

Financial Intelligence Unit *of* Aruba Meldpunt

September 26, 2019



Mission & Task

• We deliver a substantial contribution to safeguard the integrity of the financial sector, the trust of the public in institutions that provide financial services and national security.

- Collection, registration, processing and analysis of the data to prevent and detect ML/TF
- Provide data in accordance with law to prevent and combat
- Conduct research of developments and to improve methods to prevent & combat
- Providing information about practices and prevention

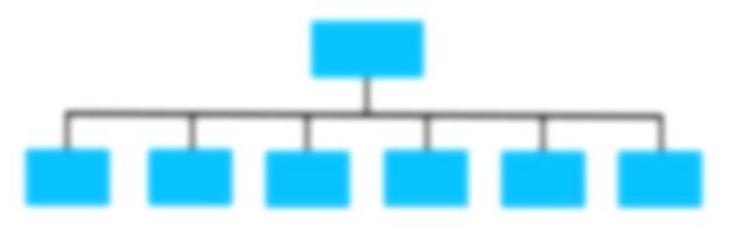




Financial Intelligence Unit *of* Aruba

Structure & systems

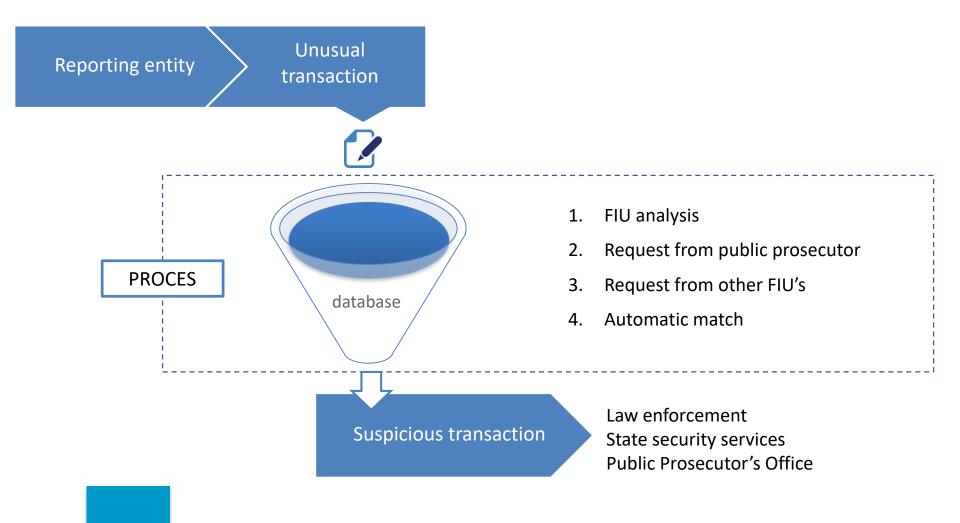
- Flat organization
- Customized automated systems
- > 190 Reporting entities
- Actively participation in national and international committees
- Intention to further automate & professionalize our analytical activities





Financial Intelligence Unit *of* Aruba

From Unusual to Suspicious





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Indicators

- 130101 A transaction reported to law enforcement authority or justice department;
- 130102 A transaction made by or on behalf of a natural person or a legal person, group or entity, located in countries of jurisdictions, which are mentioned on lists referred to by the Sanction Ordinance 2006 (AB 2007 no. 24) or mentioned on lists appointed to by Head of FIU;
- 130103 A wire transaction of Afl. 500.000,= or more;
- 130104 A cash transaction of Afl. 25.000,= or more;
- 130105 A cash transaction of Afl. 5.000,= or more (indicator is only applicable for casino's);
- 130201 A transaction which gives reason to presume that it might be related to money laundering;
- 130202 A transaction which gives reason to presume that it might be related to terrorist financing;

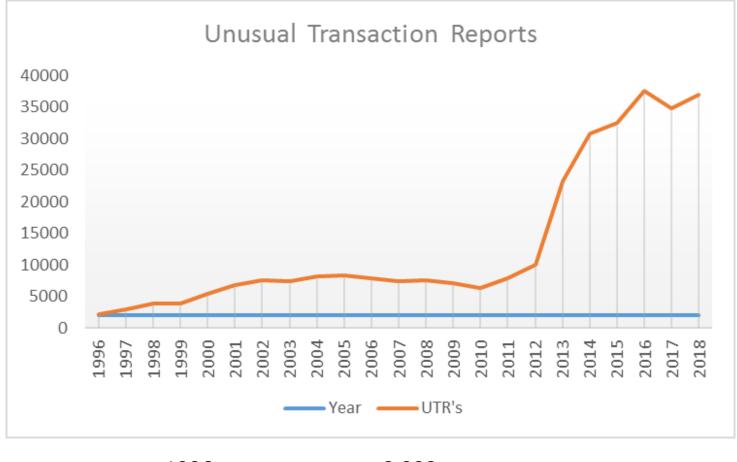
We have come a long way and we have a little further to go.

Rahm Emanuel

notefanci



We have come a long way!



•1996	: 2,223
•2018	: 36,980
•1996 – 2018	: 305,819



We have come a long way!

Year	Comm banks	Offshore banks	MTRF	Casinos	Life Ins	Customs	Other Fin	Notary	High Val Goo	Trust	Gate keepers	TOTALS
1996	2,223								-			2,223
1997	2,857								-			2,857
1998	3,532	242							-			3,774
1999	2,080	1,659	40						-			3,779
2000	3,166	1,790	424						-			5,380
2001	4,173	2,130	523	3					-			6,829
2002	4,124	2,319	986	31	4				-			7,464
2003	4,253	1,327	1,355	9	2	461			-			7,407
2004	4,883	879	1,696	4	1	670			-			8,133
2005	5,117	805	1,438	2	6	988			-			8,356
2006	5,199	698	1,145	10	2	723			-			7,777
2007	5,194	796	503	10	6	823			-			7,332
2008	5,647	530	521	26	8	783			-			7,515
2009	4,908	16	1,324	13	49	831	2		-			7,127
2010	4,152	31	1,169	10	67	838	2	9	92			6,370
2011	4,511	38	2,032	26	41	1,103	1	3	88	2	6	7,851
2012	4,221	46	4,570	50	53	985	15	3	62	-	4	10,009
2013	17,544	71	2,410	2,055	27	912	100	32	81	1	10	23,243
2014	19,839	74	2,786	6,403	6	871	159	448	82	22	3	30,693
2015	19,057	73	2,040	8,898	6	921	177	319	53	865	8	32,417
2016	17,273	11	3,409	14,485	1	922	107	649	85	603	14	37,559
2017	18,158	39	3,363	11,343	15	657	214	273	130	410	142	34,744
2018	19,596	1,264	1,614	12,627	6	560	194	437	219	388	75	36,980
Totalen	181,707	14,838	33,348	56,005	300	13,048	971	2,173	892	2,291	262	305,819



Breakdown number of UTR's (3 sectors)

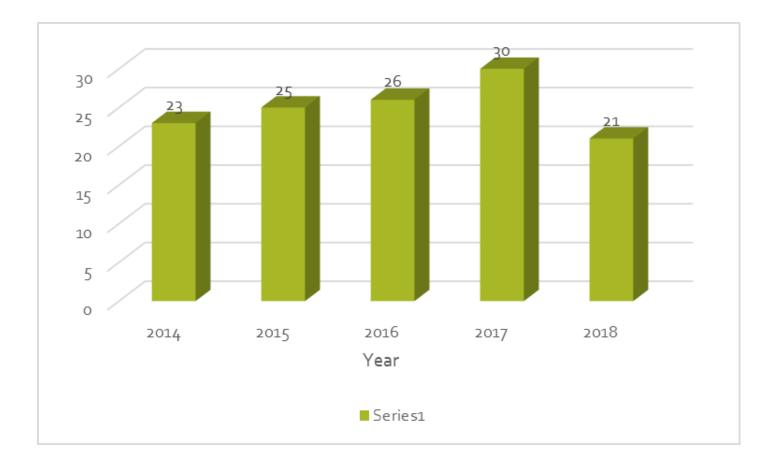
Commercial banks				
Indicator	2015	2016	2017	2018
Cash transaction > Afl. 25K	13,229	12,207	12,013	12,740
Cash transaction > Afl. 5K	1	1	1	-
Wire transfer > Afl. 500 K	5,494	4,876	5,285	5,994
Transaction reported to LEA's	37	11	50	52
Transaction which gives reason to presume for TF	1	1	1	1
Transaction which gives reason to presume of ML	220	247	582	583

Money Transfer companies				
Indicator	2015	2016	2017	2018
Transaction reported to LEA's	10	308	67	61
Transaction which gives reason to presume for TF	2	49	52	1
Transaction which gives reason to presume of ML	2,019	2,207	3,244	1,551
Cash transaction > Afl. 5K	-	-	-	1

Indicator	2015	2016	2017	2018
	2015	2010	201/	2010
Cash transaction > Afl. 25K	10	23	6	2
Cash transaction > Afl. 5K	8,877	9,559	11,291	12,490
Wire transfer > Afl. 500 K	1	-	-	-
Transaction reported to LEA's	2	4	5	8
Transaction which gives reason to presume of ML	2	7	41	122
Report based on art 32 LWTF by supervisor	3	-	-	-
Transaction on behalf of natural/legal person,				5
group or entity, located in jurisdictions mentioned				
in lists reffered to in Sanction Ordinance 2006.				



Reports to LEA's 2014 - 2018





Mutual Evaluation

- Round 1 : 1995
- Round II : 1999
- Round III : 2008
- Round IV : 2020

AN ANALYSIS OF THE COUNTRY'S REGULATORY FRAMEWORKS IS CONDUCTED

> FOCUS AREAS



Prep 2020

- National Risk Assessment
- Pre-assessment training
- Amendment of current laws to comply
- Adoption of new laws
- Trigger National alignment
- Fix what we can fix
- Professional preparation of documentation



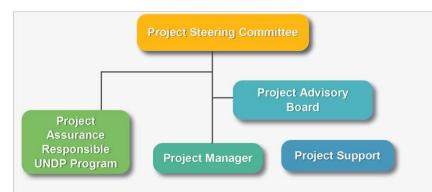
PROCEDURES FOR THE FATF FOURTH ROUND OF AML/CFT MUTUAL EVALUATIONS





Steering Committee

- Department of legislation is the Prime Contact
- Director chairs the steering committee
- FIU will assist in the coordination
- Working groups for Rec's & IO's
- Quality control reviewers
- Self assessment and required Action Plan





Prep by the FIU

- Focus on our areas
- Immediate Outcome 2 & 6





work hard but smart

• IO – 2:

International cooperation delivers appropriate information, financial intelligence, and evidence, and facilitates action against criminals and their assests.

IO − 6

Financial intelligence and all other relevant info are appropriately used by competent authorities for money laundering and terrorist financing investigations.

In Summary:

- The role of the FIU
- Development of our UTR's
- 3rd Mutual Evaluation was ok after 6 years
- Preparations for the 4th round
- Alignment required among stakeholders and hard work

