



Organization of
American States

Perspective of the new AML threats on the region

John Grajales

Anti-Money Laundering Unit
Inter American Drug Abuse
Control Commission - CICAD



Organización de los
Estados Americanos

5

Current AML/CFT Threats on the Region

The new perspective of crime

The Abuse of Cash and Bearer Negotiable Instruments

Cash Movement and Smuggling

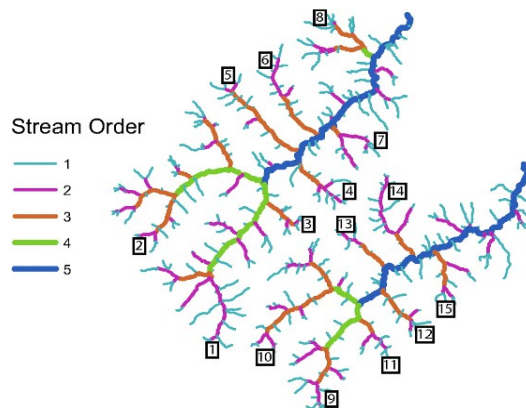
Bulk cash smuggling (BCS)



Cash Intensive Businesses



Placement (including Third Party Accounts)



Cash couriers



The Abuse of Transfer of Value

The Banking System

BNP Paribas probed over \$100B money-laundering scheme

By Kevin Draper

June 4, 2014 | 10:07pm



A US probe found that the giant French bank altered transfers and hid records to launder more than \$100 billion — much of it from Sudan between 2002 and 2009 according to people familiar with the matter.

The extent of the allegations has led federal and state officials to push for the dismissal of more than a dozen bank executives in addition to a potential \$10 billion fine, one person said.

Authorities are also seeking an admission of guilt from BNP and the temporary suspension of the bank's ability to process US dollar transactions.

Money Mules



Money Transfer Businesses and Alternative Remittance

“Cuckoo Smurfing”



The Abuse of Transfer of Value

2

The International Trade System (including Trade Based Money Laundering)



Third Party Business Structures, Charities and Other Legal Entities



The Abuse of Assets/Stores of Value

Moveable Goods



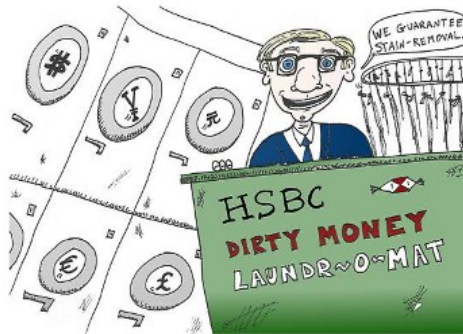
Real Estate

(Ownership and Leasing of
Land and Buildings)



The Abuse of Gatekeepers

Professionals and Insiders



Politically Exposed
Persons
(PEPs)

5 The Abuse of Environmental / Jurisdictional Aspects

Variable Standards and Controls



Cash-Intensive Economies

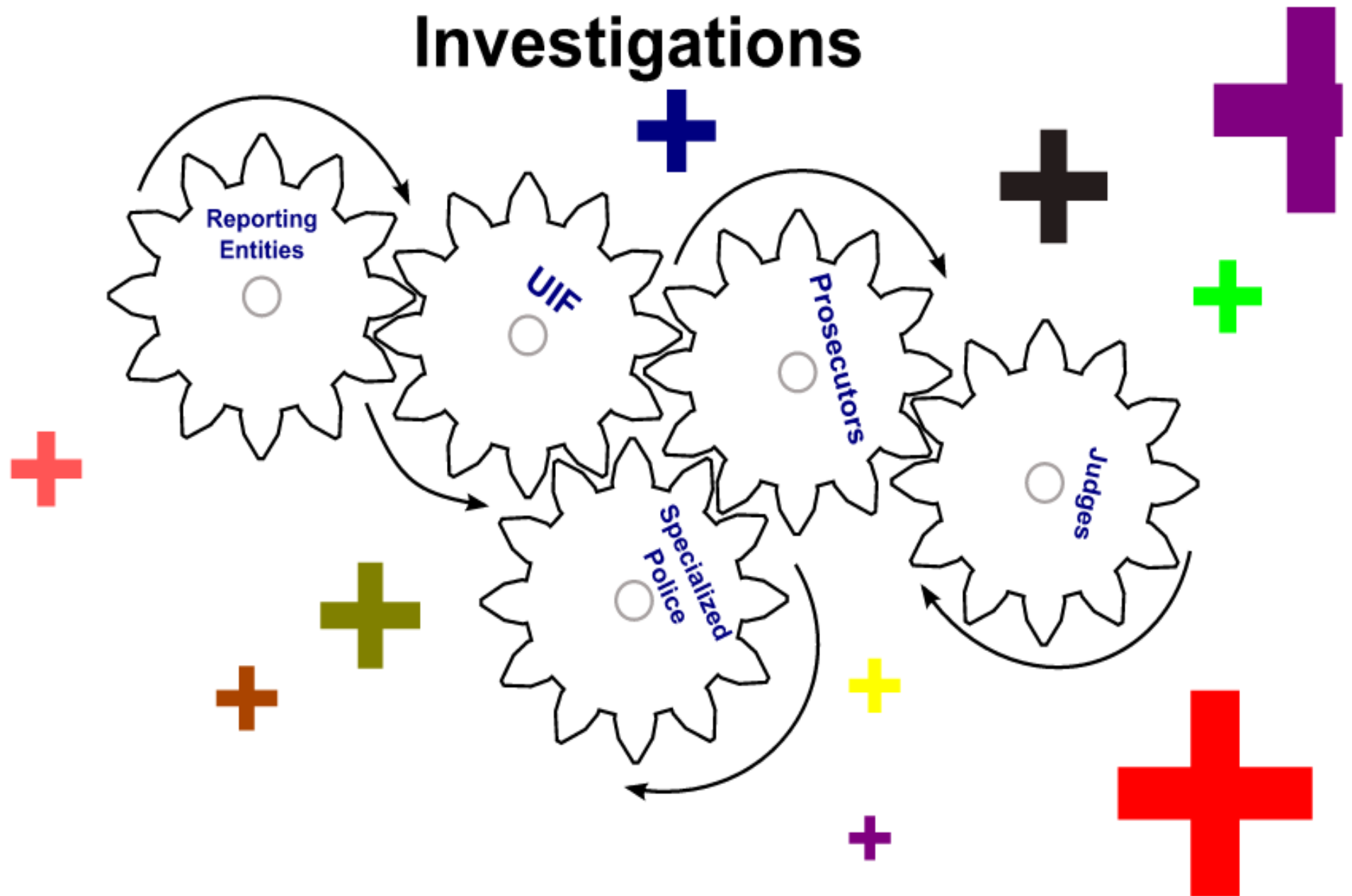


Jurisdictions with High Levels of Corruption



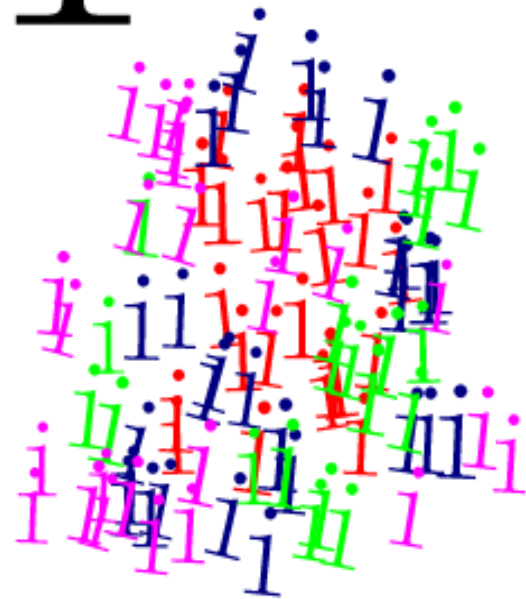
High-Risk and Conflict Zones

The Value Chain in AML/CTF Investigations

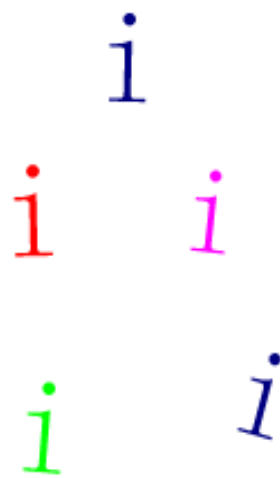


The Gap in the Availability of Information

i = Basic Unit of Information



Vs.



**Is a wasted
potencial that
maximizes
uncertainty and
minimizes
knowledge**

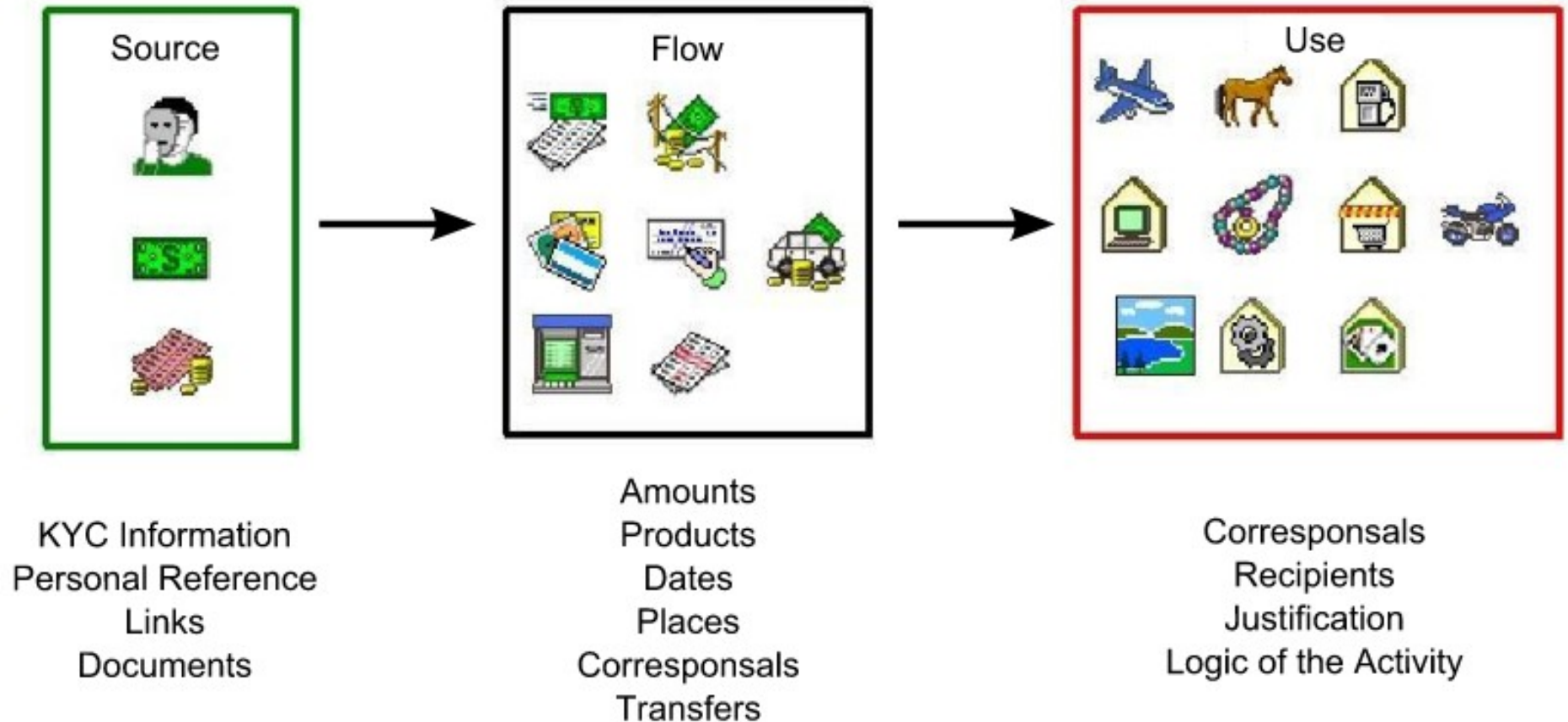
Agents Disrupting the Availability of Information

External	Transmission	Disclosure
	Trust Between Parts	Information Exchange Channels
	Formal	Informal

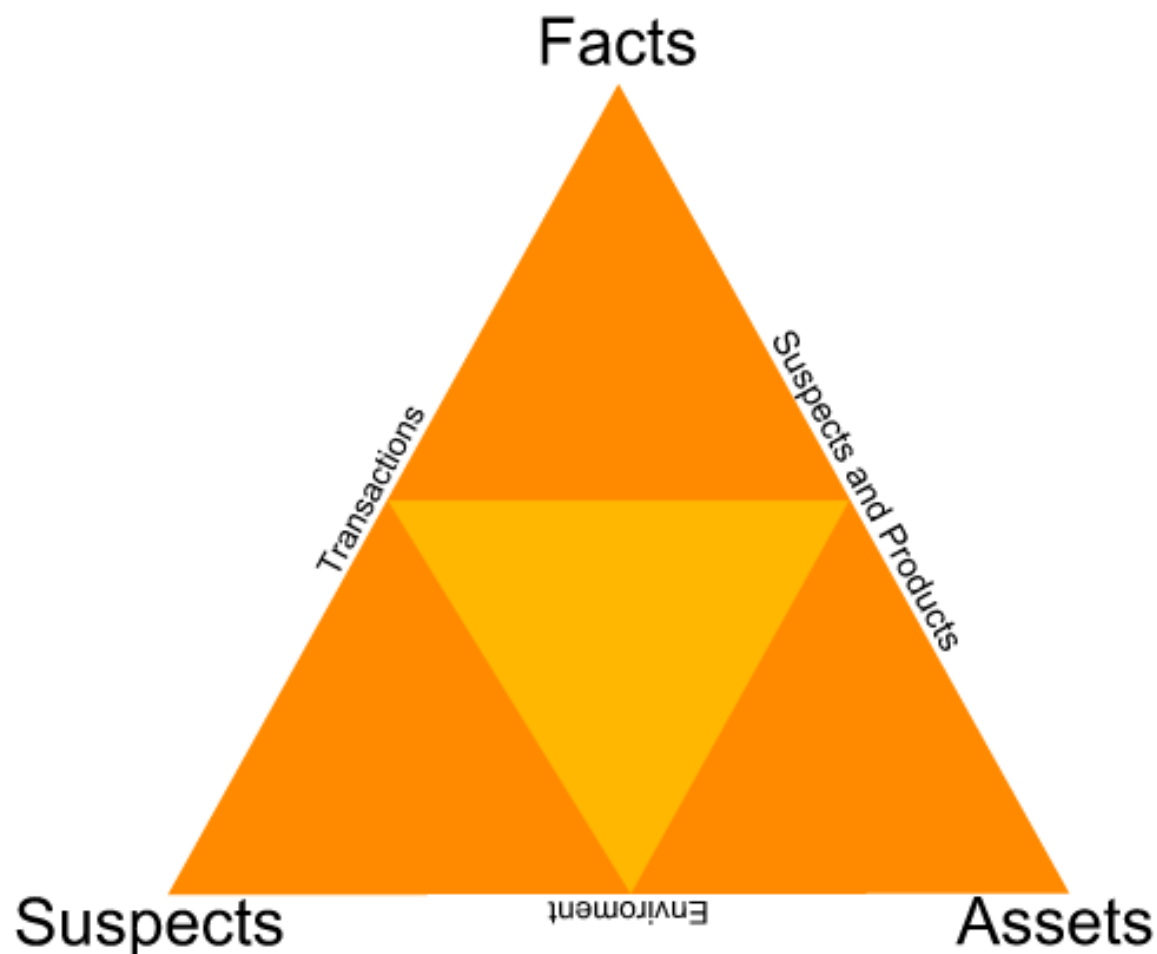
The Leads that Makes Financial Investigations



Financial Products as Source of Information



Strategic Objectives of Any Financial Investigation





Organization of
American States

John Grajales
Technical Specialist
Anti Money Laundering Unit
OAS/CICAD
jgrajales@oas.org