The Suspicious Activity Report

JUNE 2021

New Zealand Financial Intelligence Unit



INTRODUCTION

The Suspicious Activity Report is produced by the Financial Intelligence Unit (FIU), part of the New Zealand Police Financial Crime Group, currently led by Bill Peoples. This report is comprised of FIU holdings and open source media reporting collected within the last month.

Background

The Anti-Money Laundering and Countering Financing of Terrorism (AML/CFT) Act became law in October 2009. The Act's purpose is to detect and deter money laundering and contribute to public confidence in the financial system. It seeks to achieve this through compliance with the Financial Action Task Force (FATF) recommendations. The Financial Intelligence Unit produces this monthly report as part of its obligations under section 142(b)(i) and section 143(b) of the AML/CFT Act 2009. The Financial Crime Group is made up of the Financial Intelligence Unit, Asset Recovery Unit, the Money Laundering Team, and a Headquarters group.

Financial Intelligence Unit

The Financial Intelligence Unit is led by Detective Inspector Christiaan Barnard and has been operational since 1996. Its core function is to receive, collate, analyse, and disseminate information contained in Suspicious Transaction Reports, Prescribed Transaction Reports, and Border Cash Reports. It develops and produces a number of financial intelligence products, training packages and policy advice. The FIU participates in the AML/CFT National Coordination Committee chaired by the Ministry of Justice, and chairs the Financial Crime Prevention Network (FCPN). It is a contributing member to international bodies such as the Egmont Group of Financial Intelligence Units and the Asia/Pacific Group on Money Laundering.

Asset Recovery Unit

The New Zealand Police Asset Recovery Unit is led by Detective Inspector Craig Hamilton and was established in December 2009 specifically to implement the Criminal Proceeds (Recovery) Act 2009 (CPRA). The ARU is the successor to the Proceeds of Crime Units, which were established in 1991, and was combined with the FIU to create the Financial Crime Group. The CPRA expanded the regime for the forfeiture of property that has been directly or indirectly acquired or derived from significant criminal behaviour. It is intended to reduce the possibilities for individuals or groups to profit from criminal behaviour, to reduce the opportunities they have to expand their criminal enterprises, and act as a deterrent for criminal activity. There are five Asset Recovery Units (ARUs), based in Whangarei, Auckland, Waikato/Bay of Plenty, Wellington, and Christchurch.

Money Laundering Team

The Money Laundering Team (MLT), led by Detective Senior Sergeant Andy Dunhill, is the newest element of the FCG and was established in 2017 to target money laundering risks and reduce the investigative gap for financial investigations in organised crime. The MLT investigate criminal offenders moving the proceeds of predicate offending. The focus of the team is on disrupting and dismantling facilitators assisting organised criminal groups to hide illicit funds, including complicit Designated Non-Financial Business and Professions (DNFBPs) and other third parties such as money remitters.



FINANCIAL INTELLIGENCE UNIT UPDATE

Notes from the Head of FIU

Detective Inspector Christiaan Barnard

This issue of the Suspicious Activity Report marks 12 months since its first publication July 2020. Behind the scenes, our Research Analyst, Dawn Logan, diligently works to write and publish this newsletter and I would like to congratulate her on its success which has seen nearly 5,000 downloads from the FIU website.



We have had a busy 12 months, which has included the favourable publication of the FATF Mutual Evaluation and the Financial Crime

Group achieve its four-year target of restraining \$500 million in cash and assets from organised crime and gangs. Planning is well underway for the statutory review of the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 (AML/CFT Act) and the consultation document is expected to be publicly released by the end of August. The Financial Crime Prevention Network (FCPN) is due to release its first annual report in August, which will highlight its recent achievements. When the 11 Immediate Outcomes scores of the recent Mutual Evaluation were aggregated, New Zealand ranked fourth-equal in the world and was recognised as having outstanding international partnerships and a world class confiscation system. So, what are we worried about? We cannot rest on our laurels and need to remain ever vigilant — and not just accept the status quo.

With so much going on, it is easy to fall into the trap of being unable to see the forest for the trees. When looking across the work undertaken by the 4,500 reporting entities, the three supervisors, Ministry of Justice, New Zealand Police, Customs, and the law enforcement elements spread across government, what is it that are trying to achieve? Put simply, the AML/CFT regime is the premier organised crime prevention strategy. There is no other crime prevention initiative that requires such extensive engagement across so many public and private sector entities towards common outcomes. What are these outcomes? They are articulated in the <u>AML/CFT Act</u> with the vital outcome being the detection and deterrence of money laundering and financing of terrorism.

The reporting entities have a key role to play in detection and deterrence and this outcome is where we make the most difference for our communities. What does prevention mean in the AML/CFT regime? It is not domestic displacement; it is making the financial environment so difficult for criminals to enjoy their ill-gotten gains that they positively modify their behaviour or walk away all together. This can mean displacement in the international context, but domestically this means that they could exert their effort elsewhere – preferably by moving away from illicit activities to earning money through legal enterprises. In the context of some activity like tax evasion, their behaviour is modified so they become compliant.

The challenge with measuring prevention is the measuring of a non-event. To understand the effectiveness of prevention, the problem must first be baselined so any reduction can be measured effectively. We could use the implementation of AML reform in 2013 here in New



Zealand as a clear delineation between the baseline and the intervention. Unfortunately, the AML/CFT environment has been subject to a number of variables that have come into play over the last ten years: technology has changed both the financial system and criminals' ability to abuse it; New Zealand has greater exposure to transnational organised crime; the impact of the 501 deportees from Australia; changing illicit markets; the COVID19 pandemic; and other tangential policy and practice changes in the broader investigation and intelligence space are some of the variables to be accounted for. Teasing out the impact of the AML among these various changes is no easy feat and it has proven easier to fall back on the salient measurements such as the amount of money we have restrained or the number of regulatory actions undertaken to measure effectiveness.

Without detracting from the outstanding work of the Financial Crime Group and the Supervisors, we face a huge organised crime problem with New Zealand's money laundering risk being assessed in excess of \$1.35 billion per annum. The criminal abuse of our financial system is not something we are going to arrest or restrain our way out of. Prevention is central to the success of the AML/CFT Act and this is where the reporting entities play a crucial role.

There needs to be a mindset shift within reporting entities, where a risk-based approach is coupled with a response that has community outcomes as the central focus. When we consider the risk reporting entities identify through SAR reporting, where the threshold is 'reasonable grounds to suspect', reporting entities are exposed to customers who they believe are likely to be engaging in some type of criminal activity. Currently there is a belief that SAR submission is done in order for law enforcement to intervene. However, there is only a finite amount of investigative resource available so (generally speaking) reporting entities need to change their mindsets from being detectors to being disruptors, preventors, and deterrents.

If you believe that it is likely that your customer is engaging in some type of criminal activity, then I would encourage you to be more proactive in refusing to conduct transactions and moving to de-risk. We want to push criminals to the margins and into the hands of those non-compliant operators where we can more effectively deploy our law enforcement resource. This is not without its risks of unintended consequences. To improve reporting entities' ability to detect bad actors there needs to be more education, more guidance, information sharing enabled through good laws, and improved analysis to inform tactical and operational risks. While the FIU and the three supervisors carry responsibility for delivering much of this, it is also incumbent on the reporting entities to ensure that they are being proactive in their understanding of risk and typologies so that they can recognise potential criminal activity — and in addition to reporting it, are proactive in addressing it themselves.

Remember – know the risk, ask the questions, and report your suspicion to the #nzfiu... and do what you can to disrupt, prevent, and deter.



2020-2021 Year in Review

Looking Back

Our first Suspicious Activity Report was published a year ago — and also had an 'end of year' focus. Since that edition, we've added a back page, revised the Statistics Dashboard, and expanded the content to include several featured subjects. Along the way we've advised how to avoid being a money mule, what a good SAR looks like and explained what NFTs are. We've recommended movies, tv shows and podcasts to further your learning about fraud, anti-money laundering and countering terrorism financing. We've also featured the efforts of our domestic and international partners with links to publications ranging from wildlife exploitation to organised crime and corruption in sports.

More recently, we've highlighted the four FATF recommendations specific to the Financial Intelligence Unit, and some of the changes we've implemented to meet those obligations. In future editions we'll detail more of our planned improvements, as well as explore the concept of tipping off, and take a look at how money launderers are exploiting gold and real estate to launder their illicit money.

At the end of this month's edition we've included a survey so we can better understand readers' interests – please take a moment to provide feedback to assist us in planning future issues of *The Suspicious Activity Report*.

11 EDITIONS **6 FEATURES** 4 Guest Columns Spotlight on Crypto **Highlighted Achievements FIU Conference** Scams/Money Mules Entry in the 117 Pages NFTs/Blockchain \$500m Target **Egmont BECA Book** of FAQ: Suspicion and Good SARs Ш Content **FATF Mutual** Evaluation



Where are they now?

Art and Money Laundering

In the <u>first issue of the 2020-2021 year</u>, July 2020, we included an article about a bipartisan United States Senate investigation that found the 'art world' is susceptible to money laundering and sanctions evasion. At the time, the art world was considered to be the largest legal unregulated industry in the United States, according to the investigation.

Since then, the United States Congress included the Anti-Money Laundering Act of 2020 into the National <u>Defense Authorization Act 2021</u>, which became law on 2 January 2021, introducing the most significant reforms to anti-money laundering laws and regulations since 2001. The Act now includes dealers in antiquities and art under the same anti-money laundering regulatory framework as previously applied to financial institutions under the Bank Secrecy Act.

Superman29

Also included in the <u>July 2020 issue</u> was a news story about Kais Mohammad, a former bank employee who illegally exchanged between US\$15m and US\$25m [NZ\$22m – NZ\$36m] through in-person exchanges and transactions occurring at his Bitcoin ATM kiosks.

Mohammad pleaded guilty in September 2020 to operating an unlicensed money transmitting business, money laundering, and failing to maintain an effective anti-money laundering programme. Mohammad was sentenced to <u>2 years in federal prison</u> in May 2021. Prosecutors have also seized 17 of his ATMs, US\$23k [NZ\$33k] in cash, 18.4 Bitcoin [NZ\$1m] and 222.5 Ethereum [NZ\$738k] cryptocurrency.

Santa Claus

The October 2020 edition of The Suspicious Activity Report included a news story about Tau Liu, a venture capitalist who once dressed up as Santa Claus for disadvantaged youth in New York. Liu had been arrested in Guam by the United States Drug Enforcement Agency (DEA) and flown back to the United States to be indicted for laundering millions of dollars for the Mexican drug cartels utilising casinos and front companies.

Liu and three of his co-defendants pleaded guilty in April 2021 to conspiring to launder money; each faces up to 20 years in a federal prison when they are sentenced in July 2021.

QQAAZZ

Also in the October edition was a Europol press release about an international police operation "2BaGoldMule" led by Portuguese investigators and the FBI. Twenty people were arrested in multiple countries on money laundering charges.

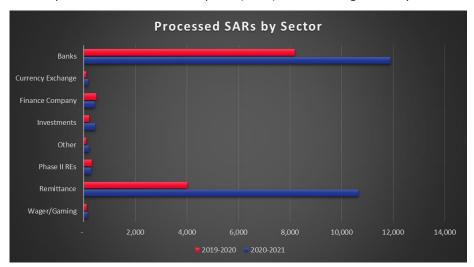
In December 2020, a Russian national, Maksim Boiko, admitted his guilt before a United States judge. Mr Boiko's online alias is "gangass" and was one of the first QQAAZZ suspects arrested. The investigation into Mr Boiko was detailed recently <u>in a video by Sumsub</u>, a private company focused on AML/CFT compliance.



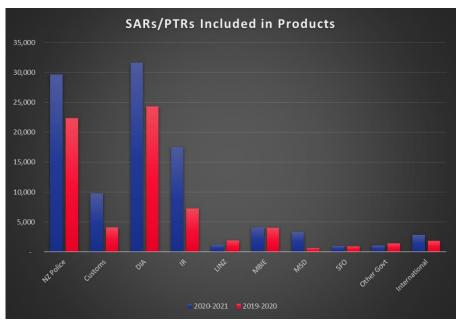
Suspicious Activity Reporting to the FIU

Reviewing the 2020-2021 annual statistics dashboard (included at the end of this edition), processed suspicious activity reports (SARs) have increased significantly over the previous year, with an 80% increase in transaction-based reports and 35% increase in activity-based reports.

Most categories of reporting entities increased their reporting – from an 18% increase in the wager and gaming sector to an 165% increase in the remittance sector. However, reporting by Phase II and finance companies decreased by 10% and 13% respectively. Transaction volumes within SARs and prescribed transaction reports (PTRs) increased significantly – over 100%!

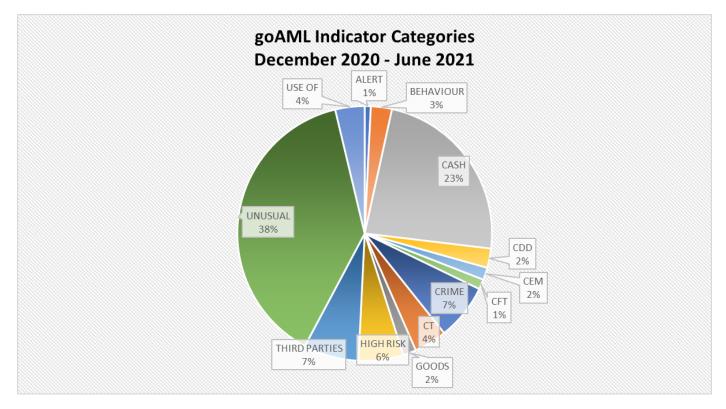


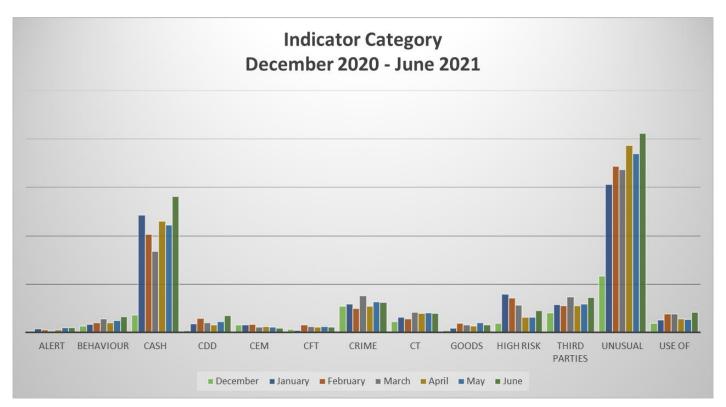
As for disseminations, Police districts and Asset Recovery Units are still the FIU's largest 'customer', receiving over 60% of all disseminated products. However, for SARs, STRs, and PTRs included in those products, the Department of Internal Affairs (DIA) receives slightly more than Police with 31% of the total disseminated. Information reports increased marginally, but analytical products decreased by half from the prior year. Despite the decrease in the number of products disseminated, the number of STRs/PTRs included in those products increased nearly 50% over the previous year, perhaps indicating more targeted FIU reporting. Agencies receiving an increase in reports in 2020-2021 included the Ministry of Social Development and the Inland Revenue Department, due to the COVID19 pandemic and the increase of benefit and tax fraud.





The new indicators have been in place since December 2020, and the FIU is continuing to see nearly all transaction and activity-based reports with indicators selected. Analysing the data from December 2020 through June 2021, the most often selected indicator category is Unusual Transaction or Activity, followed by Cash. The trend over the seven months shows increasing selection of both of the most popular categories over time, with most other categories staying flat or decreasing.



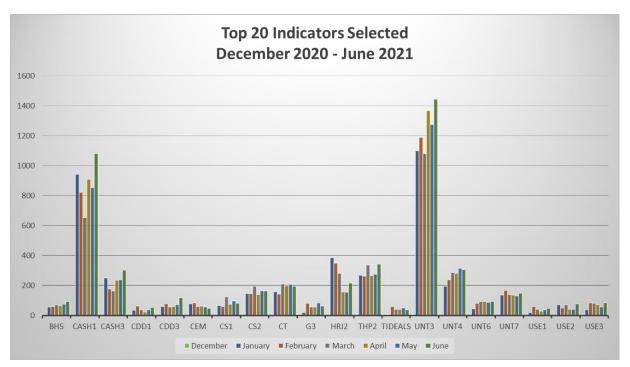




The FIU also analysed the top 20 indicators most often selected since the update in December 2020, revealing the frequent selection of UNT3 (Financial Profile) as well as CASH1 (Multiple Large Deposits). Other popular indicators include UNT4 (Level/Volume), THP2 (Third Party) and HRJ2 (Sanctioned Jurisdiction). Of the eight indicator codes in the Unusual Transaction/Activity category, UNT3 (Financial Profile) is still the indicator most often chosen by a large margin.



Indicators UNT3 and UNT4 are similar to the now-retired indicator "Activity does not match client profile", in both frequency chosen and lack of specificity. As these two indicators are often not chosen in isolation, and as they by themselves do not provide clear typologies, we will look to revise them later this year.





INTERNATIONAL AML/CFT NEWS

Malta

Cap on cash transactions leads fight against money laundering

Malta has recently introduced a cap of €10,000 on cash transactions for the sale of property and valuable items. Introduced into law last March, this cap will be enforced by a dedicated team from the Financial Intelligence Analysis Unit (FIAU).

The limit will apply to any payment in cash made or received for the purchase or sale of antiques, works of art, jewellery, precious metals and stones, pearls, motor vehicles and sea craft. The restriction applies to both sides of the transaction - both buyer and seller are held responsible for the transaction - and covers payments in Euro and the equivalent amount in any other currency. The limit will also apply to payments made in one transaction or in several linked transactions.

ADMINISTRATIVE FINE PARAMETERS

Amount Paid Over Limit in Cash	Percentage Applied*	Minimum Fine
E10,000 up to E50,000	10%	€1,000
E50,000 up to E100,000	25%	€2,500
		ů:

*percentage of what exceeded the E9,999.99

The regulations allow for the option that a person who breaches the regulation may, as an alternative to criminal proceedings, and with the consent of the Attorney General, prior to being charged in court, agree to the payment of an administrative fine to be imposed by the FIAU.

Anyone who breaches the restriction commits a criminal offence and if found guilty by a court will be liable to a fine of not less than 40 percent of the amount paid or received in cash over the limit of €9,999.99.

Nigeria

EFCC Chair: Real Estate sector major conduit for money laundering

The chairman of the Economic and Financial Crime Commission (EFCC), Abdulrasheed Bawa, has declared that the real estate sector of Nigeria served as a major conduit for money laundering in the country, and that the EFCC would be going all out to investigate money laundering in the sector. In a televised interview, the chairman stated that 90 to 100 percent of stolen public funds are used for the procurement of houses and land. The investigation will reportedly involve parts of Abuja, Lagos State and Port Harcourt.

A 2020 report by <u>Civil Society Legislative Advocacy Centre</u> (CISLAC) identified those same cities as Nigeria's major black spots of high-level capital flights. The report stated the "Nigerian real estate sector has long provided opportunity for persons and companies to launder illegally acquired funds." The report detailed that money launderers and criminals use third parties, professionals, family members and close associates to acquire high-value real estate.

Switzerland

Swiss bank admits to laundering over \$36 million in FIFA bribes

Switzerland-based Bank Julius Baer has admitted to conspiring to launder more than US\$36 million (NZ\$52m) in bribes through the United States to FIFA soccer officials.



Bank Julius Baer signed a three-year deferred prosecution agreement with the US government in which it acknowledged its involvement in the money laundering conspiracy. The bank has agreed to pay close to US\$80m (NZ\$115m) in penalties, which includes a fine of more than US\$43.3m (NZ\$62m) and forfeiture of nearly US\$36.4m (NZ\$52m).

According to the deferred prosecution agreement, the bank's anti-money laundering controls "failed to detect or prevent money laundering transactions related to the soccer bribery schemes." The agreement stated that the bank's personnel missed multiple, significant red flags, including false contracts and payments to third parties at the direction of a FIFA official.

United Kingdom



<u>Dealer's gamble of hiding £200,000 in gaming machine does</u> not pay off

Manchester police discovered £200,000 (NZ\$394,000) in cash in a "cops and robbers" gaming machine during a raid of a location tied to a suspected drug dealer. The game is called "Bank Job" and the artwork on the machine features a police officer with a truncheon chasing a masked bank robber. Controlled substances packaged for supply were also found in the suspect's possession and he was arrested and taken to custody.

Anti-money laundering expert convicted of money laundering

The former chairman of the Association of UK Payment Institutions, a UK group that represents the payment services industry, has been convicted of laundering the proceeds of an investment fraud worth £850,000 (NZ\$1.7m).

Dominic Thorncroft was chair of the Association for 14 years, and often promoted himself as an expert, working with members of parliament and financial regulators providing anti-money laundering advice and training.

An investigation by the Metropolitan Police, which began in 2016, found evidence that linked Thorncroft to an investment fraud which took place in 2014. The Crown Prosecution Service stated that "Dominic Thorncroft did not commit the fraud himself. However, his actions have allowed £850,000 defrauded from 60 individuals to be dispersed across the world. He promoted himself as an anti-money laundering expert but failed to live up to the standards he set for others."



Anti-Human Trafficking Intelligence Initiative (ATII)

How Human Traffickers Exploit International Economics (Part 1 of 4)

The ATII is a US-based non-profit formed in 2019 to combat global human trafficking by leveraging corporate social responsibilities directly through advocacy awareness, intelligence integration, technology advancement, and strategic data collaboration. In the first piece of a four-part series, ATII explores how criminal groups exploit underground banking channels.

Bank of International Settlements (BIS)

BIS Annual Economic Report 2021

The BIS's mission is to support central banks' pursuit of monetary and financial stability through international cooperation, and to act as a bank for central banks. The BIS annual report, most recently published in June 2021, explains what BIS does and who they are as an institution. Included in this year's report is a section examining digital currencies, including central bank digital currencies (CBDCs).





Financial Action Task Force (FATF)

Money Laundering from Environmental Crime

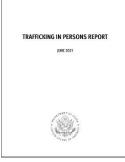
The FATF has published a new report identifying methods that criminals use to launder proceeds from environmental crime, as well as tools that governments and the private sector can apply to disrupt this activity.

Royal United Services Institute (RUSI)

Illegal Wildlife Trade and Financial Investigations in West Africa

A recent report from RUSI found that West Africa has emerged as a major source and transit hub in the global illegal wildlife trade (IWT). The paper analyses IWT trends in West Africa, identifies key challenges that currently prevent the use of financial investigation in IWT cases, and provides recommendations to support the implementation of the FATF guidelines in the region.





United States of America Department of State

<u>Trafficking in Persons Report</u>

New Zealand has been downgraded to Tier 2 from the top Tier 1 category, meaning it does not meet international standards for fighting trafficking. The report noted that "while the government convicted offenders in more cases of child sex trafficking than in previous years, it did not identify any victims in these cases as trafficking victims, as it did not use a system to specifically designate individuals as trafficking

victims, and many officials and service providers lacked an understanding of all forms of trafficking; this weakened victim protection may have undermined the ability of the government to recognise current trafficking trends in the country".



FEEDBACK

Tell Us What You Think

Your feedback is important and will assist us in planning future issues of *The Suspicious Activity Report*. Please take the time to complete this form. The completed form can be emailed to: FIU@police.govt.nz.

1. Please select your industry:	
Accountant or Bookkeeper Bank Broker or Custodian Building Society Cash Transport Casino Charitable Trust Collective Investment Scheme Credit Unions Crypto/VASP Debt Collection Derivatives Issuer Factoring Finance Company Financial Advisor Financial Leasing Foreign Exchange Government Agency High Value Dealer Other (please identify):	Investment Company Law Firm Life Insurer Managed Investment Scheme Manager Money Service Business Non-Bank Deposit Taking NBNDTL Payment Provider Peer-to-peer Lending Provider Real Estate Remittance Safe Deposit Securities Dealer Tax Pooling Trust or Company Service Provider (TCSP Trust and Loan Company Trustee Corporation Wager and Gaming Services
2. How often do you read <i>The Suspicious A</i> [] Every edition [] Occasionally [] Only editions with content directly apple	
3. What information or article did you fine Please explain why (please indicate by top	
4. What information did you find least he indicate by topic title and edition):	lpful or interesting? Please explain why (please



5. What information or topics would you like to see addressed in future editions of <i>The Suspicious Activity Report</i> ?		
_		
6.	What other feedback do you have about <i>The Suspicious Activity Report</i> ?	



MONTHLY STATISTICS* NEW ZEALAND POLICE FINANCIAL INTELLIGENCE UNIT 2021 June **SUBMITTED REPORTS to the FIU*** FINANCIAL INTELLIGENCE PRODUCTS **Disseminations of Products by Type Processed Suspicious Activity Reports (SARs)** ■ This Month ■ This Month 2,500 100 This Month Last Month ■ Last Month Last Year This Month Last Month Last Month 2,000 80 Last Year May June May June June 1,500 60 2021 2021 2020 2021 2021 1,000 40 2,009 2,007 1,489 **Information Reports** 60 89 Transaction-based 500 20 110 56 65 **Analytical Products Activity-based** Total 2,119 1,554 2,063 66 93 **Total Products** Information Reports Analytical Products Transaction-based Activity-based 8.400 **Rolling Annual** 600 Lausaction-pased 0.00, 8,200 8,000 7,900 7,800 8,300 **Totals for SARs Disseminations of Products by Recipient** 500 posed 400 Activity-based 500 Activity-based 500 Posed 500 Pose 16 4.500 4,142 Transactionbased 4,000 14 ◆ Activity-based 7,800 100 3,500 2.963 12 7,700 3,000 December February April June 10 2020 2021 2021 2021 2,500 **Processed SARs by Sector** 2,000 1,500 1.000 Phase II REs 500 nvestments Wager/Gaming Currency Ex Finance Co Other 1078 Inset ■ Products Disseminated SARS/PTRs Included in Products June 2021 Disseminations of Products by Included SARs and PTRs **Transaction Volumes within SARs and PTRs** 30 25 20 15 ■ This Month **SARs PTRs** Total This Month Last Month Last Year 9.930 Info Report ■ Last Month May June June Last Year 2021 2021 2020 2,029 9,144 11,173 10 18,126 **SARs** 26.018 24.982 5 IFTs 440,004 419,485 414,958 1.243 Intel Report **LCTs** 15,377 15,063 15,559 **SARs** LCTs

^{*}Statistical data for transaction reporting and intelligence products may be updated as new information is processed, and so there may be minor discrepancies between the statistical figures contained in this report and subsequent reports.

QTR 4

QUARTERLY STATISTICS* NEW ZEALAND POLICE FINANCIAL INTELLIGENCE UNIT **SUBMITTED REPORTS to the FIU* Processed Suspicious Activity Reports (SARs)** ■ This QTR 7,000 This QTR Last QTR ■ Last QTR Last Year 6.000 Last Year 5,000 **QTR 4** QTR 3 QTR 4 4,000 2020-21 2020-21 2019-20 3,000 6,015 5,549 3,568 Transaction-based 2,000 1,000 212 172 122 **Activity-based** Total 6,227 5,721 3,690 Transaction-based Activity-based 30.000 2.000 **Rolling Annual 2**5,000 **Totals for SARs** 1,500 20,000 15,000 1,000 Transaction-10,000 based 500 Activity-based 5,000 0 QTR 2 QTR 4 QTR 2 QTR 4 2019-20 2019-20 2020-21 2020-21 **Processed SARs by Sector** Phase II REs 2,721 Finance Co Wager/Gaming Investments Currency Ex Other 3,099 Inset QTR 20-21

Transaction Volumes within SARs and PTRs

SARs

IFTs

LCTs

This QTR

QTR 4

2020-21

78.115

1,261,466

45,208

Last QTR

QTR 3

2020-21

69.360

1,211,399

48,110

Last Year

QTR 4

2019-20

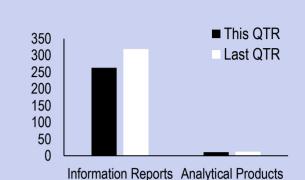
42.291

1,135,471

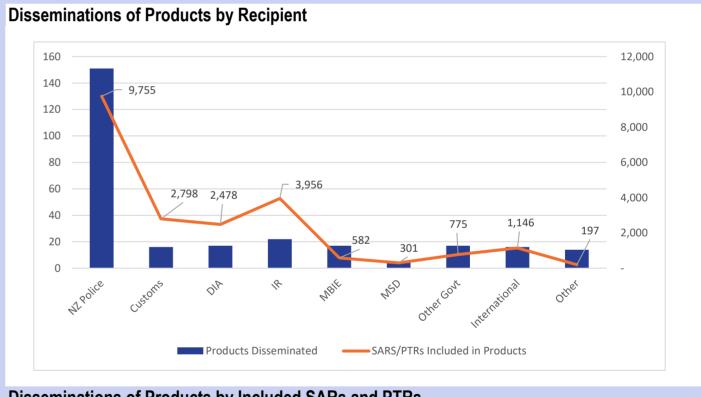
28,472

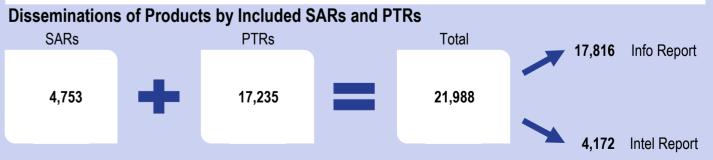
FINANCIAL INTELLIGENCE PRODUCTS





2020-21





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LCTs

■ This QTR

■ Last QTR

Last Year

100

80

60

40

20

SARs

Thousands

2020-21

YEAR

ANNUAL STATISTICS* NEW ZEALAND POLICE FINANCIAL INTELLIGENCE UNIT **SUBMITTED REPORTS to the FIU* Processed Suspicious Activity Reports (SARs)** 25,000 ■ This Year This Year Last Year 20,000 Last Year 15.000 2020-21 2019-20 10,000 23,310 12,895 Transaction-based 5,000 615 829 **Activity-based** Total 24,139 13,510 Transaction-based Activity-based 30,000 2.000 **Rolling Annual 2**5,000 **Totals for SARs** 1,500 20,000 15,000 10,000 5,000 1,000 Transactionbased 500 Activity-based 5,000 QTR 2 QTR 4 QTR 2 QTR 4 2019-20 2019-20 2020-21 2020-21 **Processed SARs by Sector** Phase II REs nvestments Wager/Gaming Finance Co Other 11,886 271 Inset 2020-2021 **Transaction Volumes within SARs and PTRs Spunsands** 500 400 300 ■ This Year

Last Year

2019-20

144,486

5,073,739

509,128

200

100

SARs

This Year

2020-21

291,130

5,057,000

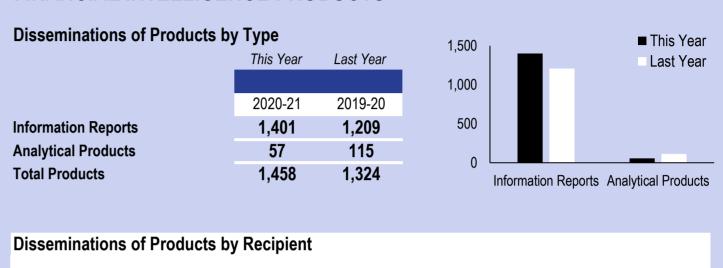
190,126

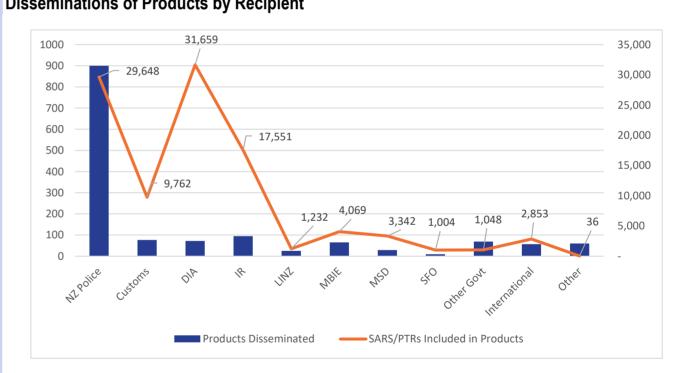
SARs

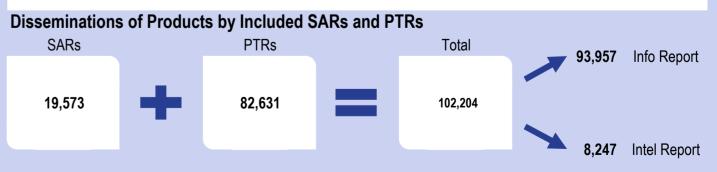
IFTs

LCTs

FINANCIAL INTELLIGENCE PRODUCTS







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LCTs

Last Year





