

ANNUAL REPORT 2008

*UNUSUAL TRANSACTIONS REPORTING CENTER
NETHERLANDS ANTILLES*



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PREFACE

Pursuant to article 3 section g, of the National Ordinance Reporting Unusual Transactions I hereby respectfully submit the Annual Report and Statistics of the Unusual Transaction Reporting Center of the Netherlands Antilles (the Reporting Center) for the year 2008 to the Minister of Finance, with notification to the Minister of Justice. This report details our activities and our contributions in the fight against money laundering and terrorism financing for the period January 1st, 2008 to December 31st, 2008.

Most priorities set out in our annual report of 2007 are being met. The year 2008 was highlighted among other things by the amendment of the Penal Code of the Netherlands Antilles indicating the financing of terrorism as a criminal act. Another accomplishment was the fact that the Netherlands Antilles succeeded in taking its name from the non-compliance list of the Egmont Group with regard to the fight against terrorism financing as mentioned in the Egmont definition of an FIU. The Ministry of Justice of the Netherlands also approved a request for assistance by the "Bureau Financieel Toezicht" in establishing the Supervisory Department of the Reporting Center for the non-financial sector. In this regard, the Central Bank of the Netherlands Antilles also made available one of their staff members. FIU the Netherlands continued giving us all required support. All in all a very positive year for the Reporting Center and we are very grateful for all assistance received.

In 2008 the Reporting Center held several (47) informative and also training sessions in Curaçao, Bonaire and Sint Maarten for different reporting entities including the future reporting entities. The increase in the number of reported unusual transactions – as a result of an increase in reports from the bank sector, the fiduciary sector, casinos and money remitters - compared to the year 2007 and the effective communication between the Reporting Center and the reporting entities, confirm that the respective reporting entities maintain a good and general understanding of the problem of money laundering.

The execution of the Governmental decision, as mentioned in the Annual Report 2007, to dismantle the Netherlands Antilles by December 15th, 2008 was postponed until the end of the year 2010. Upon dismantlement of the Netherlands Antilles, the island territories of Curaçao and Sint Maarten will most likely establish their own Reporting Center, having each to apply officially for the Egmont membership, while the reporting entities of Bonaire, St. Eustatius and Saba will most probably be reporting to the FIU of the Netherlands. As long as the Netherlands Antilles still exist, pursuant to FATF and Egmont regulations there can only exist one central and national agency which functions as the Reporting Center.

Last but not least a word of thanks to the Minister of Finance of the Netherlands Antilles, without whose extraordinary and full support during the past years it would not have been possible to comply with the tasks of the Reporting Center as stipulated in the law.

Kenneth V. Dambruck LL.M. CAMS
Head Reporting Center Netherlands Antilles

1. GENERAL

As was the case in previous years, when processing unusual transactions, the Reporting Center will, take into account the Incoming Date of these transactions (the date the transactions were registered at the Reporting Center) as a starting point. By doing so all transactions registered by the Reporting Center in the relevant year will be taken into account and consequently a more accurate view can be given of the work of the Reporting Center in that year. With regard to the furnishing or dissemination of suspicious transactions to the law enforcement agencies and the Public Prosecutor Office (PPO), the date these transactions were disseminated will apply.

Using the relevant articles in the National Ordinance Reporting of Unusual Transactions (O.G. 1996, no. 21) as a guideline, a summary of the work of the Reporting Center is given in the next paragraph. As such the reader can easily ascertain the compliance of the Reporting Center with the law in executing its work and also observe the current trends in reporting unusual transactions. The relevant articles can be found in the annexes at the end of this annual report.

The graphs and statistics and the comparisons with 2007 are given in paragraph 2.1.

1.1. SUMMARY (Compliance with article 3 and other articles of the National Ordinance Reporting of Unusual Transactions)

An impression of the work of the Reporting Center in 2008 is given in this summary while the extent of compliance with the relevant articles of the National Ordinance Reporting of Unusual Transactions is indicated at the same time.

Pursuant to article 3, letter "a" and letter "c"; receiving and analyzing data and notification of the reporting entities:

The Reporting Center received a number of 22,510 unusual transactions in 2008. That is an increase of 42.62% in reports compared to 2007, in which year the Reporting Center received a number of 15,783 unusual transactions.

Of the reports sent to the Reporting Center, the majority 86.21% was based on objective indicators. Compared to the year 2007, it constitutes an increase of approximately 1.07% in reports on the basis of an objective indicator. At the same time the percentage of the reports based on a subjective indicator has decreased from 14.86% in 2007 to 13.79% in 2008. The Reporting Center will continue to stress the importance of reporting subjectively to the reporting entities.

Compared to the previous years, the number of reports from the Money Remitter sector is showing an increase in 2008. While in 2007, 2,309 transactions were reported; in 2008 the

number of reports has increased to 4,137. An explanation for this increase can be sought among other things in the informative meetings held by the Reporting Center during the year 2007 with the Money Remitting sector both in Curacao as on Sint Maarten. The results of these meetings are still being experienced as effective in 2008. For further information please be referred to paragraph 2.1.4.

After the considerable increase in transactions in 2007, in 2008 Customs reported 784 transactions. An increase of 2.75% compared to 2007. Also in 2008 the Reporting Center organized several informative and training sessions for Customs; this time in Curaçao, Bonaire and in Sint Maarten.

No consensus has yet been reached with regard to the handwritten reports that the Reporting Center receives from Customs.

In 2007 there was also a noticeable increase in reports received from the Trust sector. While only 5 transactions were reported in 2006, in 2007 this number increased to 46 transactions reported to the Reporting Center. This increasing trend has continued in 2008, where 166 reports were received from the Trust Sector. In 2008 the Reporting Center continued with its informative sessions, presentations and training sessions to the staff and personnel of several trust companies. The Investment Institutions and Trust Supervision Department of The "Bank van de Nederlandse Antillen" (the Central Bank), was in close contact with the Reporting Center when auditing the sector, confirming the respective reporting behaviors. This department also organized informative sessions for the sector. The same can be said of the Association of Compliance Officers in the Netherlands Antilles (ACONA), that organized several informative sessions for the reporting entities in which the Reporting Center was invited as a speaker. It can safely be concluded that the aforementioned sessions and trainings by the Reporting Center, the Central Bank and the ACONA have contributed to a better awareness of the reporting obligation and consequently the increase in reports in the Trust sector.

The Offshore Banks also continue to show an increase in 2008. While in 2007, 144 transactions were reported to the Reporting Center, in 2008, 297 reports were sent to the Reporting Center.

As could be seen in the previous annual report, the Reporting Center organized several meetings with the Public Prosecutor in order to make the furnishing of suspicious transactions to the Public Prosecutor's Office (PPO), more effective. One of the objectives of these meetings was to reach an agreement for a follow-up regarding the reported suspicious transactions. This will enable the Reporting Center, among other things, to notify the reporting entities whether a reported transaction has lead to a conviction or not. The Reporting Center has however not yet succeeded in giving the reporting entities the necessary follow up regarding the convictions of money laundering in connection with the suspicious transactions that have been disseminated to the PPO. This matter will be taken up again in the coming year.

Pursuant to article 3, letter “b”; data furnished to the Public Prosecutor:

A total of 3,008 transactions were furnished to the PPO, after analyses by the Reporting Center. This is a decrease of 38.94% compared to the year 2007, in which year 4,926 suspicious transactions were disseminated to the PPO. For further details, please be referred to paragraph 2.5.1.

In the year 2008, 28 investigations with regard to money laundering and terrorism financing on the basis of tactical analyses were started by the Reporting Center. Based on these investigations 385 transactions were disseminated to the PPO. Please be referred to paragraph 2.5.1. for further details.

Information with regard to the amount of convictions in relation to money laundering and terrorism financing concerning the year 2008, has not been received at the moment of conclusion of this report.

Pursuant to article 3, letter “d”; AML/TF Developments:

The Reporting Center participated in several seminars and trainings to obtain and maintain the necessary knowledge, which is imperative to keep oneself informed of the newest developments in the field of money laundering and terrorism financing and into the improvements of the methods to prevent and detect money laundering and terrorism financing.

Please be referred to paragraph 1.3.2. for further information.

Pursuant to article 3, letter “e”; contacts with the “Bank van de Nederlandse Antillen”:

In 2008 the Reporting Center participated in joint presentations with the Central Bank regarding informative sessions for all reporting entities. The Reporting Center continued its cooperation as a member of the working group in charge of the amendment of the National Ordinance Reporting of Unusual Transactions and the National Ordinance Identification when rendering financial services, under chairmanship of the Anti Money Laundering Committee, (CWIG), chaired by staff employees of the Central Bank.

Pursuant to article 3, letter “f”; supplying information:

The Reporting Center organized several presentations for the reporting entities and for law enforcement agencies in 2008. The Reporting Center also participated in informative meetings organized by the ACONA. The Reporting Center was represented in several interviews on television and radio with regard to its work. A number of articles appeared in different newspapers on Sint Maarten and Curaçao with regard to the upcoming reporting obligation for the future reporting entities (the designated non-financial businesses and professions). Informative sessions were also held for the different future reporting entities.

For a more extensive review of these meetings and presentations, please be referred to chapter 3 of this report.

Pursuant to article 7; international exchange of information:

In 2008 the Reporting Center exchanged information with Financial Intelligence Units, (FIUs) of several countries. To be able to exchange information with foreign FIUs, pursuant to the national legislation of the Netherlands Antilles, a Memorandum of Understanding (MoU), is needed. In 2008 the Reporting Center signed MOUs with 6 countries. Further details will be given in paragraph 4.1.

Pursuant to article 12; requesting additional information:

The Reporting Center has sent 38 requests for additional information to 8 different reporting entities. The requested information was needed with regard to own investigations of the Reporting Center and in some cases to assist law enforcement agencies and/or foreign Reporting Centers (FIUs) in their investigations with regard to money laundering and terrorism financing.

Most reporting entities complied with the request and reacted within the given time period of five workdays. Those that couldn't send in the relevant information within the given time period, asked for and received an extended time period, within which the information was received by the Reporting Center.

1.2. ACHIEVEMENTS 2008

In our annual report of 2007 we set out to achieve certain objectives in the year 2008.

These objectives can be categorized under the following denominators:

- Organizational
- Training programs for the Reporting Center
- Informative and training sessions for the Reporting Entities
- Informative meetings with third parties (Civil Registry, Immigration Department)
- Informative sessions for the future reporting entities
- Cooperation with the "Bank van de Nederlandse Antillen" (the Central Bank)
- Cooperation between the Reporting Centers of the Kingdom of the Netherlands

The above-mentioned denominators will be dealt with throughout this annual report, whereby it will be seen that the Reporting Center has achieved most of the objectives it has set out to attain in 2008.

1.3. Organization of the FIU

The Reporting Center falls directly under the Minister of Finance. The Minister of Finance is the administrator of the database of the Reporting Center and has delegated this task to the Head of the Reporting Center. The Head of the Reporting Center is in charge of the daily operations.

In 2008, next to the Head, the personnel of the Reporting Center consisted of an executive secretary, an administrative and data assistant, 2 operational (IT)-analysts, two senior legal counselors in charge of establishing the Supervisory Department and one senior legal counselor also in charge of international policy, to be trained as strategic analyst. In 2008 the post of Analyst/Supervisor had been filled for a short period by someone from the police department who had been assigned to the Reporting Center temporarily. It is the intention to have this post filled permanently in the coming year.

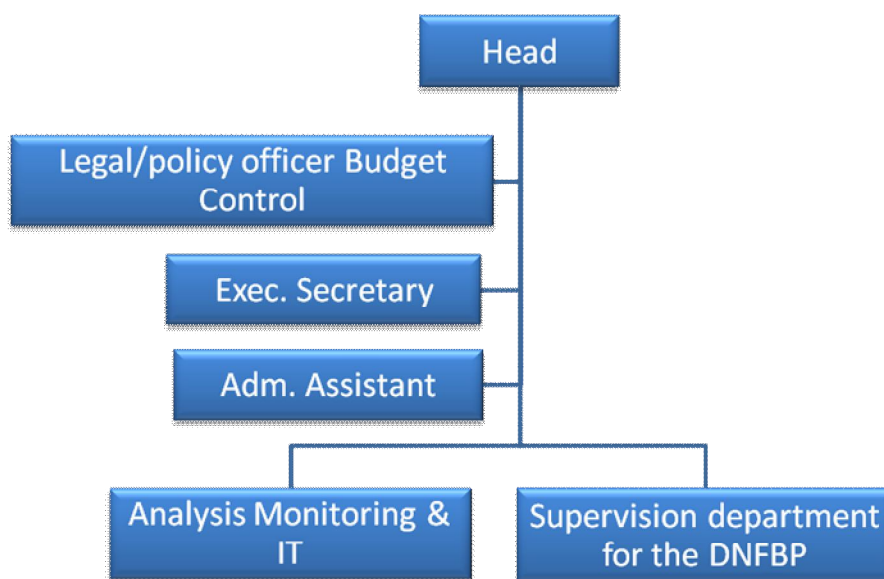


Figure 1. Organizational Chart

1.3.1. The Supervisory Department (information)

As indicated in the previous annual report, the Reporting Center is in the process of establishing a new department, which will act as the supervisory authority for the future reporting entities: the designated non-financial businesses and professions. In 2008 the Reporting Center recruited a second senior legal counselor for this new department. The Central Bank assigned one of their staff members to help establish the Supervisory

Department. During this year the Ministry of Justice of the Netherlands approved a request made by the Reporting Center (after consultation with the Minister of Finance of the Netherlands Antilles) to receive technical assistance from the “Bureau Financieel Toezicht” of the Netherlands (the Netherlands Supervisory authority for some of the designated non-financial businesses and professions) to assist in the establishment of the supervisory department.

1.3.2. Seminars and training for the FIU personnel

Training continues to be a very important issue in the fight against money laundering and combating the financing of terrorism.

During 2008 the personnel of the Reporting Center attended the following seminars and trainings:

- The annual International Conference on ML/TF in Miami
- The annual Egmont Working Group trainings
- Conference/training on the Prevention of ML in casinos in the Bahamas
- Seminar on Money Laundering in the Free Trade Zone
- Internet researching
- Writing policy documents
- Training supervision in the Trust sector organized by the Central Bank

2. STATISTICS, CURRENT REPORTING TRENDS AND TYPOLOGIES

The duties of the Reporting Center, pursuant to article 3 and other relevant articles of the National Ordinance Reporting of Unusual Transactions, are dealt with in this chapter, while the relevant statistics and current reporting trends are indicated here.

2.1. Collecting, registering, processing and analyzing data

In 2008 a total of 22,510 unusual transactions were received. This is an increase of 42.62% compared to 2007, when 15,783 transactions were received. This may be the result of the continued presentations and trainings sessions organized by the Reporting Center in 2008 and the joint informative meetings with the Central Bank and ACONA directed to the reported entities, in which both the obligation to report unusual transactions as the correct use of indicators was stressed.

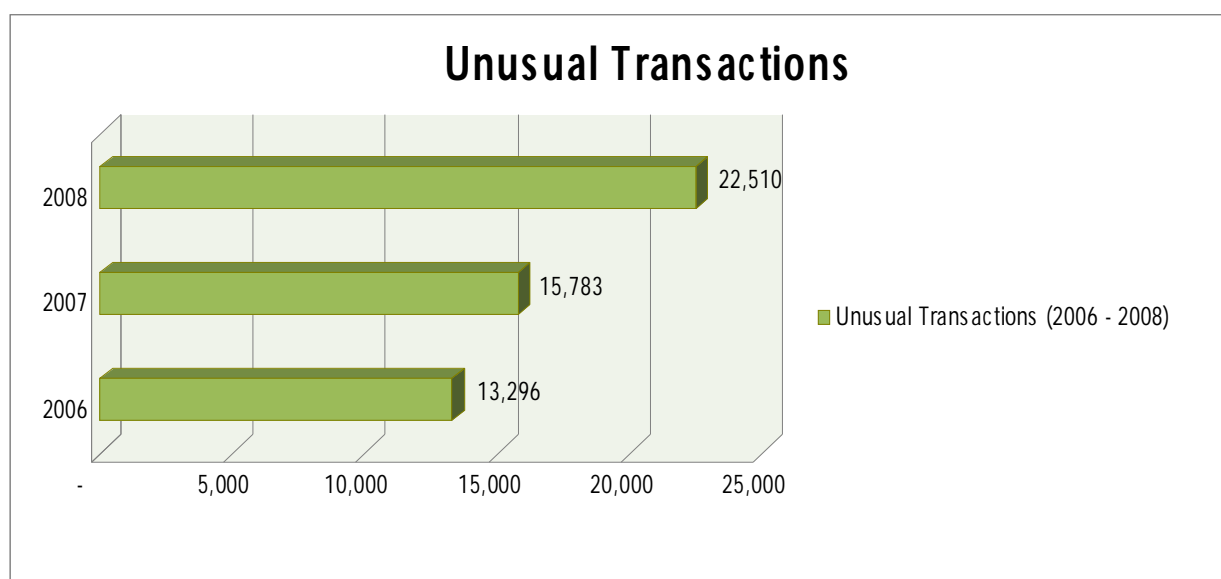


Figure 2 : Total received unusual transactions (2006-2008)

The following table shows the relation between the unusual transactions and the suspicious transactions, which have been disseminated to the PPO in the years 2006 until 2008.

Year	Unusual		Suspicious	
	Qty.	Value (in ANG.)	Qty.	Value (in ANG.)
2006	13,296	1,558,495,379	4,932	252,589,597
2007	15,783	4,219,536,891	4,926	460,371,863
2008	22,510	5,864,112,513	3,008	294,410,319

Table 1 : Unusual versus Suspicious (2006-2008)

In 2008 a decrease in the number of the disseminated suspicious transactions, compared to previous years, is noticeable. This was due to the fact that in 2008 there were only two analysts factually working at the Reporting Center, who could not deal with the amount of 22,510 unusual transactions received during that year.

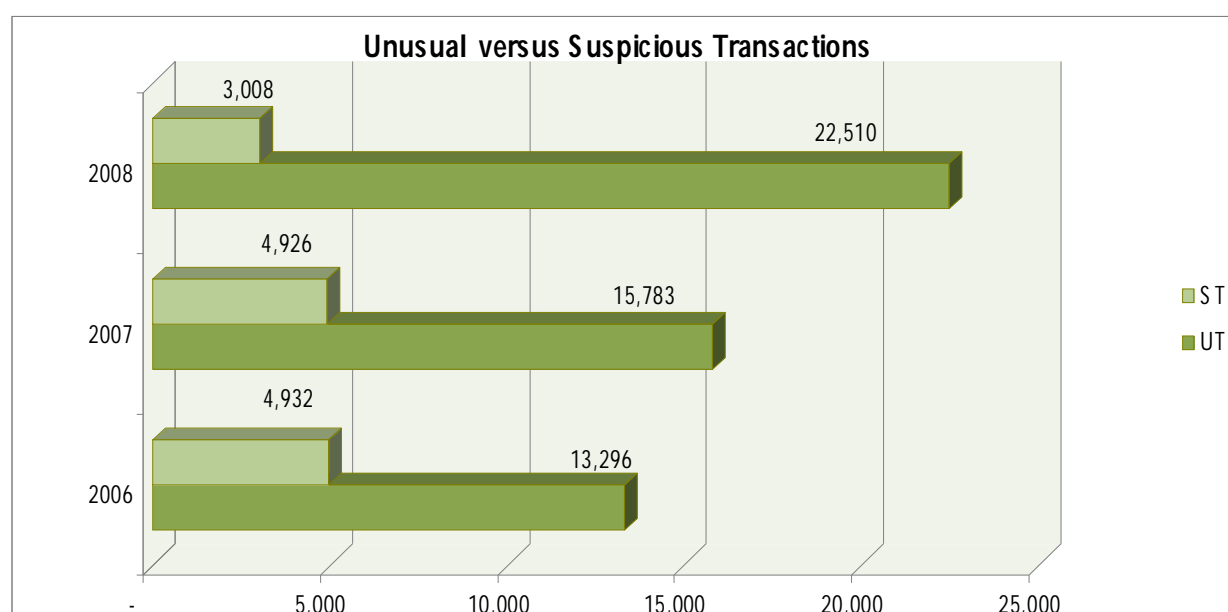


Figure 3 : Unusual versus Suspicious transactions (2006 – 2008)

An overview of the executed and intended transactions within the total number of transactions received by the Reporting Center is given in the following table.

	2008			2007			2006	
	Qty.	Value (in ANG.)		Qty.	Value (in ANG.)		Qty.	Value (ANG.)
Executed	22,163	5,210,805,927		15,556	4,206,360,265		13,206	1,385,114,167
Intended	347	653,306,586		228	13,177,626		90	173,381,212
Total	22,510	5,864,112,513		15,783	4,219,536,891		13,296	1,558,495,379

Table 2 : Total executed and intended unusual transactions (2006-2008)

The relation between objective and subjective indicators is shown in figure 4. The Reporting Center will continue to stress the importance of reporting subjectively for its investigations.

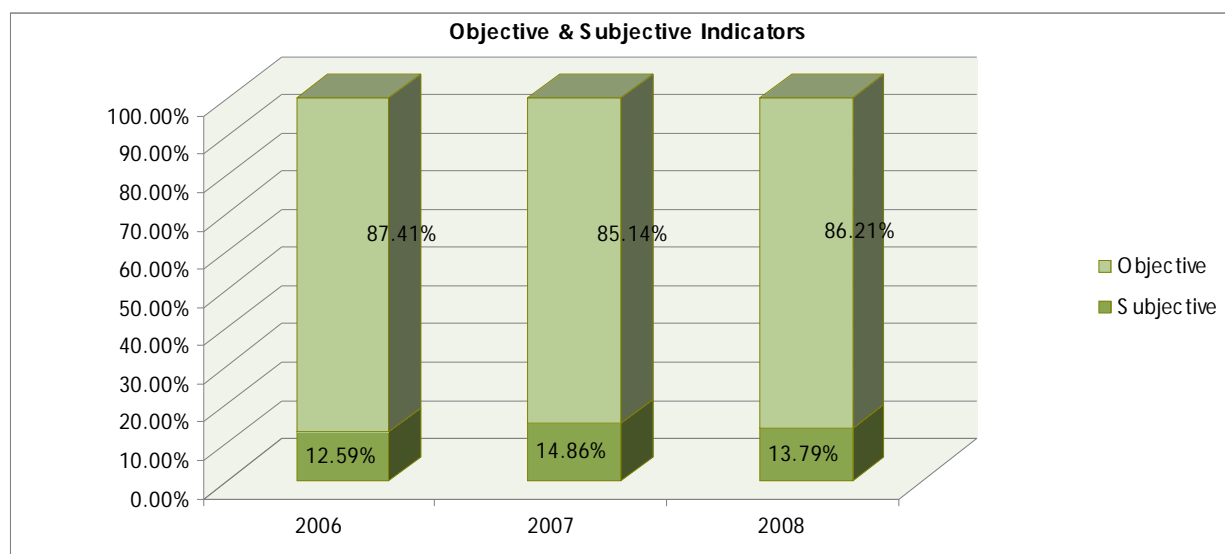


Figure 4 : Unusual transactions by objective and subjective indicators (%) (2006 – 2008)

As can be seen in the following table, the increase in 2008 in the number of the reported unusual transactions with 42.62% (compared to 2007) can mainly be contributed to the local banks and the Money Remitting sector.

	2008					2007			
Reporter Type	Qty.	%	Value (in ANG.)	%		Qty.	%	Value (in ANG.)	%
Others	-	0.00%	-	0.00%		-	0.00%	-	0.00%
Local Banks	16,979	75.43%	1,738,473,386	29.65%		12,390	78.50%	2,031,882,339	48.15%
Casinos	52	0.23%	4,000,382	0.07%		7	0.04%	176,831	0.01%
Central Bank	-	0.00%	-	0.00%		-	0.00%	-	0.00%
Credit card Companies	3	0.01%	18,760	0.00%		1	0.01%	15,000	0.00%
Offshore Banks	297	1.32%	1,591,537,619	27.14%		144	0.91%	1,733,732,272	41.09%

Customs	784	3.48%	302,471,894	5.16%	763	4.83%	324,559,519	7.69%
Credit Unions	92	0.41%	2,459,291	0.04%	103	0.65%	1,299,746	0.03%
Life Insurance	-	0.00%	-	0.00%	1	0.01%	-	0.00%
Money Remitters	4,137	18.38%	28,415,201	0.48%	2,309	14.63%	17,049,750	0.40%
Savings Banks	-	0.00%	-	0.00%	19	0.12%	2,928,164	0.07%
Trust Companies	166	0.74%	2,196,735,980	37.47%	46	0.29%	107,893,270	2.56%
Total	22,510	100%	5,864,112,513	100%	15,783	100%	4,219,536,891	100%

Table 3 : Unusual transactions by reporter type (2007 – 2008)

2.1.1. Local Banks

Most reports received in 2008 came from the banking sector. Of the 22,510 unusual transactions received, 16,979 came from the local banks. The reports are mainly based on objective indicators and there is even a slight increase in the use of subjective indicators. Local banks need to be trained more in the use of reporting subjectively.

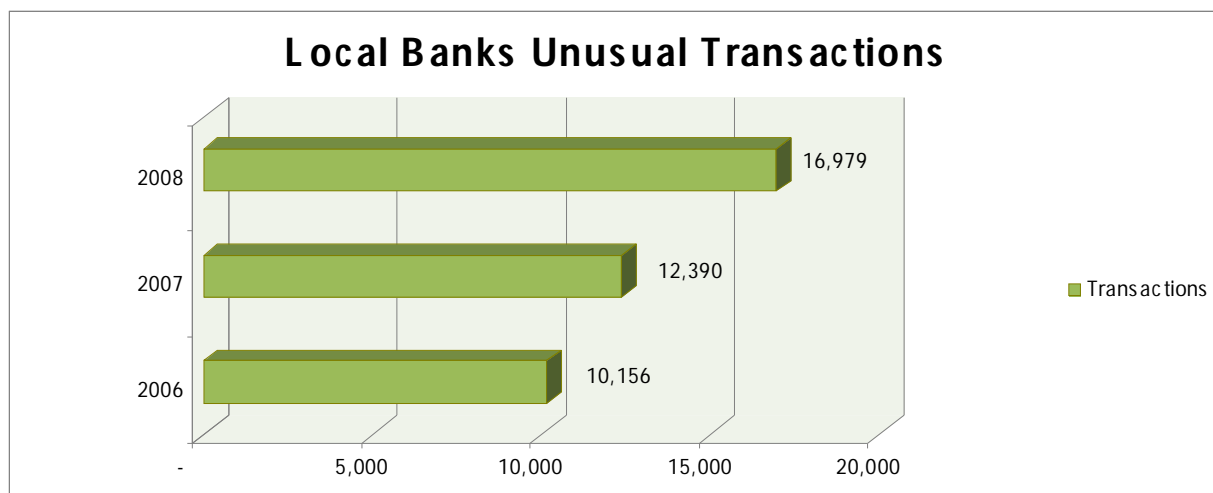


Figure 5 : Unusual transactions from Local Banks (2006 – 2008)

An overview of the executed and intended transactions of the local banks is given in the following table.

	2008		2007		2006	
	Qty.	Value	Qty.	Value	Qty.	Value
Executed	16,827	1,710,376,710	12,264	2,025,547,888	10,074	1,334,605,359
Intended	152	28,096,676	126	6,334,451	82	40,565,617
Total	16,979	1,738,473,386	12,390	2,031,882,339	10,156	1,375,170,976

Table 4 : Executed and intended transactions Local Banks (2006 – 2008)

In the following graph the percentage of the reports received, based on objective and subjective indicators, is indicated. As mentioned before, a decreasing tendency is noticeable with regard to the use of subjective indicators by the local banks.

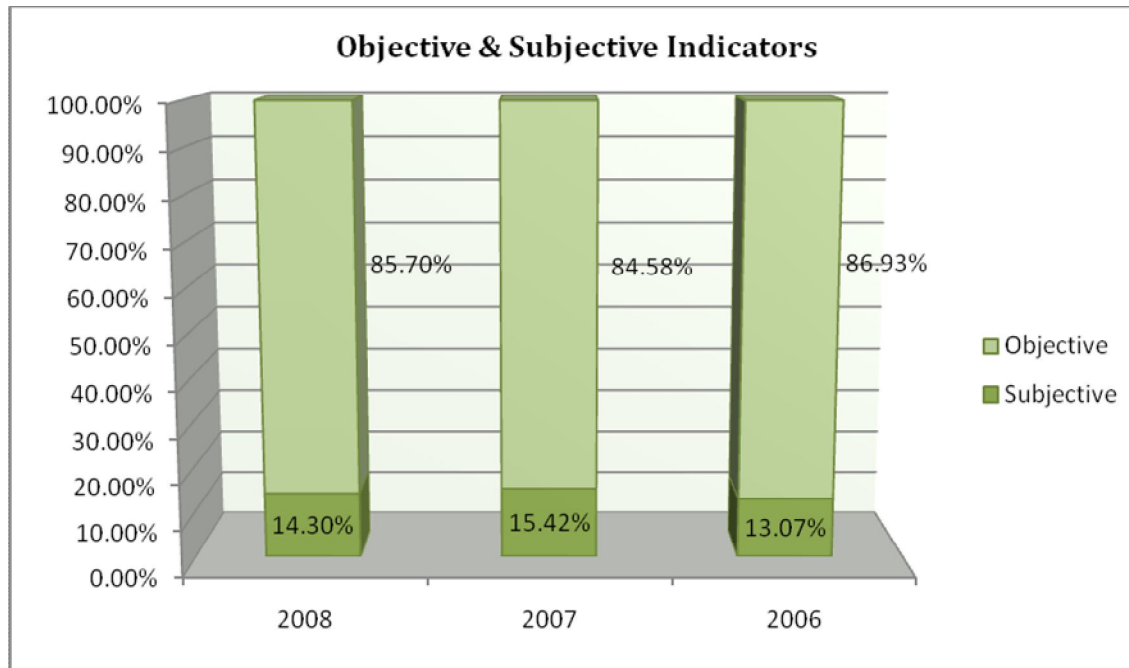


Figure 6 : Unusual transactions by subjective and objective indicators Local Banks (%) (2006 – 2008)

As can be seen in the following table the most used indicators for this sector are still the objective indicators. In table 6 the currency transactions are indicated.

			Quantity	
Code	Description	Type	Trans.	Percent.
B0110211	<i>Transactions where there is cause to presume that they may relate to money laundering or terrorist financing.</i>	Subjective	1,727	10.2%
B0110261	<i>Transactions in excess of ANG. 1.000.000 meeting two or more of the following sub-indicators; (see hard copy).</i>	Subjective	114	0.7%
B9710232	<i>Transactions in excess of ANG. 20,000.00 meeting two or more of the following indicators (see list of indicators)</i>	Subjective	455	2.7%
B9710111	<i>Transactions reported to the Police or Justice in connection with money laundering shall also be reported to the Reporting Center.</i>	Objective	50	0.3%
B9710131	<i>Transactions in excess of ANG. 250.000.</i>	Objective	750	4.4%
B9710133	<i>Transactions in excess of ANG. 20,000.00 involving exchange for another currency.</i>	Objective	1,037	6.1%
B9710134	<i>Transactions in excess of ANG. 20,000.00 concerning the acquisitions and/or cashing in by customer of checks, or similar instruments of payment.</i>	Objective	9,534	56.1%
B9710135	<i>Transactions in excess of ANG. 20,000.00 involving securities.</i>	Objective	159	0.9%
B9710136	<i>Transactions in excess of ANG. 20,000.00 meeting two or more of the following indicators; uncounted; in foreign currency; not deposited into one's own account; transfer to a foreign account.</i>	Objective	1,861	11.0%
B9710161	<i>Transactions by non-account holders in excess of ANG. 20,000.00 destined for abroad.</i>	Objective	73	0.4%
Others		Objective	1,108	6.5%
Others		Subjective	111	0.7%
	Total		16,979	100%

Table 5 : Indicators used by Local Banks (2008)

Description	2007		2008	
	Qty.	Amt.	Qty.	Amt.
<i>Transactions in excess of ANG. 250,000.</i>	692	362,011,727	750	336,383,975
<i>Transactions in excess of ANG. 20,000.00 involving exchange for another currency.</i>	608	46,000,285	1,037	58,895,049
<i>Transactions in excess of ANG. 20,000.00 involving securities.</i>	199	12,892,681	159	13,535,783
<i>Transactions in excess of ANG. 20,000.00 meeting two or more of the following indicators; uncounted; in foreign currency; not deposited into one's own account; transfer to a foreign account.</i>	1,226	97,136,573	1,861	137,571,227
<i>Transactions in excess of ANG. 20,000.00 meeting two or more of the following indicators (see list of indicators).</i>	425	39,932,832	455	41,836,458
Total	3,150	557,974,098	4,262	588,222,492

Table 6 : Currency Transaction Reports for Local Banks (2007-2008)

2.1.2. Offshore Banks

In 2008 the reports received from the offshore bank sector continued to increase. From 32 transactions in 2005 to 140 in 2006, 144 in 2007 and 297 in 2008.

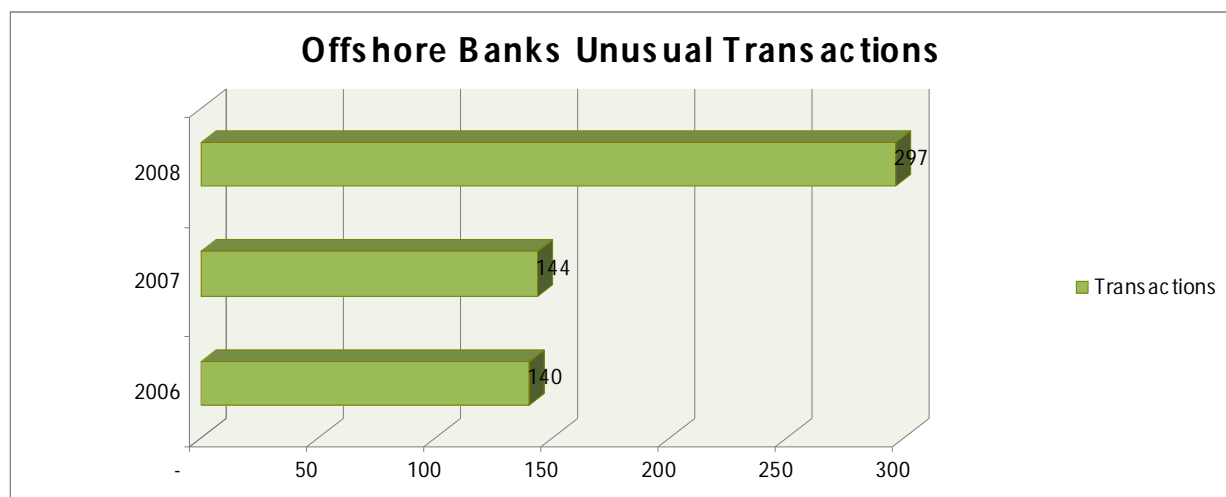


Figure 7: Unusual Transactions from Offshore Banks (2006 – 2008)

An overview of the executed and intended transactions of the offshore banks is given in the following table.

	2008		2007		2006	
	Qty.	Value	Qty.	Value	Qty.	Value
Executed	119	1,590,537,773	47	1,733,674,685	137	78,542,689
Intended	178	999,846	97	57,587	3	35,640
Total	297	1,591,537,619	144	1,733,732,272	140	78,578,329

Table 7: Executed and intended transactions Offshore Banks (2006 – 2008)

In the following graph the percentage of the reports received, based on objective and subjective indicators, is indicated. In 2008 there is an increase of nearly 15% in the use of subjective indicators by the offshore banks compared to 2007.

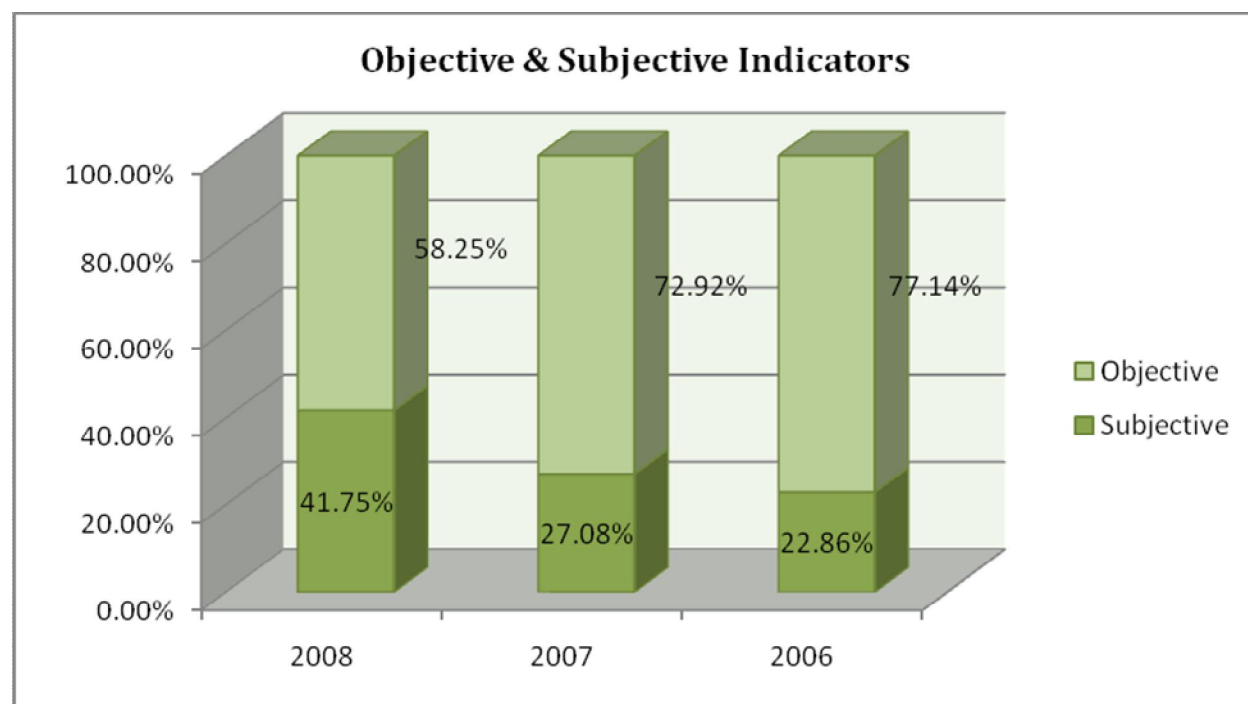


Figure 8: Unusual transactions by subjective and objective indicators Offshore Banks (%) (2006 – 2008)

As can be seen in the following table the most used indicators for this sector are still the objective indicators.

Code	Description	Type	Quantity	
			Trans.	Percent.
B0110211	<i>Transactions where there is cause to presume that they may relate to money laundering or terrorist financing.</i>	Subjective	9	3.0%
B0110223	<i>Transactions in excess of ANG. 100,000.00 concerning the acquisition and/or cashing in by customer of checks, traveler's checks or similar instruments of payment, meeting two or more of the following indicators. (see list of indicators)</i>	Subjective	4	1.3%
B0110261	<i>Transactions in excess of ANG. 1,000,000.00 that meet two or more of the following indicators. (see the list of indicators)</i>	Subjective	105	35.4%
B9710111	<i>Transactions that may be related to money laundering which are reported to the local police or justice institutions shall also be reported to the Reporting Center</i>	Objective	166	55.9%
Others		Subjective	6	2.0%
Others		Objective	7	2.4%
Total			297	100%

Table 8: Indicators used by Offshore Banks (2008)

2.1.3. Trust Companies

The unusual transactions received from the Trust sector, continue to increase. In 2006, 5 reports were received compared to 46 reports in 2007 and in 2008, 166 reports of unusual transactions were received from this sector. This sector reports primarily based on subjective indicators. Reporting based on a subjective indicator continues to be of the utmost importance for the analytical work by the Reporting Center, because in that case the reports are particularly based on the opinion of the reporting entity regarding the situation surrounding the reported transactions. In 2008 the Reporting Center continued with its informative sessions, presentations and training sessions to the staff and personnel of several trust companies. The Investment Institutions and Trust Supervision Department of The "Bank van de Nederlandse Antillen" (the Central Bank), was in close contact with the Reporting Center when auditing the sector, confirming the respective reporting behaviors. This department also organized informative sessions for the sector. The same can be said of the Association of Compliance Officers in the Netherlands Antilles (ACONA), that organized several informative sessions for the reporting entities in which the Reporting Center was invited as a speaker. It can safely be concluded that the afore-mentioned sessions and trainings by the Reporting Center, the Central Bank and the ACONA have contributed to a better awareness of the reporting obligation and consequently the increase in reports in the Trust sector. The Reporting Center will continue to encourage the reporting by using subjective indicators.

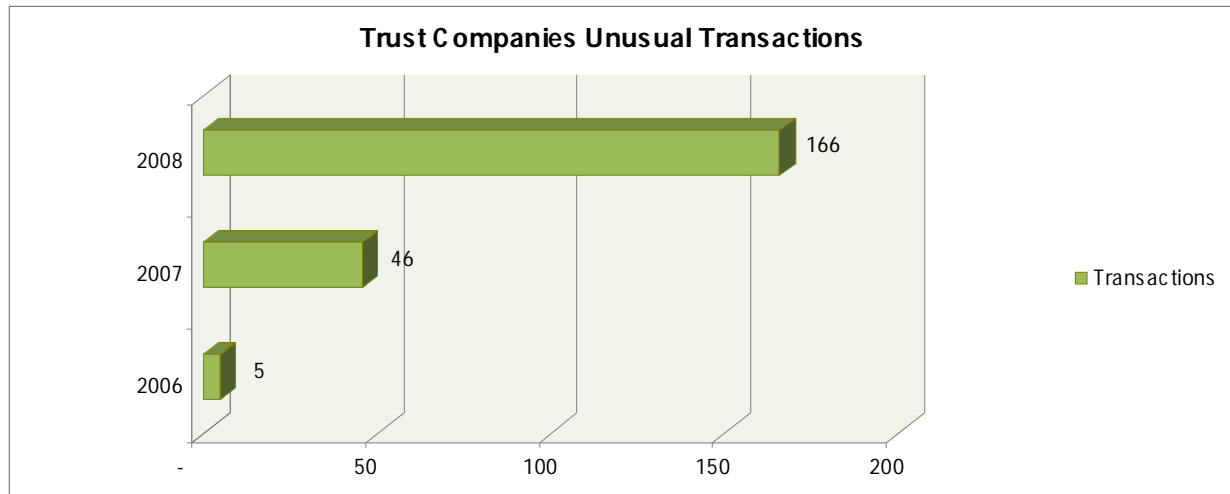


Figure 9 : Unusual transactions from Trust Companies (2006 – 2008)

In the following table an overview of the executed and intended transactions of the trust companies is given.

	2008		2007		2006	
	Qty.	Value	Qty.	Value	Qty.	Value
Executed	151	1,572,533,738	44	104,534,980	3	-
Intended	15	624,202,242	2	3,358,290	2	1,779,955
Total	166	2,196,735,980	46	107,893,270	5	1,779,955

Table 9 : Executed and intended transactions Trust Companies (2006 – 2008)

In the following graph the percentage of the reports received from trust companies, based on objective and subjective indicators, is indicated.

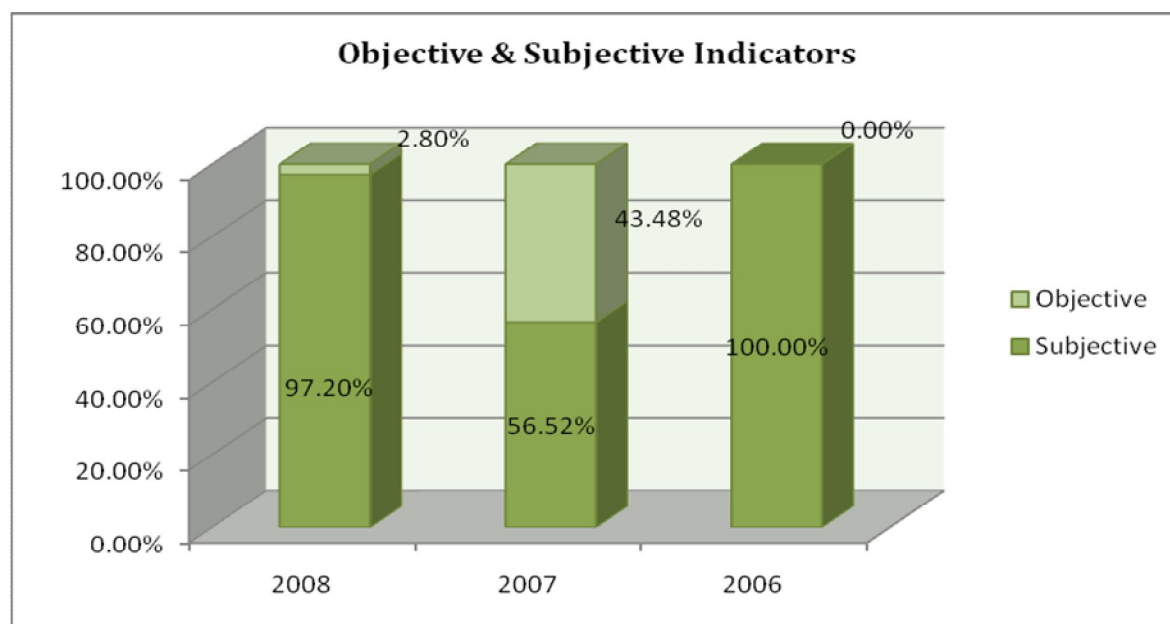


Figure 10 : Unusual transactions by subjective and objective indicators Trust Companies (%) (2006 - 2008)

The following table indicates that the most used indicators for this sector are still the subjective indicators. As can be seen in this table, the trust companies have also been using the indicators that were established for other sectors. The Reporting Center will in the coming year focus on giving more training and informative sessions with regard to the use of the indicators.

Code	Description	Type	Trans.	Percent.
B0110261	Transactions in excess of ANG. 1,000,000.00 That meets two or more of the following indicators. (see the list of indicators)	Subjective	109	65.66%
F0410211	Transactions reported to Police or Justice institution in connection with money laundering shall also be reported to the Reporting Center.	Subjective	26	15.66%
F0410133	All cash transactions in excess of ANG. 10,000 or the equivalent value in a foreign currency where the reporter is directly or indirectly involved.	Objective	26	15.66%
F0410111	Transactions reported to Police or Justice in connection with money laundering shall also be reported to the Reporting Center.	Objective	1	0.60%
Others	F0410262, B9710261, B9710221	Subjective	4	2.40%
Total			166	100%

Table 10 : Indicators used by Trust Companies (2008)

2.1.4. Money Remitters

In 2008 the transactions received from the money remitting sector increased with approximately 2000 transactions compared with the year 2007. An explanation for this increase can be sought among other things in the informative meetings held by the Reporting Center during the year 2007 with the Money Remitting sector both in Curaçao as on Sint Maarten. The results of these meetings are still being experienced as effective in 2008.

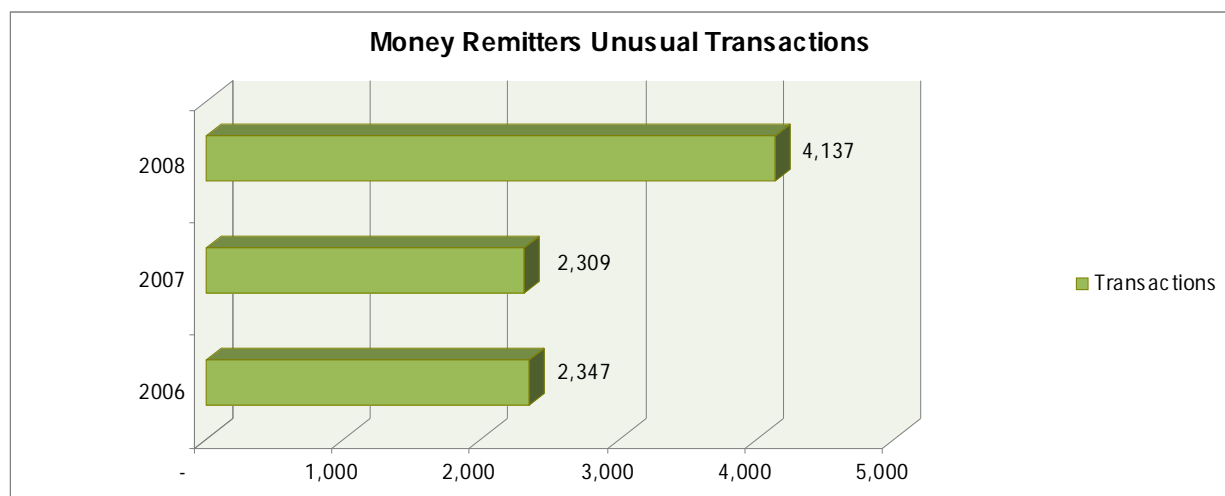


Figure 11 : Unusual transactions from Money Remitters (2006 – 2008)

An overview of the executed and intended transactions of the money remitters is given in the following table.

	2008		2007		2006	
	Qty.	Value	Qty.	Value	Qty.	Value
Executed	4,135	28,407,379	2,307	17,026,610	2,347	16,732,654
Intended	2	7,822	2	23,140	-	-
Total	4,137	28,415,201	2,309	17,049,750	2,347	16,732,654

Table 11 : Executed and intended transactions Money Remitters (2006-2008)

In the following graph the percentage of the reports received from money remitters, based on objective and subjective indicators, is indicated. In 2008 there is a decrease in the use of subjective indicators by the money remitters.

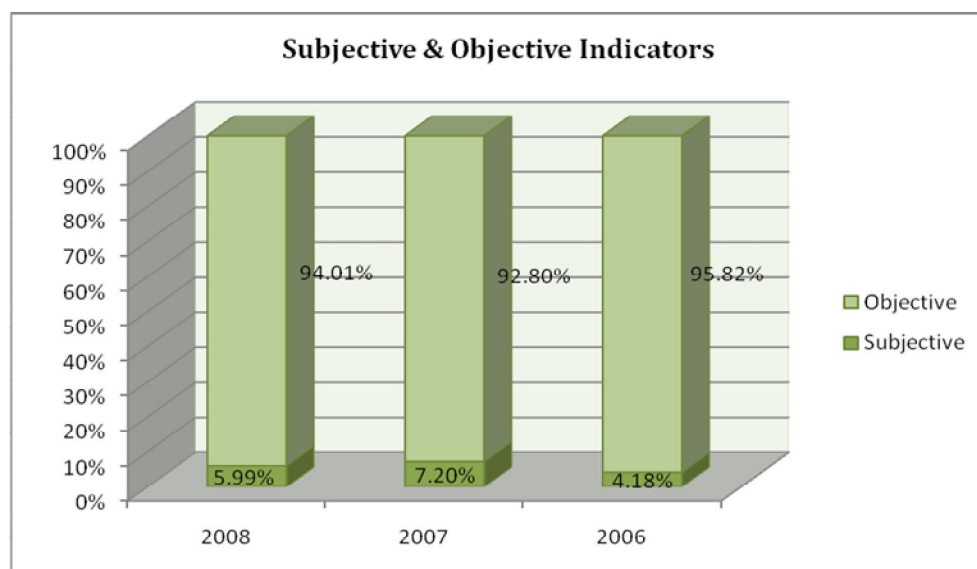


Figure 12: Unusual transactions by subjective and objective indicators Money Remitters (%) (2006 – 2008)

As can be seen in the following table the most used indicators for this sector are still the objective indicators. An indicator of the bank sector was used incorrectly in 5 reports received from the money remitters. In table 13 the currency transactions for the Money Remitting Sector are indicated.

Code	Description	Type	Trans.	Percent.
T0010111	Transactions reported to Police or Justice in connection with money laundering shall also be reported to the Reporting Center.	Objective	22	0.5%
T0010141	Transactions in excess of ANG. 5,000.00 with money made available in cash, by checks, by a credit - debit card and/or money made payable in cash, by checks or by deposits in account.	Objective	3,867	93.5%
T0010211	Transactions where there is cause to presume that they may relate to money laundering or terrorist financing.	Subjective	205	5.0%
T0010231	Customer's preference for transactions below the upper limit amount, giving rise to the presumption that he thus wants to evade reporting.	Subjective	38	0.9%
Others	M0010211, B9710221, B0110211	Subjective	5	0.1%
Total			4,137	100%

Table 12 : Indicators used by Money Remitters (2008)

Description	2007		2008	
	Qty.	Amt.	Qty.2	Amt.3
All Transactions indicated in table 12	2,309	17,049,750	4,137	28,415,201

Table 13 : Currency Transaction Reports for Money Remitters (2007-2008)

2.1.5. Customs

Pursuant to the National Ordinance Obligation to Report Cross-Frontier Money Transportations, persons entering or leaving one of the island territories of the Netherlands Antilles are under the obligation to report money for a value of ANG. 20,000 or more, (approximately US\$ 10,000) which they carry with them, to the import and excise duties officials. These officials are thereafter under the obligation to report these transactions to the Reporting Center without delay.

In 2008 Customs shows a slight increase in reported transactions. From 763 reports in 2007 to 784 reports in 2008. This year the Reporting Center organized three training sessions for Customs in Curaçao (sector Willemstad) and one for Customs in Sint Maarten. The Reporting Center also visited the island of Bonaire where an informative meeting was held with the Customs representatives of this island.

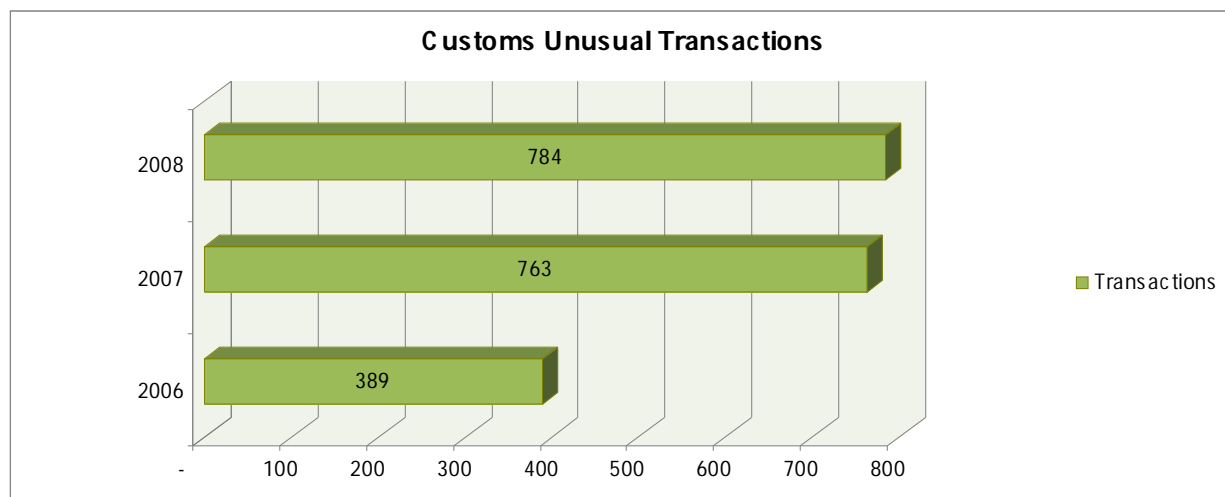


Figure 13: Unusual transactions from Customs (2006 – 2008)

An overview of the executed and intended transactions of Customs is given in the following table.

	2008		2007		2006	
	Qty.	Value	Qty.	Value	Qty.	Value
Executed	784	302,471,894	763	324,559,519	389	80,125,829
Intended	-	-	-	-	-	-
Total	784	302,471,894	763	324,559,519	389	80,125,829

Table 14 : Executed and intended transactions Customs (2006 – 2008)

In the following graph the percentage of the reports received from Customs, based on objective and subjective indicators, is indicated.

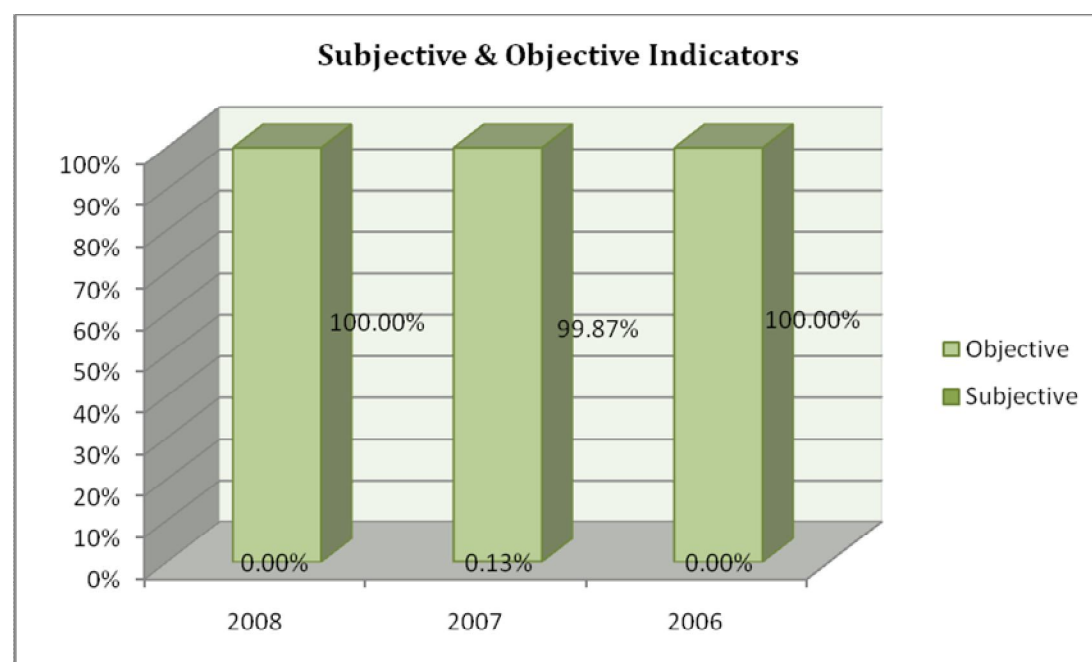


Figure 14 : Unusual transactions by subjective and objective indicators Customs (%) (2006 – 2008)

As can be seen in the following table the most used indicators for this sector are the objective indicators.

Code	Description	Type	Trans.	Percent.
D021013 3	Transportation of cash in excess of ANG. 20,000.00 in foreign currency.	Objective	764	97.45%
D021013 2	Transportation of cash in excess of ANG. 20,000.00 in foreign currency	Objective	17	2.17%
Others	D0210111, D0210131	Objective	2	0.26%
	Total		784	100%

Table 15 : Indicators used by Customs (2008)

Indicator	2007	2008	
	Qty.	Amt.	Amt.
<i>Transportation of cash in excess of ANG. 20,000.00 in foreign currency.</i>	1	117,000	0
<i>Transportation of cash, securities, checks, traveler-checks or similar instruments of payment where there is cause to presume that they may relate to money laundering or terrorist financing and which have been reported to the police instances, must be reported to the reporting centre.</i>	3	951,059	1
<i>Transportation of cash in excess of ANG. 20,000'00 in small denominations</i>	5	133,320	1
<i>Transportation of cash in excess ANG. 20,000'00 in large denominations</i>	13	5,397,018	17
<i>Transportation of cash in excess of ANG. 20,000'00 in another currency.</i>	730	763,326,860	764
<i>Transportation of goods in excess of ANG. 20,000'00 in the form of checks, traveler-checks or similar instruments of payment.</i>	11	7,812,691	1
<i>Transportation of cash, securities, checks, traveler-checks or similar instruments of payment where there is the cause to presume that they may relate to money laundering or terrorist financing.</i>	1	13,500	-
Total	763	777,751,448	784

Table 16 : Currency Transaction Reports for Customs (2007-2008)

2.1.6. Casinos

In 2008 the Reporting Center concluded the installment of the reporting program at all casinos based in Curaçao and in Sint Maarten. The sole casino of Bonaire was also visited. The afore-mentioned installment, the several informative sessions and training sessions held for the casinos of the Netherlands Antilles, can be an explanation for the relatively big increase of reports from this sector in 2008. The reports received from casinos increased from 7 reports in 2007 to 52 reports in 2008. As such the casino sector is the sector with the highest increase - percentage wise - in unusual transactions in the year 2008, being an increase of 642.86%. As will be seen in figure 16, reports based on a subjective indicator have also increased from 0% to 15.38%.

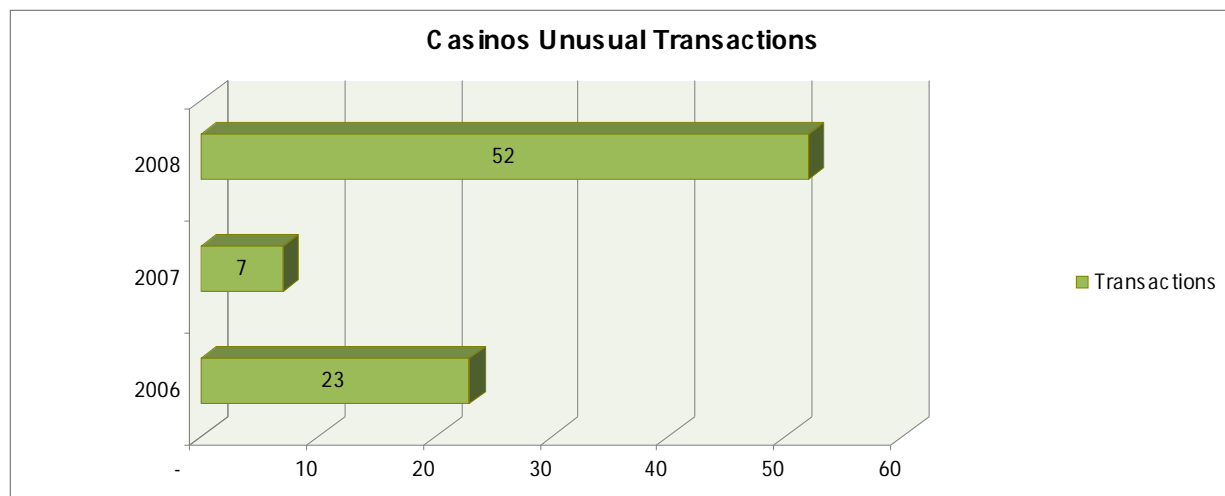


Figure 15 : Unusual transactions from Casinos (2006 – 2008)

An overview of the executed and intended transactions of the casinos is given in the following table.

	2008		2007		2006	
	Qty.	Value	Qty.	Value	Qty.	Value
Executed	52	4,000,382	7	176,831	23	938,044
Intended	-	-	-	-	-	-
Total	52	4,000,382	7	176,831	23	938,044

Table 17 : Executed and intended transactions Casinos (2006-2008)

An overview of the number of the unusual transactions of the casinos, based on subjective and objective indicators, is given in the following table.

Quantity Unusual Transactions (Obj./Subj.)		
Year	Objective	Subjective
2006	23	-
2007	7	-
2008	44	8

Table 18 : Unusual transactions by subjective and objective indicators Casinos (qty.) (2006-2008)

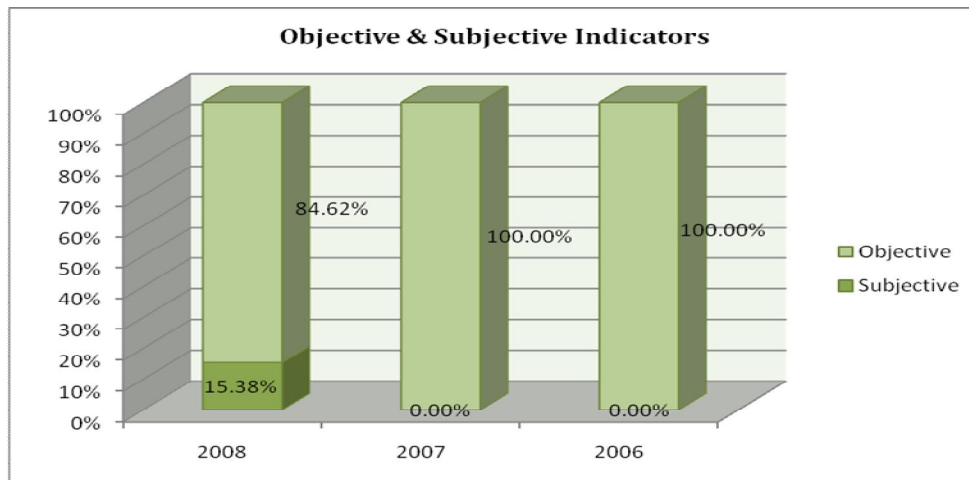


Figure 16 : Unusual transactions by subjective and objective indicators Casinos (%) (2006-2008)

As can be seen in the following table, in 2008 the reports of unusual transactions of the casinos were mostly based on an objective indicator.

Code	Description	Type	Trans.	Percent.
C0110134	<i>The purchase or exchange of tokens by a player exceeding ANG. 20,000.00.</i>	Objective	2	3.9%
C0110161	<i>Transactions in excess of ANG. 20,000.00</i>	Objective	31	59.6%
C0110181	<i>To place into deposit of cash or other values exceeding ANG. 20,000.00.</i>	Objective	2	3.8%
C0110211	<i>Transactions where there is cause to presume that they may relate to money laundering or terrorist financing</i>	Subjective	7	13.5%
Others		Subjective	1	1.9%
Others		Objective	9	17.3%
	Total		52	100%

Table 19 : Indicators used by Casinos (2008)

Indicator	2007	Amt.	2008	Amt.
	Qty.		Qty.	
Transactions in excess of ANG 1,000,000.00 that meet two or more of the following indicators: (see hard copy)	-	-	1	21,060
The purchase or exchange of tokens by a player exceeding ANG 20.000,00 by returning foreign exchange. The purchase or exchange of tokens by a player exceeding ANG 20.000,00 by returning foreign exchange.	-	-	9	525,600
The purchase or exchange of tokens by a player exceeding ANG. 20,000.00.	-	-	2	490,838
Transactions in excess of ANG. 20,000.00	7	176,831	31	2,219,579
To place into deposit of cash or other values exceeding ANG. 20,000.00.	-	-	2	47,025
Transactions where there is cause to presume that they may relate to money laundering or terrorist financing	-	-	7	696,280
Total	7	176,831	524,000,382	

Table 20 : Currency Transaction reports from Casinos (2007-2008)

2.1.7. Credit Unions

In 2008, reports from the Credit Unions continue to decrease. The Reporting Center upon reaching its normal personnel formation will focus more on sectors like the credit unions by organizing more informative and training sessions for this sector. All reports received by credit unions were based on a subjective indicator.

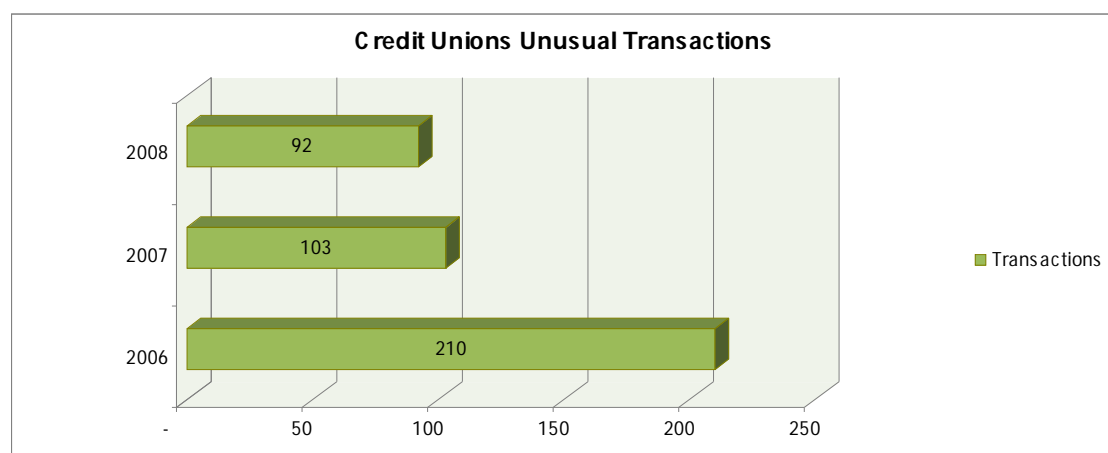


Figure 17 : Unusual Transactions from Credit Unions (2006 – 2008)

An overview of the executed and intended transactions of the credit unions is given in the following table.

	2008		2007		2006	
	Qty.	Value	Qty.	Value	Qty.	Value
Executed	92	2,459,291	103	1,299,746	210	2,017,928
Intended	-	-	-	-	-	-
Total	92	2,459,291	103	1,299,746	210	2,017,928

Table 21 : Executed and intended transactions Credit Unions (2006-2008)

In the following graph the percentage of the reports received from the credit unions, based on objective and subjective indicators, is indicated.

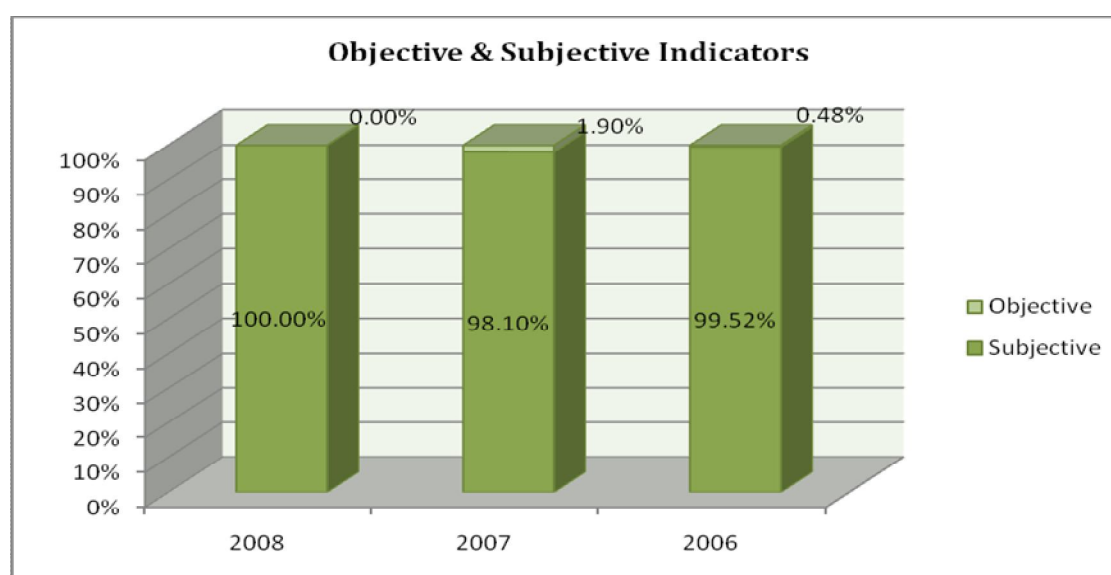


Figure 18 : Unusual Transactions by subjective and objective indicators Credit Unions (%) (2006 – 2008)

As can be seen in the following table, in 2008 all the reports of unusual transactions of the credit unions were based on a subjective indicator.

Code	Description	Type	Trans.	Percent.
B0110211	Transactions where there is cause to presume that they may relate to money laundering or terrorist financing.	Subjective	92	100%
	Total		92	100 %

Table 22 : Indicators used by Credit Unions (2008)

Description	2007		2008	
	Qty.	Amt.	Qty.2	Amt.3
All Transactions indicated in table 12	103	1,299,746	92	2,459,291

Table 23: Currency Transaction Reports for Credit Unions (2007-2008)

2.1.8. Savings Banks

In 2008 no reports were received from the Saving Banks. The year before, the Reporting Center held informative sessions for personnel of the saving banks both in Curaçao and in Sint Maarten. This sector will be approached for clarification on the reason behind this lack of reports.

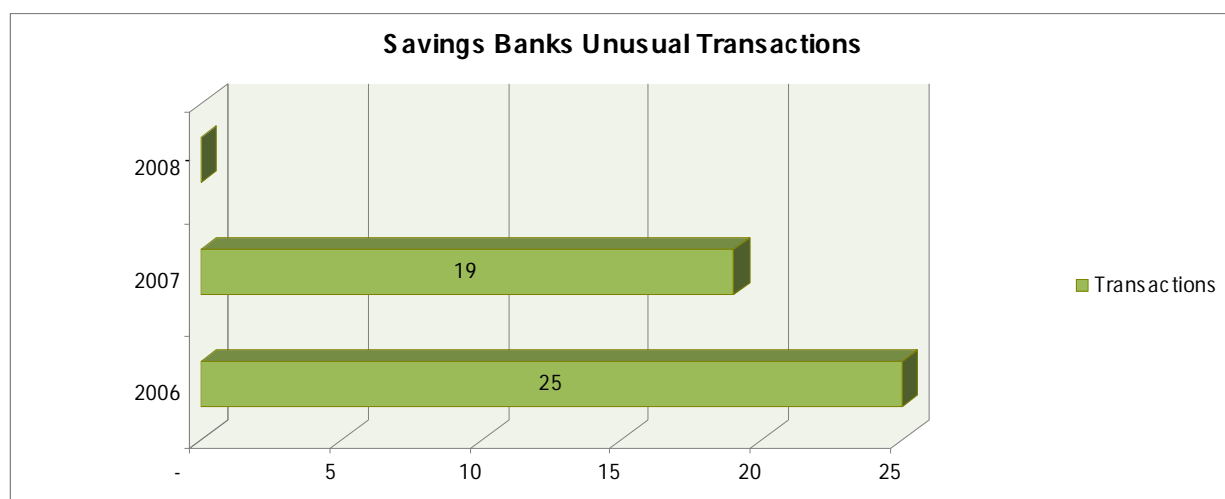


Figure 19 : Unusual Transactions from Savings Banks (2006-2008)

An overview of the executed and intended transactions of the savings banks is given in the following table.

	2008		2007		2006	
	Qty.	Value	Qty.	Value	Qty.	Value
Executed	-	-	19	2,928,164	25	3,046,735
Intended	-	-	-	-	-	-
Total	-	-	19	2,928,164	25	3,046,735

Table 24 : Executed and intended transactions Savings Banks (2006 – 2008)

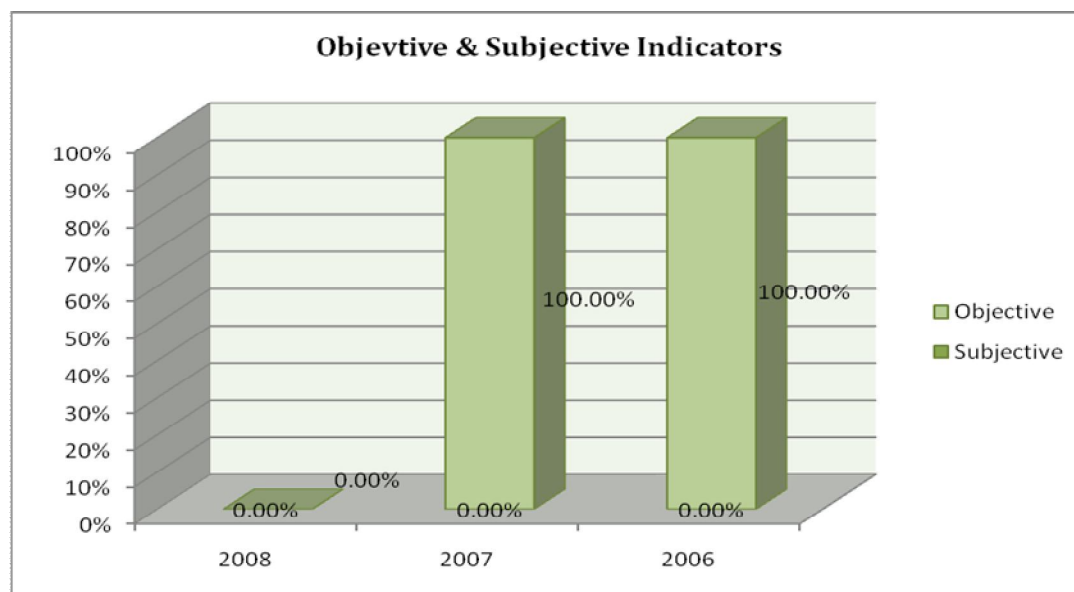


Figure 20 : Unusual transactions by subjective and objective indicators Savings Banks (%) (2006 2008)

2.1.9. Other reporting entities

In 2008, a total of 3 reports were received from the below-mentioned entities. The Reporting Center will continue to organize meetings with and presentations for particularly the Life Insurance Sector and the Credit Card companies in order to improve their reporting behavior.

Entity	2006	2007	2008
Central Bank	0	0	0
Credit card Companies	1	1	3
Insurance Companies	0	1	0
Total	2	2	3

Table 25: Other Reporting Entities (2006 – 2008)

In the following table the unusual transactions of the other reporting entities with their corresponding values (2006 - 2008) are shown.

Year	Qty.	Value in ANG.
2006	1	5,929
2007	2	15,000
2008	3	18,760

Table 26: Unusual Transactions Other Reporting Entities with corresponding value in Ang (2006 – 2008)

In the following graph the percentage of the reports received from the other reporting entities, based on objective and subjective indicators, is indicated.

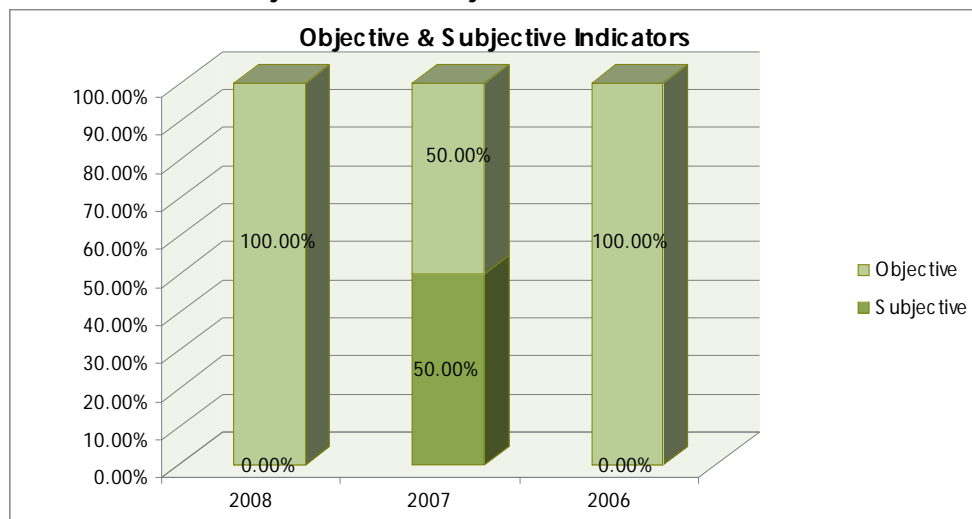


Figure 21 : Unusual transactions by subjective and objective indicators Other Reporting Entities (%) (2006 – 2008)

As can be seen in the following table the reports of unusual transactions of the other reporting entities were based on objective indicators.

Code	Description	Type	Trans.	Percent.
M0010137	Cash deposit of ANG 5,000.00 by customer in the Netherlands Antilles for the benefit of a credit card account.	Objective	3	100%
	Total		3	100%

Table 27: Indicators used by Other Reporting Entities (2008)

2.2. Requests for additional information by the Reporting Center from the Reporting Entities

Pursuant to article 12 of the National Ordinance Reporting of Unusual Transactions, the Reporting Center is entitled to ask further data or information from the party having reported. The party from whom this data or information has been requested is obliged by law to furnish the Reporting Center with such data or information in writing, within the term stated by the Reporting Center.

Further data or information is needed when there are omissions in the reports received from the reporting entities or when information is needed for ongoing investigations.

In 2008 the Reporting Center sent 38 requests for further information to reporting institutions. These requests were sent to the following sectors:

Banks	: 22
Money Remitters	: 7
Others	: 9

2.3. Reporting behavior reporting entities

The average reporting days per reporting entity is shown in the table below. This is the difference between the transaction date and the date the report was received by the Reporting Center, the incoming date.

Pursuant to the National Ordinance Reporting Unusual Transactions, unusual transactions should be reported without delay to the Reporting Center. This has always been interpreted as being within 48 hours. On their request, it has been agreed with the Associations of the onshore banks and the offshore banks that reports based on subjective indicators should be reported within 48 hours after reaching the conclusion that there is an unusual transaction. For reports based on objective indicators the time period to report will in principle be 5 workdays. Extension of this period due to organizational or unforeseen reasons is always possible. Aforementioned policy with regard to the reporting period is applicable to the other sectors as well.

The Money Remitting sector experienced several problems with their reporting system, leading to the difference between the date of the transactions and the date of registration at the Reporting Center.

The Trust sector reports in general subjectively. Subjective reporting entails that relevant due diligence (international) investigations need to be undertaken, that may lead to the indicated reporting behavior.

SECTOR	2008	2007	2006
Local Banks	12	15	11
Offshore Banks	28	7	15
Customs	35	124	35
Money Remitters	139	56	23
Casinos	10	50	19
Credit Unions	6	12	29
Credit Card Companies	57	1	6
Savings Banks	0	95	177
Trust Companies	98	76	8

Table 28: Average Reporting Behavior by Reporter Type (2006 – 2008)

2.4. Transactions per island

An overview of the number of unusual transactions reports distributed over the several island territories per reporting type is given in the table below. You can see an upward trend in reports received from most island territories.

2007					
Sector	Curaçao	Bonaire	St. Maarten	St. Eustatius	Saba
Local Banks	6,786	534	5,070	32	101
Offshore Banks	144	-	-	-	-
Customs	589	-	174	-	-
Money Remitters	2,308	-	-	-	-
Casinos	7	-	-	-	-
Central Bank	-	-	-	-	-
Credit Card Companies	1	-	-	-	-
Savings Banks	19	-	-	-	-
Trust Companies	45	-	1	-	-
Life Insurance Companies	1	-	-	-	-
Credit Unions	103	-	-	-	-
Total	10,003	534	5,245	32	101

Table 29 : Unusual transactions by Island by Reporter type (2007/Qty.)

2008					
Sector	Curaçao	Bonaire	St. Maarten	St. Eustatius	Saba
Local Banks	10,395	708	5,766	27	87
Offshore Banks	297	-	-	-	-
Customs	425	2	357	-	-
Money Remitters	1,920	-	2,216	-	-
Casinos	27	-	25	-	-
Central Bank	-	-	-	-	-
Credit Card Companies	3	-	-	-	-
Savings Banks	-	-	-	-	-
Trust Companies	130	-	37	-	-
Life Insurance Companies	-	-	-	-	-
Credit Unions	92	-	-	-	-
Total	13,289	710	8,401	27	87

Table 30 : Unusual transactions by Island by Reporter type (2008/Qty.)

In the next tables an overview of the value involved with the unusual transaction reports, distributed over the several island territories per reporting type, is given. You can see an increase in the value of the unusual transactions reported by all the island territories. This increase in the value of the unusual transactions can be contributed to specifically the local and offshore banks, Customs and the Trust companies.

2007					
Sector	Curaçao	Bonaire	St. Maarten	St. Eustatius	Saba
Local Banks	1,174,108,101	61,304,441	792,309,745	3,314,722	845,330
Offshore Banks	1,733,732,272	-	-	-	-
Customs	182,087,038	-	142,474,789	-	-

Money Remitters	17,017,798	-	-	-	-
Casinos	176,831	-	-	-	-
Central Bank	-	-	-	-	-
Credit Card Companies	15,000	-	-	-	-
Savings Banks	2,928,164	-	-	-	-
Trust Companies	107,863,355	-	29,915	-	-
Life Insurance Companies	-	-	-	-	-
Credit Unions	1,299,746	-	-	-	-
Total	3,219,228,305	61,304,441	934,814,449	3,314,722	845,330

Table 31 : Unusual transactions by Island by Reporter type (2007/ANG.)

2008					
Sector	Curaçao	Bonaire	St. Maarten	St. Eustatius	Saba
Local Banks	1,217,296,853	64,862,729	452,219,982	845,339	3,314,746
Offshore Banks	1,591,537,622	-	-	-	-
Customs	46,349,310	117,370	256,005,214	-	-
Money Remitters	13,598,815	-	14,808,366	-	-
Casinos	849,250	-	3,121,133	-	-
Central Bank	-	-	-	-	-
Credit Card Companies	18,760	-	-	-	-
Savings Banks	-	-	-	-	-
Trust Companies	2,180,848,478	-	15,887,502	-	-
Life Insurance Companies	-	-	-	-	-
Credit Unions	2,459,295	-	-	-	-
Total	5,052,958,383	64,980,099	742,042,197	845,339	3,314,746

Table 32 : Unusual transactions by Island by Reporter type (2008/ANG.)

The intended and executed transactions per island territory and the corresponding value of these transactions are given in the following table. An intended transaction is a transaction that is not executed for different reasons. These reasons can among other things be that the customer decides to discontinue the transactions or the reporting entity decides, based on its risk policies, not to continue with the transactions. Executed transactions are transactions which are fully carried out at the reporting entity.

When a transaction is discontinued (intended transaction) the reporting entity is nevertheless obliged by law to report these intended transactions to the Reporting Center, depending on the relevant indicator. The data or information that you can obtain from intended transactions can play a very important role in investigations (locally or internationally) with regard to money laundering and or terrorism financing.

	Curaçao				Bonaire				St. Maarten/Saba/St Eustatius		
YEAR		Qty.	ANG.			Qty.	ANG.			Qty.	ANG.
2008	Ext.	13,364	4,681,268,768		Ext.	654	63,187,202		Ext.	8,145	466,349,957
	Int.	340	653,197,900		Int.	4	47,016		Int.	3	61,670
	Tot	13.704	5.334.466.668		Tot	658	63.234.218		Tot	8.148	466.411.627

	Curaçao				Bonaire				St. Maarten/Saba/St Eustatius		
YEAR		Qty.	ANG.			Qty.	ANG.			Qty.	ANG.
2007	Ext.	9,653	3,209,890,509		Ext.	527	60,919,621		Ext.	5,376	935,550,135
	Int.	219	9,369,748		Int.	7	384,820		Int.	2	3,422,058
	Tot	9.871	3.219.228.305		Tot	534	61.304.441		Tot	5.378	938.974.501

	Curaçao				Bonaire				St. Maarten/Saba/St Eustatius		
YEAR	Qty.	ANG.			Qty.	ANG.			Qty.	ANG.	
2006	Ext.	8,692	1,011,233,634		Ext.	338	18,248,112		Ext.	4,181	355,632,421
	Int.	64	172,437,958		Int.	12	591,350		Int.	9	351,904
	Tot	8.756	1.183.671.592		Tot	350	18.839.462		Tot	4.190	355.984.325

Table 33 : Overview of the executed and intended unusual transactions per island (2006 – 2008)

Island	Qty.	Amount in ANG
Bonaire	13	342,062
Curaçao	2,648	266,597,468
St Maarten	347	28,695,118

Table 34: Suspicious transactions per island (2008)

2.5. Execution of article 3 (letters a and b) and article 6 of the National Ordinance Reporting of Unusual Transactions regarding the furnishing of data

The Reporting Center is obliged - pursuant to article 6 of the National Ordinance Reporting of Unusual Transactions and the relevant indicators - to furnish data to the authorities and officials of the law enforcement agencies, when there is a reasonable presumption that a certain person is guilty of money laundering and/or terrorism financing or of a criminal offence at the root thereof.

In paragraphs 2.5.1. and 2.5.2. further details with regard to the dissemination of information and the furnishing of data will be given.

2.5.1. Disseminating data to the Public Prosecutor Office and to the Law Enforcement Agencies

Contrary to other jurisdictions where suspicious transactions or suspicious activity reports are received, the Reporting Center receives unusual transactions from the reporting entities. The law indicates when a transaction can be considered as unusual by making use of indicators: objective and subjective indicators. An objective indicator states explicitly when a transaction should be considered as unusual, irrespective of who is executing the transaction, without respect of persons. The subjective indicator on the other hand leaves it to the perception of the reporting entity (the compliance officer), to report, based among other things on its knowledge of the client, knowledge of the business of the client, the transaction profile of the client, international lists of terrorists, politically exposed persons, etc. The indicator might also give guidance in this regard. After receiving these unusual transactions, the analysts of the Reporting Center analyze them to see whether there is a suspicion of ML/TF after which these suspicious transactions are disseminated to the Public Prosecutor Office (PPO.)

The suspicious transactions of the different reporting entities altogether that were disseminated to the PPO after analyses by the Reporting Center are indicated in the following table. Dissemination of information by the Reporting Center takes place via requests received from the law enforcement agencies (by way of the PPO), via own investigations, via update-disseminations (when certain transactions have previously been disseminated) and when a foreign FIU requests the Reporting Center authorization to furnish the data received to their public prosecutor and law enforcement agencies. In 2008 a number of 3,008 transactions were disseminated to the Public Prosecutor Office. This is a decrease of 38.94% compared to the previous year. The reason for this decrease can be sought in the fact that only two analysts were factually working at the Reporting Center during 2008. Of the 3,008 suspicious transactions sent to the PPO, 385 transactions were based on investigations by the Reporting Center.

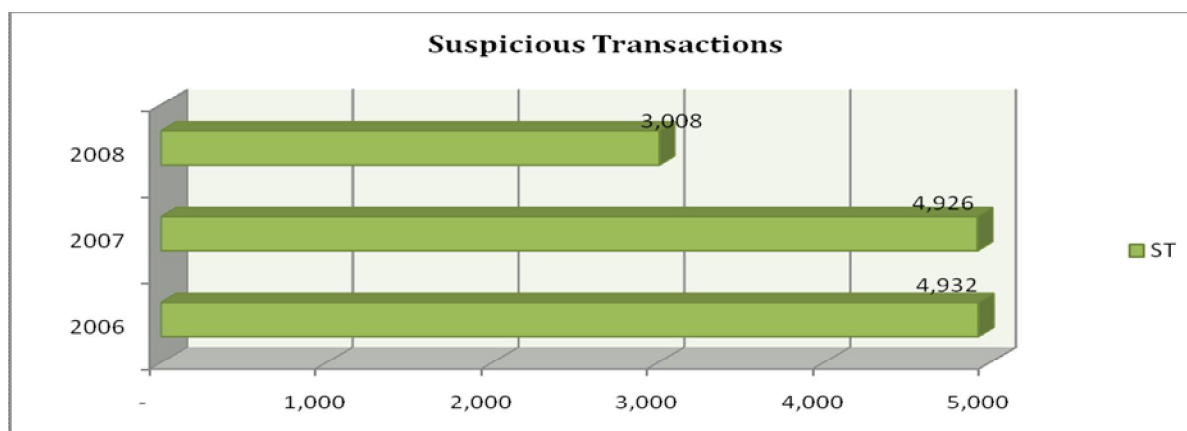


Figure 22 : Suspicious Transactions (2006 - 2008)

2.5.2. Cases & Typologies

Sanitized cases disseminated in 2008.

Case 1

PHONE CARD SALE

During an own initiative investigation in the database of the FIU the names of two subjects that made large cash deposits in a bank on one of the other islands in the Netherlands Antilles, came up. These cash deposits went on from the year 2006 thru 2008. The cash was being transferred to an offshore account in a foreign country. The above mentioned transactions summed up to a total amount of approximately ANG 2 million. (approximately US\$ 1 million)

The two subjects that transferred the money were foreigners. One of them was a shareholder of a legal entity, named X, established in the country where the money was being transferred to. The second subject was director of the afore-mentioned legal entity. This legal entity, X, had 55% of shares in another company, Y, established on the island where the transactions took place.

The reporting entity reported that Y dealt in phone card machines. The profits of Y were being deposited as remittance of dividend on the account of the foreign legal entity, X. According to the reporting entity, the two subjects involved were laundering money.

Typologies:

- transactions involving very large amounts in a very short period of time;
- phone cards machines generating a very large turnover, which is not usual in the Antillean jurisdiction;
- cash payments to an offshore account of a legal entity established in another country which is not customary;
- monthly cash payment in an offshore account, which is indicated as dividend remittance.

Case 2

THE CLUB

The FIU conducted an investigation in which some subjects appeared, whom were being suspected to be involved in pornography. The subjects consisted of two men and one woman, A,B and Miss C, who managed the bar of an adult entertainment club. Both C and A had been arrested. The house of B, representative of the club, was searched by the police. The investigation in the database of the FIU showed that B at the time of the arrest of C and A tried by colluding with a fourth person to withdraw money from the business account and depositing it on the savings account of this fourth person. This fourth person, Y, appeared in the database of the FIU with several unusual transactions, using different or changed names and different addresses.

The unusual transactions involved amounted to approximately US\$ 1 million.

Typologies:

- collusion of parties involved to mislead authorities with regard to ownership of accounts;
- use of different and changed names and also different addresses;
- subjects involved with other parties having a criminal history.

The Netherlands Antilles is a relatively small community where certain cases regarding ML/TF can easily be remembered by the population. That is one of the reasons we have not entered into too much detail with regard to transactions which have been indicated as suspicious transactions by the FIU and disseminated to the PPO.

The transactions sent to the PPO as suspicious transactions in 2008 were based on the following typologies:

1. The fact that the transactions are not in line with the normal profile of the customer.
2. Use of Offshore banks for money laundering.
3. The subject has a criminal history.
4. The fact that the subject gave different and incomplete addresses during the transactions.
5. The fact that many money transactions from Europe to different people in the Caribbean often goes hand in hand with the smuggling of narcotic drugs from the Caribbean to Europe.
6. The subject received money from different persons with a criminal history from foreign countries.
7. The fact that multiple money transfers by money remitters is considerably more expensive than bank transfers.
8. The fact that in our jurisdiction the sale machines of telephone pre-payment cards cannot generate extremely large amounts.
9. The fact that although the money is earned in Latin America, the cash amount is in EURO.

2.5.3. Requests to furnish data received from law enforcement agencies

The Reporting Center received 37 requests for information from the law enforcement agencies in 2008. These requests were answered in an average of ten workdays by the Reporting Center. The requests in question involved numerous transactions.

The table below indicates which law enforcement agency requested information during 2008 and the number of these requests.

Requesting Instance	2008	2007
BFO	10	17
CPD	0	2
HARM	12	11
KPC	0	2
RST	9	11
Others	6	7
Total	37	50

Table 35 : Requests for information by local law enforcement agencies (2007-2008)

2.5.4. Conducting investigations into the field of money laundering and terrorism financing by the Reporting Center

The Reporting Center initiated 28 investigations in 2008, to determine whether there was a suspicion of money laundering and/or terrorism financing. After analyses in which among others the analysts of the Reporting Center make use of the typologies of the Financing Action Task Force and arriving at the presumption of money laundering, 385 transactions were disseminated to the Public Prosecutor office.

3. COOPERATION

For the Reporting Center it is very important to effect an efficient cooperation with all the actors in the reporting chain. Good communication and an expeditious exchange of information within the reporting chain are very essential. A good interaction between the Reporting Center, the Minister of Finance and the Minister of Justice, the reporting institutions, the law enforcement agencies, the office of the Public Prosecutor and supervisory authorities are imperative conditions in the fight against money laundering and terrorism financing.

3.1. The Reporting Institutions

Once again the Reporting Center held several meetings with the reporting institutions, their representatives and personnel in 2008. Several trainings were organized where the focus was on the correct use of indicators when reporting. In this regard the Association of Compliance Officers of the Netherlands Antilles, ACONA, should be mentioned. The Reporting Center participated in a couple of informative meetings organized by this association sometimes jointly with the Central Bank.

In 2008, visits were paid to, or received from and presentations/trainings were held for: banks, both onshore and offshore, trust companies on Curaçao, Bonaire and Sint Maarten, the Central Bank, customs in Curaçao, Bonaire and Sint Maarten, law enforcement agencies, casinos on Curaçao, Bonaire and Sint Maarten.

In 2008 the Reporting Center installed the reporting program, "Mot voor Melders", at all casinos of Sint Maarten en Curaçao. Due to a very low number of reports, the casino in Bonaire opted to send its reports manually.

3.1.1. The future Reporting Institutions

The National Ordinance Reporting of Unusual Transactions is in the process to being amended to include among other things, the non-financial sector under the reporting obligation to the Reporting Center.

During 2008 the Reporting Center organized several meetings with the designated non-financial businesses and professions (lawyers, notaries, accountants, tax consultants, jewelers, real estate agents, administrative offices, car dealers) or their representatives (future/new reporters or non-financial sector). In these meetings the new reporters were informed of their upcoming reporting obligation, the use of indicators and reporting guidelines in their respective fields. It is the intention, in the near future, to organize a trial audit, together with the Netherlands "Bureau Financieel Toezicht", whereby one of the new reporting groups will be assisting as a pilot group.

3.2. The Law Enforcement Agencies and the Public Prosecutor in charge of money laundering and terrorism financing cases

In 2008 the Reporting Center continued with its bi-monthly meetings with the law enforcement agencies, including the PPO, Customs and the Tax office. These agencies are the main consumer of information furnished by the Reporting Center. Information of the Reporting Center is made available to the law enforcement agencies in the form of requests. The Reporting Center is obliged by law to furnish the requested information whenever, after thorough analyses by its analysts, there is a suspicion of money laundering and/or terrorism financing.

3.3. The Supervisory authorities

The “Bank van de Nederlandse Antillen” (the Central Bank) is the Supervisory body for the Financial Sector. During this reporting year the Reporting Center assisted in presentations organized by the Central Bank for the reporting entities. During this year the Reporting Center also assisted the Curinde (Curaçao Industrial & International Trade Development Co. N.V.), the supervisory authority in the Free Zone, in developing its manual for all companies established in the Free Zone and those wanting to do business in the Free Zone. The Reporting Center also continued its cooperation as a member of the working group in charge of the amendment of the National Ordinance Reporting of Unusual Transactions and the National Ordinance Identification when rendering financial services. The aforementioned working group is under chairmanship of the secretary and chairman of the Anti Money Laundering Committee (CWIG), staff members of the Central Bank.

3.4. The Minister of Finance and the Minister of Justice

The directly responsible Minister for the Reporting Center is the Minister of Finance. The Reporting Center had several meetings with the Minister of Finance with regard to the upcoming constitutional changes in the Netherlands Antilles. In 2008, the Minister of Justice assisted the Reporting Center in making available one of his police inspectors to temporarily coordinate the work of the analytical department of the Reporting Center.

3.5. Cooperation in the Kingdom of the Netherlands

In October 2008, the Reporting Center received assistance from the FIU of the Netherlands (‘FIU Nederland’) in the form of an analyst. This analyst instructed the analysts of the Reporting Center in how to effectively do queries and execute investigations. The Reporting Center also received assistance from the “Bureau Financieel Toezicht” in helping to establish the Supervisory Department for the non-financial businesses and professions.

4. INTERNATIONAL

As money laundering, terrorism and the financing thereof are global in nature, international cooperation constitutes an essential component in the fight against these criminal activities.

4.1. International exchange of information

Pursuant to Article 7 of the National Ordinance the international exchange of information shall only take place on the strength of a treaty or an administrative agreement, e.g. a Memorandum of Understanding (MoU).

In 2008 the Reporting Center has executed 6 MoU's with the following countries:

- Anguilla
- France
- Macedonia
- Nigeria
- Norway
- Portugal

During 2008 the Reporting Center received 51 requests for information from foreign FIUs. FIUs Belgium and St. Kitts & Nevis have sent in the most requests, followed by Anguilla and Spain. The requests for information regarded among other things: reported transactions, financial information on natural and legal persons and police information on subjects; both natural persons and legal entities. This information can only be used as intelligence by the foreign FIU. For other uses the foreign FIU, pursuant to the signed MoU, needs the authorization of the requested Reporting Center.

The Reporting Center sent out 12 requests for information to other FIUs. This year again, most requests from the Reporting Center were requests to the FIU of the Netherlands. During 2008 no spontaneous information was sent to international FIUs.

The following table indicates the countries from which a request for information was received. Only with countries with which the Reporting Center has signed a MoU the information could be exchanged. The countries that requested information and with which the Reporting Center didn't have a MoU, were notified of this fact and they were requested to execute a MoU with the Reporting Center as soon as possible. Together with the notification, the Reporting Center always sends a draft MoU for their perusal.

2008			
Country	Requests	Country	Requests
Serbia	1	Anguilla	4
Belgium	6	Aruba	1
The Netherlands	1	Venezuela	2
Bermuda	2	New Zealand	2
Macedonia	1	Qatar	1
Dominica	1	Spain	4
India	2	Lebanon	1
Luxemburg	3	Chile	1
Guatemala	1	Argentina	1
USA	3	Peru	1
St. Kitts & Nevis	6	Taiwan	1
Georgia	1	Slovakia	1
France	1	Nigeria	1
Grenada	1	Total	51

Table 36 : Total FIU requests during the year 2008

4.2. Caribbean Financial Action Task Force (CFATF)

In 2008 the Reporting Center attended the CFATF Plenary XXVIII/ Ministerial XV in respectively St. Kitts & Nevis. In this Plenary meeting several Mutual Evaluation Reports were dealt with.

4.3. The Egmont Group

The Egmont Group is the association of the international group of Financial Intelligence Units (FIUs), established to promote and enhance international cooperation in anti-money laundering and counter-terrorism financing. All member FIUs are required to attend the Egmont Plenary and are recommended to attend the working group meetings of Egmont. This reporting year the Reporting Center attended the Plenary of Egmont and also working group meetings. During the working group meetings in Chile, the Netherlands Antilles were taken from the non-compliant list of the Egmont. The reason being that the Netherlands Antilles' laws complied fully with the definition of an FIU, including the part regarding combating the financing of terrorism. This same year the Netherlands Antillean Penal Code was amended in the sense that the Financing of Terrorism was indicated as a criminal act.

5. PRIORITIES FOR THE YEAR 2009

For the coming year the Reporting Center intends to work on the following matters with a view to comply with its legal duties of preventing and detecting money laundering and terrorism financing and the underlying criminal offences. The following list is not exhaustive.

- Continue with the work to establish the Supervisory Department for the new reporting entities in 2010 including traineeships for the future auditors.
- Continue to inform and prepare the new reporting entities with regard to their future reporting obligation and deliberate with these entities in order to establish the indicators which will be applicable for these entities.
- Establish a branch of the Reporting Center on Sint Maarten.
- Continue organizing awareness training programs for the personnel of the Reporting Center, to make them aware of the typologies of money laundering and terrorism financing.
- Continue organizing informative sessions for the personnel of the Reporting Center with regard to the upcoming FATF Mutual Evaluation.
- Look into relevant training courses for the operational/strategic analyst.
- Appoint a supervisor analyst/IT auditor/IT security Officer.
- Continue strengthening the communication with the managing boards (of associations) of reporting institutions and the (association of) compliance officers.
- Continue discussing the possibility for electronic matching with the police files on all the five island territories of the Netherlands Antilles with the relevant actors.
- Continue working more closely with the Customs department on the reporting of cross border cash transportations. Continue giving information on the work of the Reporting Center, the reporting forms and continue discussions with Customs in order to have the reports sent electronically to the Reporting Center.
- Visit the island governments and reporting entities on Saba and Sint Eustatius organize informative sessions.
- Continue working closely with the Reporting Centers of the Kingdom of the Netherlands.

- Together with the supervisors, improve the reporting behavior of the financial institutions.
- Together with the compliance officers of the reporting institutions, (organized in ACONA, the Association of Compliance Officers of the Netherlands Antilles) work on improving the reporting of unusual transactions to the Reporting Center.
- Continue strengthening the cooperation with the different law enforcement agencies.
- Focus on providing more information regarding the reporting duty to the Saving Banks, Life Insurance companies and their brokers, the Fiduciary or Trust sector and the Casinos.
- Work on establishing the definite legal position of the Reporting Center.

6. Annexes

Annex 1: National Ordinance articles

NATIONAL ORDINANCE of 10 February 1996 on the duty to report unusual transactions noted during financial service provision (National Ordinance Reporting of Unusual Transactions) (O.G. 1996, no. 21 amended by National Ordinance of 3 August 2001, O.G. 2001, no. 78. The National Ordinance Reporting of Unusual Transactions entered into force on 1 October 1997, O.G. 1997, no. 252)

Article 1

In this national ordinance and the provisions based thereupon:

a. Financial Services shall mean the following services rendered in or from the Netherlands Antilles:

1. taking into custody securities, paper currency, coins, currency notes, precious metals and other valuables;
2. opening an account, on which a balance may be kept in money, securities, precious metals or other valuables;
3. renting out a safe-deposit box;
4. effecting payment in connection with the cashing in of coupons or comparable documents of bonds or comparable securities;
5. entering into a life insurance contract as referred to in article 1, first paragraph, sub a., of the National Ordinance Supervision of the Insurance Industry, as also rendering mediation in connection therewith;
6. making a distribution on account of a life insurance contract as referred to in paragraph 5 above;
7. crediting or debiting an account, or causing this to be done, on which account a balance may be kept in money, securities, precious metals or other valuables;
8. exchanging guilders or foreign currency;
9. providing other services to be designated by national decree containing general measures;

b. Customer shall mean: the natural person or legal person to whom or in whose favour a financial service is rendered, and also, in the event of a financial service as referred to under a, sub 5 and 6 above, who pays the premium, as also the party in whose favour the distribution is made;

c. Transaction shall mean: an act or a set of acts of or in favour of a customer in connection with the taking of one or more financial services;

d. Unusual Transaction shall mean: a transaction that must be regarded as such based on the indicators laid down pursuant to article 10;

e. Reporting shall mean: reporting as referred to in article 11;

f. Reporting Center shall mean: the Reporting Center as referred to in article 2;

g. Committee shall mean: the committee as referred to in article 16;

h. Money Laundering shall mean: an action rendered punishable in the National Ordinance Penalization of Money Laundering.

Article 3

The task of the Reporting Center shall be:

- to collect, register, process and analyze the data obtained by it, in order to determine whether this data may be important to prevent and detect money laundering and the criminal offences that are at the root thereof;
- to furnish data in accordance with the stipulations laid down in or pursuant to this national ordinance;
- to notify the party having reported, in accordance with article 11 with a view to proper compliance with the duty to report, of the handling of the report. In such a case, the notification shall state only whether data has been furnished in accordance with section b;
- to conduct an investigation into developments in the field of money laundering and into improvements of the methods to prevent and detect money laundering;
- to make recommendations, having heard the “Bank van de Nederlandse Antillen” [Central Bank of the Netherlands Antilles], for the relevant industries as regards the introduction of appropriate procedures for internal control and communication and other measures to be taken to prevent the use of the relevant industries for money laundering purposes;
- to give information as regards the manifestations and the prevention of money laundering;
- to render annual reports of its activities and its plans for the next year to the Minister of Finance and to notify the Minister of Justice of this report.

Article 6

The Reporting Center shall be under the obligation to furnish the following data to the authorities and officials in charge of the detection and prosecution of criminal offences:

- data from which the reasonable presumption results that a certain person is guilty of money laundering or of a criminal offence that lies at the root thereof;
- data from which it may be reasonably presumed that it is important to the detection of money laundering or of the criminal offences lying at the root thereof;
- data from which it may be reasonable presumed that it is important to the prevention or detection of future criminal offences that may underlie money laundering and that, in view of their seriousness or frequency or the organized relation in which they will be committed, will result in grave invasion of the legal order.

Article 7

By national decree containing general measures, rules shall be laid down as regards the furnishing of data from the register of the Reporting Center to the officially designated authorities in or outside the Kingdom, having a task comparable to that of the Reporting Center, and as regards the conditions subject to which such data shall be furnished.

The furnishing of data, as referred to in the first paragraph, to authorities outside the Kingdom shall take place only on the strength of a treaty or an administrative agreement.

Article 12

The Reporting Center shall be competent to ask further data or information from the party having reported as also from the party involved in a transaction through the rendering of a financial service as referred to in article 1, under a., sub 7, on which transaction the Reporting Center has collected data, in order for the Reporting Center to be able to judge whether the data collected must be furnished by virtue of its task, as referred to in article 3, under b.

The party from whom this data or information has been requested in accordance with the first paragraph shall be bound to furnish the Reporting Center with such data or information in writing, as also, in cases deemed urgent at the discretion of the Reporting Center, orally within the term stated by the Reporting Center.

Annex 2: List of Indicators

LOCAL BANKS	
OBJECTIVE	
B9710111	Transactions reported to Police or Justice in connection with money laundering shall also be reported to the Reporting Center.
B9710131	Transactions in excess of ANG 250,000.00.
B9710132	Transactions in excess of ANG 20,000.00 involving exchange for larger denominations.
B9710133	Transactions in excess of ANG 20,000.00 involving exchange for another currency.
B9710134	Transactions in excess of ANG 20,000.00 concerning the acquisition and/or cashing in by customer of checks, traveler-checks or similar instruments of payment.
B9710135	Transactions in excess of ANG 20,000.00 involving securities.
B9710136	Transactions in excess of ANG 20,000.00 meeting two or more of the following indicators: uncounted; in foreign currency; not deposited in one's own account; Transfer to a foreign account.
B9710161	Transactions by non-account holders in excess of ANG 20,000.00 destined for abroad.
SUBJECTIVE	
B0110211	Transactions where there is cause to presume that they may relate to money laundering or terrorist financing.
B9710221	Accounts whereby two or more of the following indicators are met: non-resident; identification problems; unusual term-offer; Remarkable number of accounts.
B0110222	Transactions in excess of ANG 250,000.00 concerning a supplied or a proposed loan, meeting two or more of the following indicators: no obvious legal purpose or no visible relation to (business)activities; certainties reserved by credit institutes or third parties, whereby the origin is not verifiable or which is not in accordance with client's (business)activities; guarantees by third parties with no visible relation to the client; application not in accordance with the purpose of the loan supplied; unexpected and inexplicable solution of a (problem)loan; Incoming flow consists of many small amounts from unknown third parties or without indication of the principal.
B0110223	Transactions in excess of ANG 100,000.00 concerning the acquisition and/or cashing in by customer of checks, traveler's checks or similar instruments of payment, meeting two or more of the following indicators: from and/or to a foreign country; no obvious legal reason or no visible relation with (business)activities; transaction non-typical of customer; incoming flow consists of many small amounts and outgoing flow of large amounts, or vice-versa; endorsed on client's name; remarkable number of accounts; customer acts as a front man; remarkable turnover or remarkable change in the balance of the account; Unusual term-offer.

B0110271	Physical surrendering or delivering up of securities in excess of ANG 20,000.00, meeting two or more of the following indicators: from and/or to a foreign country; identification problems; unusual term-offer; transactions non-typical of customer; customer acts as a front man; customer is nervous for no apparent reason; customer is accompanied and controlled; no obvious legal purpose or no visible relation to (business)activities; customer never visited the office before; Incoming flow consists of many small amounts and outgoing flow of large amounts, or vice-versa.
B9710231	Customer's preference for transactions below the upper limit amount, giving rise to the presumption that he thus wants to evade reporting.
B9710232	Transactions in excess of ANG 20,000.00 meeting two or more of the following indicators: identification problems; unusual term-offer; transaction non-typical of customer; small denominations; unusual packaging; frequent deposits by non-accountholder; customer is nervous for no apparent reason; customer is accompanied and controlled; customer acts as a front man; no obvious legal purpose or no visible relation to (business)activities; remarkable turnover or remarkable change in the balance of the account; incoming flow consists of many small amounts and outgoing flow of large amounts, or vice-versa; customer delivers uncounted money, without same being related to (business)activities; customer does not deposit amount into his own account or into that of his employer; amount is deposited in favor of an account with a bank in a foreign country
B0110241	Transactions in excess of ANG 5,000.00, whereby funds are made available by a financial institution within or outside the Netherlands Antilles for a non-accountholder, meeting two or more of the following indicators: no obvious legal purpose or no visible relation to (business)activities; identification problems; transaction non-typical of customer; Customer is nervous for no apparent reason; Customer is accompanied and controlled; Customer acts as a front man.
B0110261	Transactions in excess of ANG 1,000,000.00 that meet two or more of the following indicators: from and/or to a foreign country; identification problems; remarkable number of accounts; no obvious legal purpose or no visible relation to (business)activities; transaction non-typical of customer; unusual term-offer; remarkable turnover or remarkable change in the balance of the account; incoming flow consists of many small amounts and outgoing flow of large amounts, or vice-versa;

	not on customer's own account; to a foreign country without assignment of a beneficiary or under a code name; From a foreign country without assignment of the principal or under a code name.
B0110262	Customer's preference for transactions below the upper limit amount, giving rise to the presumption that he thus wants to evade reporting.

HAZARD GAMES	
<u>OBJECTIVE</u>	
C0110111	Transactions reported to Police or Justice in connection with money laundering shall also be reported to the Reporting Center.
C0110181	To place into deposit of cash or other values exceeding ANG 20.000,00.
C0110161	Transactions in excess of ANG 20,000.00
C0110133	The purchase or exchange of tokens by a player exceeding ANG 20.000,00 by returning foreign exchange.
C0110134	The purchase or exchange of tokens by a player exceeding ANG 20.000,00 by returning checks.
<u>SUBJECTIVE</u>	
C0110211	Transactions where there is cause to presume that they may relate to money laundering or terrorist financing.
C0110231	Customer's preference for transactions below the upper limit amount, giving rise to the presumption that he thus wants to evade reporting.

LIFE INSURANCE	
<u>OBJECTIVE</u>	
L9710111	(An application for) a life insurance reported to Police or Justice in relation to money laundering shall also be reported to the Reporting Center.
L9710112	The initial premium or the purchase sum is paid in cash and exceeds ANG 100,000.00
L9710151	Any payment from life insurance, related to money laundering, reported to Police or Justice, shall also be reported to the Reporting Center
L9710152	Any payment in excess of ANG 100,000.00 into an account with a bank outside the Netherlands Antilles within 5 years from the insurance having been entered into.
L9710153	Any payment of over ANG 100,000.00 related to the insurance, transferred within 2 years prior to the expiration date of the insurance, its use as collateral security, or the surrendering of its policy, or the beneficiary of which insurance was changed within that period (this indicator shall not apply in respect of a transfer to, or of the party benefited being changed to, a child or a grandchild).
L9710154	Any cash payment in excess of ANG 50,000.00
<u>SUBJECTIVE</u>	
L9710211	(An application for) a life insurance whereby there cause to presume that they may relate to money laundering or terrorist financing.
L9710212	Life insurances for which the initial premium payment or the purchase sum exceeds ANG 25,000.00 and which meet three or more of the following indicators: The policyholder has his residence outside the Netherlands Antilles; The policyholder reports no (private) permanent residence; The initial premium payment or purchase sum deposit is effected from an account with a bank outside the Netherlands Antilles; The duration of the insurance is 3 years or less, unless it concerns capital insurance for the covering of pension claims, the scheme of which has been laid down in a

L9710251	pension letter, clearly stating that the scheme is based on employment. There is cause to presume that the insurance concerned is related to money laundering.
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CREDIT CARDS	
OBJECTIVE	
M0010111	Transactions reported to Police or Justice in connection with money laundering shall also be reported to the Reporting Center.
M0010134	Use of the credit card in connection with transactions in excess of ANG 20,000.00 in or from the Netherlands Antilles.
M0010137	Cash deposit of ANG 5,000.00 by customer in the Netherlands Antilles for the benefit of a credit card account.
SUBJECTIVE	
M0010211	Transactions where there is cause to presume that they may relate to money laundering or terrorist financing.
M0010231	Customer's preference for transactions below the upper limit amount, giving rise to the presumption that he thus wants to evade reporting.

MONEY REMITTERS	
OBJECTIVE	
T0010111	Transactions reported to Police or Justice in connection with money laundering shall also be reported to the Reporting Center.
T0010141	Transactions in excess of ANG 5,000.00 with money made available in cash, by checks, by a credit- or debit card and/or money made payable in cash, by checks or by deposits in account.
SUBJECTIVE	
T0010211	Transactions where there is cause to presume that they may relate to money laundering or terrorist financing.
T0010231	Customer's preference for transactions below the upper limit amount, giving rise to the presumption that he thus wants to evade reporting.

CUSTOMS	
OBJECTIVE	
B9710133	<i>Transportation of cash in excess of ANG. 20,000.00 in foreign currency.</i>
D0210111	<i>Transportation of cash, securities, checks, traveler-checks or similar instruments of payment where there is cause to presume that they may relate to money laundering or terrorist financing and which have been reported to the police instances, must be reported to the reporting centre.</i>
D0210131	<i>Transportation of cash in excess of ANG. 20.000'00 in small denominations</i>
D0210132	<i>Transportation of cash in excess of ANG. 20.000'00 in large denominations</i>
D0210133	<i>Transportation of cash in excess of ANG. 20.000'00 in another currency.</i>
D0210134	<i>Transportation of goods in excess of ANG. 20.000'00 in the form of checks, traveler-checks or similar instruments of payment.</i>
SUBJECTIVE	
D0210211	<i>Transportation of cash, securities, checks, traveler-checks or similar instruments of payment where there is the cause to presume that they may relate to money laundering or terrorist financing.</i>

Annex 3: Countries with signed MoUs

1. Andorra (2004)
2. Anguilla (2008)
3. Antigua & Barbuda (2005)
4. Aruba (2001)
5. Bahamas (2009)
6. Belgium (2002)
7. Belize (2007)
8. Bermuda (2005)
9. Bosnia & Herzegovina (2007)
10. Brazil (2006)
11. Bulgaria (2007)
12. Chile (2006)
13. Colombia (2004)
14. Croatia (2007)
15. Cyprus (2006)
16. Czech Republic (Tsjechië) (2004)
17. Estonia (Estland) (2004)
18. France (2008)
19. Grenada (2005)
20. Guatemala (2005)
21. Ireland (2004)
22. Isle of Man (2009)
23. Latvia (2007)
24. Lebanon (2004)
25. Macedonia (2008)
26. Mauritius (2007)
27. Mexico (2006)
28. Netherlands (2001)
29. Nigeria (2008)
30. Norway (2008)
31. Panama (2005)
32. Paraguay (2007)
33. Peru (2005)
34. Philippines (2009)
35. Portugal (2008)
36. Slovenia (2007)
37. St. Kitts & Nevis (2006)
38. St. Vincent & the Grenadines (2005)
39. Suriname (2007)
40. Sweden (2007)
41. Taiwan (2009)
42. United Kingdom (2006)
43. United States (2004)
44. Venezuela (2007)

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