

The Egmont Group of Financial Intelligence Units

Strategic Analysis Course Session 4 Strategic analysis products





- Descriptive products
- Indicators, typologies and trends
- Intelligence products



What are they?

Summarise and extract patterns

High level information reports

Clear statements and illustrations based on observations

Operational information

e.g., how much, how frequent, how fast, how different, how variable, etc.



Examples:

- Number of incoming reports, by type of reporting entity
- Average and total amounts of funds in reported transactions
- Number of reports used in cases or referred to law enforcement investigators, by type of report
- Changes in the number of reports from a certain geographical area over time



Examples:

- Projections and scenarios
- Number of requests for information from foreign FIUs compared with number of requests to foreign FIUs, both showing number of responses, by type of response
- Number of FIU staff by type (e.g., analyst)

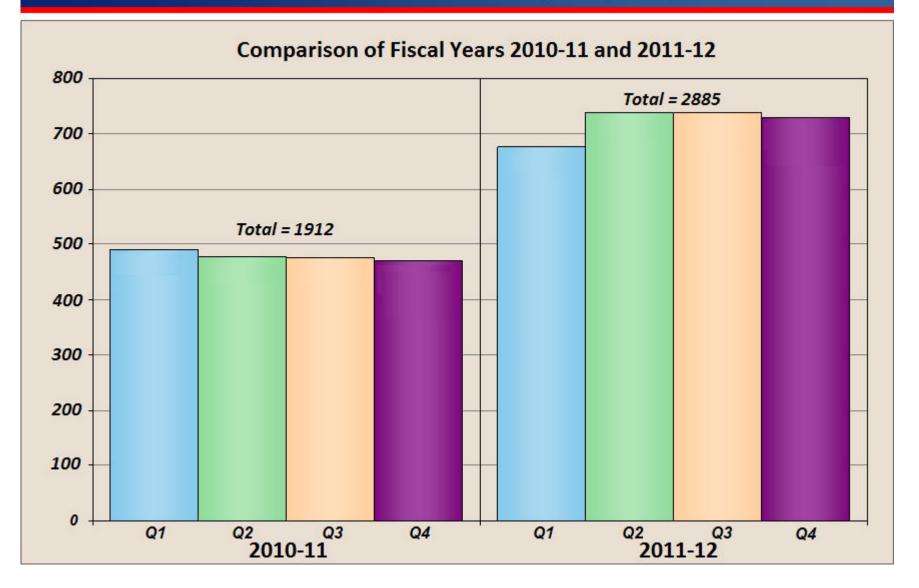


Summary Overview - Inputs

Numbers of Reports Received, by Type							
	Number in Past Month	% Change from Previous Month	% Change from Same Month in Previous Year	YTD Number	% Change from Previous Year		
STRs	7,450	↑ 2%	↑21%	61,687	↑ 17%		
LCTRs	1,503,004	↑ 7%	↑ 58%	17,320,044	↑ 26%		
EFTRs	2,530,501	↑ 12%	↓ 02%	21,892,663	↑ 23%		
Total Reports	4,040,955	↑ 11%	↑ 30%	39,274,394	↑ 24%		

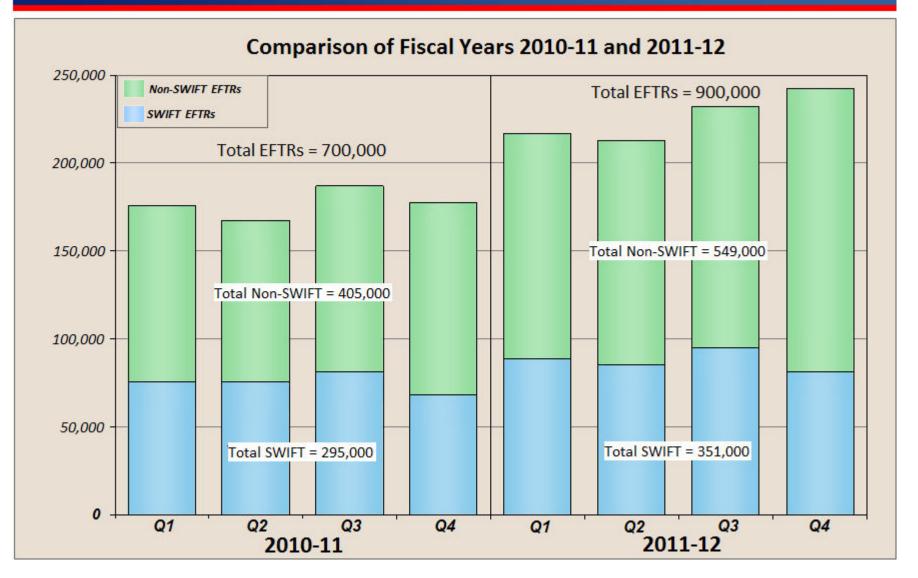


Reporting – Suspicious Transaction Reports (STRs) Received





Reporting - Electronic Funds Transfer Reports (EFTRs) Received



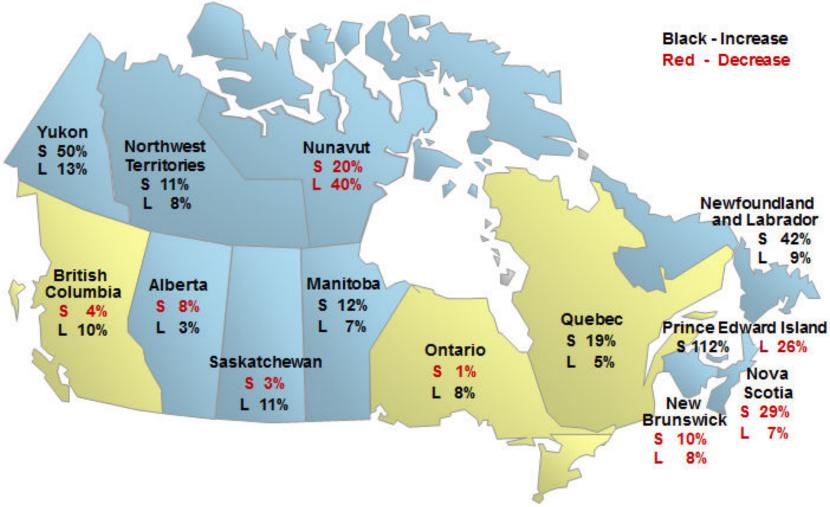


STRs and LCTRs by Geographical Area (Canada)

	STRs		LCTRs	
	Q1	Q2	Q1	Q2
British Columbia	1,253	1,468	430,222	443,689
Alberta	782	733	230,002	276,258
Saskatchewan	327	282	98,234	97,568
Manitoba	291	341	72,000	69,531
Ontario	3,618	3,751	809,325	815,364
Quebec	3,792	3,712	768,368	742,689
New Brunswick	84	85	35,654	38,026
Nova Scotia	109	99	41,575	39,568
Prince Edward Island	9	8	2,356	2,654
Newfoundland. and Labrador	22	31	10,253	10,064
Nunavut Territory	5	4	765	543
Northwest Territories	8	9	826	895
Yukon Territory	2	3	356	402

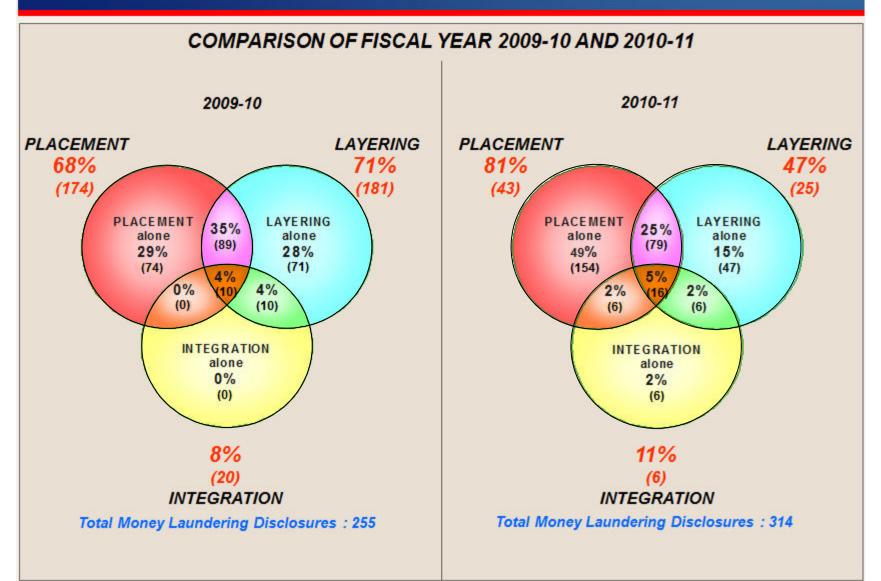


STRs and LCTRs by Geographical Area – Quarterly Changes



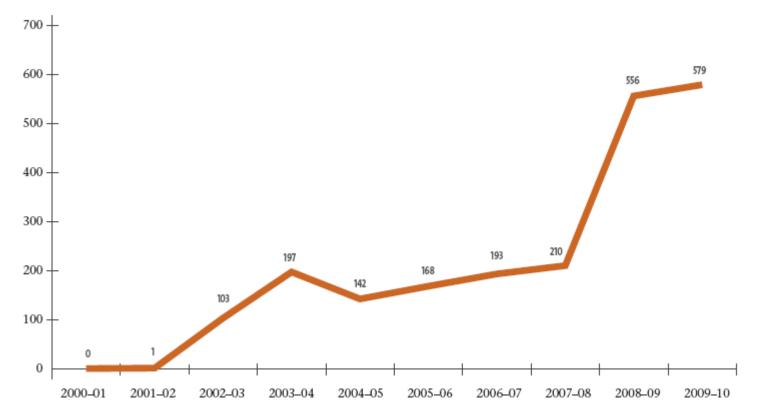


Case Disclosures – Money Laundering Stages Involved



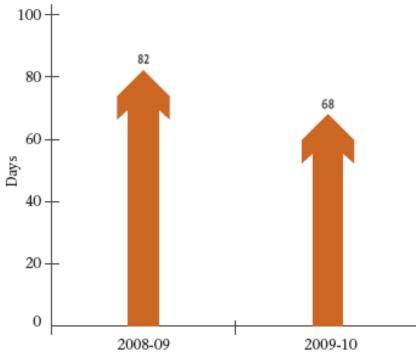




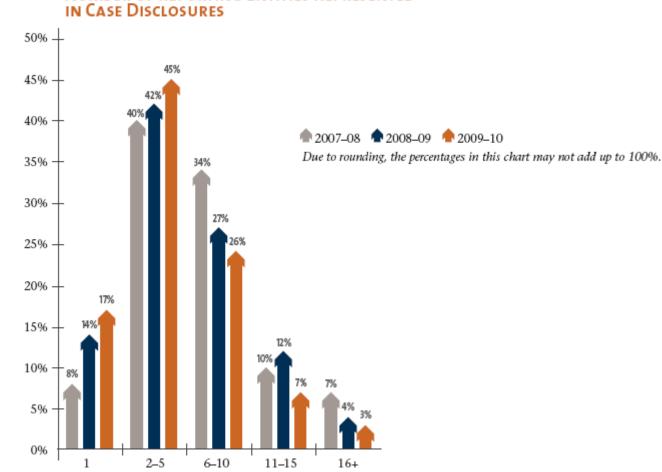








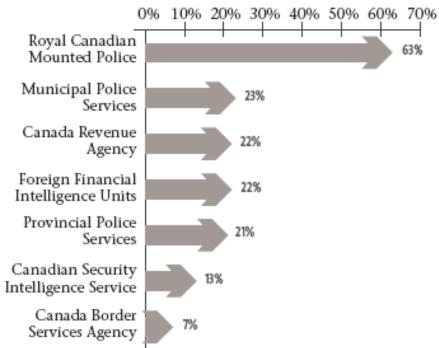




NUMBER OF REPORTING ENTITIES REPRESENTED



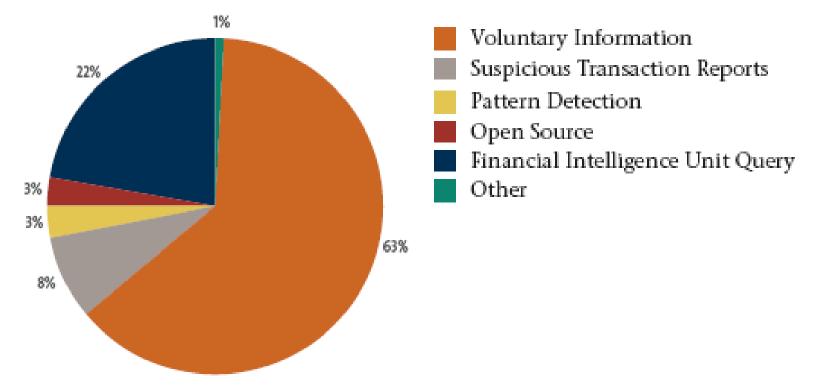
DISTRIBUTION OF DISCLOSURE RECIPIENTS IN 2009-10



The percentages in this chart do not add up to 100% because FINTRAC disclosures are often destined for more than one recipient.

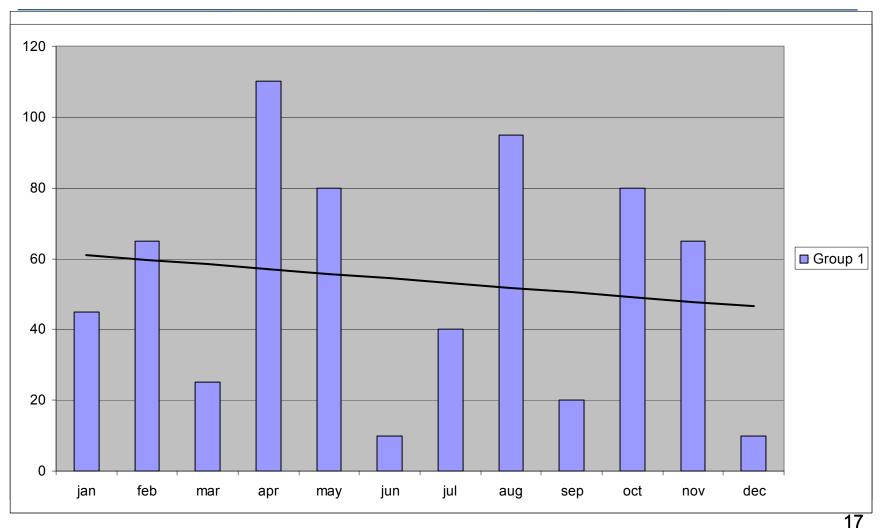


DISTRIBUTION OF CASES ORIGINATORS FOR 2009-10



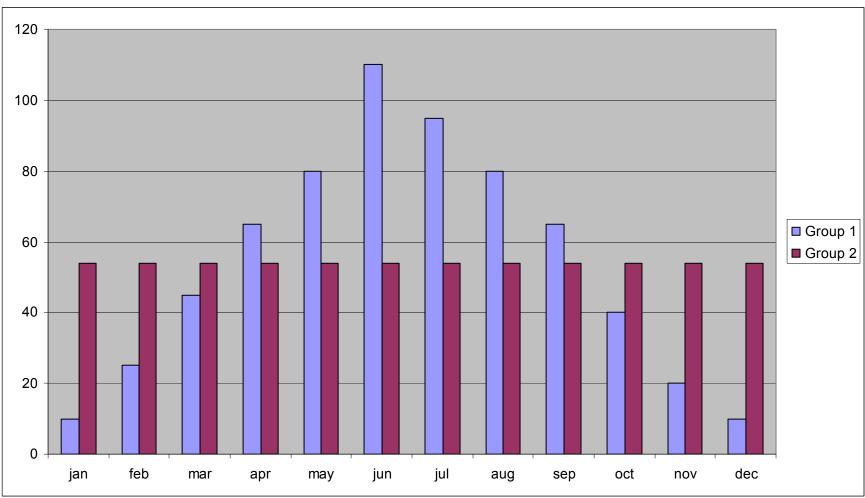


Descriptive statistics





Comparative statistics



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Not only tables and graphs:

"This year, our compliance group completed a total of 69 examinations, **an increase of 52 percent** over the previous year, and the largest number conducted in a given year to date. Of these, 32 (**47 percent**) were onsite examinations, and 36 (**53 percent**) were desk examinations. In addition, regulators shared the results of 32 assessments that they had conducted."



Not only tables and graphs:

"Demand for tactical analysis continued to climb, with a 36 percent increase this year in voluntary information received from police or other agencies. Our case disclosure output increased again this year, with a record 57 disclosures being developed."



Financial report contents...

Example: a classification of SARs STRs by key words or by the activities reported in them.

13 Suspicious transactions related to use of Inter Caisse System (client anonymity)

Table 7: Top 25 most frequently reported reasons for suspicion in a sample of French STRs from Quebec

Rank	Most frequently reported reasons for suspicion in French STRs from Quebec
1	Large cash deposits
2	Even dollar amounts deposited/transferred
3	Bills of small denomination in large amounts
4	Unusual account activity/customer behaviour
5	Suspicious use of ATM
6	Structuring (wires and large cash) below the \$10,000 reporting threshold
7	Customer provides false identification or does not provide any identification
8	Deposits/transfers and immediate withdrawal/depletion of account balance
9	Client exchanges large quantities of small denomination bills for large denominations in the same currency
10	Casino activities/transactions are undertaken by third parties

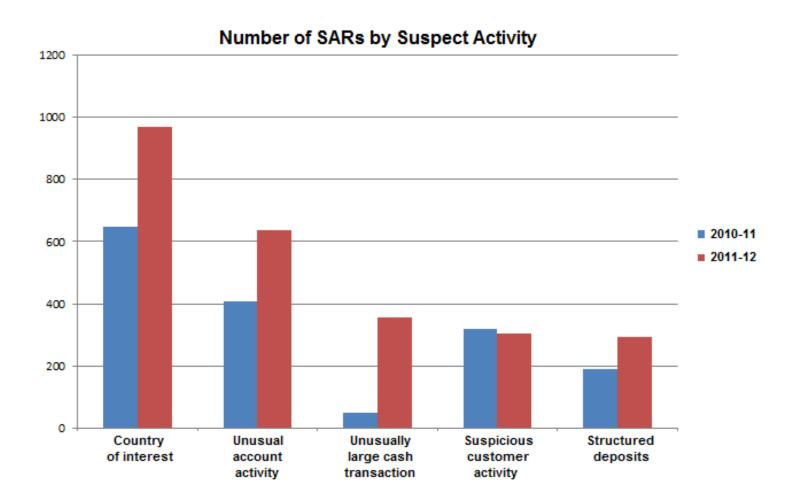


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Activity 4.1 Graph

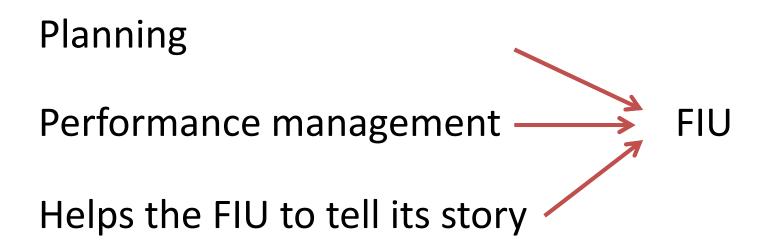


Possible result





Benefits to the FIU:





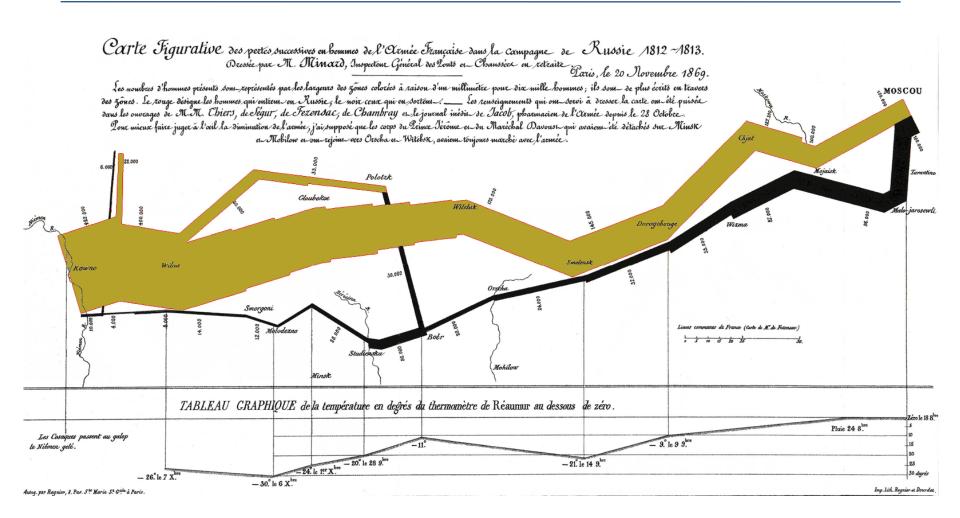
Benefits to others:

Quality of reports Value to law enforcement Reporting entities

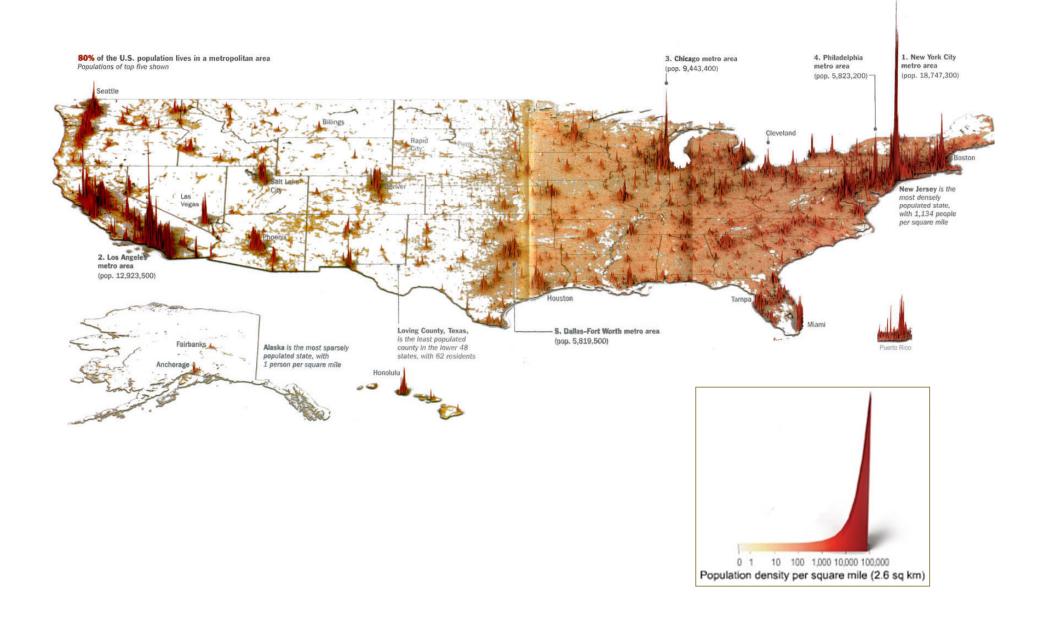
Background information — AML/CTF partners for cases



Visualisations

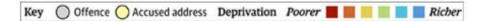


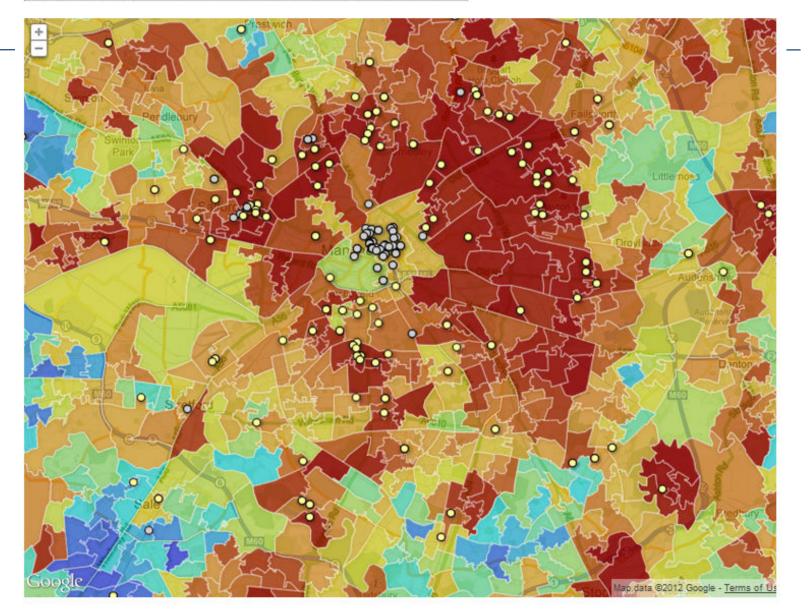






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What is an indicator?

An indicator is an observable characteristic of an "event" that points to the possibility of specific activities occurring.



Indicators

Examples:

- Cash deposits in different branches of the same bank
- Transfers to accounts on which there are no other transactions
- Transfers followed by cash withdrawals
- More concern about speed than cost



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Y Activity 4.2 Indicators





What is a typology?

A typology is the study or systematic classification of types that have several characteristics or traits in common



Typologies

Example 2:

Organized criminal groups in South and Central America most frequently use bulk cash smuggling methods to move funds internationally, while European groups most frequently use electronic funds transfers through the formal financial system.



Typologies

Why develop typologies?

- Support analysis
- Provide greater understanding of whole picture
- Direct resources
- Assist reporting entities in understanding ML/TF activity

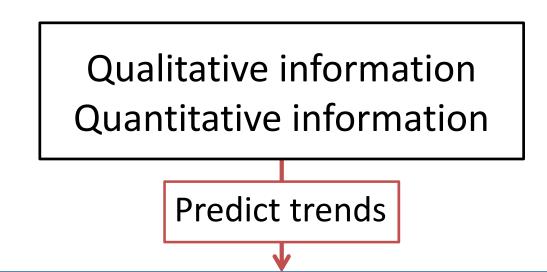


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Activity 4.3 Typologies



Typologies



- Provide guidance to reporting entities
- Strengthen analytical work
- Enhance intelligence products being disseminated



Typologies

Further FIU applications

- Monitor ML/TF trends and vulnerabilities
- Recommend legislative changes in response to identified risk
 - Identifies legislative gaps
 - Provides supporting material for legislative change
- Provide advice to policy makers



Typologies

Reporting entity applications

- Monitor accounts and transactions
- Identify high risk customers and products / services
- Improve risk management policies
- Identify suspicious transactions
- Improve quality of STRs submitted to FIU
- Enhance relationships





Law enforcement applications

- To improve financial investigations and evidence gathering
- Assist ML/TF prosecutions
- Identify additional avenues of investigation
- Ensure a more comprehensive investigation and prosecution outcome



Typologies

International efforts

Financial Action Task Force (FATF)

- Annual Typologies Report
- FATF project assistance

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- plenary meetings
- research and project assistance

<u>Regional Working Groups on</u> <u>Money Laundering</u>

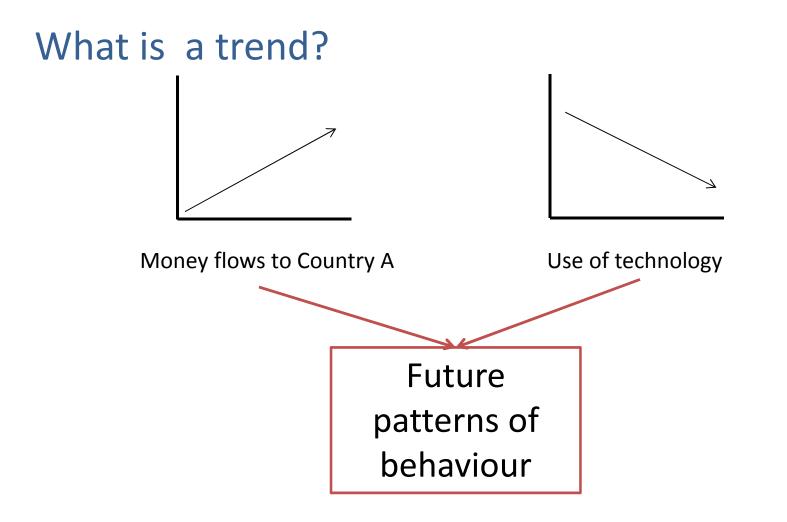
- Annual Typologies Report
- Project assistance

Other financial intelligence units

- information sharing
- technical assistance & training

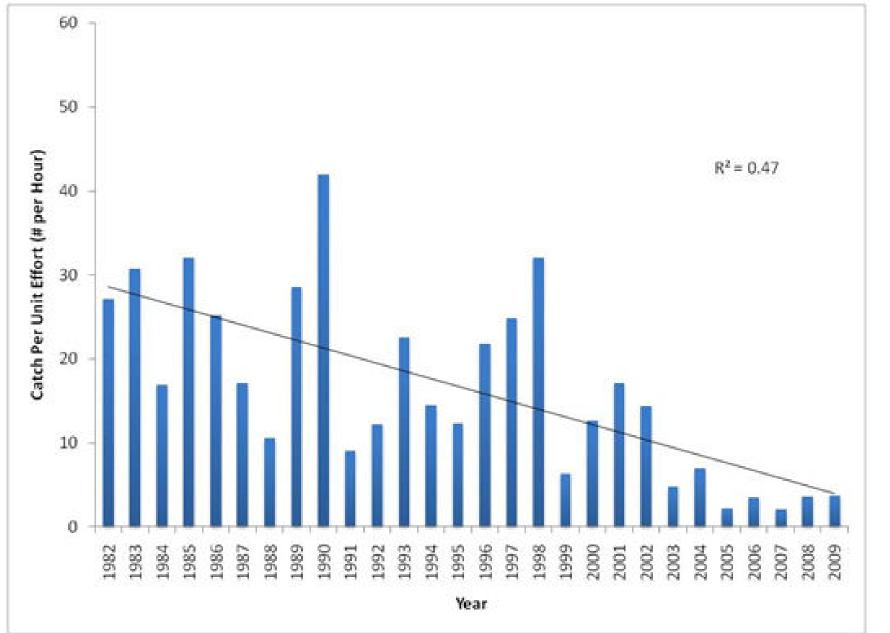


Trends





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- What are they and why we do them?
- Who do we do them and what are the benefits?
- Types of products
- Examples



What are strategic intelligence products?

- Formal assessments aimed at answering specific questions
- Forward looking and predictive

What do they contain?

- financial transaction data
- other relevant information such as open source and academic research

What do they attempt to achieve?

- Conclusions and judgements
- What is observed 'What does it mean?'
- Causative factors 'Why is it happening?'
- Predictive 'Where is it going?'



Who is the audience?

- FIU
- Other domestic LEAs or security organizations
- Policy decision makers
- Other FIUs
- International organisations
- Public

Why do we produce them?

- Inform
- Advise
- Educate

What are the benefits?

- Add a financial component to the strategic intelligence picture
- Support stronger policy-making
- Support tactical analysis prioritization



Types of products:

- Vulnerability assessments
- ML/TF intents, capabilities and practices
- ML/TF risks associated with certain countries
- Assessments of significant events
- Time-series or geographic analysis



They focus on:

- The nature of crimes / groups
- Threat assessments of such crimes / groups
- The vulnerabilities of financial and other relevant systems (e.g., trade)
- Risks (as a function of threats and vulnerabilities)



Strategic Analysis Artefact



- Working with relatively small initial internal data/ information sets
- Leverage other information to provide a wider context for the internal information

Q: From where might such information come?



Example 1:

The FIU receives approximately 150 STRs per year.

25 STRs point to persons and transactions apparently related to a certain outlaw motorcycle gang.

Q: How might this lead to the development of an advanced intelligence product?



Example 2:

Background

The casino sector wants to update its AML training program, which is over ten years old. The sector wants to know whether the issues addressed in its training program reflect the current situation.

Problem to be addressed

The casino sector is interested in knowing whether there are new money laundering methods and techniques being used in casinos, and how these methods and techniques can be identified.



Example 2 cont:

Questions (to help reporting entities understand their vulnerabilities)

- Have money laundering methods/techniques using casinos changed over the past 10 years?
- If so, what are their characteristics?



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Activity 4.4 Asking the right questions



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Questions ?