiones de la terminología del crimen organizado en Estados Unidos se hicieron frecuentes y surgieron en los medios de comunicación populares (Lamp 104). Se debatió cómo la metáfora lexicalizada *money laundering* se acuñó en inglés (Romero y Callejas, César 1), influyendo en las expresiones destacadas en español. Los juristas Blanco Cordero, Mosteyrín Sampalo y Millán aportaron datos sobre la diferencia entre los significados jurídicos de las expresiones lexicalizadas en español. Sostenemos que la congruencia expresiva es necesaria cuando existen incongruencias. Aunque el dominio del inglés no es un problema en sí, existe el riesgo de confusión cuando el texto en español se refiere a la misma metáfora utilizando términos diferentes. Por otra parte, ambas son culturas occidentales con muchas similitudes.

Canelones apunta la posibilidad de que sistemas de creencias diferentes provoquen una comunicación menos eficaz entre ellos. Canelones también señala que cuanto más especializado es el lenguaje de una disciplina, menores son las posibilidades de una comunicación eficaz entre los sistemas lingüísticos (69). Las diferencias en los lenguajes especializados requieren otros factores para el éxito de la transferencia de metáforas del inglés al español. A pesar de que la mayoría de las metáforas se transfirieron con eficacia en el corpus de textos examinados, hubo algunas diferencias conceptuales que pudieron influir de algún modo en la reacción del lector destinatario. Los textos españoles, por

ejemplo, mostraron una preferencia por las metáforas de construcción-arquitectura, de negocio de espectáculos teatrales y de partes del cuerpo en comparación con las expresiones utilizadas en inglés. Otras áreas de relevancia percibidas fueron la preferencia por las metáforas agrícolas y las metáforas bélicas en el idioma español. Pizzero Sánchez (46) mencionó que las metáforas tienen un papel tanto conceptual como estético, por lo que el valor estético de la metáfora puede ayudar a aumentar la motivación ayudando a los usuarios de estas expresiones. Si el objetivo es aumentar la motivación, el valor de las metáforas del texto fuente lo ha logrado principalmente, si no, introduciendo un mayor celo en las áreas en las que la intensificación es evidente en las secciones 4.1-4.5. En este último caso, lo que queda es más allá de un mero copia de una metáfora conceptual. Como afirma Rossi, la proyección conceptual es, desde un punto de vista ontológico, una “fotocopia ontológica” (53). Desde esa perspectiva, el movimiento cognitivista ha contribuido a reconocer el poder modelador de las metáforas, como en el análisis de Timmerman de la ingeniería genética comparada con un mapa geográfico (ibid.).

6.2. Lingüística de corpus

Abdul Malik et al. (513) sostienen que Semino señaló que la lingüística de corpus es “un método en el estudio del lenguaje que no está necesariamente relacionado con ninguna teoría específica”. Abdul Malik et al. (ibid.) indican que los investigadores pueden utilizar la lingüística de corpus junto con otros campos para explicar el uso de la lengua. La presente investigación se basa en estudios anteriores de lingüística de corpus para comprender mejor el lenguaje especializado y fomentar unas traducciones más precisas del inglés al español. El presente estudio proporciona un marco para futuras investigaciones, usos y aplicaciones de la lingüística de corpus en el mundo académico y en la vida diaria. El apartado 6.2 presenta nuestra metodología para elaborar nuestro

corpus bilingüe unidireccional, que puede servir de guía a otros. Los corpus personalizados han estado cada vez más disponibles en los últimos años debido al avance de las tecnologías, como se vio en los trabajos de Reppen y Mikhailov.

En el estudio de Sacristán, ésta reveló que los estudiantes consideraban interesante el uso del análisis lingüístico de corpus y apreciaban la posibilidad de utilizar las nuevas tecnologías en el aula para buscar y descubrir metáforas en inglés y español (94). Según el estudio de Sacristán, los estudiantes consideraban interesante el uso del análisis lingüístico de corpus y apreciaban la posibilidad de utilizar las nuevas tecnologías en el aula para buscar y descubrir metáforas en inglés y español (94). La presente investigación establece los fundamentos para futuras investigaciones de textos especializados que atiendan a la creciente necesidad de congruencia interdisciplinaria e internacional de la terminología y las expresiones metafóricas.

Abdul Malik et al. (512) indican que, aunque los estudios sobre metáforas basados en corpus han experimentado una tendencia al aumento en los últimos años, existen diversas lagunas. Muchos de los estudios realizados en su investigación carecían de datos sobre la herramienta utilizada para compilar y analizar el corpus. Otro ejemplo mencionado en su investigación fue la falta de atención a áreas poco estudiadas. En primer lugar, analizamos y comentamos la herramienta de análisis lingüístico que utilizamos, Sketch Engine. En segundo lugar, seleccionamos el área poco estudiada del lenguaje de regulación y ejecución financiera para construir nuestro corpus. Abdul Malik et al. (512) solicitan que los estudios futuros incluyan corpus especializados elaborados a partir de temas poco investigados. A pesar de que existen numerosos estudios sobre las metáforas, apenas se ha investigado la traducción de las metáforas que están relacionadas con la regulación, el cumplimiento y la aplicación de la delincuencia financiera.

6.3. Lingüística de corpus y enseñanza de segundas lenguas

Los corpus lingüísticos no solo han brindado un método para comprender mejor el lenguaje especializado, sino que también han resultado muy útiles para fundamentar la enseñanza. Burton (358) indica que los primeros profesores de gramática suelen extraer datos para encontrar ejemplos de uso incorrecto de la lengua. Los profesores de gramática modernos comenzaron a utilizar métodos descriptivos para otorgar un enfoque más científico a la enseñanza de la gramática inglesa. Se hizo uso de la correspondencia personal y de muestras de texto escrito de la lengua en cuestión (ibid.). Un ejemplo de este uso temprano de los corpus es la obra de Jespersen *A Modern English Grammar on Historical Principles*, “un 'corpus' personal de cientos de fuentes”, que demostró ser superior a los ejemplos inventados (358). Más tarde, Charles Fries elaboró una gramática casi similar a la actual “gramática informada por corpus”, basada en el inglés hablado (ibid.). A pesar de que sigue siendo muy reducido (solamente 250.000 palabras), fue antes de que existieran los análisis asistidos por ordenador. La investigación examinó el discurso real en lugar de la literatura con un enfoque descriptivo y científico (ibid.). El uso de listas de palabras se inició, por ejemplo, con la “General Service List of English Words (West 1953)” (ibid.). A partir de 1930, los investigadores comenzaron a estudiar los conocimientos y los patrones sintácticos y de construcción (360). Burton (360) sostiene que, en la primera parte del siglo XX, “la idea de considerar los datos de frecuencia... estaba en el aire” (ibid.). Como señalan McEnery y Gabrielatos (33), “desde la década de 1960, los corpus electrónicos han cobrado importancia como recurso utilizado por los lingüistas”. A pesar de ser descriptivos, los primeros análisis de corpus establecieron las bases para su posterior evolución y aplicación. Por ejemplo, los estudios comparativos han identificado errores de uso.

Se han analizado los libros de texto en comparación con los corpus para encontrar errores. Finalmente, Shortfall (en Burton) halló una sobrerrepresentación en los libros de texto de “las formas activas del presente perfecto simple y continuo, en comparación con las formas pasivas del presente perfecto” (361). Al usar el corpus del *Bank of English*, Shortfall también observó una sobreexplotación de adverbios temporales como “since” y “for”, mientras que otros como “now” estaban subrepresentados (ibid.). En otro ejemplo, los investigadores descubrieron que el vocabulario que aparecía en los libros de texto no reflejaba con exactitud el uso real (ibid.). Asimismo, otras investigaciones de Conrad, Römer y Vandenhoeck encontraron incoherencias en cuatro libros de texto a través de la investigación de corpus sobre el adverbio, aunque como “contraste y concesión” como método para “suavizar el desacuerdo entre los hablantes” (Burton 361), que era un uso importante según lo identificado por el análisis de cuerpo. Los corpus también se utilizan para descubrir nuevas facetas del idioma que aún no han sido estudiadas o que han sido estudiadas de manera insuficiente.

Los nuevos descubrimientos proporcionan datos que pueden usarse para estudiar nuevas áreas del lenguaje especializado. Burton (362) indica que los corpus se aplican a la investigación para construir o mejorar las descripciones gramaticales, no solo para criticarlas. Hemos elaborado mejores descripciones identificando áreas del lenguaje que no se han examinado previamente en los informes gramaticales estándar. Por ejemplo, en otro estudio de investigación se hallaron aspectos de la lengua hablada, como “la elipsis, los temas frontales y los espacios de cola, todos ellos considerados relevantes desde el punto de vista pedagógico, pero que rara vez aparecen en las descripciones lingüísticas tradicionales” (363). Carter y McCarthy plantean temas centrales, y los temas de fondo permiten a los oradores identificar los elementos que el orador quiere destacar o reforzar ante el oyente (ibid.). Los resultados se realizaron mediante el trabajo de corpus con el

corpus hablado Cambridge and Tottenham Corpus of Discourse English (CANCODE) (ibid.).

Granger (3) indica que “los corpus de inglés con fines específicos [...] permiten a los profesores proporcionar a los alumnos las habilidades comunicativas que necesitan para participar en contextos disciplinares concretos”. Los corpus bilingües, como el nuestro, pueden ser de gran ayuda para estudiantes o aprendices de traducción, ya que les permiten ver representaciones paralelas de textos originales y traducidos (ibid.). La visualización de ambos textos permite detectar de manera más eficiente los problemas de traducción típicos o atípicos y las soluciones de los traductores expertos anteriores (ibid.). Otra característica del aprendizaje a través de corpus es recopilar información de los estudiantes para comprender de mejor manera las tendencias y necesidades pedagógicas.

Los datos se generan de manera auténtica al capturar lo que los propios alumnos crean utilizando el corpus (Granger 5). Los estudiantes producen y analizan su uso de la lengua y los rasgos interlingüísticos (en Granger 5). Los corpus de aprendizaje permiten a los profesores suministrar “retroalimentación personalizada” a nivel individual y grupal (5). Los estudiantes de idiomas pueden aprender a través de la anotación de los corpus.

A pesar de que se puede utilizar corpus en bruto (sin anotar), las características de anotación como el etiquetado POS (partes de la oración), la estructura sintáctica (análisis sintáctico) y el error (etiquetado de errores) ayudan al alumno a ver las características interlengua y las posibles correcciones (Granger 5). Según Lee et al. (747), las herramientas de corpus deben ser “fáciles de aprender” y accesibles para aquellos con escasa experiencia en su uso. Kilgariff et al. (66) describen su desarrollo de *Sketch Engine for Language Learners* (SKELL) como “una versión simplificada y no espantosa de *Sketch Engine* para uso de los estudiantes”. Burton (5) indica que las plataformas que

proporcionan una buena visualización de los datos ayudan a que los estudiantes sean más receptivos a los datos descubiertos. El uso de datos de corpus puede ayudar a los estudiantes a comprender mejor la asociación y la colocación de palabras (ibid.).

Los corpus pueden usarse para enseñar colocación y léxico con tareas que introduzcan a los alumnos en “procesos lingüísticos, cognitivos y técnicos” (Kilgariff et al. 69). Los profesores de idiomas pueden elaborar actividades de aprendizaje mediante el uso de datos, seleccionando frases y preguntando si [sic palabras específicas] pueden sustituirse por palabras similares (ibid.). Kilgariff et al. (69) dicen que “son muchos los procesos mentales que tienen lugar durante ese trabajo”. El alumno está aprendiendo el lenguaje, sobre el lenguaje y sobre el uso de datos”. Una característica pedagógica del uso de corpus en la enseñanza es que los estudiantes tienden a comprometerse mejor con los corpus especializados cuando los han construido ellos mismos (ibid.). Los estudiantes se aprovechan del corpus al crearlo, lo que les da una mayor motivación para examinarlo (ibid.). Los estudiantes de traducción se ven beneficiados al aprender a elaborar y utilizar corpus de lingüística.

Castagnoli utilizó la función BootCaT de Sketch Engine en un estudio en el que se utilizó la función BootCaT de Sketch Engine, y luego extrajeron listas de términos para compilar bases de datos y glosarios (Kilgariff et al. 73). Los investigadores de ese estudio encontraron un número más significativo de términos relevantes que podían extraerse cuando los dominios eran muy especializados (ibid.). Los estudiantes fueron evaluados para prepararse para una traducción técnica mediante la construcción de un corpus web en el ámbito especializado de la traducción y la creación de un glosario de términos a partir de él (ibid.). El siguiente esquema muestra las etapas de enseñanza y aprendizaje para incorporar la enseñanza de corpus en el plan de estudios.

Además de la investigación sobre el corpus de hablantes nativos, la enseñanza de idiomas se beneficia de la investigación relacionada con el corpus de alumnos y los libros de texto de enseñanza de inglés (McEnery y Gabrielatos 50). Los planes de estudios y los libros de referencia pueden tomar datos descriptivos más precisos y detallados de la investigación basada en corpus que posteriormente proporcionan información sobre el contenido de la gramática y los diccionarios (ibid.). Los corpus de aprendizaje ayudan a comprender cómo los estudiantes de inglés utilizan la lengua, proporcionan indicaciones sobre los procesos de aprendizaje de la lengua y también contribuyen a la “investigación sobre la adquisición de segundas lenguas (SLA)” (McEnery y Gabrielatos 50). En la siguiente imagen se muestra una representación de los corpus y el aprendizaje de idiomas.

Otra expresión que suele estar asociada a los delitos financieros: paraíso fiscal y paraíso fiscal, las cuales se refieren al mismo concepto. La expresión “Fiscal paradise” se ha lexicalizado en inglés y algunos la consideran erróneamente traducida como “paraíso fiscal” o, literalmente, “paraíso fiscal”, que es un lugar donde el capital puede evitar la tributación. En 2010, Sanz Gómez afirmó que “Paraíso fiscal” procedía de una mala traducción de “fiscal paradise”, ya que los franceses confundieron inicialmente la traducción de “haven” con “heaven” (1). Otras investigaciones también han señalado problemas con la traducción (Enfadaque, Gómez et al., González Martín,). No obstante, Peramo sostiene que no fue necesariamente un error, argumentando que un análisis histórico más profundo de ambos términos en inglés, haven, and heaven, se refiere a lo mismo en terminología contable (6-7, Hines y Rice, Murphy).

En consecuencia, ambos términos hacen referencia a regiones extranjeras en las que la moneda no está sujeta a las obligaciones fiscales del lugar de origen. Por otra parte, el término “fiscal paradise” fue utilizado por primera vez en inglés y con frecuencia por la

Tax Justice Network (Murphy 7). Lo más adecuado para expresar el concepto es “refugio fiscal”, que se usa con mucha menos frecuencia (7 veces) en los datos del corpus. A pesar de que Peramo afirma que los términos no son unívocos. Son paraísos fiscales “esencialmente plataformas para operaciones financieras y comerciales en los mercados globales, más que meros paraísos monetarios” (traducción propia 2016:7). En esencia, el término paraíso evoca visiones en las que cosas como la delincuencia no existen. Como señala Hülse (ibid.), si el dinero se blanquea en el paraíso, parece haber cierta contradicción en el sentido de que el delito es un precursor necesario del blanqueo de capitales.

No obstante, la terminología contable en inglés adoptó este término y lo viene utilizando desde al menos comienzos de la década de 1990 (Hines y Rice). Por lo tanto, en este caso no parece que haya una pérdida metafórica del texto de origen al de destino. Los ejemplos de pérdida pueden verse en expresiones menos llamativas en las que se sustituye la metáfora, cambiando el concepto. Un ejemplo de una metáfora reemplazada con una expresión metafórica distinta podemos observar en el cuadro 16, con el término del texto de origen *pantalla* en el texto de destino, muestra un ejemplo de metáfora sustituida por una expresión metafórica diferente basada en un concepto completamente erróneo. El término del texto de origen *screen* está erróneamente traducido como *pantalla* en el texto de destino. Existe la posibilidad de que se produzca una falta de comprensión clara debido a la correspondencia entre el dominio del texto de origen del blanqueo de capitales y el dominio de destino que utiliza de manera intencionada blanqueo de capitales y lavado de dinero. La delincuencia financiera es un enemigo en el ámbito objetivo, está claro en realidad. No obstante, existe la posibilidad de confusión y cierta pérdida de conceptos metafóricos en el texto meta debido a las múltiples expresiones que pretenden referirse a la misma idea. Además de las incoherencias terminológicas repetitivas en

expresiones como paraísos fiscales, las correspondencias corren el riesgo de perderse o debilitarse. Asimismo, el ejemplo anterior muestra cómo el lenguaje normativo de Estados Unidos ha modelado e influido en la ontología de la prevención de la delincuencia financiera en el mundo hispanohablante mediante la transferencia de cierta ontología de la DS, como la guerra.

6.4. El blanqueo de capitales y la falta de concordancia terminológica en español

Uno de los hitos normativos más importantes contra la delincuencia organizada fue la Convención de Palermo, también conocida como la Convención de las Naciones Unidas contra la Delincuencia Organizada Transnacional, un acuerdo multilateral respaldado por las Naciones Unidas y aprobado en el año 2000 (Hourani-Martín y Tabares-Plasencia). El convenio, una vez que entró en vigor, comenzó a influir en la legislación nacional de los países hispanohablantes, aunque ya tuvieran leyes en vigor en este ámbito (Hourani-Martín y Tabares-Plasencia). Existe una cierta influencia del lenguaje que surgió en los medios de comunicación estadounidenses. En español, la variación de términos es muy amplia (Hourani-Martín y Tabares-Plasencia 108). En los Estados Unidos, el término "crimen organizado" se originó en una organización comunitaria conformada por banqueros, abogados y hombres de negocios para combatir la delincuencia bajo la Comisión del Crimen de Chicago (Lamp 104). El concepto de blanqueo de capitales entra en el marco de la delincuencia organizada.

A partir de los años 20, durante la etapa de la prohibición en Estados Unidos, los mafiosos (Al Capone) utilizaban lavanderías para legitimar sus beneficios derivados de actividades ilícitas. Además, cuando algunos delincuentes utilizaban la lavandería para eliminar el olor a combustible del dinero en efectivo procedente de las gasolineras, la

metáfora se acuñó como *money laundering* (Romero y Callejas, César 11). España Alba (49) sostiene que el blanqueo de capitales existe desde la antigüedad, de la misma manera que el concepto de dinero. No obstante, ha sido un delito a menudo vinculado a otros delitos, como el terrorismo y la delincuencia organizada. Hourani-Martín y Tabares-Plasencia (112) sostienen que el concepto se vinculó inicialmente con el narcotráfico y posteriormente se asoció con el terrorismo u otras formas de delincuencia que requieren grandes recursos en un contexto internacional.

Urbaneja Cillán sostuvo que “el blanqueo de capitales es, en la actualidad, un fenómeno delictivo de carácter eminentemente transnacional, que afecta, con mayor o menor intensidad, a la mayoría de los Estados y regiones del mundo, con independencia de su régimen económico, jurídico o político” (Urbaneja Cillán, 219). Como señala Tondini (5), la expresión se utilizó por primera vez en el ámbito jurídico en un caso en Estados Unidos en 1982. Sin embargo, la expresión se acuñó mucho antes. A partir de la década de 1980, la legislación estadounidense estableció y promovió el uso del término a partir de la década de 1980, cuando se promulgó la Ley de Control del Blanqueo de Capitales de 1986 en Estados Unidos, la ley pública federal 99-570, que consta de dos secciones: 18 USC § 1956, y 18 USC § 1957 (Cassela 21). Cabe destacar que el blanqueo de capitales no fue un delito en Estados Unidos hasta 1986, y fue hasta la Convención de Viena en 1988 de las Naciones Unidas cuando se internacionalizó (Mosteyrín Sampalo 67).

Existen diversas formas de expresar el concepto de *money laundering* en español. El mayor reto es la carencia de una definición global unificada (César 19, Jiménez Sanz 66). Como existen diversas metáforas lexicalizadas sobre el fenómeno, vale la pena estudiar la relación entre traducción y terminología, que está íntimamente ligada a la traducción especializada y en contextos lingüísticos de neologismos, como señala Cabré

(“La terminología” 2). Los dos elementos comunes expresan el concepto de *money laundering* desde el punto de vista jurídico.

- Por primera vez, se inicia con bienes, que suelen ser dinero, que proceden de medios ilícitos.

- En segundo lugar, el intento de reintroducir bienes lícitos con apariencia legítima en el tráfico económico (Mosteyrín Sampalo 117).

Jiménez Sanz indica que “algunos de los términos usados como sinónimos no son términos aceptados unánimemente por la doctrina jurídica” (Jiménez Sanz 66). Como resultado, no se puede suponer que las expresiones coincidan en su significado. El término “blanqueo” deriva del verbo “blanquear”, que, según el *Diccionario de la Lengua Española*, de la Real Academia Española, significa “hacer blanco algo”, “mostrar la blancura que tiene” y “hacer legal el dinero negro” (traducción propia RAE).

Una vez obtenido el dinero procedente de sus actividades ilícitas, los delincuentes (Romero y Callejas, Sansó), así como las organizaciones criminales (Millán 2004), ocultan o camuflan el dinero negro para que las autoridades no puedan descubrir su origen (ibid.). Romero y Callejas confirman que el término lavado es el preferido en América (y al parecer en la mayor parte del continente) y deriva de la expresión inglesa *money laundering* (147).

Sin embargo, Blanco Cordero sostiene que ambos términos implican conceptos diferentes. La diferencia se encuentra entre lo que se ha llamado “dinero negro” y “dinero sucio”. Si se trata de un dinero negro, “hay que blanquearlo, y si está sucio, hay que lavarlo o limpiarlo” (traducción nuestra de Blanco Cordero 87). “Se fundamenta en el origen del dinero o en los bienes. Ese dinero “negro” proviene de actividades comerciales legales, pero se evade de las obligaciones fiscales” (ibid., Bacigalupo y Bajo Fernández

14). Por otro lado, el dinero “sucio” procede de actividades criminales, es decir, contrabando, narcotráfico, trata de seres humanos, etc. (Millán 87). González (25) consigna que el uso del término blanqueo proviene del periodismo o de la sociología, pero no del jurídico.