

# AMLC

## Annual Plan 2019

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Anti Money Laundering Centre

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ANTI MONEY  
LAUNDERING  
CENTRE

## PREFACE

Dear Reader,

We are pleased to present the annual plan 2019 of the Anti Money Laundering Centre.

The AMLC is a knowledge and expertise centre where public, private, national and international parties join forces to create a state-of-the-art platform for the combating of money laundering.

Today the fight against money laundering is more urgent than ever. This is highlighted in a number of (scientific) studies and very apparent from the current approach to combating money-laundering practices. The role of gatekeepers, who offer financial products, is also a frequent subject of media reports.

This annual plan describes in broad outline the organisation of the AMLC and the direction for the coming year. The work of the AMLC is examined in greater detail in separate theme plans and an (operational) work plan.

In 2018 the AMLC made great strides improving the level of cooperation with others, developing knowledge and applying new methodologies. This year we will continue on the same course, working together to combat national and international money laundering practices along thematic lines.

Ton Scholing

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## THE AMLC



The AMLC was founded in 2013 as a platform where the parties involved in combating money laundering can share their knowledge and experience and work together operationally. The basic principle is that all the public and private parties who play a part in combating money laundering can work in the centre together (operationally) and be supported from that centre. This strengthens and guarantees the effective tackling of money laundering at a national and international level.

The AMLC is an open and externally oriented meeting place for its partner organisations such as the FIOD (Fiscal Intelligence and Investigation Service), police, Public Prosecution Service (OM), the Financial Intelligence Unit (FIU), private parties and other special investigative services. Here they are able to combine their strengths, all contributing to an integrated and wide-ranging fight against money laundering to protect the integrity of the financial system.

This year the AMLC is equipped to broaden the scope of its anti money laundering knowledge and expertise and to consolidate and intensify the cooperation with other organisations. Working along thematic lines is an effective tool in this regard.

The AMLC is constantly alert to new developments and acts in a flexible, manoeuvrable way when it is called upon to do so. Knowledge and data (analysis) are central to all our activities.

## THE MISSION

The mission, vision and strategic objectives of the AMLC are as follows:

### Mission

“The AMLC is a partnership of public and private parties with the ambition of ongoing improvement in the national and international fight against money laundering.”

### Vision

Through broad cooperation the AMLC lifts the combating of money laundering to a higher plane, thereby enhancing its efforts to protect the financial system. Such cooperation is realised through varying combinations of (public and private) chain partners. Through the deployment of our expertise and our unique access to data and by quickly identifying new trends and developments, we contribute to the realisation of targeted, high-impact interventions with preventive effect.

In this way knowledge, expertise and intelligence of the highest quality in the field of anti money laundering are combined, developed and shared.

Together with its partners the AMLC fulfils a strategic pioneering role, nationally and internationally, thereby initiating and assisting others with operational projects and complex investigations.

### Strategic objectives

For 2019 the AMLC has the following three strategic objectives, to ensure that:

**1. Parties have sufficient skills and expertise at their disposal to combat money laundering in the most effective way possible.**

Keywords: knowledge and expertise, all parties (including international), develop, collect and share (learning cycle), pool and disseminate, raise awareness, organisations versus parties

**2. The cooperation between the parties is active, structural, effective and always developing.**

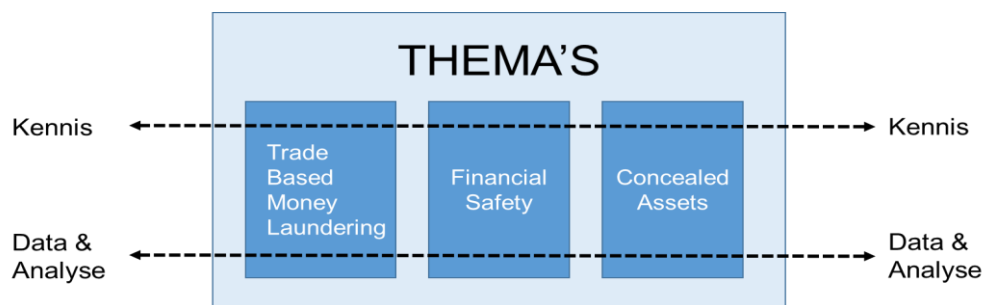
Keywords: data, signals, working with the right parties, customisation, application, structural versus ad hoc

**3. Society is aware of the detrimental effects of money laundering (in the context of prevention)**

Keywords: public interest, greater visibility, media, education, informing, raising awareness

## THE THEMES

A targeted approach



In 2019 the AMLC will adopt an even more strongly theme-based approach to bring additional focus and prioritisation to its anti money laundering activities. The AMLC will also work more closely with public and private parties on the various themes. In this way money laundering will be combated in a more targeted way, there will be a clearer picture of so-called 'blind spots', it will be possible to respond more quickly to new developments and events, new forms of money laundering will be identified, and knowledge (and knowledge development) will be expanded further.

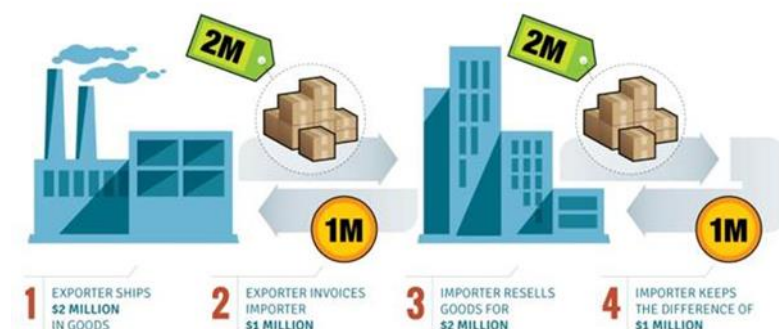
On the basis of the themes a range of products will be delivered, including knowledge documents and new opportunities for investigation and detection. Knowledge exchange will be stimulated by organising workshops, participating in conferences and writing/publishing articles. In 2019 a number of theme-based projects will be launched, sometimes in cooperation with AMLC partners, with the aim of reinforcing the link between strategy and operations.

Within the themes for 2019 additional priority will be given to specific topics. As far as possible these topics will be organised jointly.

Apart from the emphasis on a theme-based approach at the AMLC in 2019, there will also be room for experiment and flexible, rapid response to current affairs and developments.

Three themes have been set for 2019: Trade Based Money Laundering, Financial Safety and Concealed Assets.

### Trade Based Money Laundering (TBML)



Trade Based Money Laundering (TBML) is the use of (inter)national goods (value) flows for money laundering purposes. Goods and money obtained from criminal activities are concealed in ordinary (inter)national trade flows, so that in the first instance TBML serves to legitimise money transfers and create 'legal' income for criminals.

Most preventive measures to combat money laundering focus on money and the financial system. TBML is a different matter. Here it is the flow of goods and international trade that is used for money laundering purposes, whereby businesses are involved, whether they are aware of it or not, with criminality. This is a money laundering variant with numerous facets. Sometimes with, but also increasingly without, fraudulent characteristics during the transfer of the criminal value.

### Financial Safety (FS)



The Netherlands is a top European country when it comes to the strength of its financial sector. The Dutch financial sector is a comprehensive system for the legitimate flow of the money and goods of (inter)national organisations and private individuals. That system can be misused for illegal flows of money and goods in money laundering schemes. Misuse of the Dutch financial system undermines that system and therefore undermines our confidence in the rule of law. Financial Safety relates to a condition of the financial system in which such misuse does not take place. The higher the degree of Financial Safety, the less the Dutch financial system can be used for illegal money and goods flows. Complete Financial Safety will probably not be achieved, however the public and private parties can make great strides in the right direction. This is exactly what the AMLC is aiming to achieve; a working partnership that leads to the highest possible degree of Financial Safety. This is of course a desirable objective, but it is also a necessary condition for ensuring a healthy financial system.

### Concealed Assets (CA)



Many forms of criminality would not be so attractive if the perpetrators were unable to find ways to conceal their criminal gains from the judicial (and/or tax) authorities. A wide range of constructs is used for this

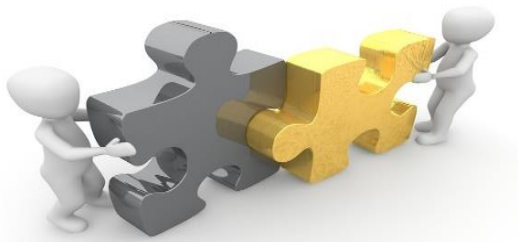
purpose, whereby the criminal wealth is often diverted abroad. The reason for making money laundering a punishable offence is to combat such practices on the basis of criminal enforcement.

The essence of money laundering is hiding or concealment. The Concealed Assets theme is therefore at the heart of our efforts to combat the crime of money laundering. These are the assets which are hidden or concealed to secure the proceeds of crime. They may belong to Dutch citizens living abroad, or to foreign nationals living in the Netherlands.



## COOPERATION

The whole is greater than the sum of the parts.



Inside the AMLC the strengths of the various disciplines are actively combined in the fight against money laundering. In the coming year the AMLC will be a facilitator and an explorer at every level – strategic, tactical and operational.

Cooperation is essential to expand the scope for action. This year will be used to strengthen, expand and further facilitate cooperation with such primary partners as the FIU, tax authorities, FIOD, police and OM. To that end the AMLC will deploy its resources on multiple fronts, through the joint execution of projects and initiatives for example, but also by opening up information with the help of databanks, analysis and the sharing of knowledge. Improving the availability of information and using one another's knowledge is essential for tackling money laundering effectively in the broadest sense, which includes identifying new forms of money laundering as they arise.

The AMLC deploys a number of tools to strengthen cooperation with other parties and to combat money laundering in an innovative way. At the strategic level it is also important to detect the signs of new trends and phenomena.

In 2019 the AMLC will set up a concept room. Inside this virtual room new trends and current affairs will be examined and new ideas tested, which can then be developed and rolled out. One of our ambitions, for example, is to arrive at a new joint theme in the fight against money laundering.

The AMLC organises 'challenges' whereby colleagues from the chain are challenged to achieve rapid and high-quality results by examining an issue together. The outcomes may be innovative concepts, operational opportunities, or simply 'fact based'.

In 2019 the AMLC will concentrate more on cooperation with science and researchers for further knowledge development. There will also be cooperation with the journalist collective OCCRP (Organized Crime and Corruption Reporting Project) for an exchange of methods and techniques.

Acting on the initiative of the money laundering team leaders of the FIOD, among others, the AMLC will organise master classes with the aim of encouraging the account manager to see new (sources of) signals for investigations and to identify trends and phenomena. This will also lead to a greater sharing and utilisation of knowledge.

In November 2018 the AMLC started a pilot in which several AMLC colleagues work together using the 'scrum' method. The aim is high-quality execution of certain assignments within a set (and very short) period of time. This method can also be used in cooperation with one or more partners.

## FURTHER PRIORITIES 2019

### FOCUS 2019

#### 1. Greater emphasis on the deployment of data & analysis

The AMLC together with its partners is working to enhance data-based prevention and enforcement. The improvement, expansion and opening up of new sources of available data is indispensable for greater effectiveness in the fight against money laundering. It also gives an added boost to the discovery and observation of new forms of money laundering. Apart from extra capacity for the deployment of data analysts the AMLC will initiate and support numerous initiatives in the field of data and analysis over the course of the year.

#### 2. Intensification of cooperation inside and outside the chain

The cooperation with chain partners will be further intensified, with more joint undertakings accompanied by clear agreements and 'definitions of done'.

The AMLC will take part in new cooperation initiatives, or launch such initiatives itself when it sees new opportunities arise. The fight against money laundering is not limited to national borders, so this year there will be an additional emphasis on international cooperation, in the context of the EU for example, and also on the exchange of information, public information campaigns and education.

### Themes

On the basis of the themes of the AMLC, a number of topics will be focused on in 2019.

With regard to topics based on Trade Based Money Laundering, the export of motor vehicles and agricultural products will be explored further.

With regard to topics based on Financial Safety the focus will be on intensifying public-private cooperation with gatekeepers inside the financial sector to raise the level of knowledge and expertise among gatekeepers and chain partners, and to arrive at a more precise definition of the collective purpose in the processing of data.

With regard to topics under Concealed Assets theme, the spearheads for 2019 are professional enablers, company structures and (foreign) bank accounts, with a particular focus on NIG-NI (non-residents/unregistered persons).

Two new projects will be launched in 2019 to give an additional boost to the above-mentioned themes.

The first is a student plan, so that certain issues can be investigated with the help of university students. The aim is knowledge development and innovation.

The second is mapping, a structured representation of the current field showing where the expertise is located, who has it, and including scientific studies and published reports, national and international developments and news. The aim is to collect and share knowledge and facilitate rapid action and response.

### In the chain

In 2019 the AMLC will continue to work with the OM on the Money Laundering National Programme for the period 2019 – 2022. On the basis of the recommendations of the Financial Action Task Force (FATF) and EU regulations, a risk-based policy against money laundering and a National Risk Assessment (NRA) will be determined. Apart from this strategic, risk-based approach, the necessary attention will of course be given

to the rule-based approach: decision-making at subject level through various committees. The AMLC also remains committed to detecting and investigating the so-called Grand signals, which are often of an international nature.

The risk-based approach is also on the agenda inside the public-private partnership. In 2019 the AMLC with several banks will be taking a closer look at company structures and professional enablers. Exchange programmes will be set up with two banks, just as they were last year. Themes will be actively brought to the attention of all partners in the public-private domain.

The Serious Crime Taskforce (SCTF), a joint initiative of the chain partners, has decided on a subject and risk based approach. The AMLC is the initiator of the risk based approach.

Together with the tax authorities the AMLC will be working on the Concealed Assets Intensification Programme. Tackling concealed assets is one of the priorities set by the new government and extra funds and capacity have been allocated for investigation and data analysis in the region. Several projects will also be run and a data tool developed to identify signals quickly for the purposes of settlement in the context of supervision or criminal law.

In 2019 a 'datascreen' will be set up for exchange of data, exchange and cooperation between data analysts, impact analyses on particular issues, and updating the (binding) legal framework with the arrival of the new Data Files Exchange Act. Extra capacity has been allocated for data analysts in 2019.

Data analysts, data scientists and the tactical analysts of the chain partners FIU, the police and the tax authorities will intensify their joint efforts to open up and analyse the available sources of data. Joint efforts of this kind are essential to achieve a single, integrated approach to combating money laundering.

In the field of learning and development, the AMLC will organise a number of master classes and challenges this year.

## **International**

In 2009 the AMLC will take part in several international initiatives and fulfil its role as a meeting place for foreign partners.

The J5 programme Joint Chiefs of Global Task Enforcement is an international partnership between the USA, UK, Australia, Canada and the Netherlands. The AMLC assists this partnership in relation to the subjects of data & tools and enablers and cybercrime.

In the European context the AMLC is active in the European Multidisciplinary Platform Against Criminal Threats (EMPACT), an initiative of - and financed by - the European Commission.

The aim of this platform is to promote international cooperation in the tackling of organised crime.

The platform distinguishes several criminal priorities. These priorities are chaired by member states who act as 'drivers' and 'co-drivers'. France is driver and the Netherlands co-driver for priority no. 9, Criminal Finances, Money Laundering and Asset Recovery (CFMLAR). The CFMLAR priority covers a number of action points and the Netherlands is the action leader in the field of Combating Money Laundering by means of New Payment Systems and Virtual Currencies, Bitcoin Traders, Bitcoin fuelled debit and credit cards, Bitcoin ATMs and Bitcoin Mixers. The Netherlands is co-action leader for among other things the tackling of enablers.

Within this EU programme the Netherlands is represented by the AMLC.