



Bundeskriminalamt

**ANNUAL REPORT 2009**  
**Financial Intelligence Unit (FIU)**  
**GERMANY**

# ANNUAL REPORT 2009

## FIU GERMANY

**Imprint** Editor:  
BUNDESKRIMINALAMT  
Zentralstelle für Verdachtsanzeigen  
FIU Germany  
65173 Wiesbaden

## Contents

1	Foreword	7
2	Reporting behaviour of the parties required to report	8
2.1	Nationwide case statistics for 2009	8
2.1.1	Suspicious transaction reports (STRs) filed pursuant to the Money Laundering Act (MLA)	8
2.1.2	Possible causes for the increase in the number of suspicious transaction reports	12
2.1.3	Reports filed by the tax authorities pursuant to Section 31 b of the Fiscal Code	13
2.1.4	Reports in accordance with Section 14 (2) of the MLA	13
2.1.5	Reports filed pursuant to the Iran Embargo	13
2.1.6	Number and nationality of individuals reported	14
2.1.7	Corporate headquarters	14
2.1.8	Grounds for suspicion	15
2.2	Results of processing	18
2.2.1	Status of report processing at the close of the reporting year	18
2.2.2	Connections to types of crime in cases forwarded to other investigative agencies	19
2.3	Summary of report volume:	19
3	Follow-up responses by public prosecutors' offices pursuant to Section 11 (8) of the Money Laundering Act	20
3.1	Initial situation	20
3.2	Statistical analysis	20
3.2.1	Follow-up responses relating to suspicious transaction reports filed pursuant to the MLA (category 1)	20
3.2.2	Follow-up responses relating to category 2 proceedings	21
3.2.3	Follow-up responses with unclear links	21
3.3	Analysis of content	21
3.3.1	Follow-up responses relating to suspicious transaction reports filed pursuant to the MLA not relevant to analysis	21
3.3.2	Follow-up responses relating to suspicious transaction reports filed pursuant to the MLA and relevant to analysis	22
3.4	Follow-up response form pursuant to Section 11(8) MLA and Sections 482 and 475 Code of Criminal Procedure	23
3.5	Conclusion	23

## Contents

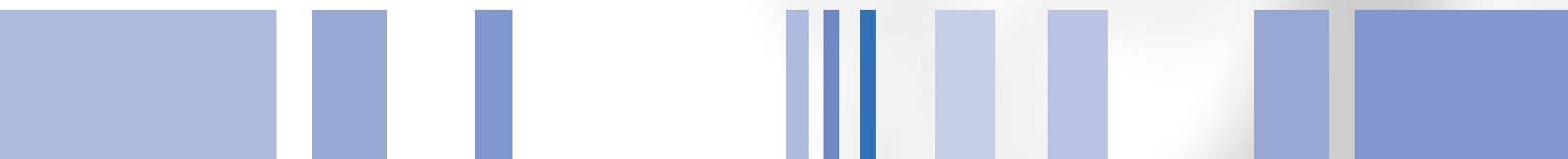
4	Monitoring of suspicious transaction reports	23
4.1	Noteworthy cases	23
4.2	Monitoring of trends	24
4.2.1	“Financial Agents”	24
4.2.2	“Electronic payment systems”	26
4.2.3	Gold trade	26
4.2.4	Correspondent bank transactions	26
4.2.5	Commercial websites	27
4.2.6	Cash transactions	27
4.2.7	International commercial transactions	27
4.2.8	CO <sub>2</sub> emission allowance trading	28
4.2.9	Suspicious transaction reports of “persons trading in goods” (Section 2 (1) No. 9 MLA)	28
4.3	Typologies	29
4.3.1	Recruitment of “financial agents”	29
4.3.2	CO <sub>2</sub> emission allowance trading	30
5	National co-operation	30
5.1	Public relations work	30
5.1.1	The FIU Newsletter	31
5.1.2	Presentations/training courses	32
5.1.3	Internet presentation of the FIU	32
5.2	The Working Party of Banks and Chambers	33
5.3	Case collection	34
6	International co-operation	35
6.1	Exchange of intelligence with other FIUs	35
6.2	International events/contacts	37
6.3	EU-sponsored project carried out in co-operation with the Albanian FIU	37
7	Financing of terrorism	38
7.1	General information	38
7.2	Suspicious transaction reports filed pursuant to the Money Laundering Act for suspected financing of terrorism	38
7.3	FIU correspondence with links to terrorist financing	40
7.4	Conclusion	41
7.5	Action taken against the Islamic Republic of Iran	41
8	Final conclusions and outlook	42
9	Appendices	44

## Graphs

Graph 1: Suspicious transaction reports filed pursuant to the MLA, 1995–2009	9
Graph 2: Suspicious transaction reports filed pursuant to the MLA, 2007–2009, without the “financial agents” phenomenon	12
Graph 3: Reports relating to money laundering pursuant to Section 31 b of the Fiscal Code	13
Graph 4: Results of processing by the money laundering clearing offices of the state criminal police offices	18
Graph 5: Connections to types of crime identified by clearing offices in cases forwarded to other investigative agencies	19
Graph 6: Follow-up responses relevant to analysis (2007–2009)	22
Graph 7: Number of STRs filed in connection with the “Financial Agents” phenomenon since 2006	24
Graph 8: Monthly number of STRs “Financial Agents” 2008–2009	25
Graph 9: Development of the case numbers of the FIU information exchange	35
Graph 10: Distribution of STRs filed for suspected terrorist financing	39

## Tables

Table 1: Reports filed pursuant to the Money Laundering Act by reporting party	10
Table 2: Nationality of the individuals reported (Top 10)	14
Table 3: Headquarters of suspicious companies (top 10)	15
Table 4: Grounds for suspicion indicated by the parties required to report (part 1)	16
Table 4: Grounds for suspicion indicated by the parties required to report (part 2)	17
Table 5: Number of follow-up responses in relation to the number of suspicious transaction reports	20
Table 6: Requests for information addressed to the FIU Germany (Top 20)	36
Table 7: Suspicious transaction reports filed for suspected involvement in the financing of terrorism	38



## 1 Foreword

The year 2009 was also still characterised by the crisis on the financial markets. However, there are growing signs that the crisis has bottomed out.

Independently of that, the FIU Germany was tasked in 2009 as well to carefully monitor the economic development on the financial markets and any form of considerable changes and their effects on money laundering and the financing of terrorism.

An important event in 2009 was the examination of the financial centre Germany with regard to the implementation of the worldwide valid 40 FATF recommendations valid throughout the world in the field of money laundering suppression and the nine special recommendations in the field of suppression of terrorist financing. Besides the ministerial level, other (supervisory) agencies and the parties required to report pursuant to the Money Laundering Act, the FIU Germany was also subject to an examination.

When looking at the content of this annual report, the wide spectrum of the FIU Germany's activities becomes evident. However, the resulting successes, improvements and progresses were only possible through the joint efforts of all agencies involved in the suppression of money laundering and the financing of terrorism. The FIU Germany would like to express its thanks for this co-operation and at the same time offer its unconditional willingness to work together to accomplish the tasks ahead of us.

Dr Michael DEWALD  
Head of FIU Germany



## 2 Reporting behaviour of the parties required to report

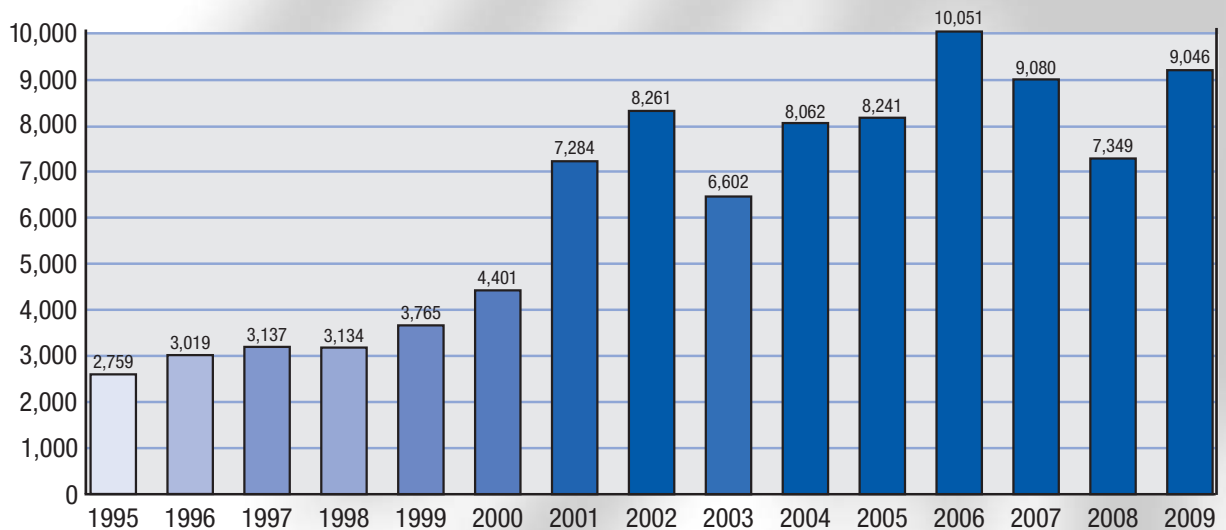
The graphs and tables shown in the following chapter are based on data originally held by the FIU Germany. Exceptions are graph 4 (“Results of processing by clearing offices of the state criminal police offices”) and graph 5 (“Connections to types of crime identified by clearing offices in cases forwarded to other investigative agencies”). These figures were collected by the competent state criminal police offices.

## 2.1 Nationwide case statistics for 2009

### 2.1.1 Suspicious transaction reports (STRs) filed pursuant to the Money Laundering Act (MLA)

In 2009, a total of 9,046 suspicious transaction reports were filed pursuant to the MLA. Compared to the previous year (7,349 suspicious transaction reports), this is an increase by 1,697 suspicious transaction reports or 23%. 710 follow-up reports relating to these 9,046 STRs have been received so that the FIU dealt with a total of 9,756 reports filed pursuant to the Money Laundering Act. The following overview illustrates the development of the suspicious transaction reports filed pursuant to the Money Laundering Act between 1995 and 2009. The figures exclusively refer to initial reports. Follow-up reports relating to previously submitted STRs have not been considered.

Graph 1: Suspicious transaction reports filed pursuant to the MLA, 1995–2009<sup>1</sup>



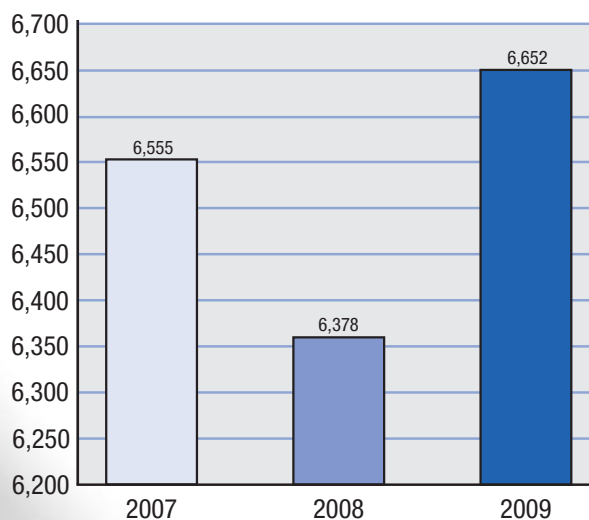
<sup>1</sup> The figures from 2003 onwards have been taken from the “FIU database” and may therefore differ from those recorded in the “Money Laundering” data network.



After a continuous increase between 1995 and 2006 with a peak of 10,051 STRs reached in 2006 and a subsequent decrease by 2,702 STRs (-27%), a significant increase by 1,697 STRs (23%) to the 2007 level was recorded again in 2009.

When deducting the special “financial agents” phenomenon from the last two years' figures, only a slight increase, i.e. 4% compared to 2008, can be observed.

**Graph 2: Suspicious transaction reports filed pursuant to the MLA, 2007–2009, without the “financial agents” phenomenon**



Without the STRs filed in connection with “financial agents” (FAs), a decrease of the “other” STRs by almost 3% was recorded from 2007 to 2008, whereas an increase of about 4% was recorded from 2008 to 2009.

After the percentage of “financial agents” STRs in the overall number of STRs filed in 2007 was still 28% and dropped to only 13% in 2008, this percentage again increased to 26% in 2009. This means that every fourth STR was filed in connection with “financial agents” in 2009.

<sup>2</sup> “Deviating values” are recorded for the years 2001 and 2002 with the special factors “terrorist attacks of 11 September 2001 in the United States” and “introduction of the EURO” in 2002.

<sup>3</sup> For further information on “financial agents”, please see 4.2.1.



The following overview illustrates the number of suspicious transaction reports filed by the various parties required to report pursuant to the Money Laundering Act:

**Table 1: Reports filed pursuant to the Money Laundering Act by reporting party**

			2009	2008	2007	2006
<b>Suspicious transaction reports pursuant to the Money Laundering Act (initial reports)</b>	<b>Banks</b>	Credit banks	2,506	2,102	2,147	2,882
		Saving banks and state central banks	3,185	2,495	2,810	3,072
		Credit unions and co-operatives	1,594	1,407	1,993	1,632
		Deutsche Bundesbank and main branches	11	14	15	49
		Other	815	334	328	508
		<b>Total</b>	<b>8,111</b>	<b>6,352</b>	<b>7,293</b>	<b>8,143</b>
	<b>Insurance companies</b>	Life insurance policies	32	30	28	14
		of them: reports by insurance agent	1	---	---	---
		Accident insurance policies	1	---	3	1
		Other	13	7	8	20
		<b>Total</b>	<b>47</b>	<b>37</b>	<b>39</b>	<b>35</b>
	<b>Financial service providers</b>	Financial transfer services	790	838	1,670	1,779
		Currency services	3	---	2	2
		Credit cards	33	82	24	4
		Traveller's cheques	---	---	---	---
		Other	4	---	5	53
		<b>Total</b>	<b>830</b>	<b>920</b>	<b>1,701</b>	<b>1,838</b>
	<b>Investment companies</b>	<b>Total</b>	<b>1</b>	<b>---</b>	<b>2</b>	<b>1</b>
	<b>Financing companies</b>	Factoring	---	---	---	---
		Leasing	2	3	4	1
		Other	4	---	4	2
		<b>Total</b>	<b>6</b>	<b>3</b>	<b>8</b>	<b>3</b>

		2009	2008	2007	2006	
<b>Suspicious transaction reports pursuant to the Money Laundering Act (initial reports)</b>	Casinos					
	Total	8	4	7	4	
	Government authorities (Sec. 14 and 16 of the Money Laundering Act)					
	Federal Ministry of Finance	---	---	---	---	
	BaFin (regulatory authority for financial services pursuant to the Credit Act)	---	1	---	4	
	BaFin (regulatory authority for insurance companies pursuant to the Insurance Law)	---	---	---	---	
	BaFin (regulatory authority for securities pursuant to the Trading Act)	---	---	---	---	
	Chamber of auditors	2	---	---	---	
	Chamber of lawyers	4	---	---	---	
	Regulatory bodies for the insurance sector (excluding BaFin)	---	---	---	---	
	Other authorities	---	---	---	4	
	Total	6	1	---	8	
	Parties required to report (Sect. 2 (1) MLA)					
	Lawyers	16	9	5	3	
	Legal advisers	---	---	---	---	
	Patent attorneys	---	---	---	---	
	Notaries	5	5	1	---	
	Auditors	1	3	3	2	
	Certified accountants	---	---	---	---	
	Tax consultants	1	5	3	2	
	Agents in tax matters	---	---	---	---	
	Real-estate brokers	1	---	---	1	
	Persons trading in goods	12	9	11	5	
	Persons who manage the assets of others	---	1	1	---	
	Total	36	32	24	13	
	Other reports filed pursuant to the Money Laundering Act					
	Total	1	---	6	6	
	<b>Total</b>		<b>9,046</b>	<b>7,349</b>	<b>9,080</b>	<b>10,051</b>



The sharp increase of STRs filed by credit institutions is noteworthy whereas a sharp drop has been recorded regarding the financial service providers.

During the year under review, credit institutions filed 8,111 suspicious transaction reports pursuant to the MLA. Thus, the number of suspicious transaction reports filed by this group increased by 1,759 (28%) compared to 2008. This development is the main reason for the total increase in the number of suspicious transaction reports. In contrast, the number of STRs filed by financial service providers dropped to 830 from 920 (-10%).

Compared to 2008, the number of reports filed by insurance companies slightly rose from 37 to 47 reports.

The number of reports filed by so-called "legal advisors" and "persons trading in goods" also went up only slightly from 32 to 36.

### 2.1.2 Possible causes for the increase in the number of suspicious transaction reports

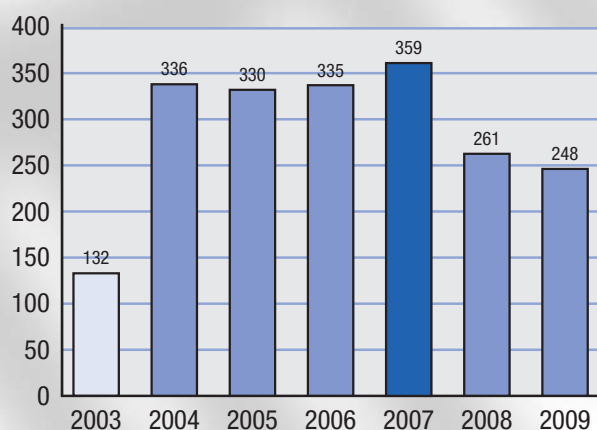
According to the FIU's assessment, the following developments are particularly responsible for the enormous increase in the number of STRs filed in 2009 compared to the previous year:

- Increase in the number of STRs filed in 2009 in connection with "financial agents" by 1,423 reports.
- Increase in the number of STRs filed by banks even without considering the "financial agents" phenomenon.
- Increase in the number of STRs filed in connection with cash transactions (2008: 1,388 STRs, 2009: 1,866 STRs).
- Increase in the number of STRs filed in connection with Internet transactions/commercial websites (2008: 214 STRs, 2009: 417 STRs).

### 2.1.3 Reports filed by the tax authorities pursuant to Section 31 b of the Fiscal Code

In 2009, in addition to the STRs filed pursuant to the Money Laundering Act, the FIU received 247 reports indicating money laundering and one report indicating financing of terrorism<sup>4</sup> which were filed by the tax authorities pursuant to Section 31 b of the Fiscal Code. After the number of reports had already dropped by 25% in 2008 compared to 2007, it decreased by another 5% during the period under review. The reasons for this decline have not yet been established.

**Graph 3: Reports relating to money laundering pursuant to Section 31 b of the Fiscal Code**



### 2.1.4 Reports in accordance with Section 14 (2) of the MLA

In accordance with Section 14 (2) MLA, the authorities responsible for the oversight of cross-border traffic shall immediately inform the competent law enforcement authority, with a copy to the Bundeskriminalamt – FIU – if facts are established suggesting that an offence as defined in Section 261 of the Penal Code or financing of terrorism has been or will be committed or attempted.

In 2009, 1,739 cash control reports were transmitted to the FIU Germany by the Zollkriminalamt (central office of the German customs investigation service) and were included in the FIU's work.

### 2.1.5 Reports filed pursuant to the Iran Embargo

During the calendar year 2009, the FIU received 301 reports filed pursuant to the Iran Embargo Regulation<sup>5</sup>. A sharp increase in the number of reports was established in the second half of the year. This increase is believed to be mainly due to efforts undertaken by the FIU to raise the awareness of the parties required to report (for example, through the Newsletters).

The original reports received by the FIU are also subjected to assessment by the State Security Division of the BKA. Further case handling is then made by the Zollkriminalamt.

<sup>4</sup> Extension of Section 31b of the Fiscal Code to include financing of terrorism by virtue of Section 7a of the Act amending the Money Laundering Suppression Act of 13 August 2008 (Federal Law Gazette "BGBl" I p. 1690).

<sup>5</sup> Council Regulation (EC) No. 1110/2008 of 10 November 2008 amending Regulation (EC) No. 423/2007 concerning restrictive measures against Iran.



### 2.1.6 Number and nationality of individuals reported

In 2009, the FIU recorded a total of 15,543 individuals who were mentioned in suspicious transaction reports filed pursuant to the MLA and reports filed pursuant to Section 31 b of the Fiscal Code. This means an increase of approx. 15% compared to the preceding year (13,490 individuals). The increase in the number of individuals reported mainly results from the increase in the total number of STRs filed pursuant to the MLA.

As to the individuals reported whose nationality was known, the percentage of German nationals amounted to approx. 53% in 2009 and has not significantly changed compared to 2008 (approx. 50%). While the number of German suspects had prevailed for years, the percentage of non-German individuals reported has amounted to roughly 50% since 2008.

Compared to 2008, there is a noteworthy increase in the number of Ukrainian (+ 94%), Bulgarian (+ 57%), Polish (+ 40%), Turkish (+ 8%) and Russian (+ 8%) individuals reported. This development can be explained by the increasing number of STRs filed in connection with “financial agents” which often referred to suspects of these nationalities.

Table 2: Nationality of the individuals reported (Top 10)

Nationality	Number		
	2009	2008	2007
German	5,866	4,756	8,533
Turkish	450	416	738
Russian	292	270	682
Polish	218	155	232
Romanian	142	180	86
Italian	134	121	224
Chinese	132	151	177
Bulgarian	126	80	38
Ukrainian	115	59	33
Iranian	114	123	226
Other	3,556	3,139	3,468
unclear / unknown	4,398	4,040	4,575
<b>Total</b>	<b>15,543</b>	<b>13,490</b>	<b>19,012</b>

### 2.1.7 Corporate headquarters

During the period under review, 3,531 companies were mentioned in the suspicious transaction reports filed pursuant to the MLA and in the reports filed pursuant to Section 31 b of the Fiscal Code (2008: 3,189). The countries where the suspicious companies are seated were mentioned in 2,232 cases. 1,091 of them had their headquarters in Germany (48%). Thus, in 2009, more than half of the “suspicious companies” with known headquarters (i.e. 52%) were seated abroad. The percentage of the reported companies with headquarters abroad has been rising continuously for years (2006: 17%, 2007: 40%, 2008: 49%).

The increase in the number of STRs referring to companies abroad might be explained by the reporting parties' raised awareness towards foreign companies, especially if sufficient information on their business activities and economic background is not available.

### 2.1.8 Grounds for suspicion

The term "grounds for suspicion" refers to the reasons cited by reporting parties for filing a report. The following distribution has been recorded for the reporting year, with multiple entries being possible in a given report and being the rule rather than the exception:<sup>6</sup>

**Table 3: Headquarters of suspicious companies (Top 10)**

Countries where "suspicious companies" are seated	Number		
	2009	2008	2007
Germany	1,091	1,068	1,815
United Kingdom	105	71	119
Switzerland	92	85	62
British Virgin Islands	69	45	58
Russia	56	28	62
Cyprus	55	43	38
Austria	32	19	33
USA	28	42	73
Spain	24	17	54
Netherlands	22	16	40
Other	658	648	661
Unknown/no information	1,299	1,107	1,377
<b>Total</b>	<b>3,531</b>	<b>3,189</b>	<b>4,392</b>

<sup>6</sup> As in previous Annual Reports, the various grounds for suspicion have been summarised in categories.



Table 4: Grounds for suspicion indicated by the parties required to report (part 1)

Category	Ground for suspicion	Number		
		2009	2008	2007
Special hints/ links to known cases	Transfer fraud	2,504	1,068	2,616
	Link to known investigation	653	531	682
	Internet transactions	417	214	213
	Garnes of chance/bets	55	43	41
	Press releases/Open source information	52	38	37
	Region involved	30	30	43
	Fraudulent offers	29	20	46
	Social security fraud	16	20	19
	Direct debit fraud	15	10	16
	Other (special) hints/links to known cases	13	5	25
<b>Total</b>	<b>3,784</b>	<b>1,979</b>	<b>3,742</b>	
Document/certificate/ identification	Document forgery	261	182	198
	Difficulties in/refusal of identification	87	114	48
	Smurfing	83	110	174
	Other (document/certificate/identification)	3	8	8
	<b>Total</b>	<b>414</b>	<b>428</b>	<b>428</b>
Company	Business activity	104	105	77
	Structure/network of companies	42	58	58
	Fictitious/letter-box company	40	51	38
	Persons involved/business partners	27	27	20
	Payment of commissions/bribes	21	23	24
	Company foundation	13	5	5
	Others (Company)	7	15	36
	<b>Total</b>	<b>254</b>	<b>285</b>	<b>258</b>
Kind of business ("how")	Cash	1,866	1,388	1,771
	Non-Cash	489	339	519
	Credit	110	184	239
	Barter	90	126	182
	Insurance	47	37	39
	Capital investment	27	21	20
	Other (kind of business)	1	7	4
	<b>Total</b>	<b>2,630</b>	<b>2,102</b>	<b>2,774</b>



Table 4: Grounds for suspicion indicated by the parties required to report (part 2)

Category	Ground for suspicion	Number		
		2009	2008	2007
Business purpose ("what")	Cheque	227	207	312
	Real estate	148	181	253
	Vehicle	113	94	171
	Securities	61	50	59
	Precious metals	60	33	35
	Building and construction	37	26	32
	Electronics	22	2	2
	Services	16	1	2
	Art	6	0	0
	Expensive goods (other)	6	3	1
	Catering sector	6	8	5
	Counselling/brokerage	5	3	1
	Boats	3	0	0
	Precious stones	2	2	5
	Licences/patents (legal claims)	1	0	0
	Other (business purpose)	1	2	5
	<b>Total</b>		<b>714</b>	<b>611</b>
Account opening/account keeping	Account use	2,781	2,209	2,487
	Economic background	1,672	1,633	1,844
	Transactions	979	791	1,123
	Economic authorisation	63	158	107
	Transfers through uneconomic/indirect channels	30	25	36
	E-money	26	1	5
	Online banking	10	5	4
	Financial (transfer) transaction without required authorisation	2	8	18
	Other (account opening/keeping)	2	4	9
	<b>Total</b>		<b>5,565</b>	<b>4,834</b>
Product/customer	Customer behaviour	605	560	791
	Safe deposit box	20	32	32
	Cash dispensers	18	9	2
	Type of account	14	18	11
	Conditions	9	11	17
	Persons in prominent political and/or economic positions	3	0	2
	Other (product/customer)	3	8	9
	<b>Total</b>		<b>672</b>	<b>638</b>
Financing of terrorism	Criminal association/organisation	26	9	21
	Matches with listed persons	23	22	28
	Other (financing of terrorism)	49	34	53
	<b>Total</b>		<b>98</b>	<b>65</b>
No specific grounds for suspicion	No specific grounds for suspicion	11	17	83
	<b>Total</b>		<b>11</b>	<b>17</b>
<b>Total</b>		<b>14,162</b>	<b>10,945</b>	<b>14,769</b>



The enormous increase in the number of cases reported where the reason was given as “transfer fraud” is especially noteworthy. This is probably due to the increase in the number of reports on “financial agents”. No considerable changes have been identified compared to the previous year in respect of the other categories.

## 2.2 Results of processing

### 2.2.1 Status of report processing at the close of the reporting year

In 2009, about 6% of the investigations regarding the 9,046 suspicious transaction reports filed pursuant to the MLA were closed without residual suspicion. In about 18% of all cases, investigations were closed despite the existence of residual suspicion from the police perspective. In about 30% of all cases, processing by the clearing offices of the state criminal police offices had not been completed by year’s end.

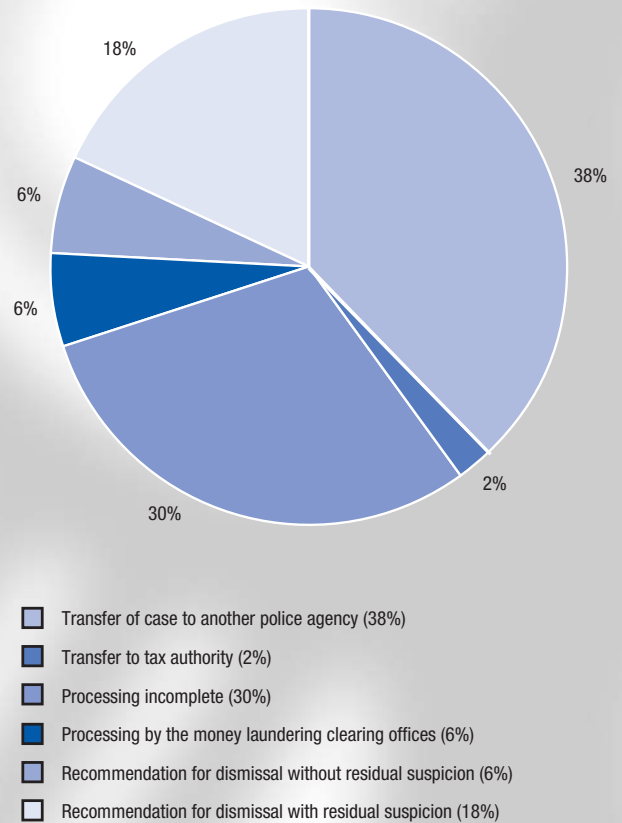
In approximately 38% of all cases, the suspicion of money laundering or another criminal offence was supported to the extent that the cases were forwarded to an appropriate police investigation office for further investigation. In 6% of the investigations, the cases were further handled by the clearing offices at the state criminal police offices.

In about another 2% of all cases, the suspicion of tax offences was corroborated so that the cases were forwarded to the tax authorities.

Thus, in approx. 46% of the cases, the suspicion of a criminal offence was corroborated (2008: 33%, 2007: 38%, 2006: 34%).

The figures show that, compared to previous years, the law enforcement authorities gleaned an even higher degree of valuable information from the suspicious transaction reports filed in 2009.

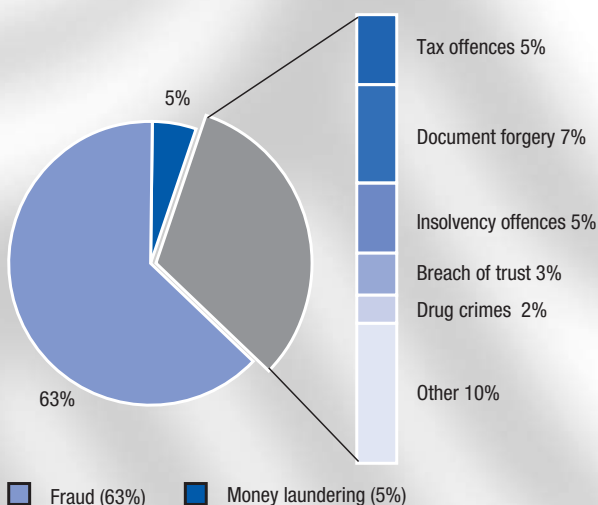
**Graph 4: Results of processing by the money laundering clearing offices of the state criminal police offices**



### 2.2.2 Connections to types of crime in cases forwarded to other investigative agencies

In these cases, connections to the following types of crime were identified (multiple listings in a single report were considered):

**Graph 5: Connections to types of crime identified by clearing offices in cases forwarded to other investigative agencies**



With 63% of the total number of cases, the clearing offices most frequently identified connections to “fraud” as type of crime. Compared to previous years (2008: 40%, 2007: 43%, 2006: 49%), this number has strongly increased as, in various German states, cases with a “financial agent/phishing” background (computer fraud) are completely transferred to the appropriate units dealing with such matters. This also explains the decline in “money laundering” cases, transferred by the clearing offices to other units, to now only 5% (2008: 33%, 2007: 37%, 2006: 28%). No significant changes were established with regard to the other types of crime.

### 2.3 Summary of report volume:

- In 2009, a total of 9,046 suspicious transaction reports were filed pursuant to the MLA. Compared to the previous year (7,348 suspicious transaction reports), this is an increase by 1,698 suspicious transaction reports or 23%. This enormous increase is largely due to the increase in the number of STRs filed in connection with the “financial agents” phenomenon. But also without this “special phenomenon”, an increase of 4% has still been recorded compared to 2008.
- The number of STRs filed by the so-called “legal advisors” and “persons trading in goods” is still considered inadequate in view of the large number of natural persons and legal entities belonging to this group.
- In 2009, 248 reports were filed by the tax authorities pursuant to Section 31b of the Fiscal Code (2008: 261, 2007: 359). This is a decline of approx. 25% in comparison to the previous year. The declining trend monitored since 2007 thus continued.
- As in 2008, the percentage of German and non-German nationals reported in the STRs remained more or less unchanged in 2009.
- During the period under review, the percentage of companies with headquarters abroad was 52%. The increasingly important role of companies with headquarters abroad is an indication of the growing internationalisation of money laundering activities.



- As the results from processing by the money laundering clearing offices at the state criminal police offices show, the suspicion of an offence was corroborated in about 46% of the reports filed. The results show that, compared to previous years, the law enforcement authorities gleaned an even higher degree of valuable information from the suspicious transaction reports filed in 2009.

### 3 Follow-up responses by public prosecutors' offices pursuant to Section 11 (8) of the Money Laundering Act

Pursuant to Section 11 (8) MLA, the competent public prosecutor's office has to inform the Bundeskriminalamt about the commencement of public legal proceedings and the outcome of the proceedings.

#### 3.1 Initial situation

After the amendment of the Money Laundering Act in August 2008, the follow-up responses by public prosecutors' offices submitted to the FIU are recorded and analysed in two categories:

1. Follow-up responses in criminal proceedings based on an STR filed pursuant to the MLA and
2. Follow-up responses in other criminal proceedings initiated for an offence according to Section 261 Penal Code and in criminal proceedings in which investigations were conducted for suspected financing of terrorism in the sense of Section 1 (2) MLA.

### 3.2 Statistical analysis

#### 3.2.1 Follow-up responses relating to suspicious transaction reports filed pursuant to the MLA (category 1)

In 2009, 4,838 follow-up responses by public prosecutors' offices pursuant to Section 11 (8) MLA were recorded and analysed.<sup>7</sup> While a decrease in the absolute number of follow-up responses by approx. 6% had first been established in 2008, a significant increase in the absolute number by more than 25% was recorded in 2009.

The following development of the response reporting practice of the prosecutors' offices has been ascertained since 2003:

**Table 5: Number of follow-up responses in relation to the number of suspicious transaction reports**

Year	Number of follow-up responses	Number of STRs pursuant to MLA	Difference	Quota in %
2003	13	6,017	6,004	0.2
2004	518	8,062	7,544	6
2005	1,680	8,241	6,561	20
2006	3,018	10,051	7,033	30
2007	4,107	9,080	4,973	45
2008	3,850	7,349	3,499	52
2009	4,838	9,046	4,208	54

**Note:**

*A direct comparison between the suspicious transaction reports filed during the calendar year and the follow-up responses received by the FIU cannot automatically be made due to the fact that the follow-up responses may also refer to suspicious transaction reports filed in previous years. A trend comparison is, however, possible since this "distortion" is probably largely evened out by the monitoring over several years.*

Accordingly, the percentage of follow-up responses again increased in 2009.

However, only the so-called “responses relevant to analysis” are decisive for the analysis and, thus, for drawing well-grounded conclusions or making statements about trends and developments.

### 3.2.2 Follow-up responses relating to category 2 proceedings

Since August 2008, the public prosecutors’ offices have been additionally obliged pursuant to Section 11 (8) MLA to inform the FIU about the outcome of other criminal proceedings initiated for an offence according to Section 261 of the Penal Code and of criminal proceedings in which investigations were conducted for suspected financing of terrorism in the sense of Section 1 (2) MLA.

While only six follow-up responses relating to such proceedings had been received between August and December 2008 – which is probably due to the fact that the new reporting obligation was not yet sufficiently known to all public prosecutors’ offices concerned – the balance for 2009 was already much more positive. All in all, 116 follow-up responses were received from public prosecutors’ offices about the outcome of criminal proceedings which were not based on suspicious transaction reports. However, in 104 cases, they related to mere dismissal orders. Only in 12 cases were the contents good enough for analysis.

### 3.2.3 Follow-up responses with unclear links

The extension of the reporting obligations mentioned at 3.2.2 also resulted in difficulties in establishing – sometimes due to a lack of precise information – whether follow-up responses referred to proceedings based on a suspicious transaction report filed pursuant to the MLA or to other criminal proceedings initiated for an offence in accordance with Section 261 of the Penal Code. In 53 cases (42 of them dismissal orders), it was not possible to clearly link the responses to one of the two categories so that these follow-up responses could not be taken into further consideration in the following examination.

The consistent use of the follow-up response form by the public prosecutors’ offices, which provides for a clear assignment to one of the two categories, would solve this problem without any additional efforts.

## 3.3 Analysis of content

### 3.3.1 Follow-up responses relating to suspicious transaction reports filed pursuant to the MLA not relevant to analysis

Of the 4,838 follow-up responses assessed by the FIU, approx. 90% (4,333 cases) referred to orders which, for various reasons, led to the dismissal of the proceedings initiated for suspected money laundering.

Besides the prosecutorial reasons for dismissal, only a few of these responses contained explanatory information about the specific cases. Thus, these follow-up responses were not suitable for more detailed analysis (regarding typologies, for example).

In addition, these follow-up responses did not allow any conclusions as to whether the proceedings were continued for an underlying offence.

<sup>7</sup> Follow-up responses which could not be clearly assigned to one of the two categories have not been included in the total number of 4,838 follow-up responses.



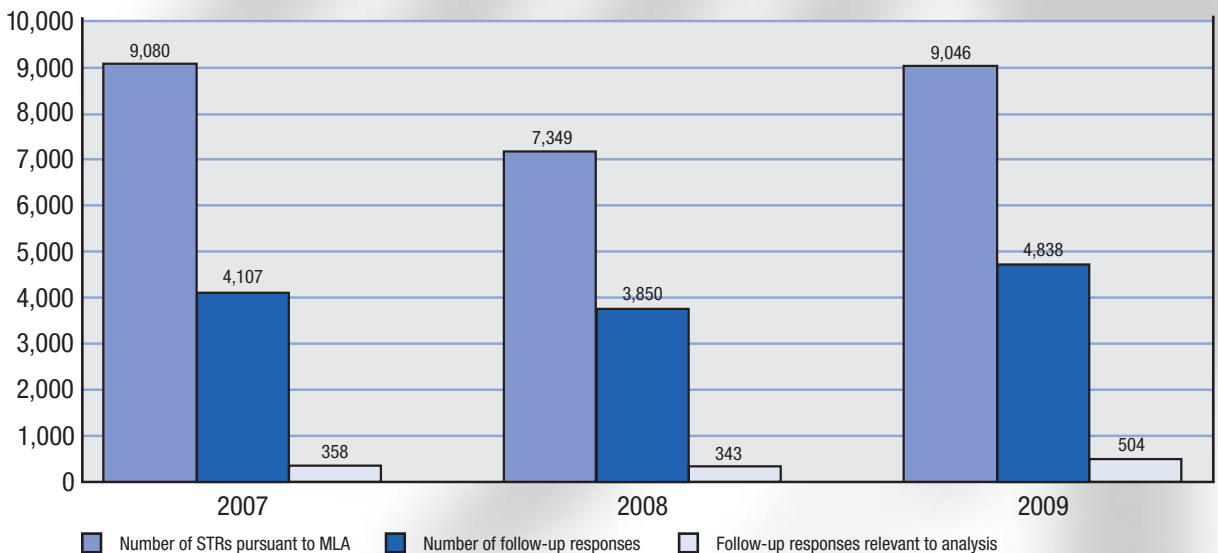
### 3.3.2 Follow-up responses relating to suspicious transaction reports filed pursuant to the MLA and relevant to analysis

Of all follow-up responses, 504 were classified as relevant to analysis in 2009. These follow-up responses refer to investigations initiated on the basis of a suspicious transaction report filed pursuant to the MLA and for which either a chargesheet, a penalty order or a judgment is transmitted. In 2009, 82 chargesheets (2008: 42 cases), 143 penalty orders (2008: 138 cases) and 32 judgments (2008: 31 cases) were sent.

When considering the 257 chargesheets/penalty orders/judgements under offence-related aspects, it can be established that, in 185 cases, they were passed for money laundering (partly in connection with computer fraud, fraud and/or violation of the Banking Act). However, only ten cases did not refer to the prosecution of a so-called “financial agent”.

In addition, a total of 247 follow-up responses were relevant to analysis in cases in which new investigations were initiated on suspicion of other offences than money laundering (161 cases; 2008: 99 cases) or where it was possible to integrate the STRs in pending investigations (86 cases; 2008: 33 cases).

Graph 6: Follow-up responses relevant to analysis (2007–2009)



### 3.4 Follow-up response form pursuant to Section 11(8) MLA and Sections 482 and 475 Code of Criminal Procedure

In 2008, in accordance with the amendment of Section 11 (8) MLA regarding the obligation for the public prosecutors' offices to provide follow-up responses, the appropriate form was revised and adapted to the new requirements and the public prosecutors' offices were requested to routinely use the form.

In 2009, follow-up responses were received from 90 public prosecutors' offices. It has been established that only 34 public prosecutors' offices used the form. Some public prosecutors' offices used the form during the whole 2009 reporting period already whereas others used it occasionally at least towards the end of the year.

### 3.5 Conclusion

The percentage of follow-up responses again increased in the 2009 reporting year.

In addition, an increase in the number of follow-up responses has been recorded due to the new legal situation (additional follow-up reporting obligation apart from STRs filed pursuant to the MLA).

This trend should, however, not hide the fact that reliable statements as a result of the analysis of the judicial authorities' case handling can, in the end, only be made if a significant increase in the number of high-quality follow-up responses (detailed penalty orders, chargesheets, judgments) can be achieved.

## 4 Monitoring of suspicious transaction reports

During the period under review, the following information was gleaned from the monitoring of suspicious transaction reports filed pursuant to the MLA and reports filed pursuant to Section 31 b of the Fiscal Code:

### 4.1 Noteworthy cases

Cases classified as "noteworthy" are those filed in connection with individuals in prominent business, political or other positions, with a high transaction volume (exceeding three million euros) or with media coverage.

Of the 9,294 initial reports on money laundering received in 2009 (9,046 STRs pursuant to the MLA and 248 reports pursuant to Section 31 b Fiscal Code), the FIU classified 141 reports as "noteworthy cases" (2008: 94, 2007: 88).

116 of these suspicious transaction reports referred to transactions exceeding three million euros each (2008: 70, 2007: 64). Suspicious transaction reports were filed against prominent political figures in six cases (2008: seven, 2007: eleven), against individuals in prominent business positions in three cases (2008: no case, 2007: no case) and against other prominent persons in two cases (2008: two, 2007: six). Eleven STRs (2008: 17, 2007: seven) were filed as a result of media coverage.



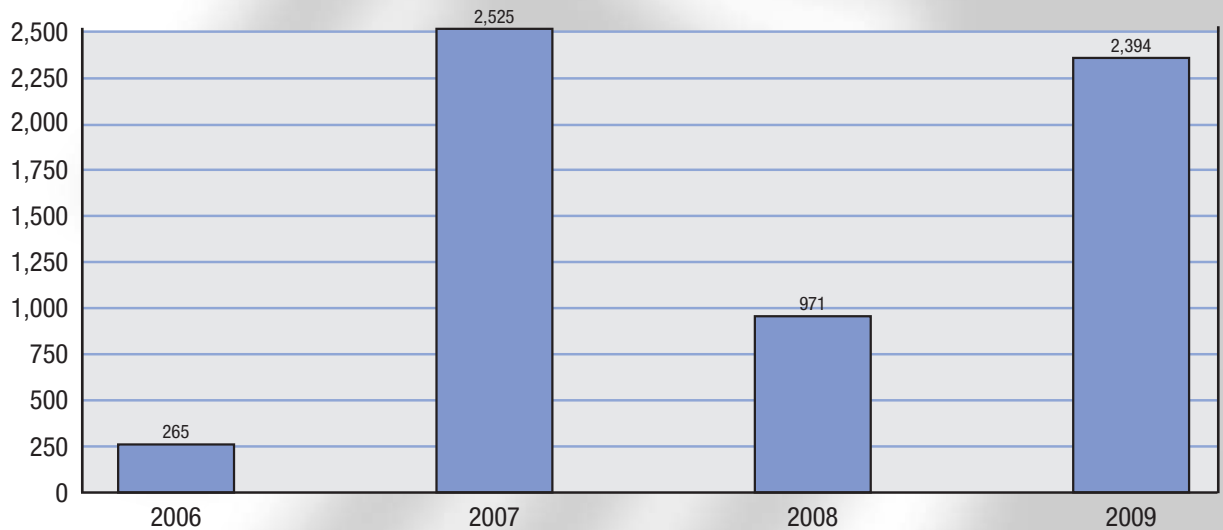
## 4.2 Monitoring of trends

If the monitoring reveals indications of new trends with regard to phenomena of money laundering and terrorist financing that are relevant to analysis or investigation (such as an unusual accumulation of similar grounds for suspicion, case-specific facts or the like), this trend is monitored with a view to obtaining further information on the phenomenon. In 2009, the following nine trends (2008: four) were monitored.

### 4.2.1 "Financial Agents"

In 2009, 2,394 STRs were filed in connection with the "financial agents" phenomenon. This represents an increase of about 147% compared to the previous year (971 reports). The following table reflects the development of the number of reports filed in connection with FAs since 2006:

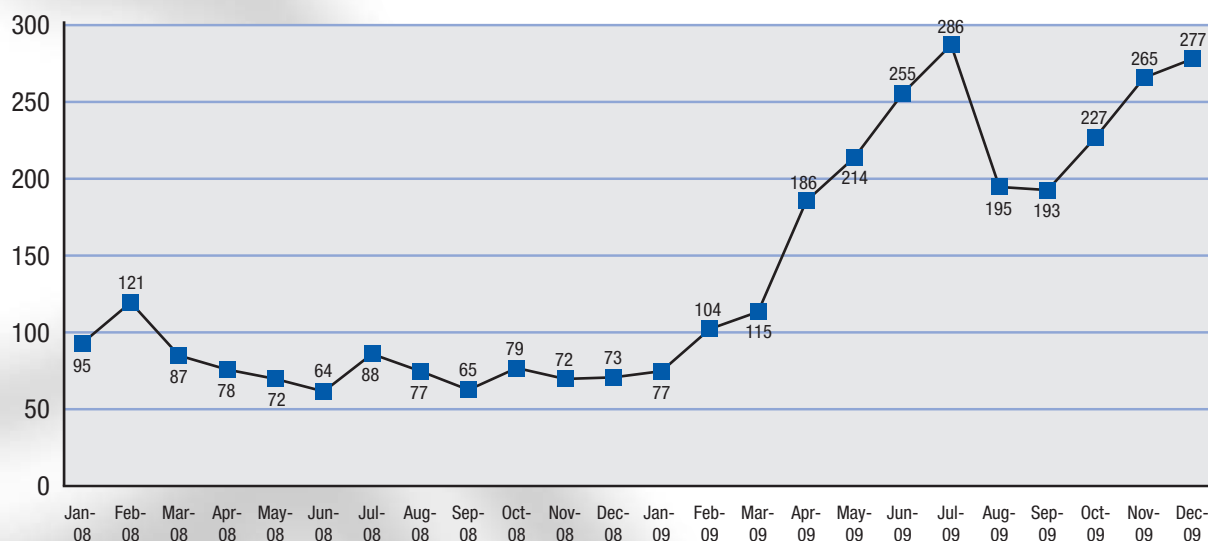
**Graph 7: Number of STRs filed in connection with the "Financial Agents" phenomenon since 2006**



When considering the monthly development between 2008 and 2009, it is striking that the number of STRs filed in connection with FAs between January 2008 and January 2009 remained practically unchanged, but almost skyrocketed between February and December 2009 (see graph 8).



Graph 8: Monthly number of STRs “Financial Agents” 2008–2009



The enormous increase in the number of STRs filed in connection with “financial agents” since February 2009 is believed to be mainly due to the following:

- The “house banks” of the financial agents increasingly often report suspicious operations. This is due to the fact that “phishing” transactions are clearly identifiable as offences of fraud due to transfer recalls by the prejudiced parties’ banks and, thus, can be more easily “rescinded”.
- The perpetrators have managed to overcome the iTAN procedure by using new malware, which resulted in a significant increase in the number of “phishing” cases. Thus, the perpetrators probably also stepped up their efforts to recruit “financial agents”.

- It was also established in the period under review that the previously applied methods of recruiting “financial agents” have been further developed<sup>8</sup> and resulted in a considerable increase in the number of recruitments. The perpetrators increasingly used so-called “social engineering methods”.<sup>9</sup>
- Despite all efforts made by the media and the police to raise the awareness about the legal consequences of activities as “financial agents”, they are believed to remain a great incentive for an allegedly lucrative (additional) income, especially in these times of economic tensions.

<sup>8</sup> See also 4.3.1

<sup>9</sup> “Social engineering” means “social manipulation”. The potential FAs are given reasons which move them personally/emotionally so that it is hard or impossible for them to refuse.



#### 4.2.2 “Electronic payment systems”

While 26 STRs had been filed in 2008 in which the suspects had used an Internet-based payment system, the number of STRs filed in this category already amounted to 63 in 2009, so that a considerable increase is expected for 2010, though the absolute level is (still) relatively low.

No information was gleaned on new modi operandi from the suspicious transaction reports filed in 2009. However, the FIU's assessment has been confirmed that electronic payment systems offer a wide range of opportunities for committing money laundering activities due to their multi-functional technical abilities and some few possibilities of anonymous use, as encryption technology and Internet-based communication channels make it difficult or impossible to trace the transactions due to the lack of leads to identify the acting persons.

Headed by the BKA, a police-internal Federation-State project has been carried out in the field of money laundering suppression in Germany since mid 2008 in order to establish the actual dimension of this phenomenon and develop possible counter strategies. All information gleaned from the trend monitoring on the actual extent to which electronic payment systems are used for money laundering activities and on the chances of prevention/suppression has been included in the project work.

#### 4.2.3 Gold trade

After, in its 2008 Annual Report, the FIU had already pointed to a new typology in connection with gold separation plants, which had given rise to the suspicion of fraud and money laundering, the FIU – within the scope of trend monitoring – has established 69 STRs since January 2009 which referred to this phenomenon and related to transactions totalling than 60 million euros.

#### 4.2.4 Correspondent bank transactions<sup>10</sup>

An increasing number of suspicious transaction reports have been filed in Germany since the beginning of 2009 which were based on correspondent bank transactions. The suspicion of money laundering was especially corroborated by the large number of daily, parallel payments made by correspondent banks abroad to various companies through credit institutions in Germany without any information about the background of the transactions.

Thus, in June 2009, the FIU started its trend monitoring “correspondent bank transactions”. In late 2009, the FIU began to strategically analyse this phenomenon. The analysis focussed on the identification of unusual or suspicious transaction patterns. The modi operandi of money laundering identified in this process have been assessed. Should any needs for action to prevent money laundering be revealed in connection with correspondent bank transactions, they will be communicated to the relevant addressees.

<sup>10</sup> Correspondent banking is a relationship entered into when credit institutions want to conduct international banking transactions with each other but have no joint bank connection. In order to conduct the intended business, a third bank is called in as a correspondent bank where both sides maintain an account.

#### 4.2.5 Commercial websites

During the period under review, the FIU conducted a trend monitoring of STRs in which the use of “commercial websites” played a role. In general, this means web pages that offer trading platform for goods. Businessmen or private individuals offer goods for sale on the Internet through “direct offers” or through a “networking/auction platform”. During the reporting period, 417 STRs were identified which referred to goods offered at very low prices via “commercial websites” but were not delivered after receipt of the payment. The advance payments were collected in accounts held by various private persons who made their accounts available as “financial agents” and passed the payments on to people behind the scenes abroad in return for a commission or — for concealment of the payment transactions — to other “financial agents” involved in the same matter.<sup>11</sup>

#### 4.2.6 Cash transactions

After a sharp drop of STRs filed in connection with cash transactions had been recorded between 2006 and 2008 (2006: 2,455 STRs, 2007: 1,771 STRs, 2008: 1,388 STRs), a reversing trend was identified in 2009 with a significant increase to 1,866 STRs. This increase by 34% compared to 2008 was mainly based on reports filed in connection with

- cash deposits at bank counters,
- cash deposits directly at automated teller machines,
- cash purchases of vehicles, precious metals and real estates,
- early redemption of loans with cash
- unusually high lump sums paid into insurance contracts

in cases in which the origin of the (cash) funds was unclear or has not been proved.

#### 4.2.7 International commercial transactions

In the course of the monitoring of suspicious transaction reports, the FIU established that cases have been increasingly reported which related to commercial transactions. For this reason, the trend monitoring “trade-based money laundering” had initially been started at the beginning of 2009 which revealed that about a third of all STRs received at the FIU showed suspicious facts relating to commercial transactions in the broadest sense.

Given the enormous complexity of this subject, an analysis of the whole phenomenon was not considered practicable. The trend monitoring “trade-based money laundering” was thus stopped and replaced by trend monitoring focusing on individual crime phenomena (“Gold trade”, 4.2.3, “Correspondent bank transactions”, 4.2.4, “Commercial websites”, 4.2.5, “CO<sub>2</sub> emission allowance trading”, 4.2.8, and “International commercial transactions”).

<sup>11</sup> See also 4.3.1



In the period under review, 121 reports were filed since there was suspicion that international transactions had been conducted where illicit funds were moved by means of commercial transactions with the intention of concealing their illicit origin and make them look legal.

The cases primarily refer to

- suspicious transactions involving letters of credit,
- over-/under-invoicing of goods and services,
- multi-invoicing of goods and services and
- incorrect description of goods and services

#### 4.2.8 CO<sub>2</sub> emission allowance trading

Since July 2009, an increasing number of suspicious transaction reports have been filed in Germany by credit institutions and energy trading companies which were based on offers or money transfers in connection with emission allowance trading. A trend monitoring has since been conducted by the FIU, with 28 STRs having been recorded during the period under review.

The cases reported are based on suspected VAT fraud. The CO<sub>2</sub> emission allowances are sold in a chain of suppliers by circumventing VAT obligations and involving several companies seated in different member states of the EU (detailed description of the modus operandi under 4.3.2).

Due to the suspicious transaction reports filed and the described transactions in the million range, channelled through various banks in Germany and abroad, there is strong suspicion that the illicit funds obtained from the emission allowance trade (underlying offence: VAT fraud) were the subject of money laundering.

#### 4.2.9 Suspicious transaction reports of “persons trading in goods” (Section 2 (1) No. 9 MLA)

During the past years, the number of suspicious transaction reports filed by “persons trading in goods” (called “other business persons” until the MLA was amended in August 2008) was on a very low level (2006: 2 STRs, 2007: 11 STRs, 2008: 9 STRs). This trend continued in 2009. During the period under review, only 12 STRs were filed by this group of persons. This reporting behaviour must still be described as inadequate in view of the large number of persons belonging to this group.

## 4.3 Typologies

The monitoring of STRs revealed the following new modi operandi in 2009:

### 4.3.1 Recruitment of “financial agents”

- Recruitment of FA for organised Internet fraud  
Persons are recruited on the Internet who make their private accounts available in return for a commission for the transfer of the purchase price for Internet articles which are offered either on commercial websites or auction platforms at “favourable conditions” against advance payment. The goods are not delivered, however, the advance payments made onto the accounts of the recruited FAs by the buyers are transferred on from there via an electronic payment service provider to wire pullers in order to conceal the payment transactions. The FIU recorded 54 STRs in 2009 which were based on this modus operandi.  
In this connection, several investigations are conducted all over Germany for fraud on a commercial basis and money laundering.
- Fewer cash withdrawals by FAs from their current accounts  
The trend monitoring revealed a modified modus operandi used by the FAs. In a very few cases only do the FAs now withdraw the “phished” funds in cash from their current accounts and transfer the money onward through financial service providers. Instead, the recruited FAs often open a new account on instructions of the wirepullers in order to avoid the termination of their own current account and the difficult search for a new house bank if their illegal activities are detected by the law enforcement authorities. The “phished” funds are transferred on through the new account. The FIU registered 501 such cases (2008:

120). What is new is that financial agents transferred money to Spain, Greece and Turkey as well. Up to now, transfers have been primarily made to Eastern European countries.

- Recruitment of so-called “purchase agents”  
Persons are recruited on the Internet to make their accounts available in return for a commission for transfers of money which they are to use to purchase high-quality goods (e. g. TVs, computers, mobile phones) and forward them to specific addresses that are supplied to them. The amounts transferred are “phished” funds. The FIU identified 39 STRs in this connection.
- Use of electronic vouchers  
Persons are recruited on the Internet as “representative and manager for payment processing and movement of goods”. Interested parties receive work contracts. After having signed them, the “employee” receives money from alleged customers of his “employer” in his account. The “employee” is to buy “vouchers” with the money. These vouchers are PINs which can be used as means of payment on the Internet. The “employee” should then forward these PINs to the e-mail address of his “employer” who converts the vouchers into cash again. The money actually originated from “phished” accounts. During the period under review, 26 such transactions were established.



#### 4.3.2 CO<sub>2</sub> emission allowance trading

Company A, seated in one of the EU member states, sells CO<sub>2</sub> emission allowances worth one million euros to company B in Germany, which is free of turnover tax for both of them. B now re-sells the allowances to C in Germany, charging 1.19 million euros for the 19% VAT tax. B would have to pay the additional 190,000 euros to the tax office in Germany within a fixed period (about four months). C, on the other hand, is immediately refunded the VAT as input tax. Within the period fixed for repayment, B absconds after having transferred the money in question abroad through transfer chains. The state has thus been defrauded of EUR 190,000. C sells the emission allowances back to company A free of VAT tax and the modus operandi can be used anew (tax carousel).

## 5 National co-operation

### 5.1 Public relations work

Since its establishment as a central office, the FIU has attached special importance to offensive public relations work and has always endeavoured to promote communication. With its information media Newsletter, Internet presentation, hotline and Annual Report, it has continuously presented itself as the central point of contact for all issues regarding the suppression of money laundering.

Both with regard to the frequency but also the depth of information, the FIU was contacted even more intensively in 2009 than in previous years by the parties with reporting obligations under the MLA but also by national authorities/bodies.

Every day, the FIU receives enquiries and requests through its telephone hotline, by e-mail or fax. In order to illustrate the variety of the subjects the FIU was approached with, the following are some of the authorities/bodies that contacted the unit in 2009 as well:

Investigation authorities of the Federation and the states (especially the joint financial investigation teams of the police and the customs at the Bundeskriminalamt and the state criminal police offices), the public prosecutors' offices, the customs and financial authorities (such as the tax investigation services), other security authorities (such as the Federal Intelligence Service, the Federal Office and the state offices for the Protection of the Constitution), regulatory authorities (such as the Federal Agency for the Supervision of the Financial Services Sector – BaFin), professional associations/chambers (e. g. for accountants, lawyers and tax advisors), umbrella organisations (such as the Union of German Insurance Companies, the Central Credit Committee), the parties required to report under the Money Laundering Act, the enterprises tasked with the prevention of money laundering, providers of special research and monitoring

software, training and further training institutions, universities/research institutions (such as the Max-Planck-Institute), commissioned business consultants as well as the Ministries of the Federation and the states (above all home affairs, finance and justice).

The Financial Intelligence Unit was also asked to participate in the preparation of publications on the subject of money laundering. Here as well, due to the large number of requests, it was not possible to comply with all of them.

### 5.1.1 The FIU Newsletter

With its Newsletter, the FIU keeps all parties required to report pursuant to the MLA as well as the law enforcement authorities updated about current developments and typologies in the field of combating money laundering and terrorist financing. It thus serves as a means to continuously improve concerted action. At the same time, the expectations linked to this medium to further optimise communication between the FIU and the parties required to report have been met.

In November 2009, the 8th FIU Newsletter was published in the password-secure section of the BKA's website. The umbrella associations representing the occupational groups required to report and other parties engaged in the suppression of money laundering were notified immediately after publication about the Newsletter's posting on the Internet.

The 8th Newsletter – as a further supplement to the indicator paper (see 3rd Newsletter) – presented current and important case constellations from the FIU's working areas "Monitoring of Suspicious Transaction Reports" and "Analysis of Follow-up Responses from Public Prosecutors' Offices".

A second focus was on formal aspects surrounding the filing of STRs and/or the sending of reports to the FIU with a view to further optimising the processes. In this context, ways and means as well as formal requirements for the filing of STRs were described. The special aspects in connection with the reports filed pursuant to the Iran Embargo Regulation (see chapter 2) were also mentioned in this Newsletter.

The FIU will publish relevant subjects through its medium Newsletter in future as well. The Financial Intelligence Unit continues to be reliant on all institutions involved in the suppression of money laundering. Their contributions/suggestions are highly appreciated.



### 5.1.2 Presentations/training courses

FIU staff members gave a large number of presentations at various events and participated in training courses. While about 30 presentations were given in 2008, about 40 were given in 2009.

The content varied significantly in 2009. Most of the presentations and discussions were about the tasks, responsibilities, processes, legal aspects, problem fields as well as the possibilities as far as the suppression of money laundering and terrorist financing is concerned. Presentations were, e.g., given

- on the occasion of visits of foreign delegations to the German FIU (the heads of FIU France, FIU Trinidad and Tobago, FIU Nigeria, scholarship holders from Indonesia and Chile, a delegation of prosecutors from Uzbekistan and the Australian Institute of Criminology etc.).
- on the occasion of police-internal basic and advanced training courses at federal (BKA, Federal Police etc.) and state level, especially on money laundering and the STR system.
- at the tax and fiscal authorities, with the focus on reports made pursuant to Section 31b of the Fiscal Code (nationwide conference of the tax investigation offices in Nuremberg, a money laundering conference held at the Essen tax office etc.).

Due to the large number of requests, the FIU has to select regularly as not all presentations can be given for capacity reasons.

### 5.1.3 Internet presentation of the FIU

The following is to show what information the FIU has currently posted on the website of the Bundeskriminalamt ([www.bka.de](http://www.bka.de)).

“Publications” (password-secured)

Some information offers are published on the Internet in the password-secure section. This access restriction is considered necessary because the contents could be misused for instructions to commit money laundering offences and the perpetrators could circumvent the information published in a targeted manner by altering their behaviour. The access data were exclusively transmitted to the money laundering officers via the respective associations and/or can be obtained from the FIU or the competent associations. The money laundering officers have to prove their appointment to the association and/or the FIU.

#### **Form “Suspicious transaction report pursuant to Section 11 of the Money Laundering Act”**

The pre-printed form, with instructions for use and the contact data of the relevant law enforcement authorities, was updated in December 2009 and is available for download. It would be very desirable to have suspicious transaction reports submitted on the standardised form to the relevant agencies, with copies sent (by fax) to the BKA (FIU). The use of this standardized form would enhance the efficiency of the process for all parties involved.

#### **Form “Follow-up responses pursuant to Section 11 (8) of the Money Laundering Act”**

In order to be able to reliably assign these responses to the original suspicious transaction report and to facilitate further analysis, the form “follow-up responses by public prosecutors' offices” was adapted to the new wording of Section 11(8) of the Money Laundering Act and published on the Internet. Although there is no obligation to use it, the form ensures that the minimum standards are fulfilled in respect of completeness and depth of information of the relevant



data, thus producing, among other things, a better overall picture of the “judicial success” of all the suspicious transaction reports filed in Germany.

#### **FIU Newsletter/Money laundering and terrorist financing indicators**

All eight issues of the Newsletter published so far have been posted on the Internet with translations into English. The third Newsletter is identical to the indicator paper.<sup>12</sup>

#### **Council Regulation (EC) No. 1110/2008 of 10 November 2008 amending Regulation (EC) No. 423/2007 concerning restrictive measures against Iran**

At the request of the parties required to report, the Iran Embargo Regulation was posted on the homepage at the beginning of 2009.

“Publications” (without access restriction)

#### **Annual reports of the FIU**

The FIU has posted all eight Annual Reports prepared so far (2002–2009) on its web page. Apart from the 2003 Annual Report, all reports are also made available in English.

#### **Money Laundering Act (MLA)**

The Financial Intelligence Unit has been requested to make the MLA that entered into force in August 2008 available on its website. An English version has also been posted which is just a working translation meant to serve as an aid. The only authoritative version is, however, the German version of the Money Laundering Act that has also been published in the Bundesgesetzblatt (Federal Law Gazette).

#### **Publications by the Financial Action Task Force (FATF)**

The FIU has also posted some important publications by the FATF on the suppression of money laundering and financing of terrorism. Translations into German cannot be offered for all reports. It is, however, recommended to directly access the FATF’s homepage at [www.fatf-gafi.org](http://www.fatf-gafi.org) which contains additional and up-dated publications.

The FIU will continue to check what significant information should be published in the FIU part of the BKA’s homepage ([www.bka.de](http://www.bka.de)). The FIU would appreciate any suggestions in this respect.

Please see appendix 1 for a graphic description of the structure and path of the Internet site.

#### **5.2 The Working Party of Banks and Chambers**

In November 2009, the FIU hosted the annual conference of representatives of bank associations, professional associations/chambers, money laundering experts from major German banks, the state criminal police offices, the Zollkriminalamt (Central Office of the Customs Investigation Service) and further experts of the BKA.

The focus of this Working Party’s meeting was on the suppression of money laundering by the fiscal authorities, as had been suggested during the previous year’s meeting. To present the subject, two speakers from the tax office for tax-related criminal matters and tax investigation in Essen had been invited.

<sup>12</sup> This indicator paper contains a catalogue of indicators which are to assist the parties required to report in recognizing cases of relevance to money laundering and suspected financing of terrorism. The indicator paper can be accessed with a password at <http://www.bka.de/profil/zentralstellen/geldwaesche/veroeffentlichung.html>.



Other topics addressed included awareness-raising among the parties with reporting obligations with regard to the financing of terrorism and the reports filed pursuant to the Iran Embargo Regulation (Council Regulation (EC) No. 1110/2008 of 10 November 2008 amending Regulation (EC) No. 423/2007 concerning restrictive measures against Iran). Two staff members of the section dealing with financial investigations at the State Security Division of the Bundeskriminalamt gave presentations here.

According to the participants, this conference has proved its value as a platform for the mutual exchange of information and experience between banks, banking associations, professional associations/chambers and law enforcement authorities. All participants agreed to hold the conference again in 2010.

### 5.3 Case collection

In 2009 as well, the information gathering regarding new phenomena in the field of concealment methods/money laundering activities was continued within the scope of the case collection.

The processing of the case data and the further information transmitted to the FIU has again shown the great understanding and commitment of all colleagues involved at the state criminal police offices, the Zollkriminalamt and the Federal Police.

The follow-up responses received from the public prosecutors' offices pursuant to Section 11 (8) of the MLA have served as further sources of information at national level and have been analysed in accordance with the requirements of the case collection. There has also been close co-operation with the working area "Monitoring of suspicious transaction reports". Valuable case-specific details for the case collection have been obtained from both areas.

The collection of information was also continued at international level. This included the analysis of publications made, for example, by the FATF or the Egmont Group, with a view to establishing possibly emerging new methods of money laundering. In addition, international events were attended which are related to this subject. FIU staff members participated in international working groups of the above-mentioned bodies, they presented the information held at this end and, in turn, assessed the information available there with regard to its relevance to the case collection.

Since the creation of the case collection, the FIU has processed and put down in writing 41 cases with specific mod operandi of concealment methods. The cases were made known to the parties with reporting obligations pursuant to the MLA through the FIU Annual Report, the FIU Newsletters or through presentations.

In addition, potential for optimisation with regard to the suppression of money laundering in Germany has again been identified through the case collection. The work on the case collection will also be continued in 2010, not only because of the statutory obligation but above all because of the proven necessity and added value of obtaining and compiling case-specific details which show new typologies of money laundering.

## 6 International co-operation

### 6.1 Exchange of intelligence with other FIUs

The German FIU is in charge of exchanging messages with the central services of other countries responsible for the prevention and prosecution of money laundering and the financing of terrorism in other countries.

The following graph shows that 906 enquiries in total were addressed to the FIU Germany in 2009. This reflects an increase of about 17% compared to the previous year. Thus, the number of cases recorded has again increased since the establishment of the FIU Germany. Since 2003, the number of cases has almost doubled.

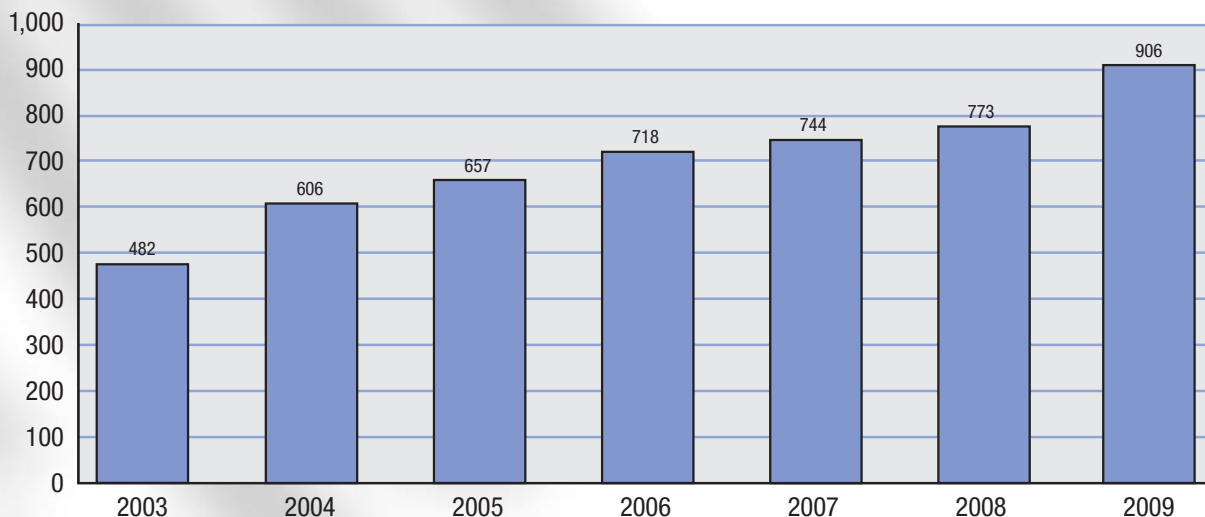
A differentiation of these 906 enquiries received in 2009, sorted by requesting authority, produces the following picture:

732 enquiries were addressed to the FIU Germany by foreign FIUs. 174 enquiries were received from German units (96 in 2008). Looking at the almost doubled number of German enquiries, it can be noted that the intended goal to considerably increase the number of national requests for information to foreign FIUs has been achieved.

When interpreting the case figures, it has to be considered that the FIU Germany opens a new case only if an initial enquiry is received. Any subsequent correspondence – no matter how complex – will be recorded under the file number assigned at the beginning.

The statistical analysis of all FIU correspondence exchanged in 2009 revealed that every file contains about 13 documents *on average*.

Graph 9: Development of the case numbers of the FIU information exchange



The following table shows the distribution of enquiries received at the FIU Germany from foreign FIUs by countries.

**Table 6: Requests for information addressed to the FIU Germany (Top 20)**

Country	2009	2008	Comparison to previous year +/-
Luxembourg	109	82	27
Belgium	84	100	-16
Slovakia	50	13	37
Switzerland	49	80	-31
France	31	31	0
Liechtenstein	29	36	-7
Finland	27	9	18
Bulgaria	24	14	10
Ukraine	22	18	4
United Kingdom	22	46	-24
Poland	20	19	1
Netherlands	19	20	-1
Hungary	17	9	8
Guernsey	15	5	10
Russia	13	23	-10
USA	13	22	-9
Albania	12	5	7
Romania	12	27	-15
Spain	12	24	-12
Jersey	9	6	3
Other	317	184	133
<b>Total</b>	<b>906</b>	<b>773</b>	<b>133</b>

In 2009, the FIU Germany exchanged information in the FIU's areas of responsibility (suppression of money laundering and financing of terrorism) with 68 countries. Considering last years' figures (2008: 75, 2007: 71), the number of the co-operation partners worldwide has, thus, remained constant at a high level.<sup>13</sup>

From the above table, the following points seem to be worth mentioning:

- The observations made in 2008 for some of the FIU's important co-operation partners were just the other way round during the period under review. The cases reported by the FIU Luxembourg, for example, increased considerably again, while the number of cases reported by the FIU Switzerland, the FIU Liechtenstein and the FIU Belgium declined.
- The increase in the number of enquiries received from the FIU Slovakia can be mainly explained by the larger amount of money "phished" from German accounts and transferred to Slovak accounts. The suspicious transaction reports subsequently filed in the Slovak Republic pursuant to its national MLA led to corresponding enquiries addressed to the FIU Germany.
- It is a particularly positive aspect that, during the period under review, German investigative authorities increasingly used the possibility of obtaining relevant information in a timely manner through the FIU channel.

<sup>13</sup> For a list of all Egmont members see appendix 2

All in all, it can be stated that Germany has become more and more involved in the global information exchange within the FIU network over the years and has, consequently, contributed considerably to the efficient suppression of the phenomena *money laundering* and *financing of terrorism*. This positive trend should be consistently pursued in the coming years as well.

## 6.2 International events/contacts

As in previous years, representatives of the FIU Germany also participated in numerous international events hosted by various bodies and institutions in 2009. Some examples of important activities are given below:

- the plenary meeting of the Egmont Group in Doha, Qatar
- plenary and typology meetings of the FATF
- the meetings of the EU-FIU platform
- the meetings of the Board of Partners and working meetings within the scope of the FIU.Net project
- bilateral working meetings with various FIUs on operational cases and strategic issues
- the presentations given at international congresses in Germany and abroad
- the assistance provided to foreign delegations and scholarship holders from, inter alia, the fields of law enforcement, banks and science

## 6.3 EU-sponsored project carried out in co-operation with the Albanian FIU

From October 2007 until September 2009, Germany carried out a two-year EU project in Albania named “Tackling Money Laundering and Financial Crime” which focused on the improvement of the Albanian FIU’s work. In these two years, the FIU Germany alone implemented 28 extremely personnel-intensive individual measures lasting several days each (more than 100 working days in total) and covering a large variety of topics. The measures were almost exclusively implemented on locations in Albania.<sup>14</sup>

In 2009, the German FIU, assisted by a large number of German experts in the field of suppression of money laundering, organised several meetings in Tirana (Albania) and Wiesbaden and successfully concluded the project in late autumn 2009.

A sample concept paper for the development of institution-specific threat and risk analyses was, for example, drawn up in 2009 together with Albanian institutions and with the help of representatives of major German banks and an important financial transfer provider.

<sup>14</sup> For the complete list of the measures handled by the FIU see appendix 3.



## 7 Financing of terrorism

### 7.1 General information

Suspicious transaction reports filed pursuant to the Money Laundering Act, which also include the suspicion of terrorist financing, are a common instrument for the suppression of terrorism and, thus, an integral part of the security architecture in Germany.

### 7.2 Suspicious transaction reports filed pursuant to the Money Laundering Act for suspected financing of terrorism

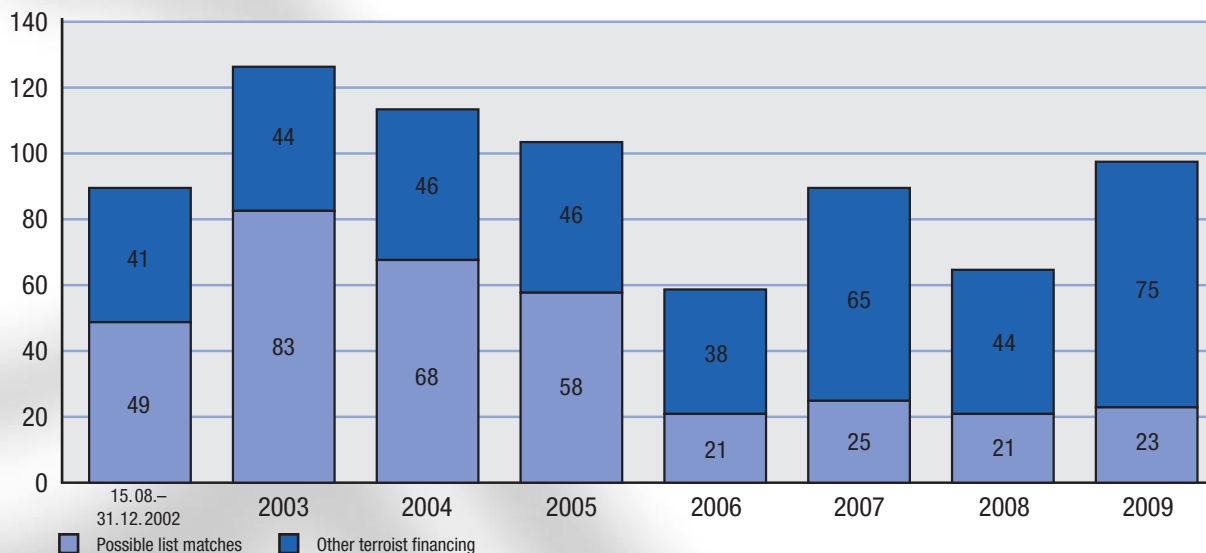
The following table shows the percentage of STRs filed for suspected terrorist financing among the total amount of STRs filed by the reporting parties. The financial authorities reported one case of suspected terrorist financing pursuant to Section 31 b of the Fiscal Code (in 2008, one case was filed as well).

**Table 7: Suspicious transaction reports filed for suspected involvement in the financing of terrorism**

	15.08.– 31.12.02	2003	2004	2005	2006	2007	2008	2009
<b>Total number of suspicious transaction reports (STRs) filed pursuant to the Money Laundering Act</b>	2,271	6,602	8,062	8,241	10,051	9,080	7,349	9,046
<b>of them, STRs checked by the BKA's State Security Division (recorded statistically since 2005)</b>	---	---	---	358	376	384	281	415
Percentage share of the total number of STRs	---	---	---	4.3%	3.7%	4.2%	3.8%	4.6%
<b>STRs filed by the parties required to report for suspected "financing of terrorism"</b>	90	127	114	104	59	90	65	98
Percentage share of the total number of STRs	4%	2%	1.4%	1.3%	0.6%	0.9%	0.9%	1.1%

According to the table, the number of cases filed for suspected terrorist financing increased from 65 in 2008 to 98 in 2009.

Graph 10: Distribution of STRs filed for suspected terrorist financing



**Suspicious transaction reports with possible list matches**

Of the 98 STRs filed for suspected financing of terrorism, 23 were filed for possible matches with the Regulations (EC) No. 2580/2001 and (EC) No. 881/2002 (so-called list matches). As in the previous year, no matches with listed persons were established in the end.

**Checks of STRs for possible links to the financing of terrorism**

In addition to the clearing procedures carried out by the German states, 415 of the 9,046 suspicious transaction reports were examined for possible links to terrorist financing by the State Security Division of the Bundeskriminalamt in 2009.



In 40 cases, further checks were made. So far, no investigations have been initiated as a result. The investigations initiated in 2008 already with possible links to politically motivated crime<sup>15</sup> and the ongoing investigations initiated in connection with STRs filed pursuant to the MLA with a possible terrorist background did not reveal any significant information on typologies.

### 7.3 FIU correspondence with links to terrorist financing

During the reporting year, 732 enquiries (2008: 677) were made to the FIU Germany by foreign FIUs. In 30 cases, relevant aspects of terrorist financing were revealed (2008: 22 cases).

In six of these 30 cases, a relevance to the field of politically motivated crime was established. In one case, concrete links to an investigation pending in Germany were revealed. A final assessment of these six enquiries cannot be made yet due to ongoing measures.

In general, it has to be pointed out that the number of matches in the field of politically motivated crime is relatively small. However, it should not be disregarded that international information in the field of politically motivated crime, which includes terrorist financing, is mainly transmitted through police and intelligence service channels and is subject to specific restrictions.

<sup>15</sup> Offences are associated with politically motivated crime if an assessment of the circumstances of the offence and/or the attitude of the perpetrator furnishes indications that they

- are intended to influence the democratic will-formation process,
- serve to achieve or
- to impede political objectives, or are directed against the implementation of political decisions,
- are directed against the free democratic basic order or against one of its essential characteristics, or against the existence and the security of the Federation and its states, or are intended to unlawfully impair the performance of duties of members of the constitutional bodies of the Federation or a state
- endanger external interests of the Federal Republic of Germany by means of force or preparatory acts to this effect or
- are directed at persons due to their political views, nationality, ethnicity, race, skin colour, religion, ideology, origin or outward appearance, their handicap, their sexual orientation or their social status and that there is a causal connection between the criminal act and these factors and/or the criminal act is directed against institutions/objects or premises.

In addition, offences defined in Sections 80-83, 84-86 a, 87-91, 94-100 a, 102-104 a, 105-108 e, 109-109 h, 129 a, 129 b, 234 a or 241 a of the German Penal Code are also recorded. These offences are "classical" state security offences which do not necessarily require a specific political motivation.



## 7.4 Conclusion

Since the amendment of the MLA in August 2008, it has been established that the reporting behaviour, especially with regard to the extended circle of those required to report, has not changed considerably.

The parties with reporting obligations still have problems with identifying/generating cases of suspected terrorist financing merely by looking at the account management and the transactions.

It is also for this reason that new indicators suggesting the financing of terrorism in the field of politically motivated crime have not been revealed from the suspicious transaction reports filed pursuant to the Money Laundering Act. An intensified co-operation and information exchange between the police and the private sector in an atmosphere of trust would be a good possibility to shed further light on this field of crime.

## 7.5 Action taken against the Islamic Republic of Iran

During the period under review, 301 reports were filed in accordance with Council Regulation (EC) No. 1110/2008 of 10 November 2008 amending Regulation (EC) No. 423/2007 concerning restrictive measures against Iran.

In order to ensure a quick, smooth and comprehensive information exchange for implementation of the sanctions, the Bundeskriminalamt (inter alia, the FIU Germany), the Federal Intelligence Service, the Federal Office for the Protection of the Constitution and the Zollkriminalamt carry out an “operational information exchange” at the financial investigation section of the State Security Division at the BKA every six months.

The initial problems on the part of the institutes regarding the necessary differentiation between reports filed pursuant to the MLA and reports filed in accordance with Council Regulation (EC) No. 1110/2008 of 10 November 2008 amending Regulation (EC) No. 423/2007 concerning restrictive measures against Iran involved a large amount of administrative efforts at the competent offices in the states and at the Bundeskriminalamt. This has been improved considerably through awareness-raising within the Working Party of Banks and Chambers, through the FIU Newletters and through additional information sent to the parties required to report.

The necessary linking of the money transfers to the movement of goods in the context of proliferation relevance checks is above all possible on the basis of the information collections maintained by the Zollkriminalamt.



## 8 Final conclusions and outlook

The trend monitored in 2008 regarding the declining number of suspicious transaction reports filed pursuant to the MLA did not continue in the 2009 reporting period. On the contrary, a considerable increase of the number of reports filed (+23%) has been recorded compared to the previous year.

However, it has to be mentioned here that the increase in the number of STRs is mainly due to reports on “financial agents”.

The increase that has been monitored in connection with the filing of STRs is an indication of the high and still increasing awareness raised among many parties obliged to report pursuant to the MLA in respect of cases involving the suspicion of money laundering or the financing of terrorism. From the FIU's perspective, the growing internationalisation in the field of money laundering/terrorist financing, that becomes apparent from various factors, seems to be worth mentioning. The development of the figures recorded for the FIU's international information exchange or the registered headquarters of companies reported can be given as examples of this observation.

During the reporting period, the FIU – like various other agencies in Germany – was subjected to a country examination with a view to the implementation of the FATF recommendations. It was established within the scope of this evaluation conducted by the IMF that the FIU largely fulfils the valid worldwide standards with regard to the suppression of money laundering and terrorist financing. The suggested measures for optimisation will be checked by the FIU shortly with regard to the possibilities of their implementation.

The increasing number of cases in which electronic payment systems were used for transferring assets (already noticed last year) is not surprising. This phenomenon should be closely monitored in future, especially with regard to the “possible use for money laundering/terrorist financing purposes”, and preventive and effective regulatory measures should be taken.

**ANNUAL REPORT 2009**  
**FIU GERMANY**

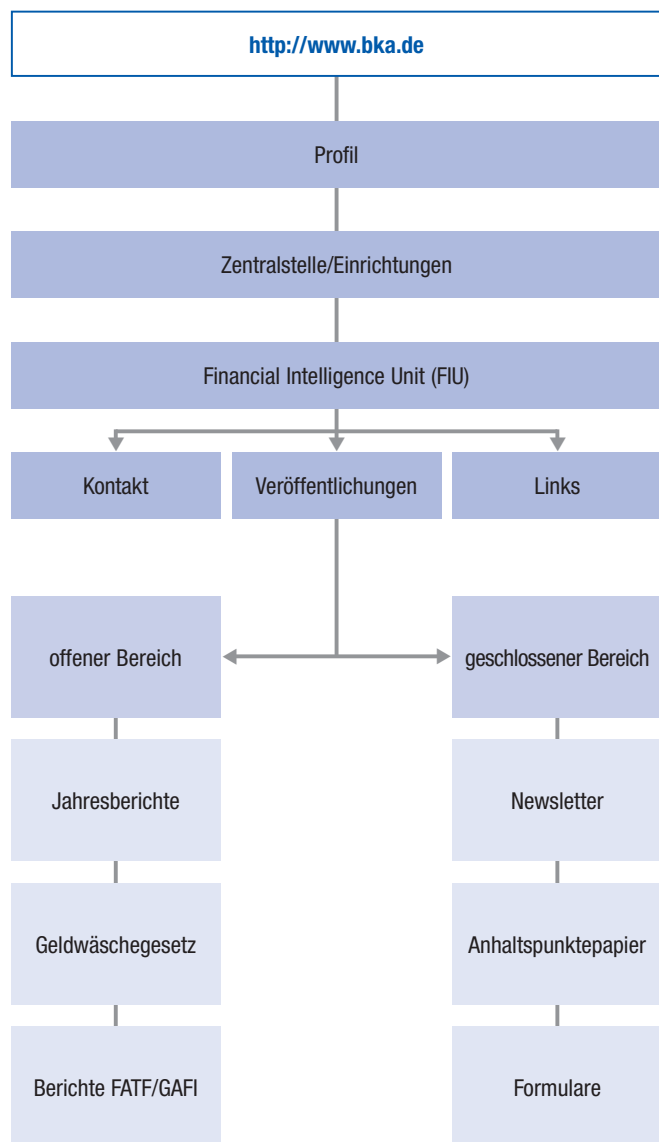
**9 Appendices**

**Appendix 1:** Internet presentation of the FIU Germany on the homepage of the BKA

**Appendix 2:** List of Egmont Group members

**Appendix 3:** List of the measures handled by the FIU in connection with the EU-sponsored project with the Albanian FIU

Appendix 1: Internet presentation of the FIU Germany on the homepage of the BKA



Postal address:  
Bundeskriminalamt  
Referat SO 32  
Zentralstelle für Verdachtsanzeigen/  
Financial Intelligence Unit (FIU)  
65173 Wiesbaden  
Telephone: +49(0)611 55-18615  
Fax: +49(0)611 55-45300

## Appendix 2: List of Egmont Group members<sup>16</sup>

Country	FIU-Name	Type	Location
Afghanistan		Administrative	Central Bank
Albania	DBLKPP	Administrative	Ministry of Finance
Andorra	UPB	Administrative	Independent
Anguilla	MLRA	Administrative	Independent
Antigua & Barbuda	ONDCP	Administrative/Police	Independent
Argentina	UIF	Administrative	Ministry of Justice (Indep)
Armenia	FMC	Administrative	Central Bank
Aruba	MOT-Aruba	Administrative	Ministry of Finance
Australia	AUSTRAC	Administrative	Independent
Austria	A-FIU	Police	Ministry of Internal Affairs
Bahamas	FIU	Administrative	Independent
Bahrain	AMLU	Police	Anti-Economic Crimes Directorate
Barbados	FIU	Administrative	Office of the Attorney General
Belarus	FIU	Administrative	
Belgium	CTIF-CFI	Administrative	Independent
Belize	FIU	Administrative/Pol/Judicial	Independent
Bermuda	BPSFIU	Police	Police
Bosnia & Herzegovina	FID	Police	State Investigation and Protection Agency
Brazil	COAF	Administrative	Ministry of Finance
Bulgaria	FIA	Administrative	Ministry of Finance
BVI	Financial Investigation Agency	Police	Financial Services Commission
Cameroon		Administrative	
Canada	FINTRAC/CANAFE	Administrative	Independent
Cayman Islands	CAYFIN	Administrative/Police	Atty General
Chile	UAF	Administrative	Independent
Colombia	UIAF	Administrative	Ministry of Finance
Cook Islands	CIFIU	Administrative	Independent
Costa Rica	UAF	Administrative	Presidential Office
Croatia	AMLO	Administrative	Ministry of Finance
Cyprus	MO.K.A.S.	Judicial/Police	Attorney General's Office
Czech Republic	FAU-CR	Administrative	Ministry of Finance
Denmark	HVIDVASK	Judicial/Police	Public Prosecutor's Office
Dominica	FIU	Police	Independent
Egypt	EMLCU	Administrative	Independent
El Salvador	UIF-El Salvador	Administrative	Attorney General's Office
Estonia	FIU	Police	Estonian National Police
Fiji	Fiji-FIU	Administrative	Independent

<sup>16</sup> **Highlighted:** FIUs that joined the Egmont Group in 2009 and 2010. Updated to April 2010.

Appendix 2: List of Egmont Group members<sup>16</sup>

Country	FIU-Name	Type	Location
Finland	RAP	Police	Police
France	TRACFIN	Administrative	Ministry of Finance
Georgia	FMS	Administrative	Independent
Germany	FIU	Police	Federal Criminal Police Office
Gibraltar	GCID GFIU	Customs/Pol	Independent
Greece	Committee/Art 7	Administrative	Independent
Grenada	FIU	Police	Independent
Guatemala	IVE	Administrative	Superintendency of Banks of Guatemala
Guernsey	FIS	Customs/Pol	Indep. Service Authority
Honduras	UIF	Administrative	National Commission of Banks and Insurance
Hong Kong	JFIU	Customs/Pol	Police Headquarters
Hungary		Police	
Iceland	RLS	Police	National Icelandic Police
India	FIU-IND	Administrative	Independent
Indonesia	PPATK (INTRAC)	Administrative	Independent
Ireland	MLIU	Police	An Garda Síógana
Isle of Man	FCU-IOM	Customs/Pol	Police
Israel	IMPA	Administrative	Ministry of Justice
Italy	UIF	Administrative	Central Bank
Ivory Coast		Administrative	
Japan	JAFIC	Administrative/Police	Nat'l Public Safety Commission/Nat'l Police Agency
Jersey	FCU-Jersey	Customs/Pol	Police
Korea (South)	KoFIU	Administrative	Ministry of Finance/Economy
Kyrgyz	FIS	Administrative	Independent
Latvia	KD	Administrative	Prosecutor's Office
Lebanon	SIC	Administrative	Central Bank
Liechtenstein	EFFI	Administrative	Ministry of Finance
Lithuania	MDP prie VRM	Police	Ministry of the Interior
Luxembourg	CRF	Judicial	Prosecutor's Office
Macau SAR, Ch.	GIF	Administrative	Independent
Macedonia	MLPD	Administrative	Ministry of Finance
Malawi	FIU Malawi	Administrative	Independent
Malaysia	FIU/UPW	Administrative	Central Bank of Malaysia
Malta	FIAU	Administrative	Independent
Marshall Isles	DFIU	Administrative	Banking Commission
Mauritius	FIU	Administrative	Independent
Mexico	UIF	Administrative	Ministry of Finance

<sup>16</sup> **Highlighted:** FIUs that joined the Egmont Group in 2009 and 2010. Updated to April 2010.

## Appendix 2: List of Egmont Group members<sup>16</sup>

Country	FIU-Name	Type	Location
Moldova	SPCSB	Police	Centre Comb. Crimes & Corr.
Monaco	SICCFIN	Administrative	Ministry of Finance
Mongolia	FIU-Mongolia	Administrative	Central Bank of Mongolia
Montenegro	APML	Administrative	Independent
Netherlands	MOT	Administrative	Ministry of Justice
New Zealand	NZ Police	Police	Police
Nigeria	NFIU	Administrative	EFCC (Law Enforcement)
Niue	FIU	Administrative	Crown Law Office
NL Antilles	MOT-AN	Administrative	Ministry of Finance
Norway	ØKOKRIM	Police/Judicial	Police
Panama	UAF-Panama	Administrative	National Security Council
Paraguay	UAF-Seprelad	Administrative	Independent
Peru	UIF	Administrative	Independent
Philippines	AMCL	Administrative	Central Bank
Poland	GIIF	Administrative	Ministry of Finance
Portugal	UIF	Police	Police
Qatar	QFIU	Administrative	Central Bank
Romania	ONPCSB	Administrative	Independent
Russia	FMC	Administrative	Independent
San Marino	FIU	Administrative	Central Bank
Saudi Arabia	SAFIU	Administrative	Independent
Senegal	CENTIF	Administrative	Independent
Serbia	FCPML	Administrative	Independent
Singapore	STRO	Police	Police
Slovakia	OFIS ÚFP	Police	Ministry of Interior
Slovenia	OMLP	Administrative	Ministry of Finance
South Africa	FIC	Administrative	Independent
Spain	SEPBLAC	Administrative	Central Bank
Sri Lanka	FIU-Sri Lanka	Administrative	Central Bank of Sri Lanka
St Vincent & the Grenadines	FIU	Administrative	Independent
St. Kitts & Nevis	FIU	Administrative	Independent
St. Lucia	FIA-St. Lucia	Adm/Pol/Jud	Police
Sweden	NFIS	Police	Police
Switzerland	MROS	Administrative	Federal Office of Police
Syria	CMLC	Administrative	
Taiwan	MLPC	Law Enforcement	Ministry of Justice
Thailand	AMLO	Police/Administrative	Independent
Turkey	MSK - FCIB	Administrative	Ministry of Finance
Turks & Caicos	FCU	Adm/Pol/Pros	Police
Ukraine	SDFM	Administrative	Ministry of Finance

<sup>16</sup> **Highlighted:** FIUs that joined the Egmont Group in 2009 and 2010. Updated to April 2010.



**Appendix 2: List of Egmont Group members<sup>16</sup>**

Country	FIU-Name	Type	Location
United Arab Emirates	AMLSCU	Administrative	Central Bank
United Kingdom	SOCA/FIU	Police	Police
United States	FinCEN	Administrative	Ministry of Finance
Uruguay		Administrative	Central Bank
Vanuatu	FIU	Administrative	State Law Office
Venezuela	UNIF	Administrative	Superintendancy of Banks

<sup>16</sup> **Highlighted:** FIUs that joined the Egmont Group in 2009 and 2010. Updated to April 2010.

**Appendix 3 – Overview of the measures handled by the FIU in connection with the EU project with Albania**

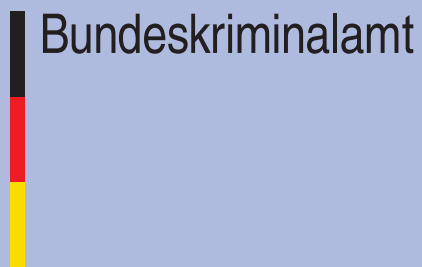
Measure	Period	Days	Experts
Evaluation of the Albanian FIU	Late November 2007	5	FIU Germany
Suspicious transaction reports filed pursuant to the Money Laundering Act (MLA) in Germany	Early December 2007	3	FIU Germany
Tasks and activities of the FIU in the field of strategic analysis	Mid December 2007	5	FIU Germany
The FIU's public relations work	Mid January 2008	5	FIU Germany
Correspondence exchanged in the field of money laundering (FIU/INTERPOL)	Late February 2008	5	Bundeskriminalamt (INTERPOL, money laundering section) and FIU Germany
Collection of intelligence by the Central Information Agency for Foreign Tax Affairs (IZA)	Early April 2008	2	Central Information Agency for Foreign Tax Affairs
Introduction into the methods and techniques of operational analysis	Mid April 2008	3	Bundeskriminalamt (analysis project unit, investigation/analysis service centre)
Operational analysis/Consolidation of intelligence/training of analysts	Early May 2008	5	Bundeskriminalamt (money laundering analysis section) and FIU Germany
Clearing procedure with regard to STRs and follow-up investigations	Mid May 2008	5	Money laundering clearing office at the Baden-Württemberg State Criminal Police Office
Tasks/activities of public prosecutors' offices (STRs and money laundering cases)	Mid June 2008	9	Prosecutor General's Office and Public Prosecutor's Office Frankfurt/Main
Suspicious circumstances established by the financial authorities pursuant to Section 31b Fiscal Code	Late July 2008	5	Tax office for tax-related criminal matters, Essen, and Regional Finance Office, Koblenz
Tasks/activities of the supervisory authority for banks, financial service providers and insurance companies	Early August 2008	5	Federal Agency for the Supervision of the Financial Services Sector (BaFin – Money laundering unit)
Training of the Albanian supervisory authorities' staff	Mid August 2008	5	Federal Agency for the Supervision of the Financial Services Sector (BaFin – Money laundering unit)
Cash checks at the borders	Late September 2008	5	“Zollkriminalamt and Regional Finance Office, Nuremberg”
Specimen STR and electronic STR	Early December 2008	3	“FIU Germany and Bundeskriminalamt”
Organisation, tasks and activities of the compliance unit of a major German bank I	Early February 2009	3	“Compliance Unit Deutsche Bank AG”

<sup>16</sup> **Highlighted:** FIUs that joined the Egmont Group in 2009 and 2010. Updated to April 2010.

**Appendix 3 – Overview of the measures handled by the FIU in connection with the EU project with Albania**

Measure	Period	Days	Experts
Organisation, tasks and activities of the compliance unit of a major German bank II	Early February 2009	3	“Compliance Unit Commerzbank AG”
Compliance at a financial transfer service provider in Germany	Mid February 2009	2	“Compliance Unit Western Union Financial Services GmbH”
Improvement of the reporting behaviour among the legal advisors	Early April 2009	5	Chamber of auditors, federal chamber of tax consultants and federal chamber of lawyers
Incorporation of the third EU Money Laundering Directive into national law	Early May 2009	3	“Federal Ministry of the Interior and Bundeskriminalamt”
“Co-operation with the FATF (Financial Action Task Force on ML)”	Late May 2009	2	“FIU Germany and Bundeskriminalamt”
Co-operation within the EGMONT group	Mid June 2009	2	“FIU Germany and Bundeskriminalamt”

<sup>16</sup> **Highlighted:** FIUs that joined the Egmont Group in 2009 and 2010. Updated to April 2010.



Bundeskriminalamt

BUNDESKRIMINALAMT  
Zentralstelle für Verdachtsanzeigen  
FIU Germany  
65173 Wiesbaden