

ANNUAL REPORT 2014

*UNUSUAL TRANSACTIONS REPORTING CENTER
CURAÇAO*



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PREFACE

Pursuant to article 3 section i, of the National Ordinance on Reporting Unusual Transactions, I hereby respectfully submit the Annual Report and Statistics of the Unusual Transaction Reporting Center of Curaçao (in Dutch: Meldpunt Ongebruikelijke Transacties, MOT) for the year 2014 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 during the period of January 1st, 2014 to December 31st, 2014.

The year 2014 was very challenging for the Reporting Center. On January 1st, 2014 the Former Head of the Reporting Center resigned. During this year the Reporting Center was managed by the Acting Head to guarantee the continuous functioning of the Reporting Center. On May 1st, 2015, I assumed the position of Head of the Reporting Center.

This report I submit herewith is mostly structured on the basis of the Annual Report 2012, as was prepared by the former Acting Head.

The year 2014 was marked by the start of the recruitment procedure for new FIU personnel. Due to understaffing the Reporting Center received one-time technical assistance from FIU - the Netherlands to create possibilities for the Reporting Center to maximize its output with limited resources. For this cooperation we are still very grateful to FIU- the Netherlands. Furthermore, the Supervision Department also received assistance by the Dutch "Bureau Financieel Toezicht" in devising a policy on imposing sanctions for the non-financial sector.

The year 2014 was also marked by cooperation and collaboration between the Reporting Center and the Duradero team. The Reporting Center plays a pivotal role in combating economic and financial crime by disseminating suspicious transactions to the Duradero project.

In October, together with St. Maarten, Aruba and the Netherlands, the Reporting Center organized a very successful "Koninkrijksseminar" (Kingdom Seminar) in Bonaire. This seminar resulted in the signing of a declaration of intent by the Heads of the FIUs in the Dutch Kingdom.

The Reporting Center also invested in the further professionalization of its organization. This year one of its employees passed the Certified Anti-Money Laundering (CAMS) certification exam. In March, an employee participated in Barbados in the workshop 'Regional National Risk Assessment', that was organized by the Caribbean Financial Action Task Force in cooperation with the World bank. The Reporting Center also got the opportunity to receive training from the Special Task Force in investigating financial crimes. In March, the Reporting Center actively participated in the Strategic Analysis Course that was organized by the Inter American Drug Abuse Control Commission. The

Supervision Department of the Reporting Center attended the 'Masterclass Corruption and Fraud' in October.

The resources of the Reporting Center were also dedicated to deliberations in the National Committee on Money Laundering (CiWG) to come to a proposal for new indicators. Furthermore the Reporting Center continued its participation in 2014 in several working groups created by the CiWG, in order to come up with proposals to address deficiencies that were identified by the Caribbean Financial Action Task Force (CFATF) in its review of the compliancy of Curaçao with FATF standards. The Reporting Center also cooperated with the Supervisory Authority (the Central Bank of Curaçao and Sint Maarten) to address the reporting behavior of its supervised entities.

Although challenging due to its limited resources, 2014 was all in all a productive year for the Reporting Center and we are very grateful for all assistance received.

Although since December 5th 2015 the name of the Reporting Center was changed to Financial Intelligence Unit (FIU) Curacao, we will for the purpose of this report regarding the year 2014 use the name Reporting Center. Also for the purpose of this report, references are made to the then current laws and decrees.

January 8, 2016

A.M.Ch. Kemna LL.M., MBA

Head MOT / Unusual Transaction Reporting Center Curaçao

1. GENERAL

For the correct understanding of the statistics as stated in this Annual Report, please note the following. As was the case in previous years, when processing unusual transactions, the Reporting Center takes the Incoming Date of these transactions (the date the transactions were registered at the Reporting Center) as its starting point. By doing so, all transactions registered by the Reporting Center in the then current year will be taken into account. Consequently a more accurate view can be given of the work of the Reporting Center in that year.

The amount of registered transactions is not necessarily equal to the amount of unusual transactions as executed in Curaçao in the reported year. The registration date of a reported (intended) transaction with the Reporting Center is in many cases not the date the transaction was executed (or was intended to be executed). This can for instance be due to a backlog at a reporting entity. Furthermore, it may well be the case that not all reportable unusual transactions are indeed being reported by entities who are required by law to report. The effectiveness of the work of the Reporting Center depends highly on the quality of reporting. Thus, supervision of reporting entities is of utmost importance for the work of the Reporting Center.

With regard to the furnishing or dissemination of suspicious transactions by the Reporting Center to law enforcement agencies, the Public Prosecutors Office (PPO) and to other Reporting Centers, the date these transactions were disseminated to such entities will be taken into account in this Annual report.

Using the relevant articles in the National Ordinance on Reporting 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. In such a way, the reader can easily ascertain the compliance of the Reporting Center with the law in executing its work and also view the current trends in reporting unusual transactions. The text of the relevant articles can be found in the annexes at the end of this Annual Report.

The graphs and statistics and the comparisons with previous years are given in paragraph 3.1.

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

Article 3 of the National Ordinance on Reporting Unusual Transactions (NORUT) indicates the legal tasks of the Reporting Center. To account for the execution of these tasks, an impression of the work of the Reporting Center in 2014 is given in this summary. The

different sections in this article are used as a guideline, while the extent of compliance with the relevant articles of the NORUT are 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 17,676 unusual transactions reports in 2014, which were confirmed as received to the reporting entities. That is an increase of 11.4% in received reports compared to 2013, in which year the Reporting Center received a number of 15,865 unusual transactions reports.

Of the reports sent to the Reporting Center, the majority, or 56.71%, was based on objective indicators. Compared to the year 2013, it constitutes a decrease of approximately 18.8% in reports on the basis of an objective indicator. At the same time the percentage of reports received based on a subjective indicator has increased from 30.14% in 2013 to 43.30% in 2014. The Reporting Center will continue to stress the importance of reporting subjectively to the reporting entities.

In 2014 we saw a slight increase in transactions received from the Money Remitting Sector. 1,180 reports were received from this sector in 2014, while in 2013 the Reporting Center received 1,101 reports from this sector.

The local banks remain the sector from which the most reports of unusual transactions are received. The amount of reports received from the local banks decreased however from 8,117 in 2013 to 7,481 in 2014.

Offshore banks showed an increase in reports received: while in 2013 3,343 reports were received from the offshore banks, in 2014 this increased to 6,433 reports. This is an increase of 92 %. We will elaborate on this increase in paragraph 3.1.13.

In 2014 Customs sent 607 reports to the Reporting Center, against 1,150 in 2013, a decrease of 47%.

In 2014 there was also a decrease in reports received from the Trust sector, 20 reports against 96 reports in 2013, a decrease of 79.2%.

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

A total of 4,509 unusual transactions that were deemed to be suspicious after analyses by the Reporting Center were furnished to the PPO. For further details, please be referred to paragraph 3.4.1.

In the year 2014, 8 investigations with regard to money laundering and terrorism financing on the basis of tactical analyses initiated by the Reporting Center itself were completed by

the Reporting Center and furnished to the PPO. Please be referred to paragraph 3.4.3. for further details.

Information with regard to the number of convictions in relation to money laundering and terrorism financing concerning the year 2014, was not 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.

In 2013, the Curaçao Minister of Finance and Minister of Justice together with the Minister of the Interior and Kingdom Relations for the Netherlands approved the launching of the Duradero project in Curaçao. The Duradero project aims to strengthen the enforcement capacity of Curaçao in the fight against economic and financial crime. The project's duration is three years and has started in January 2014. The Reporting Center plays a pivotal role in combating economic and financial crime by disseminating suspicious transactions to the Duradero project. Furthermore, the Reporting Center sent the Duradero team all investigations on the basis of tactical analyses that were completed by the MOT, since October 10th, 2010. Since aforementioned date, Curaçao has become an autonomous country within the Dutch Kingdom with its own Reporting Center.

Pursuant to article 3, letter “e”; contacts with the “Centrale Bank van Curaçao en Sint Maarten”:

In 2014 the Reporting Center continued its cooperation with the Central Bank of Curaçao and Sint Maarten (the Central Bank) as a member of the Working Group in charge of the amendment of the National Ordinance on Reporting Unusual Transactions (NORUT) and the National Ordinance Identification when rendering services (NOIS).

The Reporting Center also participated in a Working Group in charge of the implementation of the FATF Special Recommendations I (SR. I) en III (SR. III). SR. I relates to the ratification and implementation of United Nations instruments and particularly United Nations Security Council Resolution 1373 which is related to the prevention and suppression of the financing of terrorist acts. Based on SR. III, the Working Group sets up rules for the adoption and implementation of measures to freeze and confiscate funds or other assets of terrorists, of those who finance terrorism and of terrorist organizations, all in accordance with the United Nations resolutions relating to the prevention and suppression of terrorist acts.

Furthermore, the Reporting Center participated in a Working Group in charge of revising the legal structure of the Anti-Money Laundering Committee (CiWG). This Working Group was formed to devise a proposal for implementing a clear structure. The proposal also includes the participation of more operational competent authorities such as the Reporting Center, the PPO and other law enforcement agencies in the committee in addition to a forum that facilitates the competent authorities to work together on policy and legislative changes to improve the AML/CFT regime.

Aforementioned Working Groups are under chairmanship of the Anti-Money Laundering Committee, (CiWG), which is chaired by staff employees of the Central Bank.

The Reporting Center also cooperated with the Central Bank to address the reporting behavior of its supervised entities.

Pursuant to article 3, letter "f"; supplying information:

The Reporting Center organized approximately 17 presentations, meetings and training sessions for reporting entities and other stakeholders in 2014. For a more extensive review of these meetings and presentations, please be referred to paragraph 1.3.2 and chapter 4 of this report.

Pursuant to articles 5 and 6:

The Reporting Center received 34 requests for information from law enforcement agencies and sent out 74 requests for information to law enforcement agencies in 2014.

Pursuant to article 7; international exchange of information:

In 2014 the Reporting Center received 42 requests for information from foreign Financial Intelligence Units (FIUs). The Reporting Center in its turn sent out 128 requests for information to foreign FIUs. Pursuant to the national legislation of Curaçao, a Memorandum of Understanding (MoU) is no longer needed in order to be able to exchange information with foreign FIUs that are a member of the Egmont Group of FIU's. The FIU can exchange information with all recognized Egmont FIUs without signing an MoU, unless the laws of the jurisdiction of the foreign FIU requires the signing of an MoU (article 7 paragraph 2 NORUT). Further details will be given in paragraph 5.1.

Pursuant to article 12; requesting additional information:

The Reporting Center has sent out 12 requests for additional information to 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.

1.2. Achievements 2014

In our annual report of 2013 we set out to achieve certain objectives in the year 2014.

These objectives can be categorized under the following denominators:

- Organizational; acquire personnel;
- Informative sessions for the personnel of the Reporting Center;
- Informative and training sessions for the Reporting Entities;
- Informative meetings and cooperation with partners in the reporting chain;
- Improve reporting behavior of the financial institutions;
- Addressing the deficiencies that were identified by the CFATF evaluation.

The online reporting system CORSYS of the MOT, which had been launched in 2011, has made reporting more efficient for our reporting entities. However, statistics of the FIU indicate that the reporting behavior of many entities that are registered for CORSYS, still needs to be improved. In 2013 the Reporting Center has emphasized this concern in various writings to these entities. In 2014 the Reporting Center addressed the reporting behavior of the reporting entities in the financial sector in the CiWG and also in meetings with the Central Bank of Curaçao and St. Maarten.

The issue of staffing has also been dealt with in the CFATF evaluation part regarding the Reporting Center. The evaluators concluded that with a view to the effectiveness of the Reporting center, the current number of employees at the Reporting Center should be increased. In 2014 the recruitment procedure and selection for new FIU personnel was started.

1.3 Organization of the Reporting Center

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 mandated this task to the Head of the Reporting Center. The Head of the Reporting Center is in charge of the daily operations. In 2014, next to the Acting Head, the personnel of the Reporting Center consisted of an Office Manager, an assistant to the supervision department, an administrative/data assistant, a legal/policy advisor, three (3) tactical and operational analysts (among which one (1)(IT)-analyst) and three (3) supervisors in the Supervisory Department. End third quarter of 2014, two (2) persons left the Reporting Center.

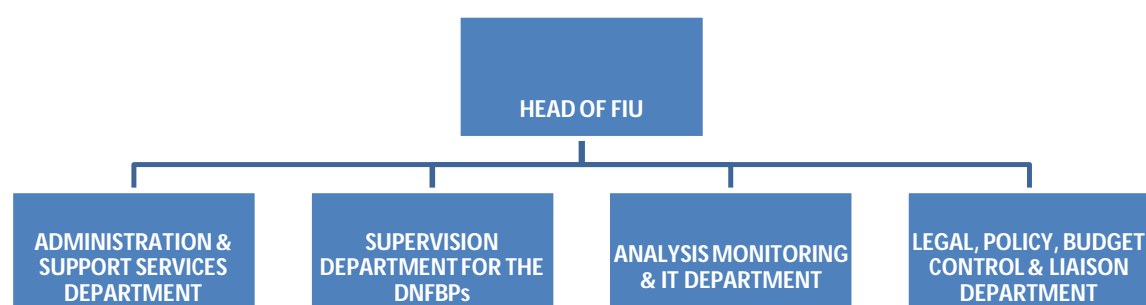


Figure 1. Organizational Chart

1.3.1. The Supervision Department

The Supervision Department of the Reporting Center performed several audits on some of the designated non-financial businesses and professions (1 car dealer, 1 tax adviser and 1 real estate agency) during 2014. The objective of the investigations was to do a full scope audit.

The Supervision Department also selected from the different categories certain DNFBPs which were visited in 2014. The focus was on car dealers, pawn shops, real estate agencies and lawyers. This resulted in on site meetings with management of the institutions. The Supervision team visited 1 expert in the administrative field, 1 jeweler, 2 real estate agents, 4 lawyers and 3 pawn shops. The department received sufficient information during the audits to start identifying the institution's degree of risk with regard to money laundering and terrorism financing. This resulted in clarifying subjects and questions about the Customer Due Diligence (CDD) requirements and the implementation of the implementation of the NOIS and the NORUT.

As part of its off site research, the Reporting Center developed and circulated in 2012 a survey to the entities under its supervision. This survey allowed the Reporting Center to gain insight and gather information with regard to the progress of supervised entities in implementing a compliance regime (including procedures with regard to performing CDD measures and implementing the risk based approach). This resulted in a significant interaction in 2014 between the Reporting Center and the representatives of associations of tax advisors, real-estate agencies, car dealers and accountants.

The Supervision Department also participated in several conferences regarding supervision issues. The Supervision Department for example attended a Master class about

Finance and Money Laundering organized by the University of Curacao mr. dr. Moises Frumencio da Costa Gomez. The Supervision Department also attended a conference regarding cooperation between stakeholders on AML/CFT within the Kingdom of the Netherlands.

1.3.2. Seminars and training for and by the FIU

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

During 2014, the personnel of the Reporting Center attended the following seminars and trainings:

- Koninkrijksseminar in Bonaire;
- The Egmont Plenary meeting;
- The annual CFATF Plenary and Heads of FIU meeting;
- The workshop 'Regional National Risk Assessment', organized by the CFATF and the World bank;
- Course "Investigating Financial Crimes", organized by the Special Task Force;
- Strategic Analysis Course, organized by the Inter American Drug Abuse Control Commission;
- Master class Fraud & Corruption, Money Laundering and Terrorism Financing, University of Curaçao, prof. dr. P. Diekman RA, hoogleraar Compliance & Risk Management en Academic Director van het executive program Financieel Forensisch Deskundige van de Erasmus School of Accounting and Assurance.
- ACAMS certification course;
- Information session FATCA, organized by the Ministry of Finance in collaboration with CIFA, IFG, IBA, CBA, CBIA and ACCUR;
- Information session organized by Mr. H. van der Werff, LL.M. (public prosecutor and member of the Duradero team).

2. CASES & TYPOLOGIES & ML/TF indicators

Curaçao 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 will not be going into too much detail with regard to transactions which have been indicated as suspicious transactions by the Reporting Center and disseminated to the PPO.

2.1. Sanitized cases disseminated in 2014

Case 1

Several unusual transactions were registered in the name of two subjects. The subjects have been reported by three different local banks for suspicion of money laundering and/or terrorist financing.

The transactions were for the exchange of Euros, which occurred on the same day or on subsequent days, whereby the subjects provided contradictory statements regarding the origin of the money.

The explanations for the origin of the funds were not satisfactory. In the description of the transaction it was stated that one of the subjects was accompanied by another person and that the money was handed over to someone else, whilst in the bank.

Typologies:

Money Laundering through the use of the financial sector.

Indicators of Money Laundering/Financing of Terrorism:

The fact that multiple transactions had been conducted by the subjects in several banks and branches on one day or subsequent days.

The fact that the subjects either could not or refused to declare the origin of funds.

Specific information from the reporting entity which indicates that the subject may be involved in the laundering of money.

The fact that several transactions had been reported with the subjective indicator B0120211; Suspicion of Money Laundering/Financing of Terrorism.

Case 2

Five transactions were reported. A subject executed these five unusual transactions at three different banks. These transactions were reported with the use of the subjective indicator: suspicion of money laundering and/or terrorist financing; indicator B0120211.

The reporting entity required the client to provide the entity with information regarding the source of funds. The subject however refused to provide the requested information and left the bank.

Then the subject performed a transaction at another bank where a large amount of cash was deposited. It was indicated by this reporting entity that it was not common for the subject to deposit a large amount of cash. This situation lead to the suspicion of money laundering for this bank. The subject did also deposit cash in Euro's on her own account, where she declared that the amount was derived from her husband's bank account. Two prior deposits had been performed by the subject's husband himself which have been reported under the same indicator; B0120211.

Typologies:

Money laundering through the use of the financial sector.
The (possibly pretended) use of third-party accounts.

Indicators of Money Laundering/Financing of Terrorism:

The fact that multiple (intended) transactions by this subject occurred on the same day at different banks.
The fact that the subject refused to provide the reporting entity with the information needed (source of funds).
The fact that the transaction was not in line with the normal profile of the client (atypical).
Client-specific information from the reporting entity indicating that the subject may be involved in money laundering.

Case 3

Using a subjective indicator (-261, wire transactions above ANG 1mljn), an off shore bank reported a total of 30 transactions, performed in two consecutive years, between two international legal entities that both held accounts at this reporting bank. Also the bank reported, using subjective indicator -211, that amounts had been transferred from the account of one of the entities to four different bank accounts held by four different legal entities at the same reporting bank, and that the UBO (Ultimate Beneficial Owner) of the other entity and this entity itself were registered in the World Check database for involvement in investigations regarding corruption with a mining company. Further international intelligence through various FIU's indicated that transactions did not have legitimate business purposes, that there was indication of 'layering', and that high risk jurisdictions were touched. Also that there was involvement in a so called "Informal Value Transfer System", conducted in a network with several other natural and legal persons.

Typologies:

Money laundering through the use of the financial sector.

Indicators of Money Laundering/Financing of Terrorism:

The information from the reporting entity indicated that the transactions were possibly related to money laundering and bribery.

Subjects and/or business associates are involved in criminal investigations possibly involving money laundering.

Transactions do not have legitimate business purposes and indicate layering; Indication of the use of the so called "Informal Value Transfer System".

Transactions indicate illegal currency exchanges and unclear sources of funds, which are possibly derived from criminal activities and bribery abroad.

Trade with high risk jurisdictions.

3. STATISTICS and CURRENT REPORTING TRENDS

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

3.1 Collecting, registering, processing and analyzing data

In 2014 a total of 17,676 unusual transactions were received. This is an increase of 1,811 transactions compared to the number of unusual transactions received in 2013.

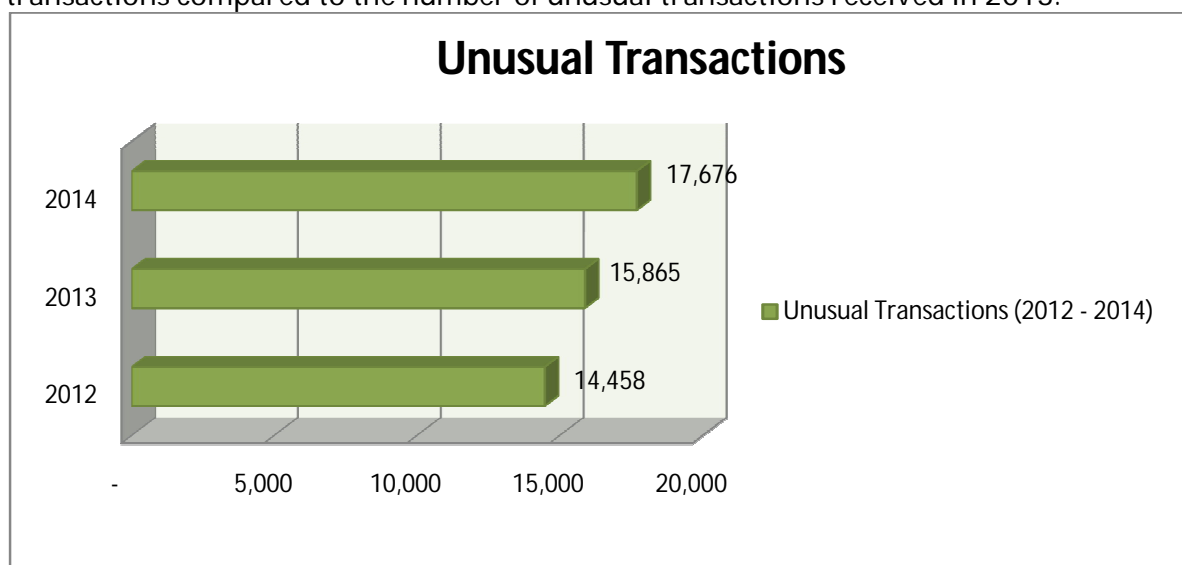


Figure 2 : Total received unusual transactions (2012-2014)

The following table shows the relation between the total unusual transactions and the suspicious transactions, which have been disseminated to the PPO in the years 2012 until 2014.

	Unusual		Suspicious	
Year	Qty.	Value(in ANG.)	Qty.	Value (in ANG.)
2014	17,676	44,286,244,574	4,509	4,766,297,998
2013	15,865	35,641,113,926	481	671,677,923
2012	14,458	25,314,591,270	870	8,361,065,412

Table 1 : Unusual versus Suspicious transactions (2012-2014)

In 2014, the number of suspicious transactions disseminated to the PPO increased to 4,509. This can be seen as a consequence of several factors. The one-time technical assistance by FIU the Netherlands had its influence on the amount as shown; it resulted for instance in a dissemination of a back-log of transactions. Furthermore the Reporting Center 's data contributed considerably to several investigations of Duradero, RST and the Netherlands. The new Duradero project also was provided with all transactions pertaining to investigations of the FIU as disseminated since 2010. In 2014 the Reporting Center did not receive a feedback with regard to the transactions disseminated to the PPO office yet. The issue with the archives not being automated, has not been solved yet.

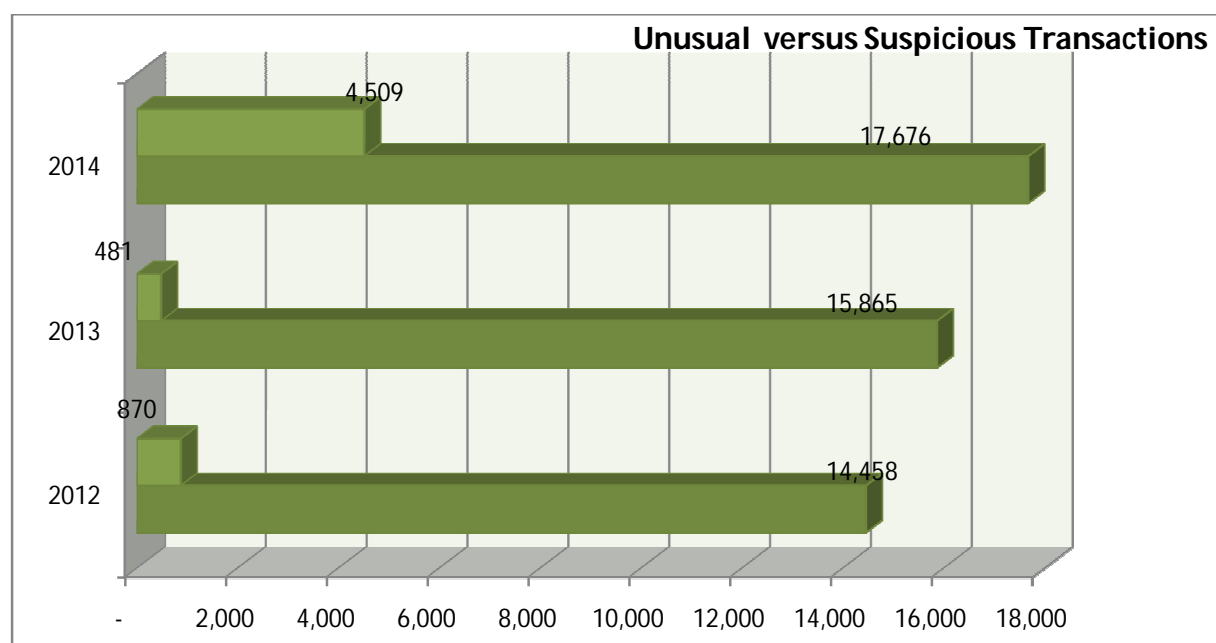


Figure 3 : Unusual versus Suspicious transactions (2012 – 2014)

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 (table 2). An intended transaction is a transaction that is not executed, which can be due to different reasons. These reasons can among other things be that the customer decides to discontinue

the transaction or the reporting entity decides, based on its risk policies, not to continue with the transaction. Executed transactions are transactions which are fully completed at the reporting entity.

When a transaction is discontinued (an intended transaction), the reporting entity is nevertheless obliged by law to report such an intended transaction to the Reporting Center, if it fits with a relevant indicator. The data and/or information that one 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.

	2014			2013			2012	
	Qty.	Value (in ANG.)		Qty.	Value (in ANG.)		Qty.	Value (in ANG.)
Executed	17,527	43,999,993,194		15,727	35,534,970,265		14,317	25,150,177,416
Intended	149	286,251,438		138	106,143,749		141	164,413,854
Total	17,676	44,286,244,574		15,865	35,641,114,014		14,458	25,314,591,270

Table 2 : Total reported executed and intended unusual transactions (2012-2014)

The relation between objective and subjective indicators is shown in figure 4 below. As can be seen, the use of subjective indicators has increased in 2014. Reporting subjectively is important to the Reporting Center as normally there is a suspicion involved of ML/TF. In the case of subjective indicators it is up to the compliance officer(s) of the reporting entities, who know their clients best and who have more information about the situation surrounding the reported transaction, to decide if a transaction could be related to money laundering or terrorism financing. The Reporting Center will continue to stress the importance of reporting subjectively for its investigations.

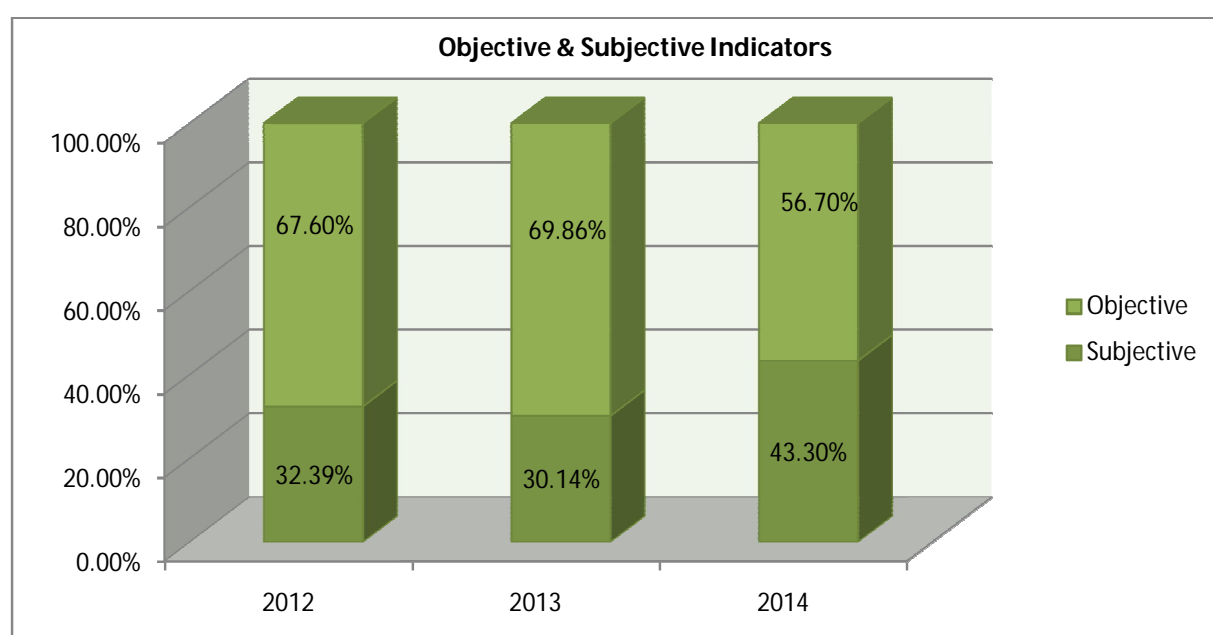


Figure 4 : Unusual transactions by objective and subjective indicators (%) (2012 – 2014)

As can be seen in the following table, the increase in 2014 in the number of the reported unusual transactions is mainly a result of the increase in reports from offshore banks. In 2014 this sector shows a remarkable increase in reported transactions, from 3,334 transactions in 2013 to 6,433 transactions in 2014. This significant increase in reported transactions is due to the reporting of a backlog in transactions by a single reporting entity, in addition to the normal reporting of transactions within this sector.

Reporter Type	2014				2013			
	Qty.	%	Value (in ANG.)	%	Qty.	%	Value (in ANG.)2	%
Administration Offices	1	0.01%	455,767	0.00%	1	0.01%	99,263,719	0.30%
Car Dealers	33	0.19%	932,330	0.00%	39	0.25%	1,340,888	0.01%
Casinos	1,800	10.18%	87,276,207	0.02%	1,906	12.00%	62,239,573	0.20%
Credit Unions	13	0.07%	2,923,745	0.00%	25	0.16%	682,393	0.00%
Credit card Companies	-	0.00%	-	0.00%	-	0.00%	-	0.00%
Customs	607	3.43%	228,937,611	0.05%	1,150	7.16%	478,756,552	1.34%
Life Insurance Companies	8	0.05%	3,690,893	0.00%	22	0.14%	7,421,526	0.02%
Jewelers	92	0.52%	1,668,442	0.00%	-	0.00%	-	0.00%
Lawyers	1	0.01%	20,000	0.00%	1	0.01%	711,000	0.00%
Local Banks	7,481	42.32%	4,194,178,204	9.50%	8,117	51.30%	4,069,958,844	11.40%
Lotteries	0	0.00%	0	0.00%	55	0.35%	495,950	0.00%
Money Remitters	1,180	6.68%	7,074,926	0.00%	1,101	6.95%	7,060,063	0.02%
Notaries	6	0.04%	2,308,869	0.00%	8	0.05%	1,218,452	0.10%
Offshore Banks	6,433	36.38%	39,512,649,899	89.20%	3,343	21.00%	30,340,261,812	85.00%
Real Estate	1	0.01%	263,219	0.00%	0	0.00%	0	0.00%
Savings Banks	0	0.00%	0	0.00%	1	0.01%	54,878	0.00%
Trust Companies	20	0.11%	243,864,462	1.00%	96	0.61%	571,648,276	1.60%
Total	17,676	100%	44,286,244,574	100%	15,865	100%	35,641,113,926	100%
Reporter Type	Qty.	%	Value (in ANG.)	%	Qty.	%	Value (in ANG.)	%

Table 3 : Unusual transactions by reporter type (2013 – 2014)

3.1.1. Administration Offices

With the amendment of the NORUT in 2010, administration offices became obliged by law to report their unusual transactions. In 2014 the Reporting Center received 1 unusual transaction report from the administration offices sector.

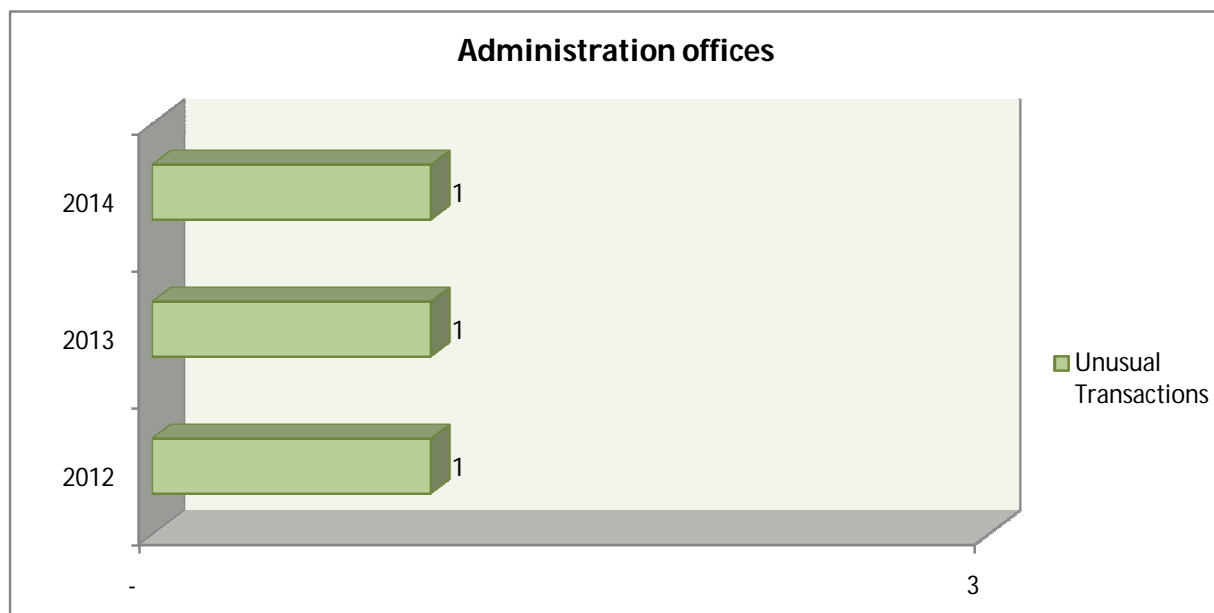


Figure 5 : Total received unusual transactions: administration offices (2012-2014)

An overview of the reported executed and intended transactions in the administration offices sector is given in the following table.

	2014		2013		2012	
	Qty.	Value	Qty.	Value	Qty.	Value
Executed	-	-	1	99,263,719	1	90,000
Intended	1	455,767	-	-	-	-
Total	1	455,767	1	99,263,719	1	90,000

Table 4 : Unusual transactions by reported type; administration offices (2012 – 2014)

3.1.2. Car Dealers

With the amendment of the NORUT in 2010, car dealers became obliged by law to report their unusual transactions. In 2014 the Reporting Center received 33 unusual transaction reports from the car dealers sector.

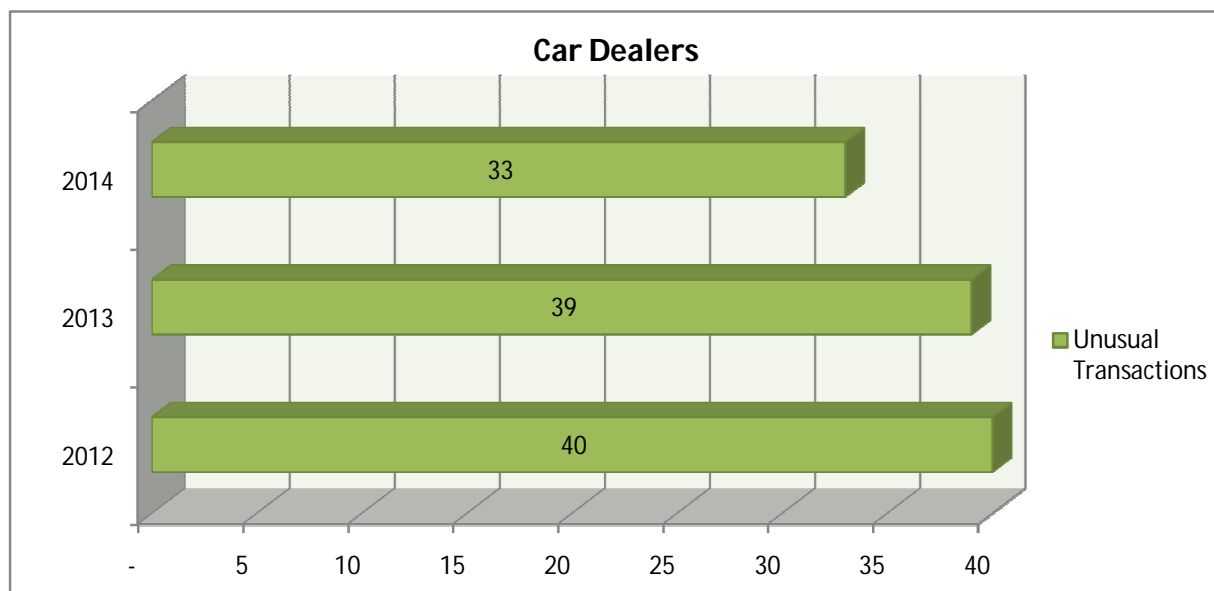


Figure 6 : Total received unusual transactions: car dealers (2012-2014)

An overview of the reported executed and intended transactions in the car dealers sector is given in the following table.

	2014		2013		2012	
	Qty.	Value	Qty.	Value	Qty.	Value
Executed	33	932,330	39	1,340,888	40	1,109,416
Intended	-	-	-	-	-	-
Total	33	932,330	39	1,340,888	40	1,109,416

Table 5 : Unusual transactions by reported type: car dealers (2012 – 2014)

3.1.3. Casino's

In 2014 the reports of unusual transactions received from the casino sector decreased slightly to 1,800 reports. The Reporting Center will continue to monitor the reporting behavior of casino's in the coming years.

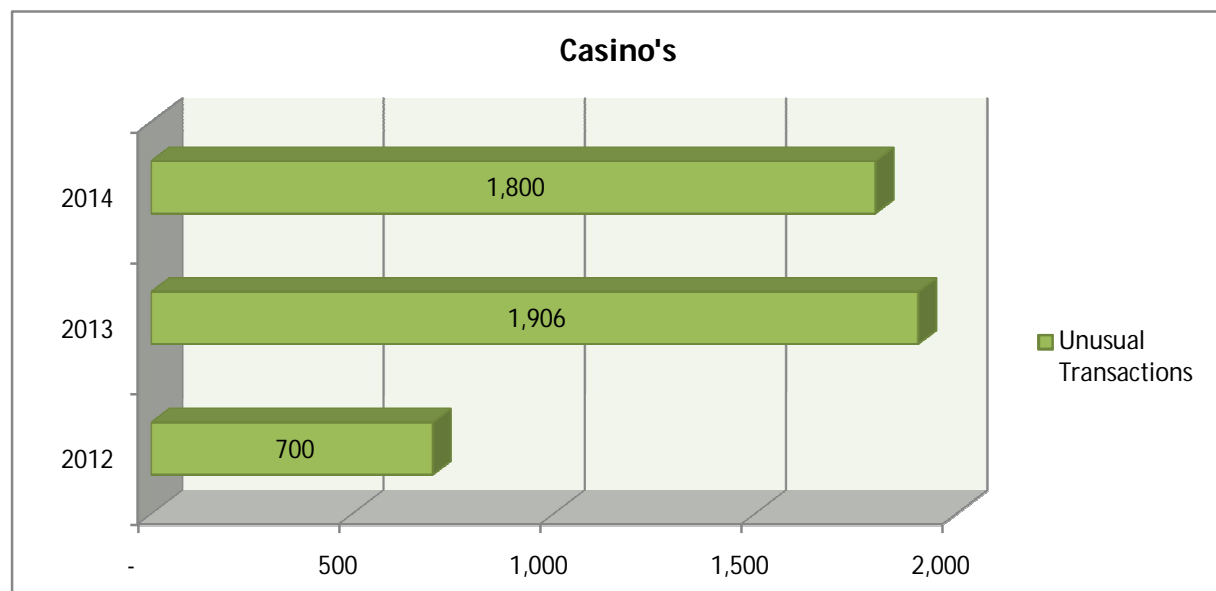


Figure 7 : Total received unusual transactions: casino's (2012-2014)

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

	2014		2013		2012	
	Qty.	Value	Qty.	Value	Qty.	Value
Executed	1,800	87,276,207	1,906	62,239,573	700	24,113,318
Intended	-	-	-	-	-	-
Total	1,800	87,276,207	1,906	62,239,573	700	24,113,318

Table 6 : Unusual transactions by reported type; casinos (2012 – 2014)

3.1.4. Credit Unions

In 2014 a total of 13 reports of unusual transactions were received from the credit unions sector. The Reporting Center upon reaching its normal personnel formation intends to focus more on this sector by organizing additional informative and training sessions for this sector.

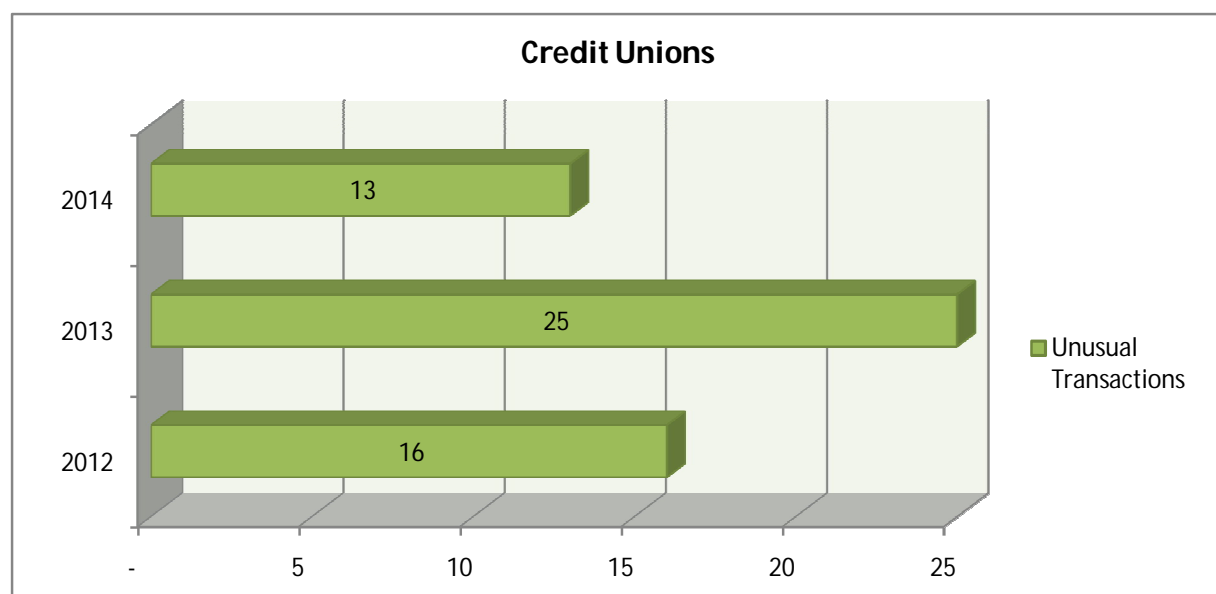


Figure 8 : Total received unusual transactions (2012-2014)

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

	2014		2013		2012	
	Qty.	Value	Qty.	Value	Qty.	Value
Executed	13	2,923,745	25	682,393	16	401,750
Intended	-	-	-	-	-	-
Total	13	2,923,745	25	682,393	16	401,750

Table 7 : Unusual transactions by reported type; credit unions (2012 – 2014)

3.1.5. Customs

Pursuant to the National Ordinance Obligation to Report Cross-Frontier Money Transportations, persons entering or leaving Curaçao are under the obligation to report money for a value of ANG. 20,000 or more (approximately US\$ 10,000) that 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 2014 Customs shows a decrease in reported transactions, from 1,150 reports in 2013 to 607 reports in 2014.

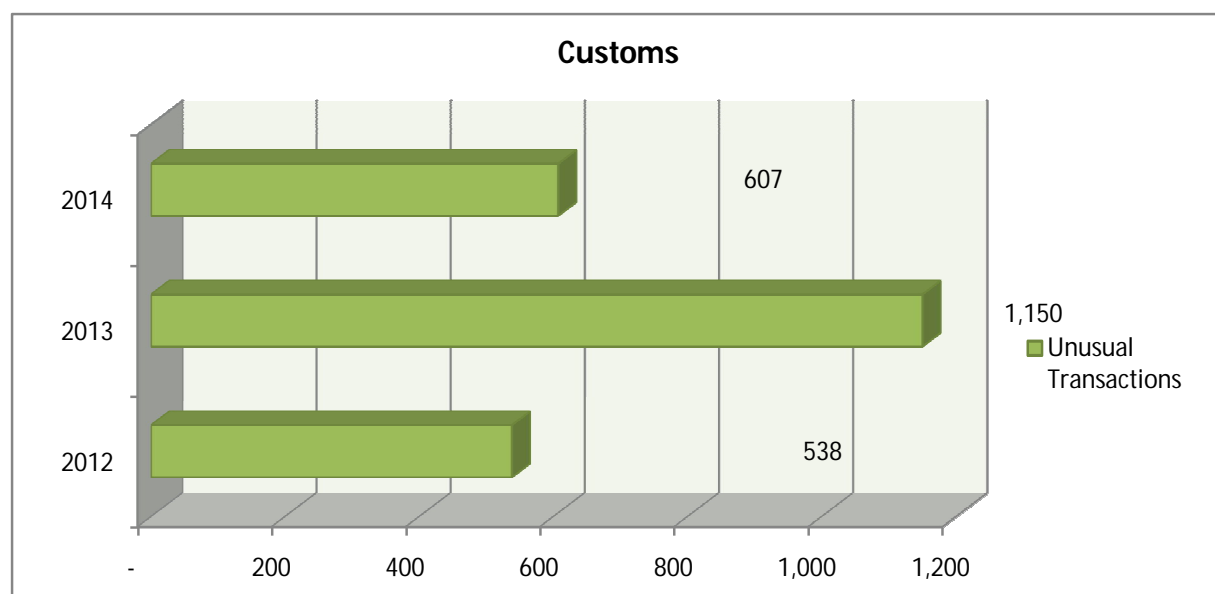


Figure 9 : Total received unusual transactions (2012-2014)

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

	2014		2013		2012	
	Qty.	Value	Qty.	Value	Qty.	Value
Executed	607	228,937,619	1,149	478,512,663	537	172,685,469
Intended	-	-	1	243,889	1	86,581
Total	607	228,937,619	1,150	478,756,552	538	172,772,050

Table 8 : Unusual transactions by reported type; customs. (2012 – 2014)

3.1.6. Life Insurance Companies

In 2014 the reports of unusual transactions from the life insurance sector decreased to 8 reports. The Reporting Center, upon reaching its normal personnel formation, intends to focus more on this sector by organizing additional training sessions for this sector. In this year the Reporting Center addressed the reporting behavior of this sector with the supervisory authority.

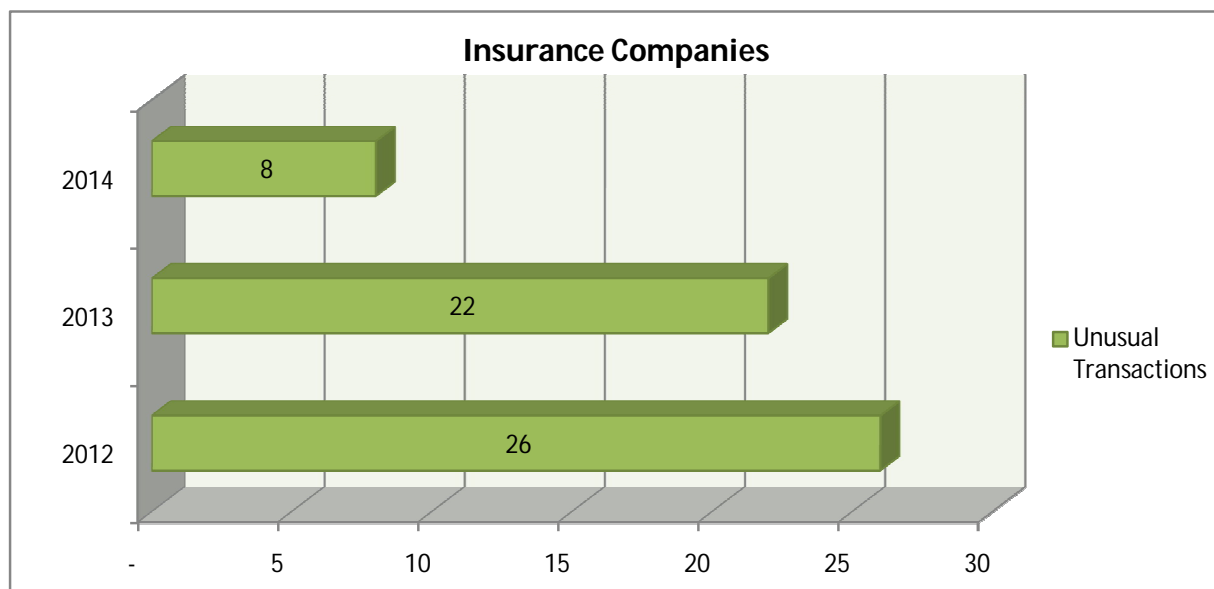


Figure 10 : Total received unusual transactions: insurance companies (2012-2014)

An overview of the reported executed and intended transactions of the insurance sector is given in the following table.

	2014		2013		2012	
	Qty.	Value	Qty.	Value	Qty.	Value
Executed	8	3,690,893	21	26	2,744,547	2,255,002
Intended	-	-	1	-	-	31,740
Total	8	3,690,893	22	26	2,744,547	2,286,742

Table 9 : Unusual transactions by reported type: insurance companies (2012 – 2014)

3.1.7. Jewelers

With the amendment of the NORUT in 2010, the jewelers sector became obliged by law to report their unusual transactions. In 2014 the Reporting Center received 92 unusual transaction reports from the jewelers sector.

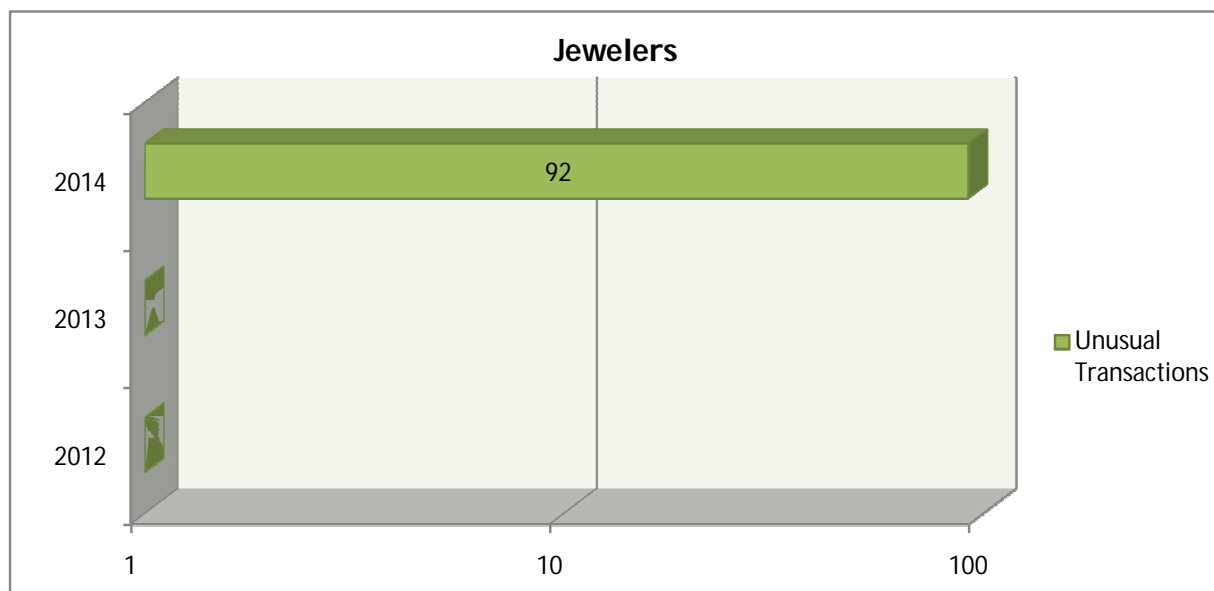


Figure 11 : Total received unusual transactions (2012-2014)

An overview of the reported executed and intended transactions of the jewelers section is given in the following table.

	2014		2013		2012	
	Qty.	Value	Qty.	Value	Qty.	Value
Executed	92	1,668,442	-	-	-	-
Intended	-	-	-	-	-	-
Total	92	1,668,442	-	-	-	-

Table 10 : Unusual transactions by reported type : jewelers (2012 – 2014)

3.1.8. Lawyers

With the amendment of the NORUT in 2010, lawyers (attorneys, tax advisors and other legal advisors that give or are involved in services as defined in the NORUT) became obliged by law to report their unusual transactions. In 2014, the Reporting Center received 1 unusual transaction report from lawyers. The Reporting Center, upon reaching its normal personnel formation, intends to focus more on this sector by organizing additional informative and training sessions for this sector.

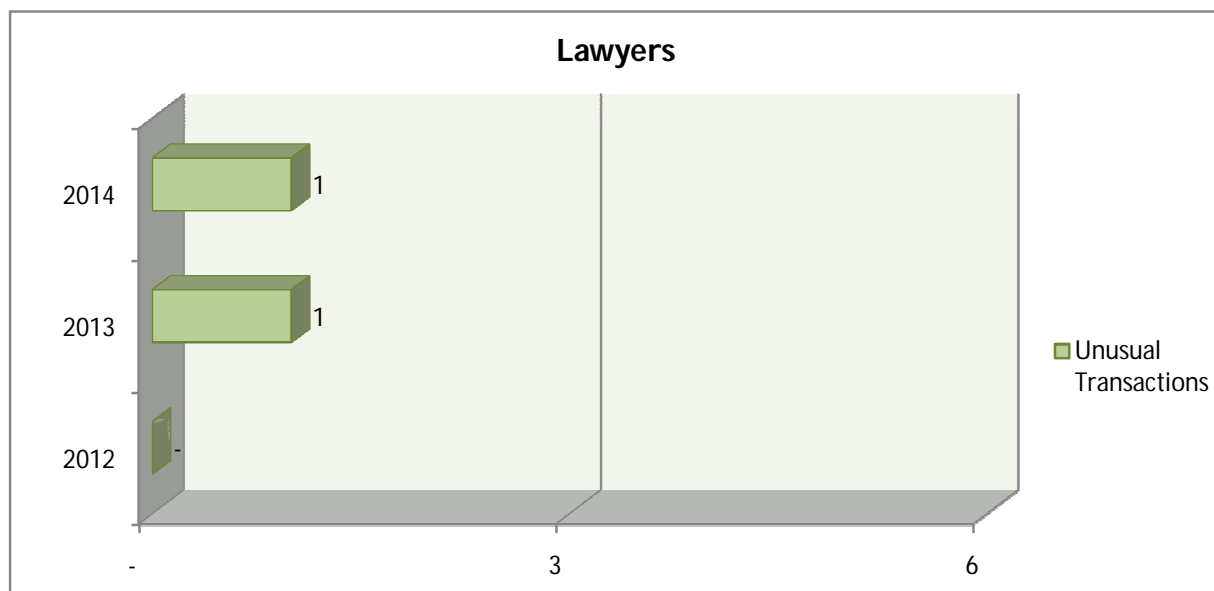


Figure 12 : Total received unusual transactions (2012-2014)

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

	2014		2013		2012	
	Qty.	Value	Qty.	Value	Qty.	Value
Executed	1	20,000	-	-	-	-
Intended	-	-	1	711,000	-	-
Total	1	20,000	1	711,000	-	-

Table 11 : Unusual transactions by reported type: lawyers (2012 – 2014)

3.1.9. Local Banks

Most reports received in 2014 came from the local banking sector. Of the 17, 676 unusual transactions received, 7, 481 came from the local banks.

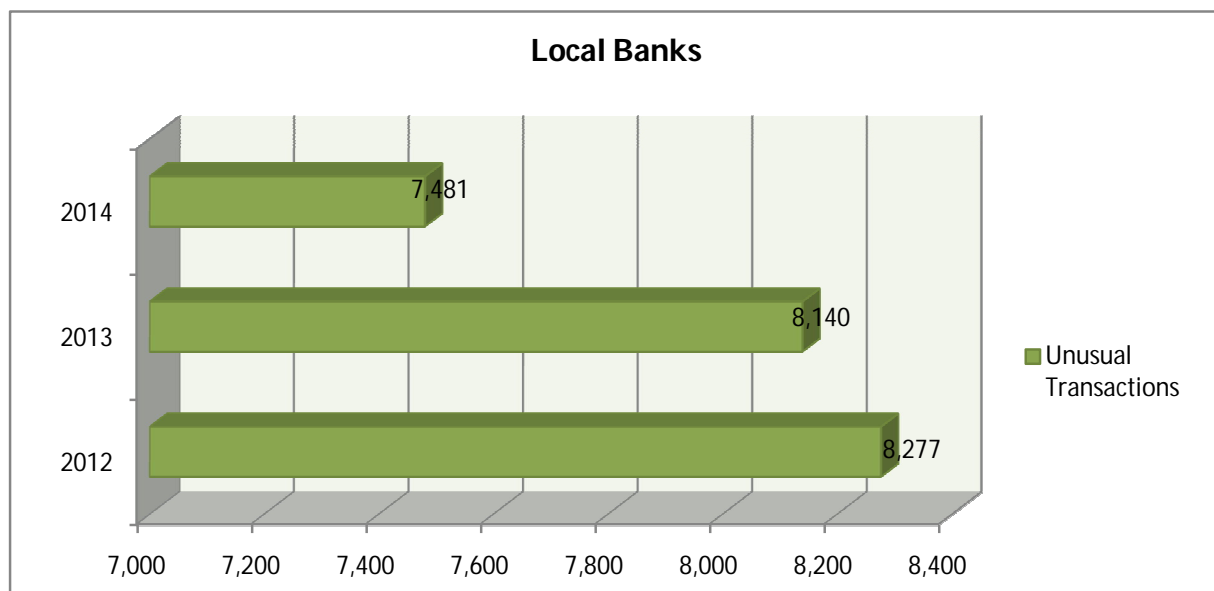


Figure 13 : Total received unusual transactions (2012-2014)

An overview of reported executed and intended transactions of the local banking sector is given in the following table.

	2014		2013		2012	
	Qty.	Value	Qty.	Value	Qty.	Value
Executed	7,399	4,182,956,100	8,017	4,005,879,304	8,167	2,474,889,036
Intended	82	11,222,104	100	64,079,540	110	4,034,333
Total	7,481	4,194,178,204	8,117	4,069,958,844	8,277	2,478,923,369

Table 12 : Unusual transactions by reported type: local banks (2012 – 2014)

3.1.10. Lotteries

With the amendment of the NORUT in 2010, the lottery sector became obliged by law to report their unusual transactions. In 2014 the Reporting Center received 0 unusual transaction reports from the lottery sector.

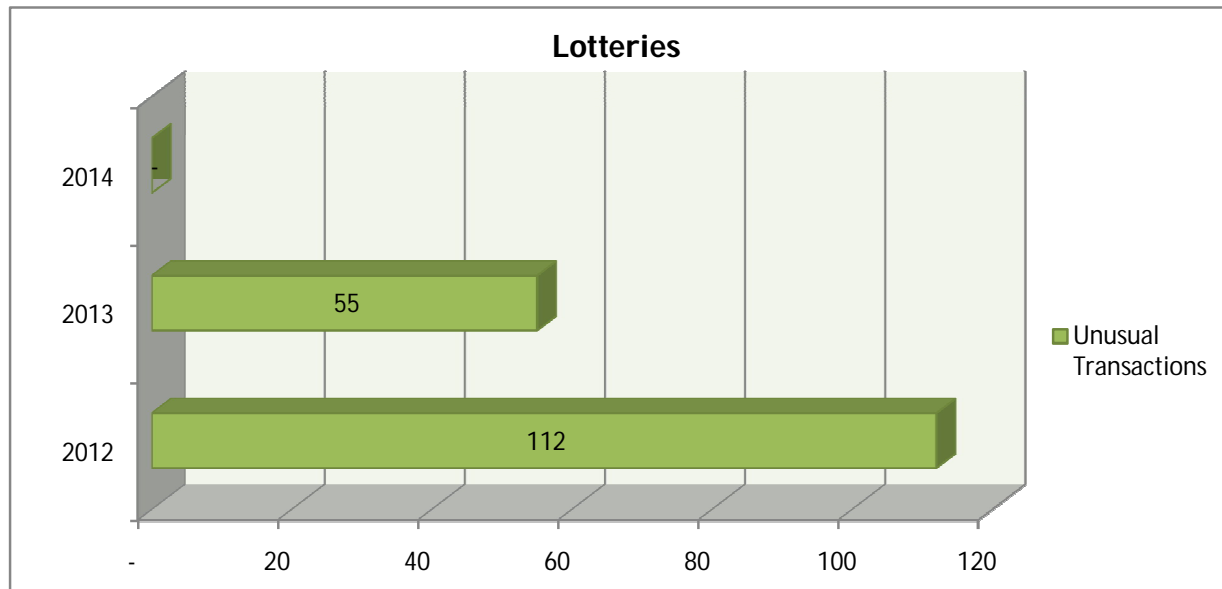


Figure 14 : Total received unusual transactions (2012-2014)

An overview of reported executed and intended transactions of the lottery sector is given in the following table.

	2014		2013		2012	
	Qty.	Value	Qty.	Value	Qty.	Value
Executed	-	-	55	495,950	112	1,702,075
Intended	-	-	-	-	-	-
Total	-	-	55	495,950	112	1,702,075

Table 13 : Unusual transactions by reported type : lotteries (2012 – 2014)

3.1.11. Money Remitters

In 2014 the reports of unusual transactions received from the money remitting sector increased slightly to 1,180 reports.

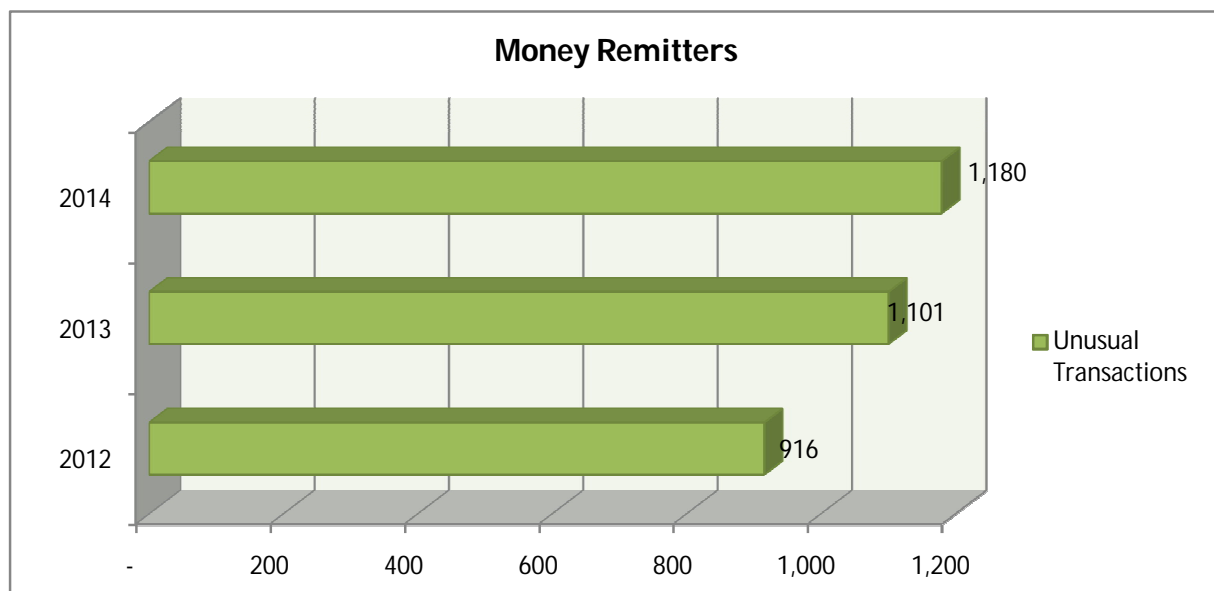


Figure 15 : Total received unusual transactions: money remitters (2012-2014)

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

	2014		2013		2012	
	Qty.	Value	Qty.	Value	Qty.	Value
Executed	1,178	7,064,995	1,095	7,054,222	916	5,838,723
Intended	2	9,931	6	5,841	-	-
Total	1,180	7,074,926	1,101	7,060,063	916	5,838,723

Table 14 : Unusual transactions by reported type: money remitters (2012 – 2014)

3.1.12. Notaries

With the amendment of the NORUT in 2010, the notaries became obliged by law to report their unusual transactions. In 2014 the Reporting Center received 6 unusual transaction reports from notaries.

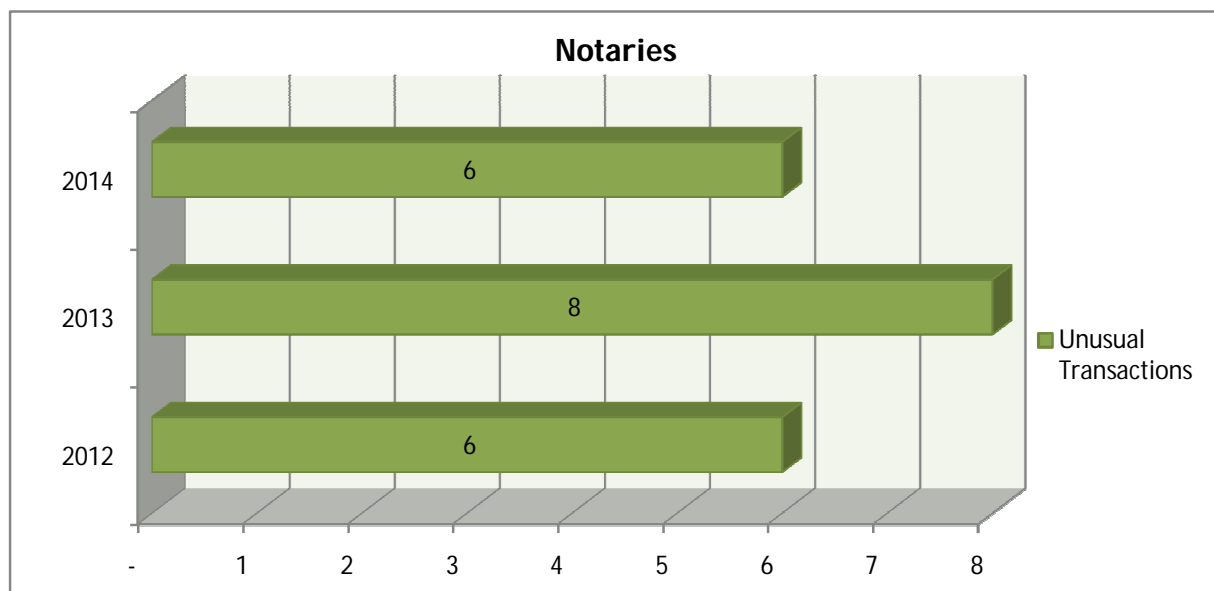


Figure 16 : Total received unusual transactions (2012-2014)

An overview of reported executed and intended transactions of the notaries sector is given in the following table.

	2014		2013		2012	
	Qty.	Value	Qty.	Value	Qty.	Value
Executed	3	1,167,757	8	1,218,452	4	330,049
Intended	3	1,141,112	-	-	2	83,000,000
Total	6	2,308,869	8	1,218,452	6	83,330,049

Table 15 : Unusual transactions by reported type: notaries (2012 – 2014)

3.1.13. Offshore Banks

In 2014 the reports of unusual transactions received from the offshore banking sector increased considerably to 6,433 reports. This significant increase in reported transactions is due to the backlog in reporting at one reporting entity. From the 6,433 reports of unusual transactions, 3,880 transactions were reported by a single reporting entity in the course of the reporting of a backlog of transactions.

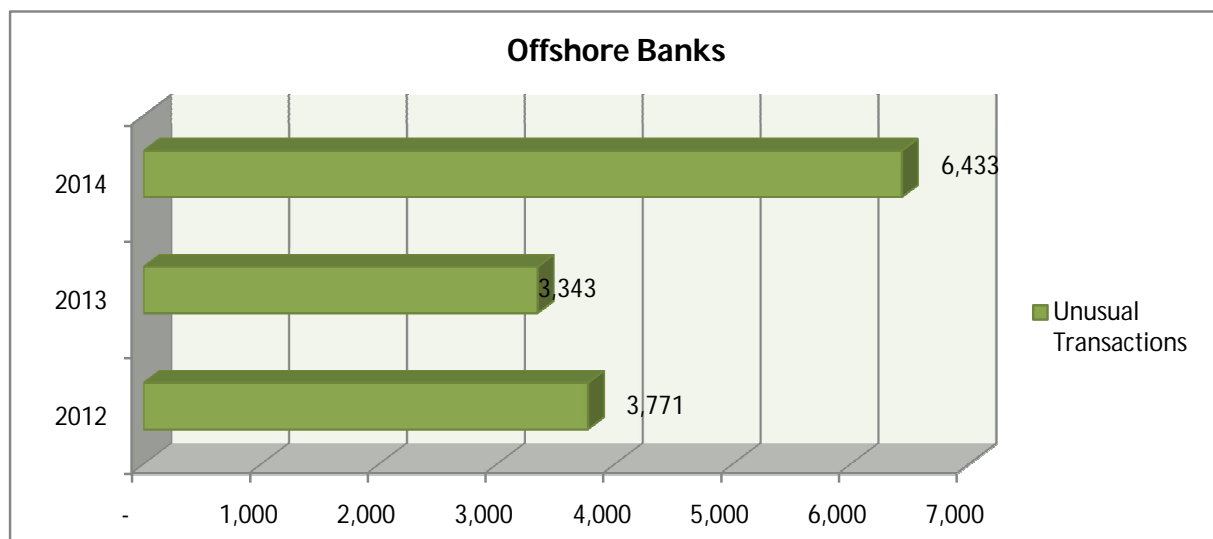


Figure 17 : Total received unusual transactions (2012-2014)

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

	2014		2013		2012	
	Qty.	Value	Qty.	Value	Qty.	Value
Executed	6,375	39,249,874,875	3,316	30,301,683,934	3,747	22,277,762,987
Intended	58	262,775,024	27	38,577,878	24	76,911,200
Total	6,433	39,512,649,899	3,343	30,340,261,812	3,771	22,354,674,187

Table 16 : Unusual transactions by reported type : offshore banks (2012 – 2014)

3.1.14. Trust Companies

In 2014, the unusual transactions received from the trust sector underwent a decrease as can be seen in the following table. In 2014 the Reporting Center addressed the reporting behavior of this sector with the Supervisory Authority.

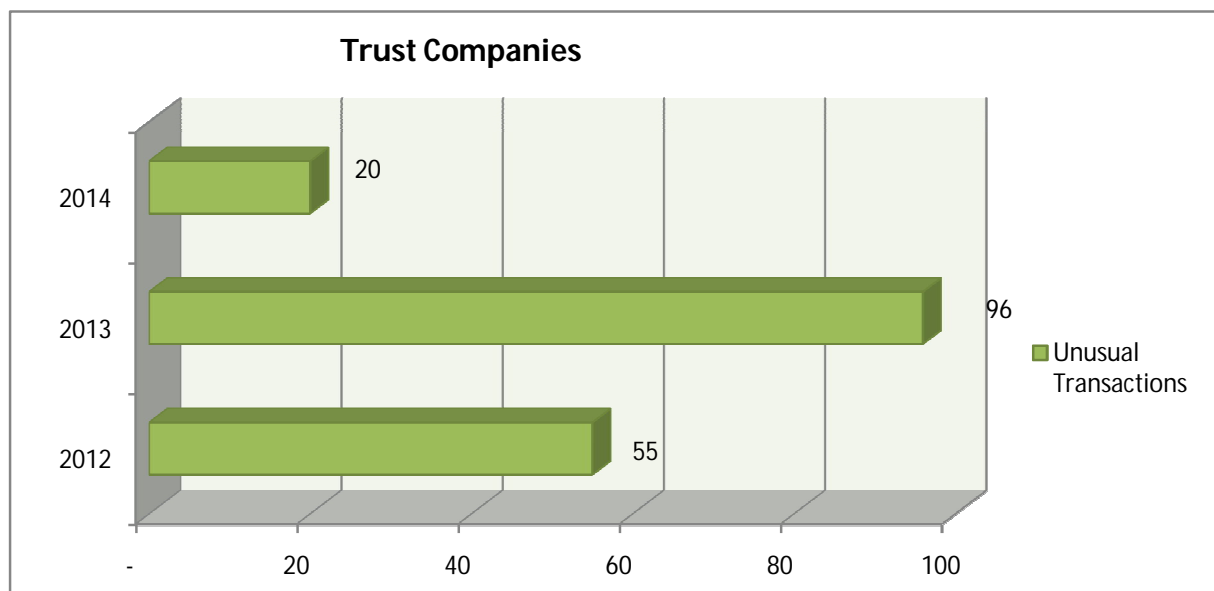


Figure 18 : Total received unusual transactions: trust companies: (2012-2014)

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

	2014		2013		2012	
	Qty.	Value	Qty.	Value	Qty.	Value
Executed	17	233,216,962	94	569,468,215	53	188,531,786
Intended	3	10,647,500	2	2,180,061	2	360,000
Total	20	243,864,462	96	571,648,276	55	188,891,786

Table 17 : Unusual transactions by reported type : trust companies (2012 – 2014)

3.1.15. Savings Banks

In 2014, no reports were received from the Savings banks sector. The Reporting Center will continue to encourage the reporting in this sector.

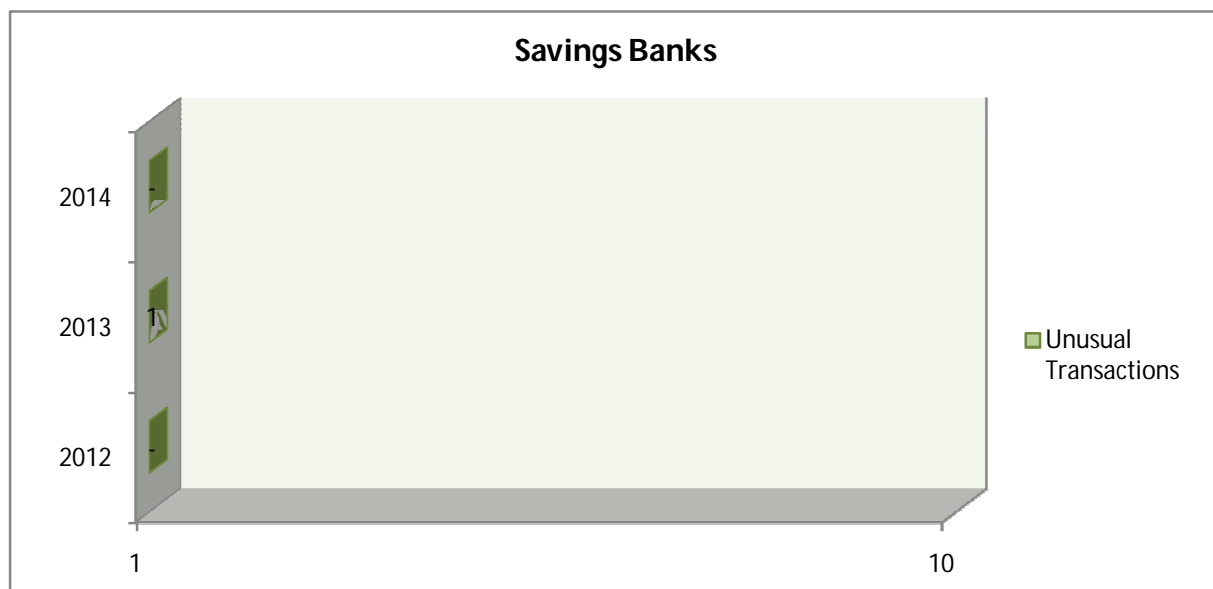


Figure 19 : Total received unusual transactions: savings banks (2012-2014)

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

	2014		2013		2012	
	Qty.	Value	Qty.	Value	Qty.	Value
Executed	-	-	1	54,878	-	-
Intended	-	-	-	-	-	-
Total	-	-	1	54,878	-	-

Table 18 : Unusual transactions by reported type : savings banks (2012 – 2014)

3.2 Requests of the Reporting Center for additional information 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 additional information is needed for ongoing investigations.

In 2014, the Reporting Center sent 12 requests for further information to reporting institutions.

3.3 Reporting time period for reporting institutions

The average reporting time period 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 on Reporting Unusual Transactions, unusual transactions should be reported without delay to the Reporting Center. All reporting entities, with the exception of Banks (onshore banks, offshore banks, savings banks), should send their unusual transaction reports based on an objective indicator within 48 hours after the transaction has been executed or after there has been an intention for a transaction. For Banks, the reporting period for unusual transactions based on an objective indicator is in principle 5 working days, from the moment the transaction is executed or from the moment of an intention to execute a transaction. The time period for Banks to report unusual transactions based on an objective indicator can be extended (due to organizational or unforeseen reasons) to a maximum of 10 workdays.

For reports based on a subjective indicator, the reporting period for all reporting entities (including Banks) is as follows. The time period between the execution of the transaction (or the intention to execute a transaction) and the moment the Compliance Officer receives the report, should not exceed 24 hours. As of the moment the Compliance Officer receives the transaction report, the Compliance Officer will have 10 working days to complete the relevant research with regard to possible money laundering/terrorism financing situation. If after the research period (maximum 10 working days), there is a suspicion of ML/TF, the Compliance Officer must report the transaction within 48 hours to the Reporting Center.

An overview of the guidelines for the reporting period is given on the website of the FIU, under Section: Reporting.

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

Pursuant to article 6 of the National Ordinance on the Reporting of Unusual Transactions and the relevant indicators, the Reporting Center is obliged 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 underlying such offences. In paragraphs 3.4.1. and 3.4.2. further details with regard to the dissemination of information and the furnishing of data will be given.

3.4.1. Disseminating data to the Public Prosecutor's Office and to the Law Enforcement Agencies

Contrary to other jurisdictions where *suspicious* transactions or Suspicious Activity Reports (SAR's) 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 circumstances. The subjective indicator on the other hand leaves it to the assessment 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, whether a politically exposed person is involved, particular circumstances, etcetera. The indicator might also give guidance in this regard.

After receiving unusual transactions, the analysts of the Reporting Center analyze them to see whether there is a suspicion of ML/TF. If so, such suspicious transactions are disseminated to the Public Prosecutor's 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 (subject to approval of the PPO), via own investigations, via update-disseminations (when certain transactions related to subjects 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.

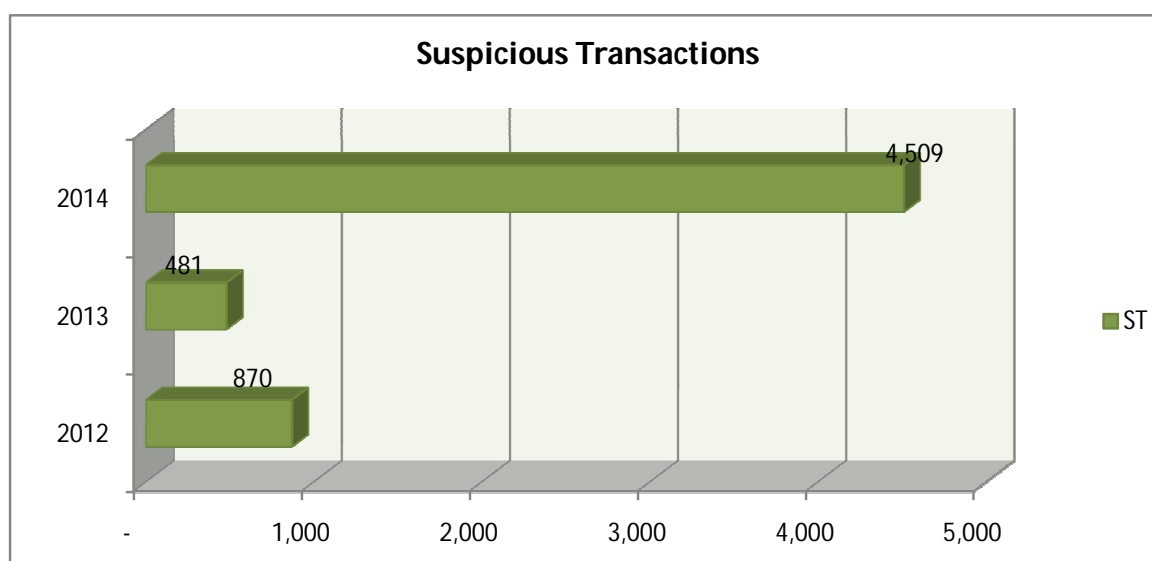


Figure 20 : Total disseminated transactions to the PPO.

As stated before, in 2014, the Reporting Center received one-time technical resources from FIU Netherlands, which enabled us to boost the output. On the basis thereof, the Reporting Center started a study into the required resources and initiatives to expand its professional capabilities and resources. Other circumstances that boosted the output are described in paragraph 3.1.

3.4.2. Requests to furnish data received from law enforcement agencies

The Reporting Center received 34 requests for information from the law enforcement agencies in 2014, based on article 6 of the NORUT. The table below indicates which law enforcement agency requested information during 2014 and the amount of these requests.

On the other hand the Reporting Center sent out 74 requests for information, based on article 5 of the NORUT, to several law enforcement agencies.

Requesting Instance	2014	2013
BAB	4	3
BFO-HARM	1	9
KONINKLIJKE MARECHAUSSEE	3	0
KPC-CPD-DGC	12	13
OM	1	0
RST	12	8
Landsrecherche	1	3
Total	34	36

Table 19 : Requests for information by law enforcement agencies (2014-2013)

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

The Reporting Center initiated several investigations into the field of money laundering and terrorism financing, and completed 8 investigations in 2014. These investigations amounted to 1333 transactions.

3.4.4. Training/AML and CFT Developments

During 2014 the Reporting Center organized meetings with several of the designated non-financial businesses and professions (representatives of the accountants, jewelers and real estate agents). In these meetings the sectors were informed of their reporting obligation and reporting behavior since their reporting obligation came into effect. The Reporting

Center also gave a presentation about the core activities of the Reporting Center to Customs Curaçao on two consecutive days in October. Meetings took place with a money remitter company and a local and international bank where the focus was on the correct use of indicators. Furthermore, trainings were given to two local banks.

In October the Reporting Center also gave a presentation to law students of the University of Curaçao about the core activities of the Reporting Center and its role in combating and preventing money laundering and/or terrorism financing.

The personnel of the Reporting Center attended an in-house presentation with regard to the obligation for member countries to implement a National Risk Assessment.

Numerous meetings (approximately 7) were held with the members of the Duradero team to increase the effectiveness of the cooperation with regard to the disseminating of suspicious transactions to the Duradero team.

4. COOPERATION

An efficient cooperation with all the actors in the reporting chain is of the utmost importance to the Reporting Center. 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.

4.1 The Reporting Institutions

The Reporting Center held approximately 10 training and informative sessions for the reporting institutions, their representatives and personnel in 2014. Information was given to, among others, compliance officers where the focus was on the correct use of indicators and on their reporting obligation and behavior.

4.1.1. Audits for the DNFBP

The Supervision Department of the Reporting Center conducted 3 full scope audits on some of the designated non-financial businesses and professions (1 car dealer, 1 tax adviser and 1 real estate agency) during 2014.

The Supervision Department selected from the different categories certain DNFBPs, that were visited in 2014. The focus was on car dealers, pawn shops, real estate agencies and lawyers. This resulted in several meetings with management of these institutions. The Supervision team visited 1 expert in the administrative field, 1 jeweler, 2 real estate agents, 4 lawyers and 3 pawn shops.

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

In 2014 the Reporting Center held approximately 7 meetings with members of the Duradero team to increase the effectiveness of the cooperation with regard to the disseminating of suspicious transactions. Also separate meetings took place with the PPO and other law enforcement agencies, such as the Special Task Force with regard to individual cases. Information of the Reporting Center is made available to the law enforcement agencies after the Reporting Center has completed its own investigations and upon request by the law enforcement agencies. The Reporting Center is obliged by law to furnish the requested information if, after thorough analyses by its analysts, there is a suspicion of money laundering and/or terrorism financing.

4.3 The Supervisory authorities

During this year, the Reporting Center continued its participation in several Working Groups created by the National Committee on Money Laundering (CiWG). This Committee is under chairmanship of the Central Bank. The aforementioned Working Groups were formed in order to come up with proposals to address the deficiencies that were identified by the CFATF in the evaluation of Curaçao. In the National Committee on Money Laundering the Reporting Center deliberated with the Gaming Control Board (supervisory authority for the casino sector) and the Central Bank (supervisory authority financial sector) on the proposal of new indicators.

In 2014 the Reporting Center addressed the reporting behavior of the reporting entities in the financial sector in the National Committee on Money Laundering and also in two separate meetings with the Central Bank.

4.4 The Minister of Finance

The directly responsible Minister for the Reporting Center is the Minister of Finance. The Reporting Center had several meetings with the Minister of Finance regarding, among other things, personnel matters, and other organizational matters.

4.5 Cooperation in the Kingdom of the Netherlands

In May 2014 the Reporting Center received technical assistance from FIU the Netherlands to create possibilities for the Reporting Center to maximize its output with limited resources. These limited resources were the result of understaffing due to the moratorium on the filling of additional personnel in government agencies. The moratorium has been lifted in the second half of 2014, additional personnel may be hired within the boundaries of the planning of the Ministry of Finance.

In October 2014 the third so called 'Kingdoms seminar', under the title 'The power of together', was organized. FIU the Netherlands was responsible for the organization of this seminar. Besides attendance by the Heads of FIU of the four FIUs in the Kingdom of the Netherlands and their staff, this seminar was visited among others by law enforcement agencies, the public prosecution, customs, and by Supervisory Authorities. The three-day assembly took place from October 14 till October 16 at the Plaza Beach Resort in Bonaire. The Kingdoms seminar intended to bring together the FIUs in the Kingdom and also their partners in the reporting chain. One of the aims of the seminar is to promote and develop the cooperation between the FIUs in the Kingdom and also their cooperation with Law Enforcement. The main subjects that were dealt with during the seminar were: the developments over the past four years, since the constitutional reform of October 10th, 2010 and to realize a closer cooperation between the FIUs with regard to the sharing of information. The seminar resulted in the signing of a declaration of intent by the Heads of the FIUs in the Dutch Kingdom. In 2014, FIU the Netherlands also facilitated the installation of secure high end equipment at the FIUs in Aruba, St. Maarten and Curaçao to allow video conference meetings among the analysts.

During 2014 the Supervision Department also received assistance by the Dutch "Bureau Financieel Toezicht" in devising a policy on imposing sanctions for the non-financial sector.

5. INTERNATIONAL COOPERATION

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.

5.1. International exchange of information

Pursuant to Article 7 of the NORUT, 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), unless the FIU with which to exchange information is a member of the Egmont Group of FIU's.

In 2014 the Reporting Center executed 4 MoUs (Australia, Japan, Poland and Guyana). At the time of signature of the MoU, the FIU of Guyana was not an Egmont member. A total of 58 MoUs have been completed with other countries up to the year 2014.

During 2014, the Reporting Center received 42 requests for information from foreign FIUs.

The requests for information regarded among other things: reported transactions, financial information and police information on certain subjects; both natural persons and legal entities.

Such provided information can only be used as intelligence by the foreign FIU. For other uses, the foreign FIU, pursuant to the signed MoU and the Egmont principles for information exchange between FIUs, needs the authorization of the requested Reporting Center.

The Reporting Center sent out 128 requests for information to other FIUs.

The following Table 20 shows an overview of received requests for information per country.

2014			
Country	Requests	Country	Requests
Anguilla	1	Bahrain	1
United States	5	Sri Lanka	1
Panama	1	Germany	1
Turkey	1	United Kingdom	2
Nigeria	1	Peru	2
Netherlands	13	Aruba	2
Singapore	1	Belgium	1
Trinidad and Tobago	2	Spain	1
Israel	1	Ukraine	1
Guyana	2	Sint Maarten	2
Total			42

Table 18 : Requesting FIU's (2014)

5.2. Caribbean Financial Action Task Force (CFATF)

In May of 2014 the FIU of Curaçao attended the XXXIX CFATF Meetings in the United States (Miami) and in November of 2014 the XL CFATF Meetings in San Salvador. On both occasions the FIU Curaçao attended the Heads of FIU Meeting and the Plenary Meetings.

At the plenary meetings in San Salvador the 3rd follow-up report of Curaçao was presented to the plenary. In this report to the plenary, Curaçao presented the actions that were undertaken in order to improve the shortcomings that were identified during her 2011 evaluation.

FIU Curaçao also participated in a total of 12 Steering Group meetings during 2014 in representation of the Dutch speaking countries in the organization (Aruba, Suriname, St. Maarten and Curaçao). Some of the meetings were face to face meetings and others via conference calls. The CFATF Steering Group is an advisory organ for the Chair, the Secretariat, the Ministers and the whole organization with regards to the general policy and other specific policy issues.

FIU Curaçao is also a member of several CFATF working groups including the International Cooperation Review Group (ICRG) which deals with evaluation of the member countries in combating money laundering and terrorism financing and in a more general sense the degree in which the member countries comply with the Financial Action Task Force (FATF).

5.3. The Egmont Group

The Egmont Group is an international association 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. Recognizing the importance of international cooperation in the fight against money laundering and financing of terrorism, the FIU of Curaçao is one of the more than 147 FIUs worldwide that are members of the Egmont Group of Financial Intelligence Units. The Egmont Group of FIUs meet regularly to find ways to promote the development of FIUs and to cooperate, especially in the areas of information exchange, training and the sharing of expertise.

This reporting year the Reporting Center attended the 22th Plenary of Egmont (June 1-6, 2014), hosted by our colleagues of the Peruvian Financial Intelligence Unit in Lima, Peru. This plenary was attended by representatives of FIUs from 115 jurisdictions. 8 FIUs were welcomed into the Egmont Group as new members, bringing the Egmont membership to 147. The new members are Angola, Brunei, Daressalam, Chad, Ghana, Jamaica, Namibia, Sint Maarten and Tanzania.

5.4. Organization for Economic Co-operation and Development (OECD)

The Global Forum on Transparency and Exchange of Information for Tax Purposes is the multilateral framework within which work in the area of tax transparency and exchange of information is carried out by over 100 jurisdictions, which participate in the Global Forum on an equal footing. The Global Forum is charged with in-depth monitoring and peer review of the implementation of the international standards of transparency and exchange of information for tax purposes.

All members of the Global Forum, as well as jurisdictions identified by the Global Forum as relevant to its work, are being reviewed. This process is undertaken in two phases. Phase 1 reviews the quality of the legal and regulatory framework for the exchange of information. Phase 2 reviews the practical implementation of that framework.

In the year 2014 the Phase 2 OECD Peer Review was held in Curaçao. The Reporting Center was one of the governmental organizations that participated in this review.

The Reporting Center gave a presentation to the representatives of the OECD about the tasks of the FIU and especially about its new tasks with regard to the supervision of the Designated Non-Financial Businesses and Professions.

After several months of correspondence, deliberations and completion of a questionnaire, the Minister of Finance was presented with the Peer Review Report Phase 2 Legal and Regulatory Framework containing the results of the OECD review. The results of the peer review can be viewed on the website of the Global Forum on Transparency and Exchange of Information for Tax Purposes: www.eoi-tax.org.

6. PRIORITIES FOR THE YEAR 2015

The priorities of the Reporting Center for 2015, with a view to complying with its legal duties of preventing and detecting money laundering and terrorism financing and the underlying criminal offences, are as follows (the following list is not exhaustive):

- Invest in the online reporting system Corsys in order to create more capacity and to make it easier for the reporting entities to send in their reports in a more effective way;

- Update the IT-system and expand the security system of the Reporting Center;

- Fill existing vacancies at the Reporting Center;

- Focus on strategic analysis;

- Upgrade the personnel of the Reporting Center through training;

- Continue to inform and train the reporting entities with regard to their reporting obligation;

- Enter into negotiations with the Receivers Office in order to agree on working arrangements between both organizations with regard to collection and recovery of administrative fees.

ANNEXES

Annex 1: Selected NORUT articles

NATIONAL ORDINANCE of 10 February 1996 on the duty to report unusual transactions noted during financial service provision (National Ordinance on Reporting Unusual Transactions) (O.G. 1996, no. 21). The National Ordinance on Reporting Unusual Transactions entered into force on 1 October 1997, O.G. 1997, no. 252 and was lastly amended by Act of 26 October 2009, O.G. 2009, no. 65. In this Annex, the text of some relevant articles is cited.

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 sub 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 favor 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 favor the distribution is made;
- c. Transaction shall mean: an act or a set of acts of or in favor 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:

- a. collecting, registering, processing and analyzing the data that it obtains in order to consider whether these data could be of any relevance for preventing and tracing money laundering or the financing of terrorism and the underlying criminal offenses;
- b. providing data in accordance with the provisions laid down by or pursuant to this Act;
- c. informing the person who, in accordance with article 11, has reported in view of the correct compliance with the obligation to report, regarding the conclusion of the reporting. In that case, it is only notified whether the provision has taken place in accordance with subparagraph b.;
- d. conducting investigations into developments in the field of money laundering or the financing of terrorism and into improving the methods to prevent or trace money laundering or financing terrorism;
- e. giving recommendations, after consultation with the Supervisors or professional organizations in question, for the relevant business sectors regarding the introduction of fitting procedures for internal control and communication and other measures to be taken for preventing the use of relevant business sectors for money laundering or financing terrorism;
- f. giving information to the business sectors and professional groups, the persons and institutions that are entrusted with the supervision of the compliance with these Acts, the Public Prosecutions Department, the civil servants in charge of tracing offenses and to the public regarding the manifestations and the prevention of money laundering or the financing of terrorism;
- g. maintaining contacts with foreign police and non-police agencies, as stipulated by the authorities, that have a task that is comparable to that of the Reporting Center;
- h. maintaining contacts with and participating in meetings of international and intergovernmental agencies in the field of combating both money laundering and the financing of terrorism;
- i. presenting annually a report of its activities and of its intentions for the coming year to the Minister of Finance, and bringing this report to the notice of the Minister of Justice.

Article 6

1. 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:
 - 1) 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;
 - 2) 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;
 - 3) 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.
2. The Reporting Center is authorized to supply information regarding the reporting conduct of the reporting institutions to persons and institutions that are entrusted with the compliance with this Act.

Article 7

1. By Act, providing for general measures, rules are set regarding the supply of data from the register of the Reporting Office and the conditions under which this can take place with police and non-police agencies appointed by government authorities in or outside the Kingdom that have a task that is comparable to that of the Reporting Office and with agencies in the Kingdom of which the tasks have interfaces with the activities of the Reporting Office.
2. The supply of information to agencies outside the Kingdom shall take place only on the basis of a treaty or an administrative agreement, unless it concerns an agency that is acknowledged by the Egmont Group as a member and which, pursuant to its national legislation, for the exchange of data with other agencies acknowledged as a member by the Egmont Group, is not obliged to conclude a written agreement.

Article 12

1. The Reporting Center is authorized to request further data or information from the one who has submitted a reporting, and also from the one who, by rendering a service, as referred to in article 1, first paragraph, subparagraph a., sub 7, is involved in a transaction on which the Reporting Center has collected data, in order to be able to assess whether the collected data should be supplied on the basis of its duties, referred to in article 3, under b.
2. The person who, in accordance with the first paragraph, has been requested to supply these data or information, is obliged to supply them to the Reporting Center in writing, and also orally in urgent cases in the opinion of the Reporting Center, within the term set by the Reporting Center.

Article 14

1. Data or information that, in accordance with articles 11 or 12, second paragraph, have been supplied, cannot serve as a basis for or in favor of a criminal investigation or a prosecution due to suspicion of, or as a proof with respect to an indictment due to money laundering or an offense underlying this or the financing of terrorism by the person who has supplied these data or information.
2. The first paragraph is applicable by analogy to the person who works for the person who, in accordance with articles 11 or 12, has supplied data or information or has cooperated in such.

Article 15

1. The person who has proceeded to reporting, as laid down in article 11, is not liable for damage that a client or a third party consequently sustains, unless that damage is the consequence of an intentional act or conscious recklessness of the person who has reported.
2. The first paragraph is applicable by analogy to the person who works for the person who, in accordance with article 11, has supplied data or information or has participated in such.

Article 20

1. Data and information that have been supplied or received, pursuant to the provisions by or in accordance with this Act, are confidential. Anyone who supplies such data or information, and also the one who, pursuant to article 11, first paragraph, submits a reporting, is obliged to maintain such confidential.

2. It is prohibited for anyone who, pursuant to the application of this Act or of decisions taken pursuant to this Act, performs or has performed any duties, to make use thereof further or otherwise, or to give publicity to such further or otherwise, than for performing his duties or as required by this Act.
3. The Supervisor is authorized, in derogation of the first and second paragraphs and any other possible applicable legal confidentiality provisions, to inform the Reporting Center, if, in the performance of duties, facts come to light that could possibly indicate money laundering or the financing of terrorism.
4. The Reporting Center is authorized, in derogation of the first and second paragraphs:
 - a. to supply the Supervisor with data and information regarding, among other things, the conduct of reporting of the reporting institutions, obtained in the discharge of the tasks assigned to it, pursuant to this Act;
 - b. not to disclose reducible information and publish statistics to individual Service Providers by using data and information, obtained in the discharge of the tasks assigned to it, pursuant to this Act.

Article 21

The Reporting Center is authorized, in derogation of article 20, first and second paragraphs, and with due observance of the provisions in article 7, to supply data and information, obtained in the performance of its duties, pursuant to this Act, to foreign police and non-police agencies that have a task that is comparable to that of the Reporting Center and to agencies in the Kingdom of which the tasks have interfaces with the activities of the Reporting Center.

Annex 2: Countries with signed MoUs

1. Andorra
2. Anguilla
3. Antigua & Barbuda
4. Argentina
5. Aruba
6. Australia
7. Bahamas
8. Barbados
9. Belgium
10. Belize
11. Bermuda
12. Bosnia & Herzegovina
13. Brazil
14. Bulgaria
15. Canada
16. Chile
17. Colombia
18. Costa Rica
19. Croatia
20. Cyprus
21. Czech Republic (Tsjechië)
22. Denmark
23. Dominican Republic
24. Estonia (Estland)
25. France
26. Grenada
27. Guatemala
28. Guyana
29. Ireland
30. Isle of Man
31. Israel
32. Japan
33. Latvia
34. Lebanon
35. Macedonia
36. Mauritius
37. Mexico
38. Netherlands
39. Nigeria
40. Norway
41. Panama
42. Paraguay
43. Peru

- 44. Philippines
- 45. Poland
- 46. Portugal
- 47. Qatar
- 48. Slovenia
- 49. St. Kitts & Nevis
- 50. St. Maarten
- 51. St. Vincent & the Grenadines
- 52. South Africa
- 53. Suriname
- 54. Sweden
- 55. Taiwan
- 56. United Kingdom
- 57. United States
- 58. Venezuela

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