

Egmont Strategic Analysis Course

Session 4 Strategic analysis products

Participant's Manual

Version 30 October 2012 Page 2 of 34 Session 4

1. Introduction

This session is intended to provide an overview of the kinds of products that may be produced when doing strategic analysis. The product range can vary greatly, however we will cover three main categories: descriptive analysis, indicators and typologies, and advanced intelligence products.

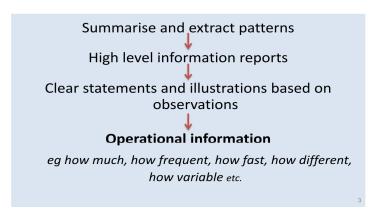
2. Descriptive products

The process of producing strategic descriptive products applies various (usually quantitative) techniques to summarize, extract patterns and otherwise produce high-level information on detailed data, reports, etc. Descriptive products are very high level.

They are not intended to explain or draw conclusions, but to produce clear statements and illustrations of what is being observed, drawing attention to particular aspects (comparisons, changes over time, apparent relationships), where appropriate.

The most frequent focus of descriptive products is on operational information, where questions such as: how many, how frequently, how fast, how much, how different, how variable, and so on are asked.

Answers to those question can be very useful to decision-makers in the FIU and outside it, because the information is helpful in coping with various uncertainties they face.



Examples of descriptive analysis

- 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

Why develop descriptive products?

Descriptive products can help to anticipate the future based on what we're seeing in our data. They don't tell us about cause and effect, but can give us quite a bit of information on what is likely to happen, on the assumption that the conditions which produced what we've seen previously don't change too much.

They can also help us to identify alternative futures (scenarios), based simply on where our greatest uncertainty exists. These aren't predictive, but can help managers and the organization be prepared for a much wider range of possibilities than can simple projections based on what is known about the past.

3. Types of descriptive products

There are a number of different types of descriptive products including-

- Tables
- Graphs
- Narratives (text)

Sample tables

This table shows the numbers of reports over a particular month of a year. It compares them with the previous month and with the same month of the previous year.

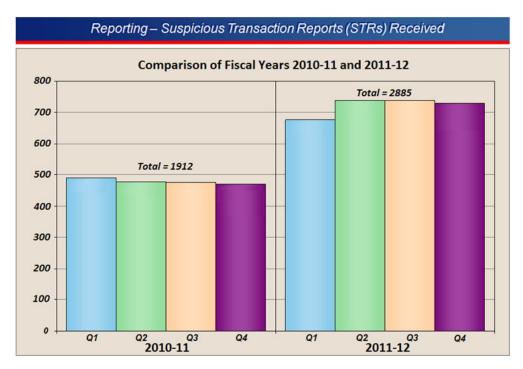
Summary Overview - Inputs

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	1 26%	
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Total Reports	4,040,955	↑11%	↑ 30%	39,274,394	↑ 24%	

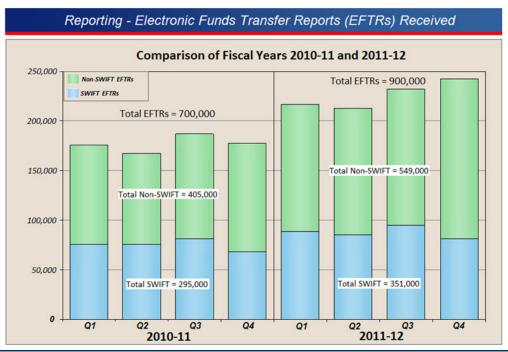
What sorts of things does the table tell the reader?

Sample Graphs

Here, we see a graphical representation of the numbers of STRs received by the FIU, per quarter, over two years, as well as the totals for each year.



Here is a similar figure, showing a different type of report received by an FIU – on international electronic funds transfers (EFTs). The totals for each quarter have two components, reflecting the number of standard SWIFT EFT Reports and the non-SWIFT ones.



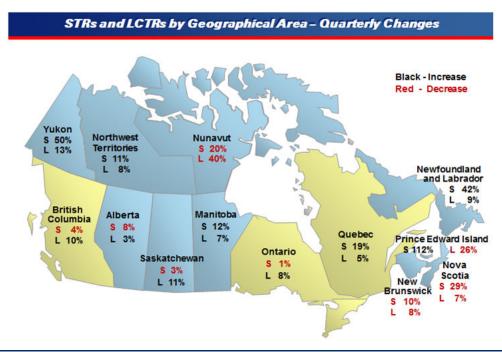
Tables and graphs can work together

This table shows the geographic breakdown of the numbers of STRs and Large Cash Transaction Reports received by the FIU, by geographic region (in this case, Canadian provinces and territories), for two quarters.

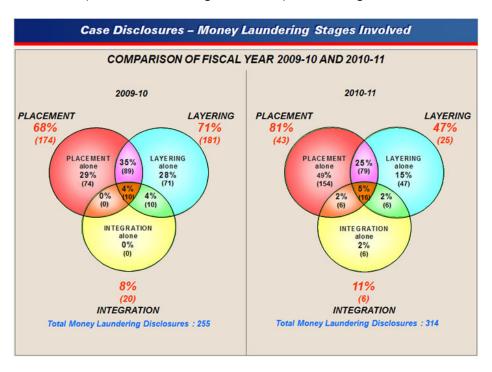
STRs and LCTRs by Geographical Area (Canada)

	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

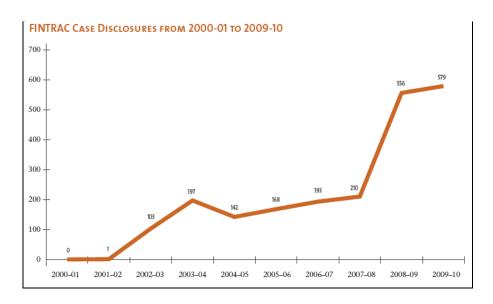
Here is similar information, but in a graphic form showing percent changes, rather than the base numbers. The values are given in two colours, depending on whether the change from one quarter to the next was up or down.



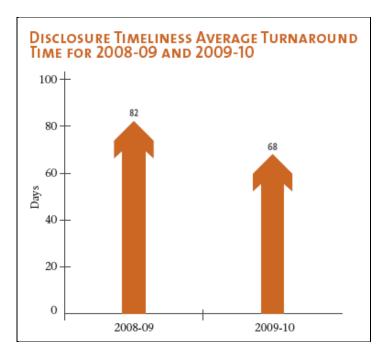
Venn diagrams - Here is a comparison between two years of money laundering case disclosures by the numbers and proportions of them that included aspects of each stage of money laundering.



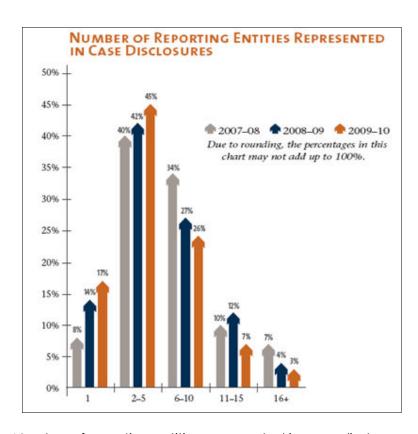
External Reporting – The following are examples of the sorts of graphic representations you might find in and FIU's annual report.



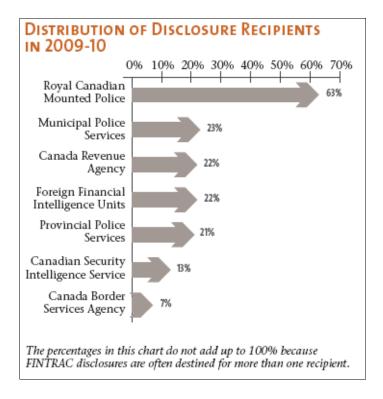
Case disclosures from 2000-2001 to 2009-2010



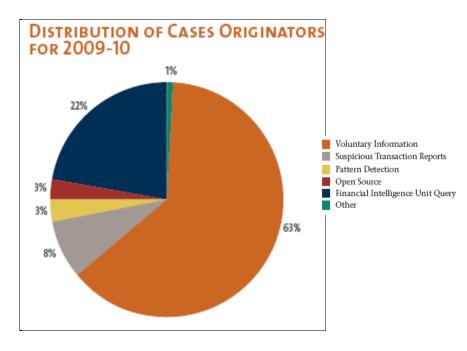
Timeliness of disclosures – average turnaround rime



Number of reporting entities represented in case disclosures



Distribution of disclosure recipients in 2009-2010



Distribution of cases originators 2009-2010

" Activity - Graph 4.1

You have been provided with some information on the number of reports received according the suspect activity types recorded.

In the space provided, reproduce this information as a graph.

Activity type	2010-2011	2011-2012	
Country of interest	649	970	
Unusual account activity	407	635	
Unusually large cash transaction	51	357	
Suspicious customer activity	319	306	
Structured deposits	188	294	

Benefits of descriptive products to the FIU

The FIU can benefit considerably from conducting descriptive products based on the information available to it. For example -

- Planning capacity requirements, allocation of staff, etc.
- Performance management helps the FIU to see how it is keeping up with reporting inputs and demand for outputs.
- Helps the FIU to tell its story in, for example, annual reports.

Descriptive products can also help the FIU focus on such things as reporting entity sectors, or geographical areas where reporting trends are not consistent with expectations.

Benefits of descriptive products to others

As well the FIU's descriptive products can benefit others, including reporting entities and AML/CTF partners.

They can show reporting entities useful information related to the quality of their reports, the extent to which their reports are referred to law enforcement agencies or included in larger cases, etc.

Descriptive products can provide AML/CTF partners with background information for the cases they receive from the FIU.

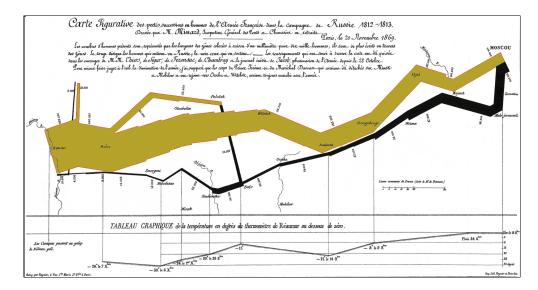
Very effective visualizations

There are many other types of descriptive analysis that can be used including visualizations.

Over the page are a number of examples of where very effective visualizations have been used.

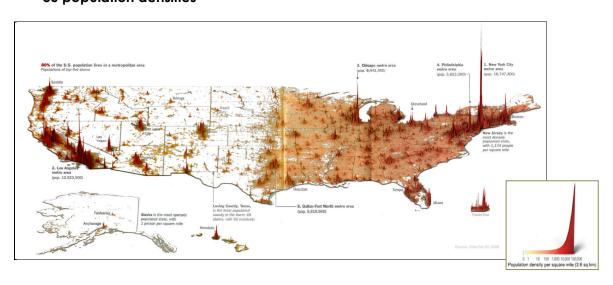
Napoleon's march

The use of visualizations is by no means new. In fact, one of the most recognized visualizations is this one, which depicts Napoleon's march to Moscow (and subsequent retreat) as a function of weather conditions and time.



Napoleon's march to Moscow and retreat.

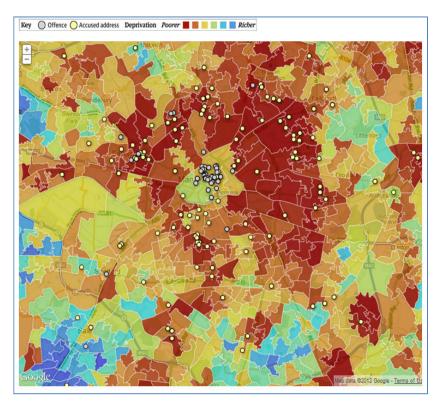
US population densities



US population densities (80% of US population lived in metropolitan areas).

English riots

The map was created by overlaying addresses of suspects involved in the riots / location of the riots with poverty indices (scale from red to blue). It was used as an aid in the analysis of the role of poverty as a factor in the riots that took place in England in 2011.



4. Indicators, typologies and trends

a. Indicator

An indicator is an individual characteristic of an "event" (e.g., financial transaction) that has drawn attention to that event (transaction). Where we see more indicators of an activity there tends to be a greater likelihood or probability of it occurring.

Examples of indicators

- 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

'Y' Activity 4.2 - Indicators

Below, you see Case 10 from Purpleana Read through the case and identify as many indicators as you can.

PURPLEANA - CASE 10

While driving his truck across the border of Purpleana in January of 2010, Victor Vincent, who worked for an international transport company, was caught with a huge amount of cash in different currencies stashed in his truck. Under local legislation, Victor should have declared this money to customs before attempting to cross the border. Furthermore, the money was concealed in a package, which had names of a number of persons and companies on it.

As the police were questioning him, they remembered an intelligence report that they had received from a neighbouring country a few days before. Kevin Benedict, who also worked for an international transport company, was caught bringing money into the neighbouring country without declaring it to customs. The police thought that there could be a connection between the two cases and decided to co-operate more closely with the neighbouring country. A further possible link was that one of the names on Victor's package was Rob Vector. Rob was a citizen of the neighbouring country, and he owned an exchange office in that jurisdiction. According to police information, Rob was linked to a terrorist organization and his exchange office was heavily involved in laundering the organizations' dirty money.

The police notified the Purpleanian FIU of the cash detection and the possible link to the neighbouring country. The FIU decided to analyse the names and company details on Victor's package to determine whether they had any known or suspected links to criminality. The FIU determined that Pete, one of the names on the package, was Rob's brother and also had his own exchange office in the neighbouring country. Apart from that, Pete had authorization in two non-residential accounts in Purpleana. Inquiries with the bank employees revealed that the identity of the actual account holders was unknown. Financial analysis identified that Pete was using the non-residential accounts to transfer money to several countries. According to the documentation supplied by Pete to the financial institution, the transferred money was income from an export business. That way Pete concealed the real origin of the monies.

b. Typology

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

In money laundering a typology is built on a fairly consistent series of indicators that show how money was laundered, moved or concealed.

When you have a series of indicators that determine a typology, that typology can be used to contribute to our understanding of an issue or method of ML.

Why develop typologies

Typologies are used by a range of people for a variety of reasons. Each user in the intelligence process uses them in different ways to feed into their work.

The primary reason why typologies are used is that they-

- support better analysis, primarily at the tactical level.
- help us understand the picture more completely, allowing better conclusions to be drawn and help us better support decision makers.
- allow the FIU to direct its resources and analysis most effectively
- assist reporting entities in understanding activity they may not have come across before.

Ϋ́ Activity 4.3 - Typologies
Now you will need to turn to the same Purpleana example. Can you develop a statement that may describe a typology?

FIU applications of typologies

From a strategic analysis perspective, typologies are combined with qualitative and quantitative information to predict trends and better understand the issues at hand.

This enables the FIU to:

- Provide guidance to reporting entities
- Strengthen analytical work, and
- Enhance intelligence products

Typologies are constantly evolving because they reflect the evolution of criminal or suspect activity. As a result, there is great value in using them to train analysts, encouraging them to identify new and potential money laundering patterns.

Further FIU applications

Monitor trends and vulnerabilities

The study of typologies also allows us to **monitor** trends and vulnerabilities in particular areas.

Inform legislation

We can also use the information we gain from typologies to inform legislation.

For example, gaps in legislation that lead to certain vulnerabilities may be identified through knowledge acquired through typologies.

• Inform policy and decision makers

Typologies can also be used to assess risk associated with a particular entity. This may be useful if a reporting entity applies for exemption from some of its reporting requirements.

In this situation, typologies can provide information which enables decision-makers, to determine whether or not the entity's request should be approved or denied.

Reporting institution applications

Typologies also have useful applications for reporting entities as well.

Generally, typologies provide reporting entities with comprehensive feedback – a big picture, if you will – of activity they may or may not have observed.

This information can help reporting entities to:

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

It gives them a common language to identify and describe suspicious activity.

Finally, typologies help enhance the relationship between reporting entities and the FIU, which is an essential component of an effective AML/CFT regime.

Law enforcement applications

Another critical user of typologies is the law enforcement community.

Law enforcement use typologies for a range of reasons, including:

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

Often, law enforcement agencies have their own sets of typologies or indicators, however the FIU's financial intelligence perspective often has something unique (and complementary) to offer.

International effort

Finally, they play an important role in international AML efforts. You can see on the slide a number of international bodies and the types of work they do and how typologies feed into this.

Two examples of FATF's work include the –

2010 – 'Money laundering using new payment methods, 2011 – Laundering the Proceeds of corruption'.

We rely heavily on typologies to inform ML policy – both for individual jurisdictions as well as internationally.

c. Trends – What are they?

Trends are long term increases or decreases over a given set of data. They help us to predict future events.

For example, these changes may be with regard to crime types, or the ways in which money is moved.

Trends may affect a large geographic area over an extended period of time. Generally a trend occurs when an area, for whatever reason, becomes more or less conducive to a particular crime or group of crimes.

Studying the crime data enables us to determine the who, what, when, where, why and how of criminal activity which can be used to identify future patterns of behaviour.

Types of trends

Trends may vary from one jurisdiction to another while others will be similar across the globe.

Generally there are a number of trends that an analyst will look for, for example –

Trends associated with other trends.

Some trends may be associated with others that occur at the same time and therefore suggest some sort of causative relationship

eg A decline in population concurrent with a decline in crime.

Trends associated with crime type

For example there may be an increase in ID fraud

Trends associated with new technologies

A common global trend is the increased use of new technologies.

The increased accessibility to new financial products such as e-money, stored value cards and new payment methods increases the risk of money laundering.

The internet also facilitates the perpetration of fraud and other criminal activity due to the sense of anonymity.

5. Strategic Intelligence products

Strategic intelligence products are -

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

What do strategic products contain?

- They are centered on financial transaction data, but almost invariably also use related information from other sources.
- They do not always involve large data sets.
- They generally take an "all-source" approach to their collection plans, including using open source and academic research information.
- They usually deal with complex issues.

What should they achieve?

- When completed, they always produce formal assessments such as conclusions, judgements even when those assessments are inconclusive.
- They attempt to provide explanations of what is being observed, answering the "What does it mean?" question.
- Where possible, they also answer the "why?" question.
 In other words, what are the factors and conditions that caused or supported the observed and reported facts.
- They are often forward forward-looking and predictive ("Where is it going?"), and consider how <u>future changes may impact on the</u> observed facts.

Who is the audience?

- The FIU, itself, especially those within it who are conducting <u>tactical</u> analyses or those performing compliance-monitoring functions
- Other domestic criminal and security intelligence agencies, and investigative agencies
 - Policy decision-makers, including those at the political level
 - Other FIUs and international intelligence partners
 - International organizations such as FATF and the Egmont Group
 - Occasionally, the public

Why do we produce them?

Strategic intelligence products are developed to –

- <u>inform</u> them on the nature, capabilities, and intentions of entities and countries of concern through understanding their financial behaviour
- <u>advise</u> on risks and threats that may undermine the domestic and international financial systems
- to <u>enhance awareness</u> and <u>understanding</u> of ML/TF, therefore improving detection and deterrence

What are the benefits?

What do strategic intelligence assessments do for those who receive them?

- They capitalize on the FIU's information holdings and tactical analyses and thereby produce what some consider to be the greatest intelligence benefits from those sources.
- They provide a previously unavailable financial component of the wider strategic intelligence picture on particular groups, countries, regions of a country, money laundering, terrorist financing or other financial crime, as well as, very often, other associated activities and persons who do them.
- They support stronger public policy decision-making.
- They provide a stronger foundation for prioritization of targeted tactical analysis.
- They support participation in discussions and information/intelligence exchanges with domestic and international partners to further enhance understanding of the financial transaction information.

6. Types of products

Advanced intelligence products come in many forms, including:

- Vulnerability assessments on existing financial sectors and emerging sectors and technologies
- Assessments of the money laundering or terrorist financing intents, capabilities and practices of particular groups
- Assessments of money laundering or terrorist financing issues in relation to particular countries of concern
- Assessments of significant events, for example, the 2008 Mumbai attack, from a financial intelligence perspective
- Assessments of major time-series (trend) and geographic variations in relation to, for example, AML/CTF efforts and events.

Focus of strategic intelligence products

Our strategic intelligence assessments generally focus on ML or TF matters, for obvious reasons, but they can also relate to other subject areas, including –

- specific profit-motivated crimes
- corruption
- Weapons of Mass Destruction proliferation,
- capital flight
- threats to national security, etc.

Strategic intelligence assessments focus on:

- The nature of certain criminal or terrorist groups, etc. such as purpose, organizational objectives, structures)
- Such groups' intentions and capabilities (in threat assessments)
- The vulnerabilities of financial and other relevant systems (e.g., trade)
- Risks (as a function of threats and vulnerabilities)
- How does information on financial transactions contribute to the wider intelligence picture?

Collaboration with others

Of course, it's only part of the picture, a segment of the intelligence "pie." We often must collaborate with other intelligence producers to develop a more complete picture.

Strategic intelligence products are the combination of tactical information into a single strategic package, to see things that are not evident in any one or two of the tactical cases

e.g., strategic analysis across ten tactical cases on members of an identified group provides:

- a better picture of the whole group
- geographic information
- rolls and relationships
- · changes over time

Ψ'	Activity	4.4– Asking	g the	right	questions
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Case 1 Background

The flow of the illegal drugs produced and trafficked by a certain organized criminal group, involving movements between a number of countries, is fairly well documented. However, the methods by which the proceeds of this activity are laundered are not well understood.

Problem

Law enforcement agencies are interested in knowing how the group's money laundering, especially the integration stage, is conducted, and whether its methods are specific to that group or similar to others'.

How would you articulate the questions for an intelligence assessment, in this case?

Case 2

Background

In recent years, new forms of payment systems have emerged that are not currently monitored by FIUs. These systems provide easy transactions, as well as anonymity.

Problem

Policy-makers and legislators are interested in knowing to what extent the new payment systems are vulnerable to ML and TF activities.

How would you articulate the questions for an intelligence assessment?

Case 3

Background

• The "Brothers of Awareness" is an organization that has taken credit for a number of terrorist attacks in its home country of "Fantasia." The group has been active for many years, and almost all of the group's funding is suspected to originate in Canada.

Problem

Canadian intelligence agencies are interested in knowing how the funds acquired are transmitted by the BoA to "Fantasia."

Articulated questions you would ask.

How do the "Brothers of Awareness" transmit funds acquired in Canada to "Fantasia?"

What has been the BoA's reaction to recent attempts to block its funds transmission processes?

If you were going to break these questions down further, what would you want to know?



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Types of Products

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

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Descriptive products

What are they?

Summarise and extract patterns

High level information reports

Clear statements and illustrations based on observations

Operational information

eg how much, how frequent, how fast, how different, how variable etc.

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Descriptive products

Examples:

- Number of incoming reports, by type of reporting entity
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Descriptive products

Examples:

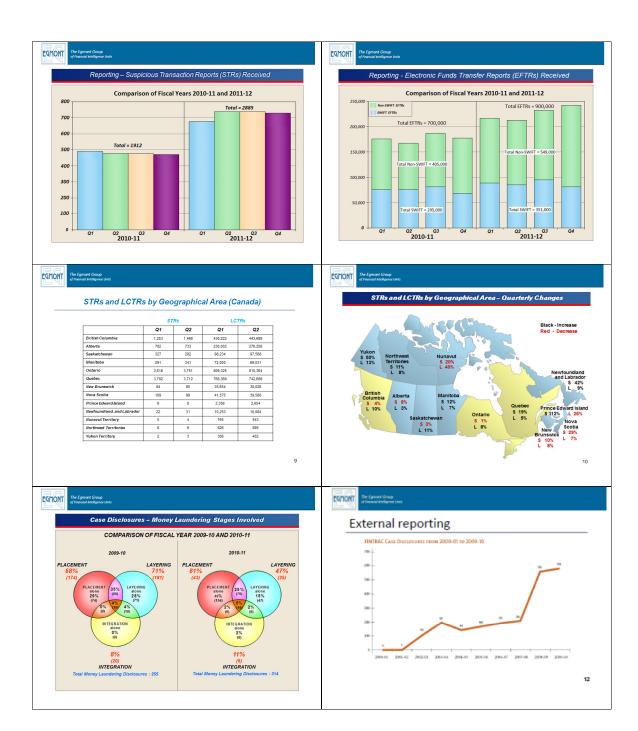
- · Projections and scenarios
- Number of requests for information from foreign FIUs compared with number of requests to foreign FIUs, both showing number of responses, by type of response
- · Number of FIU staff by type (e.g., analyst)

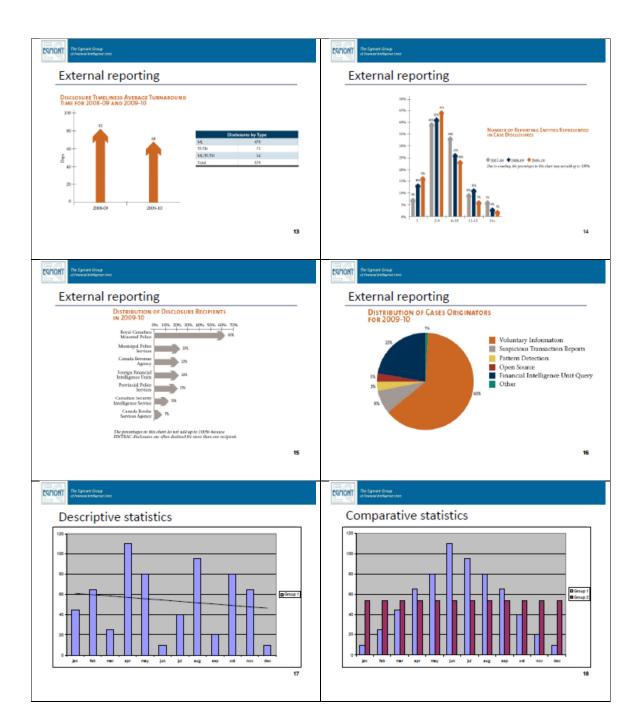
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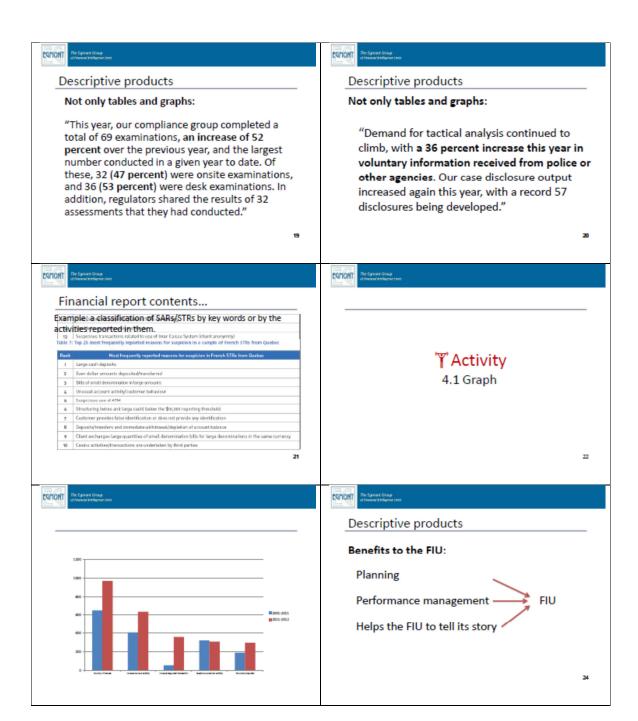
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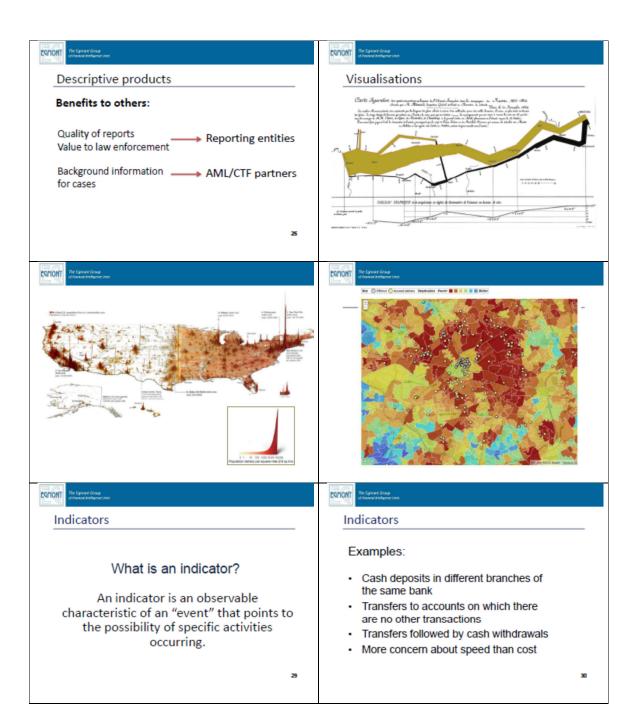
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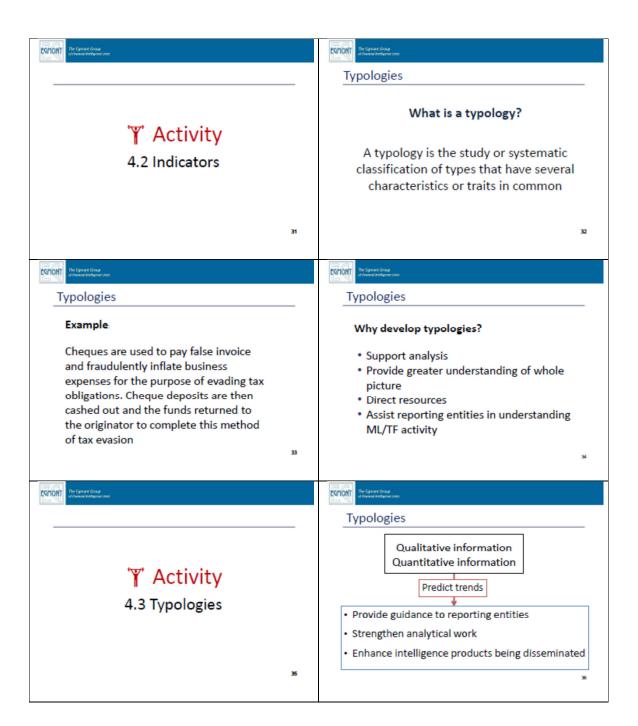
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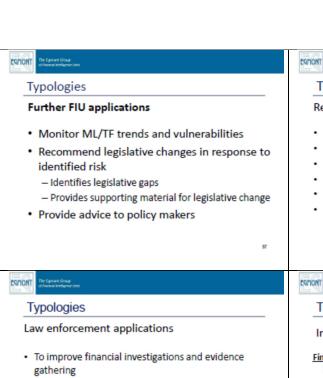




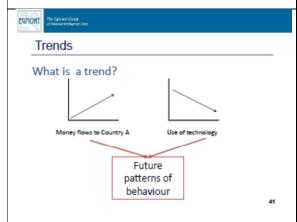












· Assist ML/TF prosecutions

prosecution outcome

· Identify additional avenues of investigation

· Ensure a more comprehensive investigation and

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Trends

Examples

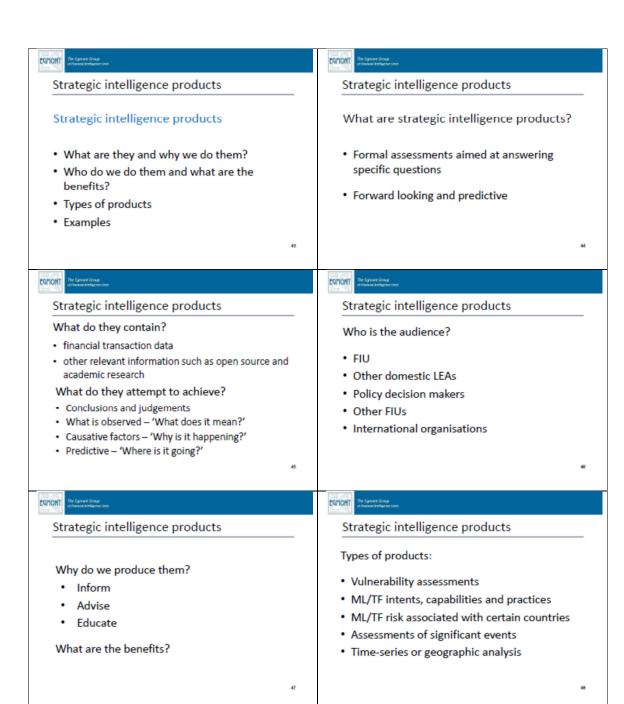
Typologies

Reporting entity applications

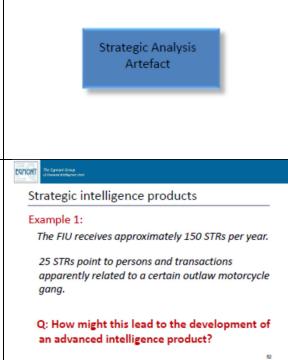
· Monitor accounts and transactions

- Trends associated with other trends eg Decline in population concurrent with decline in crime
- Trend associated with crime type eg ID fraud
- Trend associated with emerging technologies eg E-money / Stored Credit Cards eg Misuse of new payment methods

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Strategic intelligence products

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Strategic intelligence products

context for the internal information

Q: From where might such information come?

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.

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Strategic intelligence products

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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