AMLC
Annual plan 2021

Anti Money Laundering Centre

A targeted approach

ANTI MONEY LAUNDERING CENTRE

Foreword

Dear Reader,

The year 2021 – a year eagerly anticipated all over the world – is now well underway. It was hoped that this would be a year in which cherished ambitions and special plans could once again be brought to fruition, both privately and professionally.

We are pleased to present you with the AMLC's annual plan for 2021. It is bursting with ambition to raise the fight against money laundering to an even higher level together with all those involved. The plan has not been adapted to the limitations of the COVID situation but instead seeks out the current opportunities. We would like to do this together with you!

In recent years, we have seen "working together" develop into concrete partnerships. The lines of communication between organisations and colleagues working on money laundering have become shorter. There are many examples of collaborations in initiatives in the fight against money laundering. We at the AMLC set out to contribute to this every day through our knowledge and expertise and our data initiatives. One development that is now being firmed up is an intelligence position in the fight against money laundering. This addresses how we build it up and exploit it with parties in the chain ranging from public parties to private parties.

The laundering of money and goods remains a serious crime aspect in the Netherlands and abroad. Fortunately, awareness of this is growing across the board. Investing in parties that combat money laundering is therefore high up on the agenda. This year, we at the AMLC will once again be making a constructive contribution to combating this form of subversive crime.

From an ambitious, to a successful 2021!

Ton Scholing
Suzanne Visser

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THE AMLC

The AMLC was established in 2013 as a platform where parties involved in the fight against money laundering can share and pool their knowledge and experiences and cooperate operationally. The starting point is that all public and private parties involved in combating money laundering should be able to cooperate and receive support from the centre. This strengthens and guarantees the approach to money laundering at national and international level.

Since its inception in 2013, the AMLC has gone through several stages of development. After initially focusing chiefly on money laundering signal, this task was assigned to the various investigation teams in the country. This gave the AMLC the room to continue to develop into a knowledge and expertise centre. Knowledge and insight make it possible to answer more questions and better interpret transactions, and then share that knowledge and bring it together in the chain. Since then, the focus has been on the AMLC as an alliance that combines the strengths of various organisations to take a firm stand against ever smarter money laundering techniques.

Since 2020, the AMLC has been working towards an additional profile of its organisation as a (virtual) intelligence centre in which the various parties can view, access, analyse, process and share all kinds of data. The AMLC has also developed its own tooling for this purpose. An efficient and careful exchange of information is vital to this.

In 2021, the AMLC will continue to build on its expertise and intensify its collaboration with other organisations. Based on strategic choices, the link between strategy, tactics and operations is pursued to combat money laundering.

THE MISSION

The AMLC has formulated the following mission, vision and strategic objectives.

Mission

"The AMLC is a partnership of public and private parties that aspires to continuously improve the national and international fight against money laundering."

Vision

Through broad cooperation, the AMLC raises the fight against money laundering to a structurally higher level and protects the financial system. This cooperation within the AMLC takes place in varying compositions between the chain partners (public and private). We contribute to effective and hard-hitting interventions with a preventive effect by deploying our expertise and unique data position and promptly identifying trends and developments.

The AMLC thus brings together, develops and shares the highest level of knowledge, expertise and intelligence in the fight against money laundering. The AMLC takes a strategic, national and international leading role and initiates and supports operational projects and complex research.

Strategic objectives

The AMLC has set the following three strategic goals for 2021. The AMLC strives to ensure that:

1. **Parties have the knowledge and expertise they need to combat money laundering optimally.**
   Keywords: knowledge and expertise, all parties (also international), develop, collect and share (learning cycle), bundle and disseminate, raise awareness, organisations versus parties.

2. **The cooperation between the parties is active, structural, effective and under continuous development**
   Keywords: data, signals, working with the right parties, customisation, application, structural versus ad hoc.

3. **Society is aware of the harmful consequences of money laundering (in the context of prevention)**
   Keywords: social importance, increased visibility, media, education, awareness.

SPEARHEADS FOR 2021

For 2021, the AMLC has identified the following focal points:

- Strengthen and disseminate knowledge and expertise on money laundering in the chain.
- Strengthen intelligence for signals and cases for detection purposes.
- Strengthen international and public-private cooperation.
- Collaborate with science.

KNOWLEDGE AND DATA
The common thread

The AMLC's permanent pillars are Knowledge & Expertise and Data & Analysis, which form a common thread that runs through all our activities. They support the themes and topics of the AMLC, connect the public and private partners involved in combating money laundering, develop new methodologies, deliver new products and offer new detection opportunities. Together, the two pillars make up the entirety of **Intelligence** at the AMLC. Knowledge is applied to generate and analyse reliable data. Performing analyses yields knowledge and makes it possible to build up expertise. That is how the AMLC learning cycle of awareness, analysis, application and operation is continuously renewed.

Knowledge
Learning about money laundering and the fight against it is an ongoing task at the AMLC. The world does not stand still, not even in money laundering. Smart and new ways of laundering money worldwide mean that the AMLC must remain on top of the game in the fight against money laundering. Additional efforts to promote knowledge and disseminate knowledge within the cooperation are indispensable. The more you know, the better you do.

Data
Data and data exchange alone is not enough to gain the desired effect. It is precisely the interpretation and analysis of this data and seeing new connections between the various data sources that can make the difference. Innovative tools are developed and implemented for this purpose. The tools are also used to initiate and facilitate cooperation. Together with its operational chain partners, including the police and the Financial Intelligence Unit (FIU), the AMLC is developing a (virtual) intelligence community: the entirety of data and analysis with a direct link to operations. Depending on the issue, a combined 'Intel team' is assembled - efficiently and effectively - to work on a problem. Customisation is the keyword here. The outcomes may take the form of potential cases for investigation, new phenomena or knowledge documents. The essential idea behind this is to collect data/intelligence and identify the gaps in information sharing and monitor the legal framework.

COOPERATION
The whole is more than the sum of its parts

Cooperation and working together are essential to a focused and vigorous approach to combating money laundering. The 2021 operational plan described will be pursued by working together.

In the chain
But cooperation is easier said than done. The AMLC stands for a fluid approach. The use of tailor-made solutions is regarded as adding value: having the right people consider specific subjects from a certain perspective. The forms of cooperation can vary in size and commitment. Structural or incidental. With various partners from inside or outside the chain.

The coming year will be used to make this cooperation with primary partners such as the FIU, Tax and Customs Administration, FIOD, Police and Public Prosecution Service more accessible and to further consolidate and expand it. The AMLC does this by working on several fronts, such as the joint implementation of projects and initiatives and providing access to information through data and analysis. Improving and

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updating the information position and using each other's knowledge are vital aspects of an effective approach to combating money laundering in the broadest sense.

The Strategic Money Laundering Programme will be further detailed in 2021 together with the Public Prosecution Service, the FIU and the police. This is the national programmatic approach to money laundering for the period 2019 - 2022. A risk policy against money laundering and a National Risk Assessment will be adopted based on the recommendations of the FATF and EU regulations. As well as this strategic risk-based approach, the rule-based approach will of course also continue to receive attention: decision-making at subject level in the penal approach to money laundering signals. The head of the AMLC will discuss the current situation and the details and progress of the annual operational plans three times a year.

The AMLC is working on the Concealed Assets (Intensification) Programme with the Tax and Customs Administration. Tackling concealed assets is one of the current government's priorities, and additional funding and capacity have been allocated for detection and data analysis in the region. There are also a number of projects running, such as the Debit and Credit Card project. A data tool is being developed to quickly determine which cases should be dealt with through supervision or under criminal law. A significant development that can be deployed in 2021 is the addition of tax information to the AMLC browser that can be used to retrieve new information.

Signals and alerts

The AMLC hosts the national Money Laundering Signals Consultation and the national Money Laundering Weighing Team. At the Money Laundering Signals Consultation, which is held about 22 times a year, promising signals are discussed and selected together with the regional money laundering account managers and the Public Prosecution Service. The Money Laundering Weighing Team, which meets about 12 times a year, works with the PPS and the police to determine whether a processed signal can be used for investigation. These operational meetings are also used to share knowledge.

If necessary, the AMLC internal case consultation group can organise a quarterly case conference for FIOD project leaders and money laundering account managers, at which all parties can present signals or cases to discuss modus operandi.

In 2021, the AMLC liaisons for the FIU will look into whether a more structured and dedicated look can be taken at the ST (suspicious transaction) monitor, for example by topic, through a dashboard or the general use of tags. AMLC specialists and analysts are also deployed to address the reports made by banks in the joint effort to improve the reporting process.

The AMLC has committed itself to monitoring the balance between reports from banks and reports from other institutions.

The AMLC, together with various chain partners, organises a 'data challenge' at least once a quarter. These two-day data challenges are all about customisation. Depending on the issue, analysts from various parties are invited to view, combine, analyse and seek answers from collected data sources. The suspicious transactions provided by the FIU play a vital role in this respect. Products may include promising signals for investigation, discovering new trends within the themes or making hypotheses 'fact based'.

Programmes and projects

The AMLC participates in several national and international programmes and actively seeks connections. As well as participating in implementation projects in the chain, the AMLC also initiates its own projects related to specific money laundering topics with an issue attached to them, such as a knowledge document or signals for investigation, etc.

THEMES
A targeted approach

By 2021, the AMLC will be taking a theme- and project-based approach to add focus and prioritisation to implementing anti-money laundering operations. The AMLC implements the theme plans together with public and private parties. This will make the fight against money laundering more focused. There will be more insight into blind spots. It will be possible to respond more quickly to current events, new forms of money laundering will be recognised, and knowledge and knowledge development will be further expanded within organisations.

The themes yield various products such as knowledge documents, articles, typologies, current trends and new opportunities for detection. Efforts are being made to share knowledge by collecting and transferring it, organising workshops, participating in conferences and writing and publishing articles.

Priority is given to specific subtopics within the themes. These sub-topics will be organised jointly in the chain as much as possible. Three themes have been established for 2021: Trade Based Money Laundering, Financial Safety and Concealed Assets.

Trade Based Money Laundering
Trade Based Money Laundering (TBML) involves using national and national flows of goods (value) for money laundering purposes. Money and goods obtained through crime are concealed in regular national and international trade flows, serving at first glance to legitimise the movement of money or create legitimate income for criminals.

Most preventive measures to combat money laundering focus on money and the financial system. TBML calls for a different approach. In this case, it is mainly the flow of goods (supply chain) and international business practices that are used for money laundering and companies are involved in crime, both consciously and unconsciously. A money-laundering variant with many aspects.

Financial Safety
The Netherlands takes the lead in Europe when it comes to the strength of its financial sector. The Dutch sector offers an extensive financial system for legitimate flows of money and goods from national and international organisations and individuals. This system can also be abused for illegal flows of money and goods in money laundering constructions. Abuse of the Dutch financial system undermines confidence in the Dutch rule of law. Financial Safety (FS) refers to a financial system in which risks and threats are promptly identified to prevent such abuse.

The higher the degree of FS, the less the Dutch financial system can be used for illicit flows of money and goods. If all parties involved join forces, public and private parties can take great strides towards meeting the long-term objectives. We are aiming for cooperation with our partners that leads to the highest possible state of FS, because this is a desirable and necessary condition for a healthy financial system.

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Concealed Assets

Many forms of crime would become less attractive if the perpetrators could not find ways of hiding the proceeds from law enforcement and tax authorities. These forms of crime make use of all kinds of constructions, in which the criminal assets are also frequently channelled abroad.

The essence of the money laundering offence is the concealment of criminal assets. The theme of Concealed Assets (CA) thus goes to the heart of the offence money laundering: concealing the assets to secure the proceeds of crime. This may involve the CA of Dutch citizens abroad and CA of foreigners in the Netherlands.

AMLC Topics

In addition to the strategic themes, several topical subjects have been categorised in AMLC Topics.
A topic is a specific subject that requires more attention (priority, capacity) in the period concerned. The choice is based on internal coordination, considering aspects such as priority, topicality, and importance for the fight against money laundering.

For 2021, the following four topics have been identified within the AMLC, namely:
- Current Affairs
- International orientation
- Subversive crime
- Public Private Partnership

Together with the strategic themes and the pillars of the AMLC, they form a focused, topical and comprehensive whole with which the AMLC implements the 2021 operational plan.
Therefore, each topic is given its own 'section' of the annual plan, which explains what is meant by the topic, why it has been chosen, and provides an overview of the activities and intended outcomes.

OPERATIONAL PLAN FOR 2021
In Action

As mentioned above, the AMLC has invested in building knowledge and expertise in recent years. Several data tools have been developed to strengthen and support analysis and detection. All kinds of collaborative initiatives have been developed and built using a theme- and project-based approach, and a lot of effort has been put into networking. The focus for 2021 is on making use of all these benefits to achieve an impact.

Data and Analysis

In 2021, there will once again be a substantial investment in intelligence within the AMLC. The work performed includes analyses of suspicious transactions, data escalations and the opening up of new datasets. The learning circle knowledge - intelligence - operation is an essential common denominator. In 2020, a proof of concept was conducted on enriching the STs with fiscal data. This is due to be reviewed in 2021. Also, a project to enrich the STs with Summ-IT data will be started in 2021.

The deployment of new techniques and models (machine learning, pattern building, graphical algorithms) ensures that detection is better supported by intelligence.

An important product of Data and Analysis is the developed AMLC Suite, which is used nationally and internationally. This Suite is continuously developed and now has five components that will be further exploited in the coming year. The AMLC Browser is a tool for interactively searching and analysing various datasets. The AMLC Matcher is a tool for finding connections between the different datasets. The AMLC Parser is a tool for loading new datasets. The AMLC Data Frame Network is a tool for deploying new construction techniques. The AMLC Webserver is a lightweight, fast and scalable web server that can be used for test environments and small production environments. The AMLC Suite is used for the data challenges, the various themes and to support investigations by the regional units. The AMLC Suite will be expanded to include the AMLC Spider in 2021. This web crawler can provide extra information for challenges, among other things.

Internationally, the AMLC Suite is used to support operational issues.
Within the AMLC, a (virtual) data and analysis body is being set up for the investigation side. The cooperation with the police/FINEC in particular aims to support the specialist combi-teams and the Multidisciplinary Intervention Team that are being set up from the subversion funds. Generating promising signals and sharing knowledge is of paramount importance.

Core tasks of Data & Analysis:
- Deploying and securing the AMLC Suite internationally (J5 and EMPACT).
- Making the AMLC Suite available to investigative partners (BOD).
- Making the AMLC Suite available to private parties (PPP).
- Creating dashboards on Suspicious Transactions and enriching Suspicious Transactions with tax data.
- Cooperating with Customs in the field of liquid assets.
- Organising and participating in the J5-challenge in the Netherlands.
- Participating in and organising data challenges at the AMLC.
- Co-organising a Big Data meeting of EMPACT/Europol in Wiesbaden (BKA).
- Supporting and analysing money laundering issues.
- Reinforcing the fight against money laundering by making new data positions available.
- Providing service and being the point of contact for ad-hoc issues.

Knowledge and Expertise

Fighting money laundering starts with awareness and knowledge. The Knowledge and Expertise (K&E) topic is committed to strengthening both. The first step is awareness. For example, among parties that can be used in money laundering constructions: they can be given the opportunity to work on the weaknesses in their business operations. The second step is knowledge. Knowledge of money laundering phenomena is needed to combat them actively. Knowledge of court rulings is required to effectively organise the criminal investigation process. Knowledge of the law is required to create the broadest possible range of barriers within the legal constraints. With K&E, we combine the knowledge the AMLC itself has acquired from investigations and projects with our collaborative partners' knowledge, for example. New scientific insights are also used. As a knowledge centre, we make sure that knowledge comes together, but also that it is shared. K&E thus gives substance to all three of the AMLC's strategic objectives; awareness, knowledge, collaboration.

In concrete terms, this means that in 2021 we will once again be sharing topical subjects, in-depth articles and court decisions using newsletters, our websites (amlc.nl and amlc.eu) and social media. Training courses are given at the FIOD and the Tax and Customs Administration, and presentations and workshops are given to both government and private partners. The cooperation with PwC on the awareness game 'Pressure Cooker' will be continued. The same applies to the cooperation with the compliance officers of several large Zuidas

offices. There has been a marked shift from physical knowledge sharing to 'Corona-proof' knowledge exchange via webinars and podcasts.

Core tasks of Knowledge & Expertise:
- Viewing and sharing knowledge
- Drafting newsletters, tracking social media
- Updating and analysing case law
- Keeping abreast of national and international developments in the field of money laundering policy and regulations
- Providing training for investigators within the FIOD
- Providing interactive money laundering workshops to specific parties in the money laundering area.

Trade Based Money Laundering

Two major projects under the TBML theme were completed by 2020. They were the new FATF report on TBML and the public-private partnership under the FEC banner of which AMLC was the project leader. The first quarter of 2021 will be devoted to securing and communicating these results to the outside world.

Core tasks of TBML:
- National
- Risk-based approach: in 2021, in cooperation with the scientific community, the AMLC will take on the challenge of using a risk-based approach to discover where the weaknesses of the Dutch economy lie with regard to TBML. That means investing in what is not yet known. The aim is to share this knowledge in a targeted way and convert it into possible crime detection opportunities.
- FEC project: a new TBML project will follow within the FEC. The AMLC will participate in it.
- Signals and Investigations: the AMLC is kept informed of all TBML signals and investigations. The AMLC advises on and monitors these signals. Also, in 2021, many signals TBML will come from the FEC project. The AMLC will assist where needed.
- Supervise of students: in 2020, there was room within the TBML theme for two students to complete their graduation projects. This will be possible again in 2021.
- International
- Empact: the AMLC and Spain are co-action leaders of a TBML project in 2021. The exact details are currently being given shape.
- International PPP: given the cross-border nature of TBML, an international public-private partnership is an obvious choice. Nowhere in the world is there any such cooperation at the moment. The Netherlands could lead the way in this field. In 2021, the Netherlands will explore the options for this and, the first international PPP in TBML will be initiated if there is enough commitment.
- EFIPPP: in the Netherlands we lead the world in public-private cooperation within the theme of TBML. In 2021 wee will share our experience and knowledge through the Europol-initiated EFIPPP.

Financial Safety

The Financial Safety (FS) theme focuses on those involved in money flows within the financial system. These can be financial institutions but also large companies with complex, international payment processes. Two streams are used within FS. For compliant actors, the aim is to strengthen the gatekeeper role by mutually sharing knowledge and expertise. Non-compliant actors will be tackled through enforcement interventions.

> **Core tasks of FS:**
> - Strengthening the major banks' gatekeeper role under FEC-PPS (Public-Private Partnership);
> - Increasing awareness of money laundering risks and strengthening the gatekeeper role.
> - Identifying financial enablers, actors who enable criminal money flows through our financial system.
> - Paying attention to cash flows and underground banking.

Concealed Assets

As described above, the theme of Concealed Assets (CA) goes to the core of money laundering and has been an important theme at the AMLC for several years. The coming year will be devoted both to completing a number of projects and starting up new ones. Cooperation with the tax authorities is especially vital.

> **Core tasks of CA:**
> - Completion of pillar 2 offshore project companies as well as an evaluation of pillars 1 and 2 of the project;
> - A Webinar on real estate and money laundering will be held in cooperation with Topic Subversive Crime. Consideration is also being given to organising knowledge sessions with the Real Estate Knowledge Centre of the Tax and Customs Administration concerning real estate risks. Finally, the AMLC, in cooperation with other parties, is investigating where it can add value to the subject of money laundering and real estate.
> - Completion of the first analysis and validation phase of the No Shelter project in which an attempt is made, based on public information sources, to identify service providers (legal or illegal) that may be involved in concealing (international) business structures and facilitate money laundering. Determine the No Shelter project's next steps, including further prioritisation and alternatives for cooperation with public and private parties.
> - Strengthen close and coordinated cooperation with various Taxation components, the UBO register and unexplained assets, and explore new topics.

Public-Private Partnership

The AMLC will continue to focus on Public-Private Partnerships in 2021 for two reasons. First, the potential impact on crime is high due to the preventive effect of strong gatekeepers. Secondly, the investigation benefits from the higher quality of signals in the form of suspicious transactions. The mutual exchange of knowledge about phenomena is valuable for understanding existing and future trends.

The AMLC plays an active role in various collaborations. As well as sharing knowledge, it also focuses on jointly setting a strategic agenda that links the anti-money laundering chain to properly follow up on the money laundering signals thus generated.

The AMLC takes a two-pronged approach to signals. At topic level, promising signals are worked up and put to use in regional investigations. For instance, FIOD/AMLC and FIU, together with the banks, participate in the Serious Crime Taskforce (SCTF). This concerns topic-oriented cooperation on brokers within the National Intelligence Overview framework on Subversive Crime (NIBO). A risk-oriented approach also remains important, and this is given impetus mainly under the themes. The intelligence at the AMLC is available to support the public-private partnership, especially the subject of together learning to choose the right signals. Signals from the PPS can also be picked up in the Financial Crime Analysis process, which is a collaboration between the FIOD and the police. This guarantees a thorough follow-up of the PPP theme.

> **Main PPP activities**
> - AMLC participation in SCTF subject focused collaboration on enablers (brokers).
> - AMLC participation in FEC PPS.

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- Establish structural PPP focused on phenomena based on exchanging knowledge, strengthening gatekeepers' role, enriching suspicious transactions and better following up money laundering signals.
- Establishing and expanding cooperation with parties other than banks such as auditors and civil-law notaries, non-financials.
- Data-driven detection via CRS-data, company service providers, foundations, and so on.

International

The AMLC will be participating in several international programmes and projects in 2021. We increasingly see the emergence of a global modus operandi. After all, money flows do not recognise national borders. There is a pressing need for a multilateral and multidisciplinary approach.

As of 1 January 2020, the AMLC will chair, on behalf of the Netherlands, EMPACT (European Multidisciplinary Platform Against Criminal Threats), CFMLAR (Criminal Finance, Money Laundering and Asset Recovery) priority; in short, money laundering. As a driver of this priority, the AMLC has a directing, coordinating and boosting role. Together with the Member States, the AMLC has set the agenda for 2021. In addition to its role as a driver, the AMLC - together with its cooperation partners - also acts as an executive action or co-action leader in various operational activities. The operational activities are:
1) Money laundering linked to new virtual payment methods with Europol
2) Professional enablers, together with the UK
3) TBML, together with the UK
4) Corruption, together with Spain
5) Precious metals, together with France
(6) Expertise on money laundering and cross-fertilisation with other priorities within EMPACT.
7) knowledge dissemination and networking, together with Europol.
These activities are carried out in varying compositions between the Member States or various parties. While the AMLC itself is an action leader, it also seeks cooperation in the Netherlands with partners such as the police, the Anti-Corruption Centre, the Cyber Centre and FIOD International. The AMLC also sees many opportunities for detection in the activity 'expertise on money laundering and cross-fertilisation with other priorities within EMPACT' and will look into whether additional signals can be generated on this basis.

In addition to its chairmanship of CFMLAR, the AMLC also chairs AMON, the global Anti Money Laundering Operational Network, on behalf of the Netherlands. In that capacity, the AMLC will work to generate influence at a strategic level. Network members are encouraged to participate actively. Direct links will also be sought with the Empact programme. It is hoped that the annual AMON meeting, which was to be held in the Netherlands in 2020 but was postponed because of the covid measures, will be held in 2021. One of the items on the agenda is the topic of TBML.

The J5 programme Joint Chiefs of Global Tax Enforcement is an international partnership between the USA, the UK, Australia, Canada and the Netherlands. The AMLC provides support for this in the areas of data & tools and enablers. This programme has an interface with the AMLC Suite and the EMPACT program.

The Netherlands is due to be evaluated by the FATF in the coming year. The AMLC will provide the necessary documentation for this together with the PPS, FIU and the police.

Main international activities:
- Chairing the EU programme Empact and AMON.

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- As an action-leader, implementing operational actions within EMPACT.
- Contributing to international collaborations.
- Following developments from EFECC and EFIPPP; the AMLC will join in where necessary and desirable.
- Implementing the International programme, developing and coordinating the AMLC's international connections and activities.
- Further operationalising the Empact programme, centring on proactive action taken by the participating countries.

Subversive Crime

The issue of subversion is highly topical. The AMLC as a money laundering centre operates the following working definition of subversion: "Money laundering as an aspect of subversive crime refers to money laundering constructions deployed through facilitating networks in legitimate society in order to possess, conceal, pass on or sell criminal assets (money, goods or services) with impunity".

Like other special investigative services, the AMLC has been asked to contribute to tackling financial flows and countering organised subversive crime. During the next few years, the AMLC will contribute to the operational effectiveness of the various investigative services and the new special combined teams, mainly in intelligence. The aim is to generate financial information and promising signals, on demand or otherwise.

Secondly, joint investments will be made in knowledge sharing: how to look at organised crime from a financial perspective. One way of doing this is by working with the RIECs to gain an insight into the facilitating networks/opportunity structures through which organised crime sets out to channel its money into the legitimate circuit.

Together with the FIOD and Police Combiteam in Utrecht, the AMLC writes strategic reports on the cases run by the Combiteam, which is in line with the approach to money laundering and subversive crime. The idea is that these reports will also contribute to the FIOD and the police.

Main Subversive Crime activities
- Permanent broadening of the network.
- Collaboration with and between the parties through knowledge meetings, theme meetings and data challenges.
- Initiation of various projects, including a project for a graduation student.
- Exploration of a regional session on (fringe) criminal youth.
- International exploration.

Current Affairs

Current Affairs can best be described as the topic with a signalling function for content relevant to the AMLC and the fight against money laundering. Content relevant to the AMLC and anti-money laundering is actively monitored. This relevant content is picked up from news sources such as the media, trends and crime investigation. Under this topic, opportunities are inventoried and discussed. In 2021 Current Affairs will be working on giving this relevant content the right follow-up, in line with the other themes and topics and paying attention to the common subjects. This makes it easier to decide on the next step to be taken.

Current affairs works mainly with two signal sources:
1   Signals from news sources
2   Signals from the periodic ST analyses (by D&A).

Presumed promising signals are enriched within the topic with relevant data and further elaborated.

Main Current Affairs activities
- Identify, list and assess opportunities for the AMLC and the fight against money laundering in the broadest sense
- Bring parties together for a follow-up Cross-pollination of topics among themselves, contact with chain partners, stakeholders, etc.
- Initiating signals (with some weight/impact) originating from current affairs and the (periodic) ST analyses.

For more information about the AMLC:
www.amlc.nl
www.amlc.eu

Disclaimer:

This annual operational plan describes the ambitions. The approach and execution of the work may change during the current year.

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