



FINANCIAL INTELLIGENCE GROUP

AP SUSTRANS

FINANCIAL INTELLIGENCE GROUP



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The diagram illustrates the organizational structure of the Financial Intelligence Group. At the top is the main title 'FINANCIAL INTELLIGENCE GROUP'. A vertical line descends from this title and connects to a horizontal line. From this horizontal line, three vertical lines branch out downwards to three separate sub-units: 'AP SUSTRANS', 'AP ASSET RECOVERY', and 'FIU.NET'. Each sub-unit is enclosed within a partial circular arc, with the top arc above the unit and the bottom arc below it.

AP SUSTRANS

AP ASSET
RECOVERY

FIU.NET

SOURCES OF INFORMATION



**MONEY LAUNDERING
INVESTIGATIONS
(LEA)**



**STRs and CTRs
(FIUs)**



**CASH DECLARATIONS
CASH SEIZURES
(CUSTOMS)**



FINANCIAL INTELLIGENCE GROUP

2017

FROM SUSPICION TO ACTION

Converting financial intelligence into
greater operational impact



 EUROPOL

Key findings

- The overall number of reports continues to increase. In 2014 almost 1 million reports were received.
- Just 10% of suspicious transaction reports (STRs) are further investigated

Total reports across all Member States (2006 - 2014)

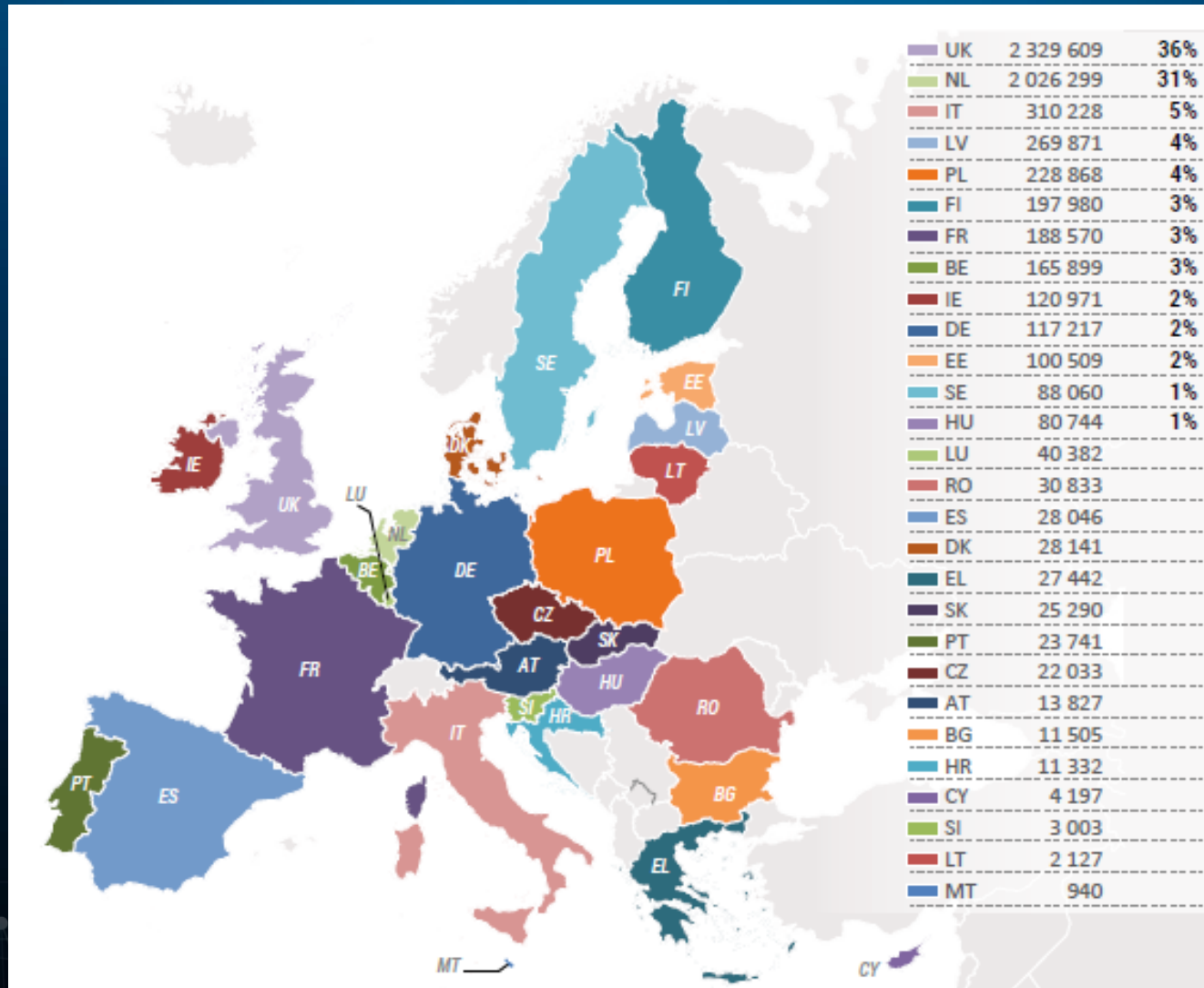
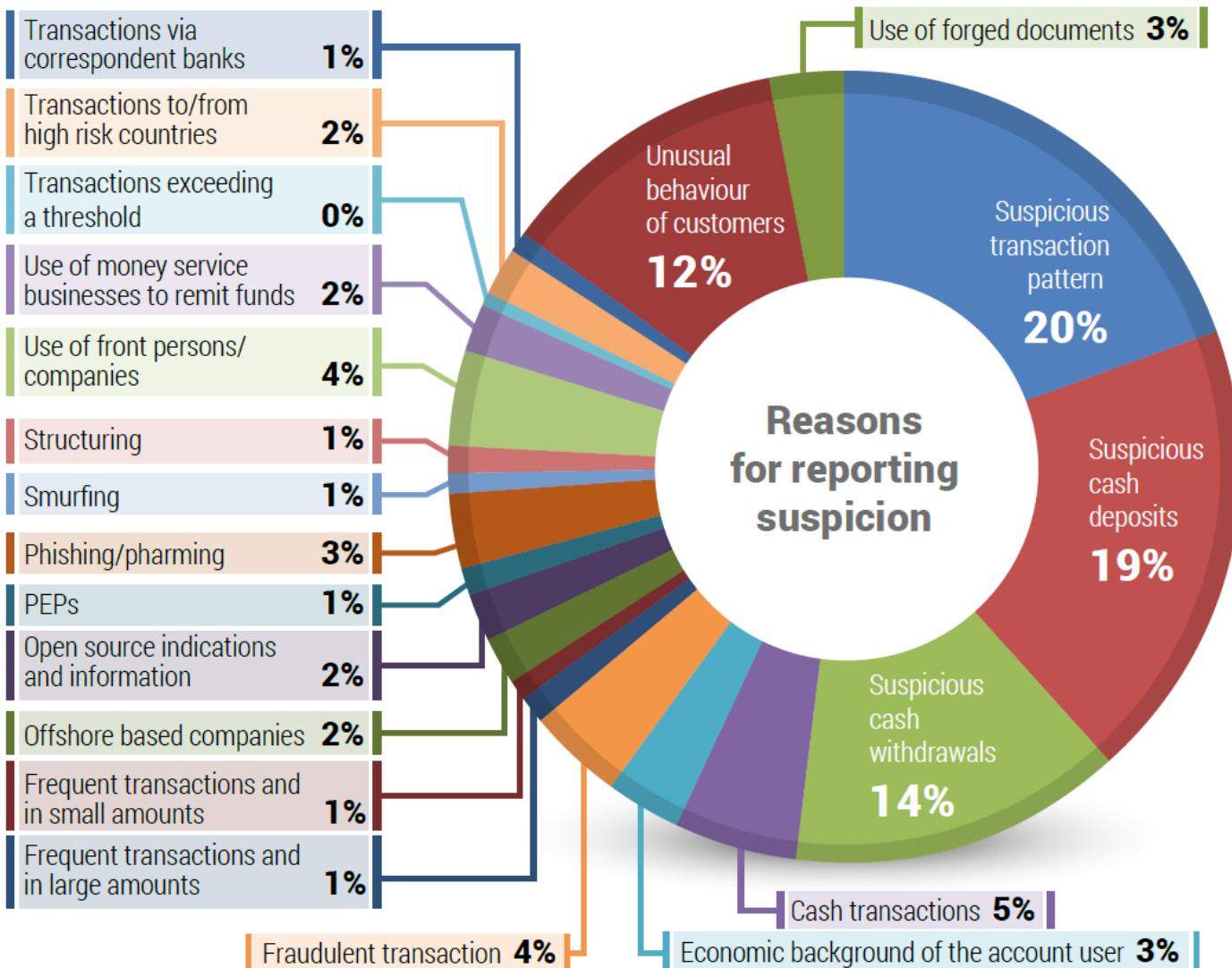
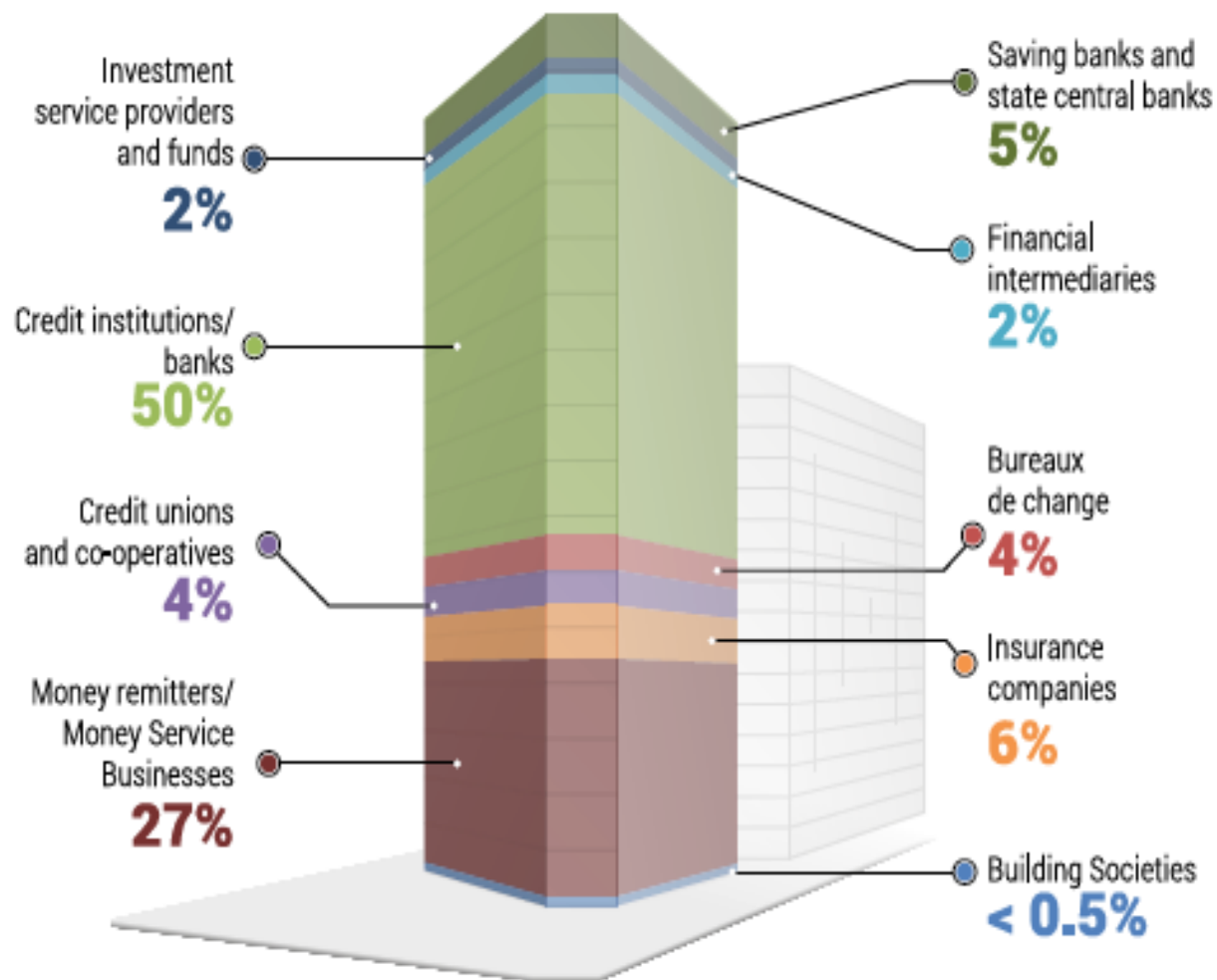
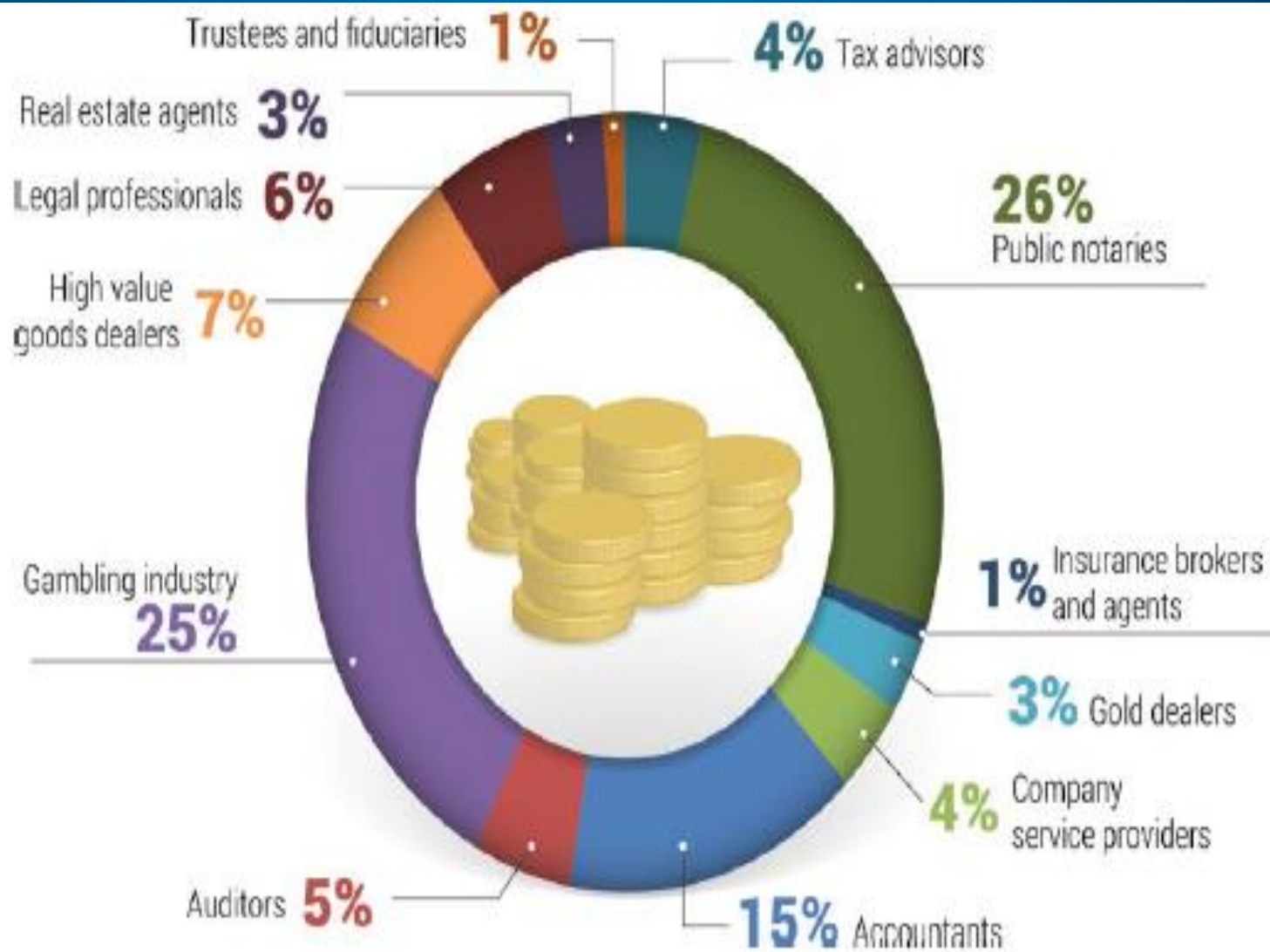


Chart 10 – Main reasons behind STR reporting 2013/14 ⁽¹⁸⁾







Least frequent reporting entities 2013/2014

- ✓ Financial – currency exchange bureaux, pension and investment funds
- ✓ Non-financial – traders in high value goods, TCSP, real estate

High value goods dealers: Operation Cedar

On 24 January 2016, law enforcement and judicial authorities from France, the US, Germany, Belgium, Italy, the Netherlands and Spain, supported by Europol and Eurojust, took action against a prominent OCG responsible for the laundering of profits from cocaine sales throughout Europe.

Building on long-standing ties to South American drugs cartels, the OCG's modus operandi involved the use of cash couriers travelling across Europe by car to collect the proceeds of crime, followed by the purchase of expensive cars, luxury watches and jewellery. These high value goods were then exported to Lebanon where they were sold and the proceeds placed into the financial system for onward transfer to cartels in South America.

Financial investigations revealed that in 2014 alone, the group spent EUR 26 million in cash to purchase luxury watches, without triggering any STRs. The sums involved in 2015 are thought to have been even higher, by which time the group was laundering an estimated EUR 1 million per week.

The targeted OCG was mainly composed of Lebanese nationals also suspected of being involved in financing terrorism through Hezbollah's military wing. In the wake of coordinated days of action, one of the main suspects of Operation Cedar was designated by US OFAC (Office for Foreign Asset Control) for his involvement in the financing of terrorist activities ⁽¹⁴⁾.



Operation Snake – results

- ✓ 200 police officers involved
- ✓ 65 searches
- ✓ 75 persons and 126 companies indicted
- ✓ 32 persons arrested
- ✓ 1 million euro, 26 vehicles and 28 properties seized.



Operation USURA– results

Russian money laundering criminal network dismantled

29/06/2016 The Hague The Netherlands Europol

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The Spanish Guardia Civil supported by Europol, dismantled a money laundering ring with origin with links to two well-known Russian criminals. Published: Thursday, 30 June 2016 17:51

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It has been estimated that, in the last few years, the company has generated approximately EUR 62 million through property investments.

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The operation codenamed "Usura" has resulted in alongside 142 financial products such as bank accounts, numerous mobile phones, IT devices, and businesses in various locations in the Tarragona province and

The Spanish Civil Guard dealt a major blow to an **organized money-laundering ring** with connections to two Russian crime syndicates on Tuesday. The operation, two years in the making, was named “Usura” and was supported by Europol.



One of the Alleged Criminals (PHOTO: Spanish Civil Guard)

El Mundo in Spain reports that the two notorious crime syndicates Tambovskaya and Taganskaya were involved. The **Spanish Guardia Civil** recovered € 62 million (US\$ 68 million) through property investments.

Eight suspects were arrested, 191 properties were seized, and 142 financial products, such as bank accounts, were confiscated, as well as € 120,000 in cash and numerous mobile phones, computers and documents. The operation involved 180 Spanish Civil Guards.

According to El Mundo, the suspects consist of six Russians, a Ukrainian lawyer, and a Spanish citizen.

The criminals used offshore companies that offered high-interest loans and mortgages to Spanish and foreign customers to hide financial operations and investments. The investigation found that the companies had links to tax havens and to professional “front men” known for money laundering.

Europol has supported this investigation for almost
Around 1400 phone records have been analysed. A
mobile office on-the-spot at the Guardia Civil coord
intelligence analysis and cross-checks against Eur

This isn't the first instance of Russian syndicates showing up in Spain.

In May, the National Court of Spain issued arrest warrants for several Russian citizens who were linked to organized crime in the region, including several current and former high-level government officials.

Among the wanted are the chair of the State Duma Committee on Credit Organizations and Financial Markets, Vladislav Reznik, as well as the current deputy director of the Federal Drug Control Service of the Russian Federation, Nikolai Aulov, and even a former deputy of Russia's Investigative Committee, Igor Sobolevsky.

The warrant for Vladislav Reznik was later **revoked**, according to the Associated Press.

Bribery and corruption

Le Monde

4 octobre 2017

Londres, grande lessiveuse de l'argent sale nigérian



Plusieurs associations de lutte contre la corruption dénoncent le rôle joué par l'immobilier de luxe de la capitale britannique dans le blanchiment. Après avoir sévi, le gouvernement semble vouloir faire demi-tour

UK approach

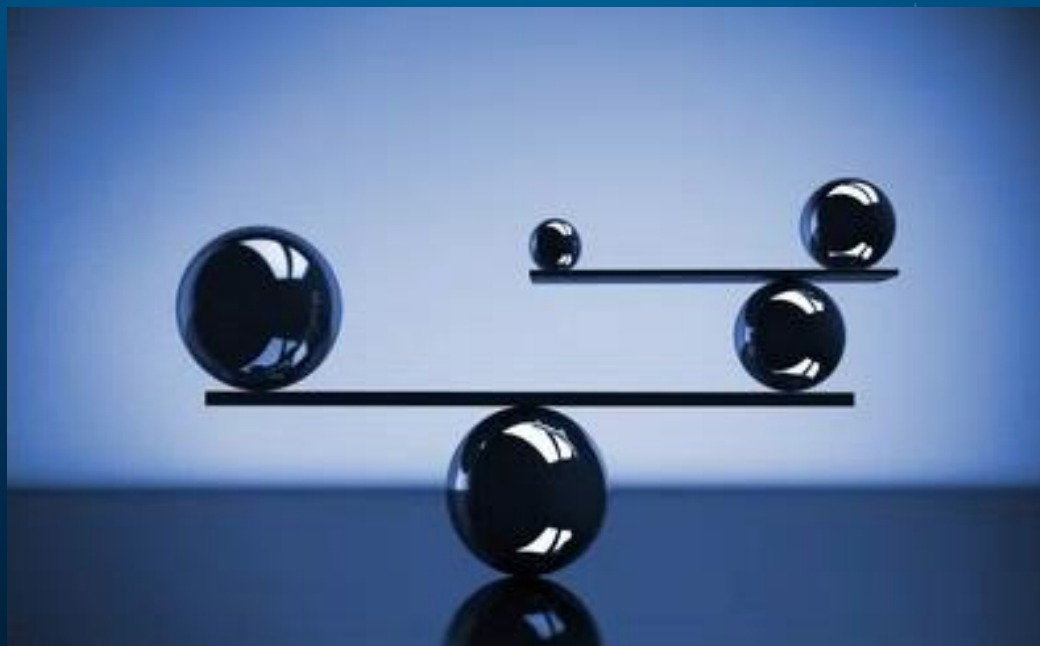
the real estate agents are obliged to perform CDD and identify the beneficial owner of the property. 15% additional tax if the property is acquired by a company



US approach

GTO (Geographic targeting order) – impose enhanced AML reporting obligations for a short period of time over a limited geographic region

Current challenge



Conducting profit driven activity/Gatekeeping for infiltration of criminal assets



Focusing on the basics on any client relationship
– researching and knowing who is the person or
company you are dealing with is

Trigger and key indicators

TRANSACTION MONITORING



INTELLIGENCE LED REPORTING



Thank you for your attention

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