



# REPORT

2011

**May 2012**

**ANNUAL REPORT BY THE MONEY LAUNDERING REPORTING  
OFFICE SWITZERLAND MROS**

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## TOPICS

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Statistics

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Typologies

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From the MROS office

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International scene

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Internet Links

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# MROS

## 14th Annual Report

April 2012

## 2011

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Federal Office of Police

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## 1. Introduction

The number of Suspicious Activity Reports (SARs) increased in 2011 for the fifth consecutive year. In fact, the increase was significant: from 1,159 SARs in 2010 to 1,625 SARs in 2011, an increase of 40 percent. The total asset value involved also rose to a record sum of CHF 3 billion, more than the 2009 and 2010 reporting years together. These increases can be attributed not only to political events primarily in the Middle East and North Africa, but also to a significant increase in the number of SARs submitted by money transmitters.

Of the 1,625 incoming SARs in 2011, 1,000 were submitted under Article 9 of the Anti-Money Laundering Act (AMLA). This act places financial intermediaries under the obligation to report cases of suspected money laundering (mandatory reporting). The remaining 625 SARs were submitted under Article 305<sup>ter</sup> Swiss Criminal Code (SCC), which allows financial intermediaries on suspicion of money laundering to submit a SAR, but does not compel them to do so (voluntary reporting).

By far the most SARs were submitted, once again, in connection with suspected fraud as the predicate offence. Although only about 50 more SARs in connection with this offence were submitted in 2011 compared to the previous year and although there were greater (sometimes twofold and threefold) increases in SARs involving other criminal offences, the high number of SARs in connection with fraud remains unrivalled. There was also an increase in SARs involving money laundering: this category comprises cases that cannot be classified under a specific form of crime, but that suggest acts of money laundering due to the modus operandi involved. As a result of political events in several countries (especially across the Middle East and North Africa), the number of SARs involving suspected bribery increased significantly, too. These events were reflected in our work and aroused the interest of many of the agencies we are in contact with. In chapter 2.3 we therefore examine in more detail the SARs that were submitted in the wake of these events.

The Swiss Federal Supreme Court (FSC) delivered two verdicts on cases involving fraud. The verdicts address the issue of causality between the predicate offence and the financial gain arising as a consequence thereof. The verdicts also look in detail at the financial intermediary's duty to clarify under Article 6 of the Anti-Money Laundering Act (see chapter 4.6).

In the last few years there have been a number of developments on the international scene, which have far-reaching consequences for MROS. For one, the FATF Recommendations have been revised. According to the press release of 16 February 2012<sup>1</sup>, the new standards are aimed specifically at enabling national authorities to

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<sup>1</sup> « FATF steps up the fight against money laundering and terrorist financing » in [http://www.fatf-gafi.org/document/41/0,3746,en\\_32250379\\_32236920\\_49684649\\_1\\_1\\_1\\_1,00.html](http://www.fatf-gafi.org/document/41/0,3746,en_32250379_32236920_49684649_1_1_1_1,00.html)

take more effective action against money laundering and terrorist financing. Being a member of the Swiss delegation to the FATF, the new international standards affect the work of MROS. The other development concerns the Egmont Group. In July 2011, the Egmont Group accused MROS of insufficient international co-operation and issued a warning of suspension. MROS has been a member of the Egmont Group since 1998 and has proven to be an active and reliable partner. The members of the Egmont Group agreed to exchange certain financial information, but the deadlines set for MROS to provide information to other partner agencies were extremely short, a fact that was recognised by the partner agencies. In addition to the short deadlines, MROS is not authorised under national law to pass on specific financial information to foreign FIUs. The Egmont Group holds this situation to be no longer sustainable and has granted MROS one year to work towards changing the relevant legal provisions. The amendment of the provisions contained in the Anti-Money Laundering Act and criticised by the Egmont Group are currently the subject of a referendum to be completed by 27 April 2012. Amending the law accordingly would not only ensure MROS's continuing membership of the Egmont Group, but would also bring Swiss legislation into stricter conformity with the revised FATF recommendations.

Bern, May 2012

Judith Voney, Attorney

Head of the Money Laundering Reporting Office Switzerland MROS

Federal Department of Justice and Police FDJP

Federal Office for Police, Directorate Staff

MROS Section

## 2. Annual MROS statistics

### 2.1. Overview of MROS statistics 2011

Summary of reporting year (1 January 2011 – 31 December 2011)

SAR reporting volume	2011	2011	+/-	2010	2010
	Absolut	Relativ		Absolut	Relativ
<b>Total number of SARs received</b>	<b>1625</b>	<b>100.0%</b>	<b>40.2%</b>	<b>1159</b>	<b>100.0%</b>
Forwarded SARs	1471	90.5%	46.8%	1002	86.5%
Non-forwarded SARs	154	9.5%	-1.9%	157	13.5%
Pending SARs	0	0.0%	N/A	0	0.0%
<b>Type of financial intermediary</b>					
Bank	1080	66.4%	31.4%	822	70.9%
Payment services sector	379	23.3%	106.0%	184	15.9%
Fiduciary	62	3.8%	6.9%	58	5.0%
Asset manager / Investment advisor	27	1.7%	-32.5%	40	3.5%
Attorney	31	1.9%	138.5%	13	1.1%
Insurance	11	0.7%	22.2%	9	0.8%
Credit card company	10	0.6%	11.1%	9	0.8%
Casino	6	0.4%	-25.0%	8	0.7%
Foreign exchange trader	7	0.4%	16.7%	6	0.5%
Securities trader	0	0.0%	-100.0%	4	0.3%
Other	3	0.2%	-25.0%	4	0.3%
Loan, leasing and factoring business	5	0.3%	400.0%	1	0.1%
Commodity and precious metal trader	1	0.1%	0.0%	1	0.1%
Currency exchange	3	0.2%	N/A	0	0.0%
<b>Amounts involved in CHF</b>					
(Total effective assets at time of report)					
Total asset value of all SARs received	3'280'578'413	100.0%	287.1%	847'378'467	100.0%
Total asset value of forwarded SARs	3'222'772'033	98.2%	350.6%	715'269'220	84.4%
Total asset value of pending SARs		0.0%	N/A	0	0.0%
Total asset value of non-forwarded SARs	57'806'380	1.8%	-56.2%	132'109'247	15.6%
Average asset value of SARs (total)	2'018'817			731'129	
Average asset value of forwarded SARs	2'190'872			713'842	
Average asset value of pending SARs	0			0	
Average asset value non-forwarded SARs	375'366			841'460	

## **2.2. General remarks**

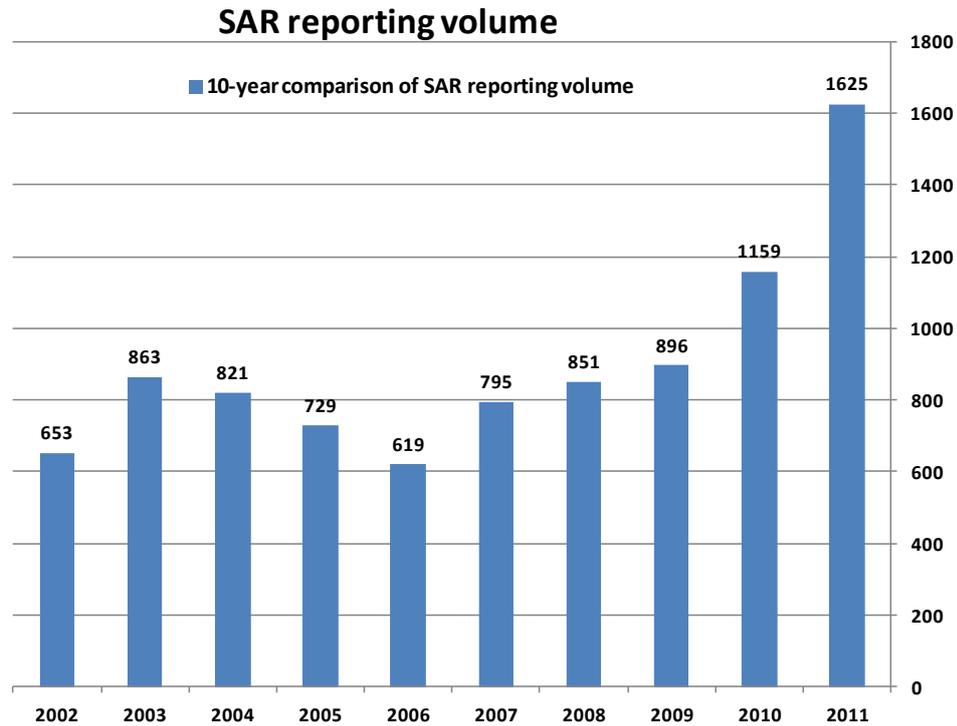
The 2011 reporting period was characterised by the following developments:

1. Record number of SARs (1,625);
2. Increase in SARs from the *banking sector*;
3. Increase in SARs from the *payment services sector*;
4. High total asset value.

### **2.2.1 Record number of SARs**

In the 2011 reporting period, MROS received a total of 1,625 reports (2010: 1,159). This is the second time since the Anti-Money Laundering Act came into force that well over 1,000 SARs have been submitted and it represents an increase of more than 40 percent over 2010. The increase can be attributed, on the one hand, to the increase in the number of SARs from the *banking sector*, due largely to the numerous business connections reported in the wake of political events primarily in the Middle East and North Africa. On the other hand, MROS received twice as many SARs from the *payment services sector* as in the previous year, due mainly to the clean-up of accounts by one money transmitter. It should be noted here that a single case can generate a large number of SARs due to the high number of business connections reported, and this is subsequently reflected in the reporting volume. As in the previous year, the majority of SARs in 2011 were submitted by the *banking sector*: with a total of 1,080 (67 percent), this sector submitted more SARs (in absolute terms) than in the previous reporting period (2010: 822 SARs or 71 percent of total reporting volume). There was also a noticeable increase in the categories *payment services sector* and *attorneys*. In absolute figures, however, it is the banking and payment services sectors that mainly influence the total reporting volume. The remaining categories hardly influence the total volume because of the small number of SARs. However, any fluctuation – however small – in the number of SARs from these categories can have a dramatic effect in relative terms.

Despite the higher reporting volume, the average length of time to process SARs in 2011 was two working days (remaining unchanged over 2010).



### 2.2.2 SARs from the payment services sector

With an increased share of more than 23 percent of the total reporting volume, the *payment services sector* was again the second largest contributor of SARs behind the *banking sector* (2010: nearly 16 percent). Both sub-categories *providers* and *money transmitters* have again been listed separately. With 141 SARs, the category *providers* submitted slightly more reports than in 2010 (123 SARs). The fourfold increase in the number of SARs from *money transmitters*, however, is remarkable (2010: 61, 2011: 238). This dramatic increase is due to one financial intermediary cleaning up his accounts retroactively and reporting a large number of suspicious transactions that had already been carried out. In these cases the suspected predicate offence was primarily drugs-related. MROS forwarded many of the cases to the prosecuting authorities, a fact that also contributed to a higher proportion of forwarded cases (2011: 85 percent, 2010: 67 percent). In contrast, the proportion of forwarded cases from *providers* remained virtually unchanged (2011: 88 percent, 2010: 89 percent).

<b>year</b>	<b>total SARs</b>	<b>in %</b>	<b>payment services sector</b>	<b>in %</b>	<b>-of which provides</b>	<b>in %</b>	<b>-of which money transmitters</b>	<b>in %</b>
2002	653	100	281	43	84	30	197	70
2003	863	100	460	53	130	28	330	72
2004	821	100	391	48	97	25	294	75
2005	729	100	348	48	57	16	291	84
2006	619	100	164	26	61	37	103	63
2007	795	100	231	29	100	43	131	57
2008	851	100	185	22	78	42	107	58
2009	896	100	168	19	106	63	62	37
2010	1159	100	184	16	123	67	61	33
2011	1625	100	379	23	141	37	238	63
<b>Total</b>	<b>9011</b>	<b>100</b>	<b>2791</b>	<b>31</b>	<b>977</b>	<b>35</b>	<b>1814</b>	<b>65</b>

### 2.2.3 Mandatory SARs (Art. 9 AMLA) and voluntary SARs (Art. 305<sup>ter</sup> para. 2 SCC)

Out of the 1,625 SARs submitted in 2011, 625 (over 38 percent) were submitted under Article 305<sup>ter</sup> paragraph 2 SCC (right to report or voluntary SARs) and 1,000 (nearly 62 percent) were submitted under Article 9 AMLA (duty to report or mandatory SARs). Thus, the proportion of mandatory SARs was higher than in the previous year. The reason for this is the higher number of SARs from the *payment services sector*: money transmitters, in particular, tend not to differentiate greatly between voluntary and mandatory SARs. Distinguishing between a vague suspicion and a reasonable suspicion is difficult, and freezing assets under Article 10 AMLA is usually not considered an option because the transaction has been reported retroactively. The statistics of the last few years reveal that individual financial sectors follow different practices with regard to what type of SAR they submit: voluntary reporting is chosen especially by the banking sector (half of all SARs) and providers from the payment services sector (more than one-fifth of all SARs), which is reflected in the total number of voluntary SARs submitted. The number of voluntary SARs has increased rapidly, especially since 2009. This is probably due to MROS's call to submit voluntary SARs (under Art. 305<sup>ter</sup> para. 2 SCC) not to prosecution authorities, but directly to MROS. Since the revision of the Anti-Money Laundering Act in 2009 financial intermediaries, who once had the choice to whom they could submit voluntary SARs (Art. 305<sup>ter</sup> para. 2 SCC), may now only submit them to MROS.

On taking a closer look at the individual banking categories, it becomes evident that major banks made the most use of voluntary reporting in 2011: 69 percent or 214 of their SARs were submitted under Article 305<sup>ter</sup> paragraph 2 SCC, as opposed to 96 SARs submitted under mandatory reporting (Art. 9 AMLA). A similar trend is evident for foreign controlled banks, which submitted 52 percent of their SARs under voluntary reporting.

Financial intermediary	Type of SAR	2003	2004	2005	2006	2007	2008	2009	2010	2011	Total
Banks	Total	302	342	294	359	492	573	603	822	1080	<b>4867</b>
	9 AMLA	275	313	258	271	307	392	401	426	536	<b>3179</b>
	305 <sup>ter</sup> SCC	27	29	36	88	185	181	202	396	544	<b>1688</b>
Supervisory authorities	Total	2		2	5	1	1	4	0	1	<b>16</b>
Casinos	Total	8	2	7	8	3	1	5	8	6	<b>48</b>
	9 AMLA	8	2	7	8	2	1	5	4	3	<b>40</b>
	305 <sup>ter</sup> SCC					1			4	3	<b>8</b>
Foreign exchange trader	Total	2	1	1	1			5	6	7	<b>23</b>
	9 AMLA			1	1			5	6	5	<b>18</b>
	305 <sup>ter</sup> SCC	2	1						0	2	<b>5</b>
Securities trader	Total		2	2		2	5	2	4		<b>18</b>
	9 AMLA		2	2		2	5	2	1		<b>15</b>
	305 <sup>ter</sup> SCC								3		<b>3</b>
Currency exchange	Total		3	3	2	1	1	1		3	<b>14</b>
	9 AMLA		2	3	2	1	1	1		1	<b>11</b>
	305 <sup>ter</sup> SCC		1							2	<b>3</b>
Loan, leasing, factoring and non-recourse financing	Total	2	1	1	7	4	1	11	1	5	<b>33</b>
	9 AMLA	2	1	1	3	4	1	10	1	5	<b>28</b>
	305 <sup>ter</sup> SCC				4			1			<b>5</b>
Credit card company	Total	1	2			2	2	10	9	10	<b>36</b>
	9 AMLA	1	2			2	2	3	6	6	<b>22</b>
	305 <sup>ter</sup> SCC							7	3	4	<b>14</b>
Attorney	Total	9	10	8	1	7	10	11	13	31	<b>100</b>
	9 AMLA	9	9	8	1	7	10	11	12	27	<b>94</b>

	305 <sup>ter</sup> SCC		1						1	4	6
Commodity and precious metal trader	Total	1				1	5	1	1	1	10
	9 AMLA	1				1	5	1	1	1	10
	305 <sup>ter</sup> SCC										
Fiduciary	Total	47	36	31	45	23	37	36	58	62	375
	9 AMLA	44	36	31	43	20	35	34	58	57	358
	305 <sup>ter</sup> SCC	3			2	3	2	2		5	17
other FI	Total	1	7		1	2		1	4	2	18
	9 AMLA	1	7		1	2		1	4	2	18
	305 <sup>ter</sup> SCC										
Asset manager / investment advisor	Total	18	13	18	6	8	19	30	40	27	179
	9 AMLA	17	13	17	6	5	16	29	38	21	162
	305 <sup>ter</sup> SCC	1		1		3	3	1	2	6	17
Insurance	Total	8	8	9	18	13	15	9	9	11	100
	9 AMLA	8	7	7	15	12	12	9	9	8	87
	305 <sup>ter</sup> SCC		1	2	3	1	3	0		3	13
Distributor of investment funds	Total	3	3	5		1	1				12
	9 AMLA	2	3	4			1				10
	305 <sup>ter</sup> SCC	1	0	1							2
Payment services, divided into	Total	459	391	348	164	231	185	168	184	379	2509
a) providers	9 AMLA	127	87	32	22	27	46	86	65	91	583
	305 <sup>ter</sup> SCC	2	10	25	39	73	32	20	58	50	309
b) money transmitters	9 AMLA	268	255	257	102	129	104	61	57	236	1469
	305 <sup>ter</sup> SCC	62	39	34	1	2	3	1	4	2	148

#### **2.2.4 Reporting cases of attempted money laundering under Article 9 paragraph 1 (b) Anti-Money Laundering Act**

Since the revision of the Anti-Money Laundering Act in 2009, a financial intermediary must report situations in which negotiations to establish a business relationship have been broken off due to a reasonable suspicion that the assets involved are

- connected to an offence in terms of Article 305<sup>bis</sup> SCC (money laundering) or Article 260<sup>ter</sup> paragraph 1 SCC (criminal organisation)
- the proceeds of a felony or
- subject to the power of disposal by a criminal organisation.

In practice, little use is made of this type of mandatory reporting. Only 21 SARs were submitted in 2011 under Article 9 paragraph 1(b) AMLA (eight more than in 2010), and of these 21 only nine were forwarded to the prosecuting authorities, four of which were subsequently dismissed. The percentage of forwarded SARs in connection with attempted money laundering is, at just under 43 percent (2010: just under 31 percent) low in comparison with the overall percentage of forwarded SARs (just under 91 percent). The reason for this is that when negotiations are terminated, business relations have not yet been established, assets have not yet been transferred and it is usually difficult to prove related predicate offences. Thus, there is generally insufficient basis for initiating criminal proceedings. It should be noted here that the Anti-Money Laundering Act is a piece of preventive legislation whose primary aim is to prevent the financial market from being infiltrated with money of criminal origin. The regulation of due diligence is a first step in this direction. The financial intermediary is subject to strict rules with regard to identifying the contracting party, the beneficial owner, the origin and legality of assets. If he suspects money laundering or terrorist financing, he must discontinue negotiations and report to MROS. Even if MROS does not forward the SAR to the prosecuting authorities, the client will not have succeeded in introducing criminal assets into legal circulation or in financing terrorism, and the aim of prevention will thus have been achieved. Moreover, MROS can voluntarily inform national and international prosecution authorities or its international partner agencies on individuals' suspected criminal activities, thus providing investigative authorities with new clues on suspects. It is important, therefore, that the reporting financial intermediary does not draw the wrong conclusions from a SAR that has not been forwarded by MROS to the prosecuting authorities and, subsequently, re-enter into negotiations with the client.

<b>Financial intermediary</b>	<b>Type of SAR</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>Total</b>
Banks	Total	302	342	294	359	492	573	603	822	1080	<b>4867</b>
	of which Art. 9 (1)b AMLA	2	4	10	9	16	6	15	9	13	<b>84</b>
Supervisory Authority	Total	2		2	5	1	1	4	0	1	<b>16</b>
Casinos	Total	8	2	7	8	3	1	5	8	6	<b>48</b>
	of which Art. 9 (1)b AMLA										<b>0</b>
Foreign exchange trader	Total	2	1	1	1			5	6	7	<b>23</b>
	of which Art. 9 (1)b AMLA									2	<b>2</b>
Securities trader	Total		2	2		2	5	2	4		<b>17</b>
	of which Art. 9 (1)b AMLA										<b>0</b>
Currency exchange	Total		3	3	2	1	1	1		3	<b>14</b>
	of which Art. 9 (1)b AMLA										<b>0</b>
Loan, leasing, factoring and non-recourse financing	Total	2	1	1	8	4	1	11	1	5	<b>34</b>
	of which Art. 9 (1)b AMLA										<b>0</b>
Credit card company	Total	1	2			2	2	10	9	10	<b>36</b>
	of which Art. 9 (1)b AMLA								1		<b>1</b>
Attorney	Total	9	10	8	1	7	10	11	13	31	<b>100</b>
	of which Art. 9 (1)b AMLA										<b>0</b>
Commodity and precious metal trader	Total	1			1	5	1	0	1	1	<b>10</b>

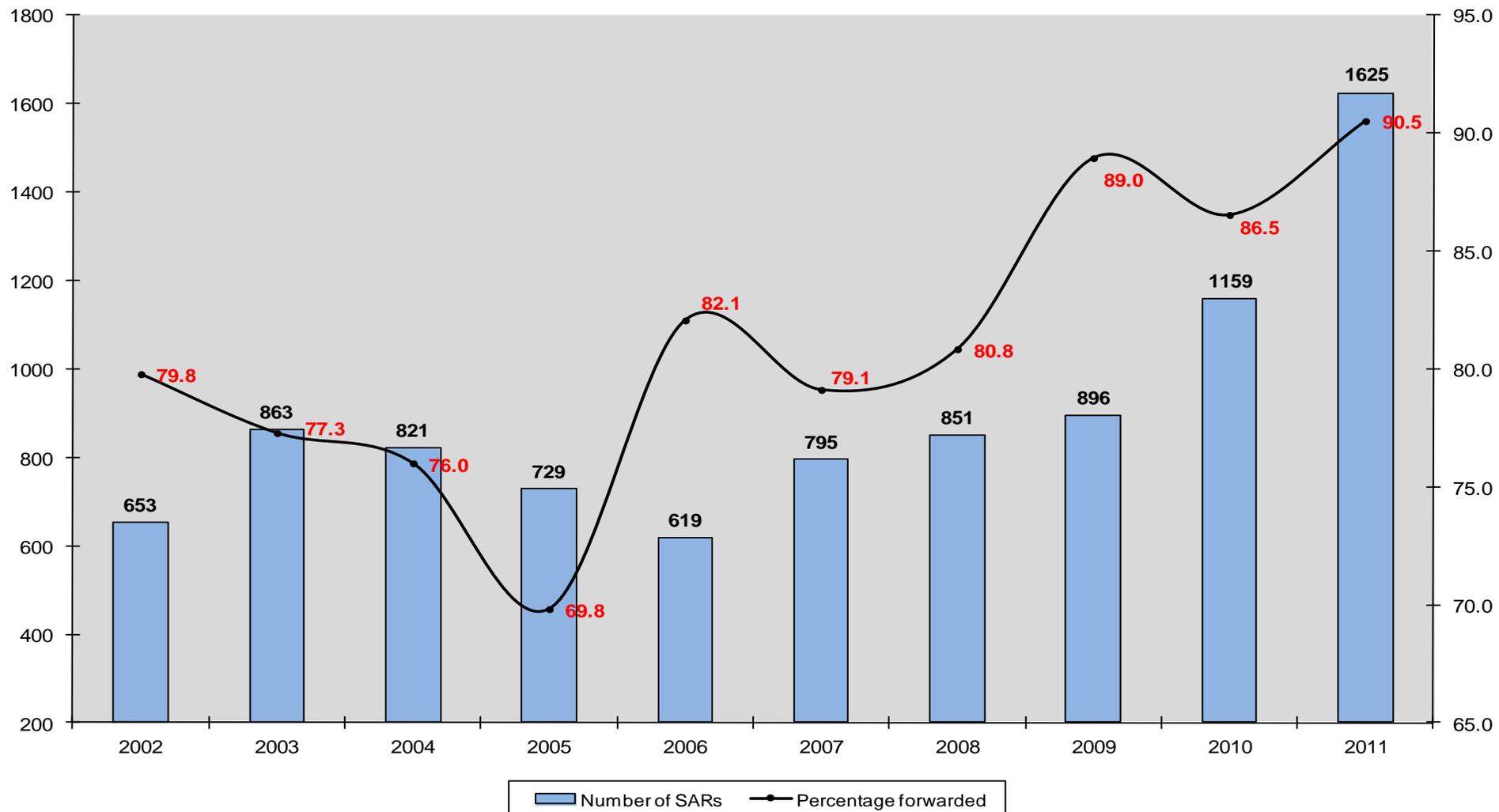
	of which Art. 9 (1)b AMLA										<b>0</b>
Fiduciary	Total	47	36	31	45	23	37	36	58	62	<b>375</b>
	of which Art. 9 (1)b AMLA							1	1	2	<b>4</b>
Other FI	Total	1	7		1	2		1	4	2	<b>18</b>
	of which Art. 9 (1)b AMLA										<b>0</b>
Asset manager / Investment advisor	Total	18	13	18	6	8	19	30	40	27	<b>177</b>
	of which Art. 9 (1)b AMLA								2	1	<b>3</b>
Insurance	Total	8	8	9	18	13	15	9	9	11	<b>100</b>
	of which Art. 9 (1)b AMLA										<b>0</b>
Distributor of investment funds	Total	3	3	5		1					<b>12</b>
	of which Art. 9 (1)b AMLA										<b>0</b>
Payment services	Total	459	391	348	164	231	185	168	184	379	<b>2509</b>
	of which Art. 9 (1)b AMLA									3	<b>3</b>

### 2.2.5 Proportion of SARs forwarded to the prosecuting authorities

The proportion of forwarded SARs rose from 87 percent in 2010 to about 91 percent in 2011. This figure, which is very high, continues to reflect the excellent quality of the SARs submitted to MROS. In contrast to most foreign reporting systems, which are based on a “suspicious transaction report STR” (i.e. an unqualified suspicion), or even merely on a “currency transaction report CTR” (i.e. a transaction exceeding a certain monetary threshold), the Swiss reporting system is based on a well-founded suspicion of money laundering – as the name SAR or “suspicious activity report” suggests. Foreign systems result in a much higher number of reports whose content does not compare with the high quality of the Swiss reports, however. The efficiency and effectiveness of money laundering legislation should not only be measured against the number of reports or statistics, but – more relevantly – by comparing the proportion of forwarded reports. Compared with foreign reporting systems, the Swiss reporting system boasts a high proportion of SARs forwarded to prosecution authorities.

The percentage of forwarded SARs from all sectors is high. As to be expected, the banking sector is top of the list once again with a slightly higher percentage than the previous reporting period: 93 percent in 2011 as opposed to 90.5 percent in 2010. Looking at the proportion of forwarded SARs from the payment services sector, it is apparent that the category *providers* remained virtually unchanged over the previous year (2011: 88%, 2010: 89%). The *money transmitters* have significantly enhanced the quality of their reports, which is reflected in the much higher proportion of forwarded SARs from this category: from 67 percent in 2010 to 85 percent in 2011. The reason for the increase, as mentioned on page 5, is the high number of SARs from one financial intermediary from this sector. The proportion of forwarded SARs in the other categories of financial intermediaries remained at the usual accountable level. A further reason for the general increase in forwarded SARs may lie in the revision of the Anti-Money Laundering Act: as mentioned, financial intermediaries no longer have to act “with the diligence required in the circumstances”, but only “in good faith” (Art. 11 para. 1 AMLA). This provides the financial intermediary with better protection and may well have resulted in lower reservations about submitting a SAR.

Proportion of SARs forwarded to the prosecution authorities in comparison to the total number submitted 2002 – 2011



<b>Financial intermediary category</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>Total</b>
Bank	97.0%	96.0%	91.8%	92.2%	94.4%	92.1%	87.4%	90.7%	90.5%	93.0%	<b>92.0%</b>
Supervisory authority	100.0%			100.0%	100.0%		100.0%				<b>100.0%</b>
Casino	50.0%	62.5%	50.0%	85.7%	75.0%	66.7%	100.0%	80.0%	50.0%	50.0%	<b>65.4%</b>
Foreign exchange trader	100.0%	100.0%	0.0%	100.0%	100.0%			100.0%	83.3%	57.1%	<b>80.0%</b>
Securities trader			100.0%	100.0%		100.0%	83.3%	50.0%	25.0%		<b>70.6%</b>
Currency exchange	0.0%		100.0%	100.0%	50.0%	100.0%	100.0%	100.0%		33.3%	<b>73.3%</b>
Loan, leasing, factoring and non-recourse financing	100.0%	100.0%	100.0%	100.0%	75.0%	50.0%	100.0%	90.9%	100.0%	100.0%	<b>85.7%</b>
Credit card company		100.0%	100.0%			100.0%	100.0%	100.0%	66.7%	100.0%	<b>91.7%</b>
Attorney	83.3%	100.0%	100.0%	75.0%	0.0%	85.7%	80.0%	100.0%	69.2%	93.5%	<b>87.5%</b>
Commodity and precious metal trader	100.0%	100.0%			100.0%	100.0%	0.0%		0.00%	100.0%	<b>81.8%</b>
Self-regulating organisation	100.0%			100.0%	100.0%	100.0%		100.0%		100.0%	<b>100.0%</b>
Fiduciary	89.4%	95.7%	91.7%	100.0%	88.9%	82.6%	91.9%	86.1%	79.3%	85.5%	<b>88.6%</b>
Other FI	100.0%	100.0%	100.0%		0.0%	100.0%		0.0%	25.0%	100.0%	<b>77.3%</b>
Asset manager / investment advisor	92.9%	94.4%	92.3%	83.3%	33.3%	75.0%	52.6%	83.3%	77.5%	92.6%	<b>80.8%</b>
Assurance	88.9%	87.5%	87.5%	88.9%	72.2%	61.5%	86.6%	66.7%	44.4%	54.5%	<b>73.4%</b>
Distributor of investment funds	100.0%	66.7%	100.0%	60.0%			0.0%				<b>71.4%</b>
Payment services	60.1%	61.7%	58.6%	46.0%	57.3%	51.9%	60.5%	84.5%	81.5%	86.3%	<b>64.0%</b>
a) of which providers	71.4%	76.9%	79.4%	59.6%	83.6%	66.0%	87.2%	97.2%	88.6%	87.9%	<b>88.4%</b>
b) of which money transmitters	53.8%	54.5%	51.7%	41.2%	40.8%	38.2%	40.2%	62.9%	67.2%	85.3%	<b>63.6%</b>
<b>Total</b>	<b>79.8%</b>	<b>77.3%</b>	<b>76.0%</b>	<b>69.8%</b>	<b>82.1%</b>	<b>79.1%</b>	<b>80.8%</b>	<b>89.0%</b>	<b>86.5%</b>	<b>90.5%</b>	<b>82.3%</b>

## **2.2.6 SARs involving substantial levels of assets**

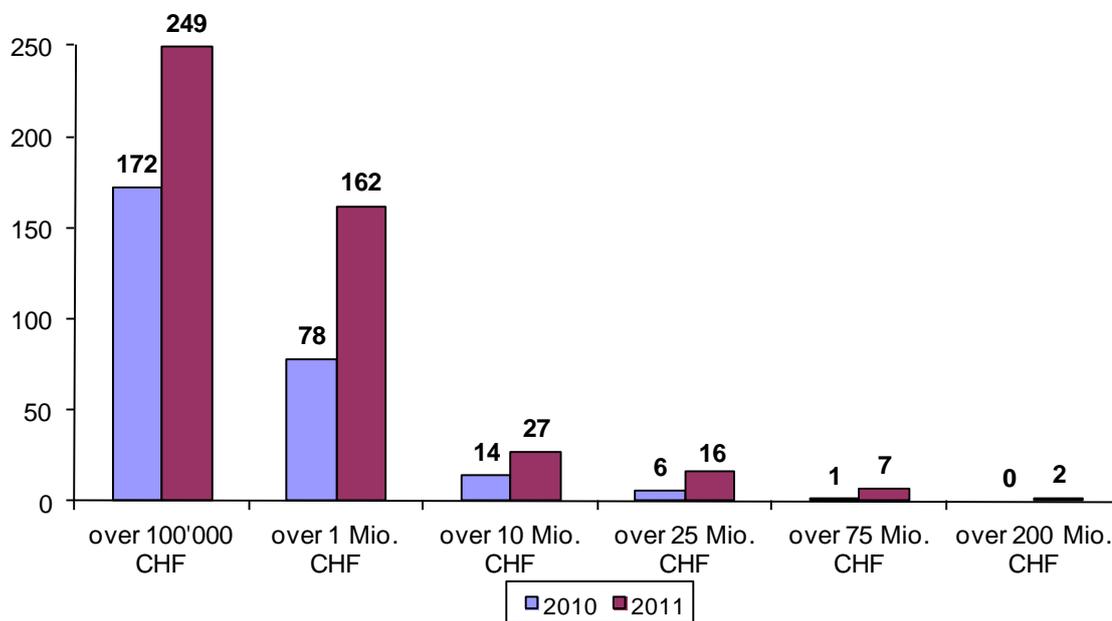
The record number of SARs in 2011 also influenced the total asset value. In 2011, 1,625 SARs generated a total asset value of just under CHF 3.3 billion (2010: CHF 850 million from 1,159 SARs). Compared to the number of submitted SARs, total asset value therefore came close to the 2009 level. To explain this increase, we must look more closely at the number of SARs involving substantial asset value: four SARs in particular, involving a total asset value of more than CHF 560 million, are evident. These SARs involved suspected online gaming. The 25 SARs in 2011 involving a substantial level of assets totalled approximately CHF 2.258 billion. In 2010, however, MROS received only seven SARs involving a substantial level of assets, whereby none of these individual SARs involved a total asset value of over CHF 100 million, as opposed to eight SARs in 2011 involving total assets of CHF 1.456 billion.

Of the reports in 2011 with substantial asset value, seven SARs with a total asset value of CHF 791 million involved suspected corruption (bribery). The financial intermediaries who submitted these SARs based their reports on outside information such as media reports, information from third parties and information they received from prosecuting authorities. Some of these seven voluntary reports were connected, and three of them were linked to political events.

All SARs involving substantial asset value were forwarded by MROS to the prosecuting authorities.

For the above-mentioned reasons and because of the large increase in the total number of SARs, the average asset value of each incoming SAR in 2011 was approximately CHF 2 million (2010: CHF 731,000).

### Number of SARs involving substantial assets 2010/2011

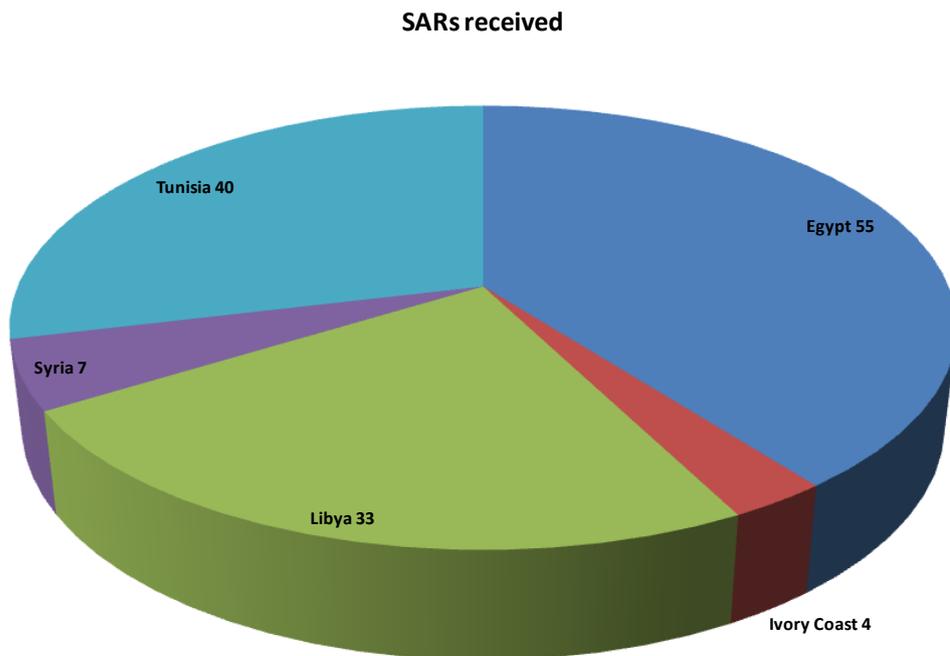


### 2.3. SARs linked to political events or international sanctions

The chart below show the number of SARs MROS received in connection with countries undergoing political events. The chart shows that most reports involved Egypt (55 SARs).

Amongst the predicate offences arousing suspicion, bribery was at the top of the list (with 37 cases involving Egypt). Most of the cases connected to Tunisia involved money laundering. The category *money laundering* comprises cases that cannot be classified under a specific predicate offence but that suggest acts of money laundering due to the modus operandi involved.

These SARs were submitted as a result of the Federal Council's emergency regulations on certain persons from Tunisia and Egypt etc. (see chapter 4.1). This is confirmed by the fact that MROS did not receive a single SAR involving these countries in 2010 (see table below).



Predicate offences		Egypt		Ivory Coast		Libya		Syria		Tunisia	
		2010	2011	2010	2011	2010	2011	2010	2011	2010	2011
Bribery	SARs received	-	37	-	-	-	19	-	7	-	4
	Amounts involved		291'198'013.65				102'037'788.65		27'264'960.00		2'739'379.00
Embezzlement	SARs received	-	7	-	-	-	2	-	-	-	7
	Amounts involved		36'150'684.00				18'471'649.00				23'250'374.00
Organised crime	SARs received	-	10	-	-	-	-	-	-	-	-
	Amounts involved		19'790'017.45								
Arms dealings	SARs received	-	-	-	-	-	2	-	-	-	-
	Amounts involved						5'848'486.15				
Money laundering	SARs received	-	1	-	4	-	10	-	-	-	27
	Amounts involved		0.31		232'758.60		8'251'484.00				54'230'468.20
No plausibility	SARs received	-	-	-	-	-	-	-	-	-	2
	Amounts involved										3'984'462.00
<b>Total</b>	<b>SARs received</b>	<b>-</b>	<b>55</b>	<b>-</b>	<b>4</b>	<b>-</b>	<b>33</b>	<b>-</b>	<b>7</b>	<b>-</b>	<b>40</b>
	<b>Amounts involved</b>		<b>347'138'715.41</b>		<b>232'758.60</b>		<b>134'609'407.80</b>		<b>27'264'960.00</b>		<b>84'204'683.20</b>

## 2.4. The search for terrorist funds

The number of SARs involving suspected terrorist financing declined significantly in the current reporting period: from 13 SARs in 2010 to 10 SARs in 2011. The same applies to the total asset value involved: from CHF 23 million in 2010 to CHF 152,000 in 2011.

The main reason for this marked decrease was one single SAR in 2010 from the banking sector involving total assets of more than CHF 18.6 million, which temporarily led to a fluctuation in 2010. Of the 10 SARs in connection with suspected terrorist financing in 2011, 6 came from financial intermediaries from the payment services sector, 3 came from the banking sector and 1 from an insurance company. Six SARs were submitted based on outside information the financial intermediary had obtained from newspaper reports or information from third parties, including information from the compliance databases of private providers, which are used by financial intermediaries to match clients. With the exception of one SAR, MROS forwarded all the reports to the prosecuting authorities following its own evaluation of the facts of the case and the people involved. In three cases the prosecution did not enter into the substance of the case and dismissed them because the initial suspicion could not be substantiated. To date, six SARs are still being investigated by the Office of the Attorney General of Switzerland (OAG), including one SAR involving around CHF 144,000, which was submitted by a financial intermediary from the payment services sector.

One of the SARs submitted to MROS in 2011 revealed a connection to one of the official terrorist lists.

### Status of forwarded SARs in connection with terrorist financing

Status	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	Total
Dismissal	4	4	7	13	2	3	4	3	3	3	46
Pending	7		2				1	1	3	6	20
Suspension	2		1	2					4		9
Temp. suspension	2	1	1	3	3		1				11
Judgement							1				1
<b>Total</b>	<b>15</b>	<b>5</b>	<b>11</b>	<b>18</b>	<b>5</b>	<b>3</b>	<b>7</b>	<b>4</b>	<b>10</b>	<b>9</b>	<b>87</b>

Year	Number of SARs			Factors arousing suspicion				Asset value	
	Total	Terrorist funding (TF) SARs	TF in % of total number of SARs	Bush	OFAC	Taliban (seco)	Other	In connection with TF	TF in % of total asset value reported
2002	653	15	2,3%	13	0	0	2	1'613'819.00	0.22%
2003	863	5	0,6%	3	1	1	0	153'922.90	0.02%
2004	821	11	1,3%	0	4	3	4	895'488.95	0.12%
2005	729	20	2.7%	5	0	3	12	45'650'766.70	6.71%
2006	619	8	1.3%	1	1	3	3	16'931'361.63	2.08%
2007	795	6	0.8%	1	0	3	2	232'815.04	0.03%
2008	851	9	1.1%	0	1	0	8	1'058'008.40	0.05%
2009	896	7	0.8%	0	1	1	5	9'458.84	0.00%
2010	1'159	13	1.1%	0	1	0	12	23'098'233.85	2.73%
2011	1'625	10	0.6%	0	0	1	9	151'592.84	0.00%
<b>TOTAL</b>	<b>9'011</b>	<b>104</b>	<b>1.2%</b>	<b>23</b>	<b>9</b>	<b>15</b>	<b>57</b>	<b>89'795'468.45</b>	<b>0.69%</b>

The following table shows the 10 suspected terrorist funding SARs submitted in 2011 in detail:

a) Location of reporting financial intermediary

	<b>No. of SARs</b>	<b>%</b>
Bern	4	40%
Zug	2	20%
Geneva	1	10%
Zurich	1	10%
Jura	1	10%
Basle	1	10%
<b>Total</b>	<b>10</b>	<b>100%</b>

b) Type of financial intermediary

	<b>No. of SARs</b>	<b>%</b>
Money transmitter	6	60%
Bank	3	30%
Insurance	1	10%
<b>Total</b>	<b>10</b>	<b>100%</b>

c) Type of reporting bank

	<b>No. of SARs</b>	<b>%</b>
Foreign-controlled bank	2	66.7%
Cantonal bank	1	33.3%
<b>Total</b>	<b>3</b>	<b>100.0%</b>

## d) Nationality and domicile of client

<b>Country</b>	<b>Nationality</b>		<b>Domicile</b>	
Switzerland	0	0%	7	70%
UAE	0	0%	1	10%
Italy	1	10%	1	10%
Kosovo	1	10%	1	10%
Somalia	2	20%	0	0%
Albania	1	10%	0	0%
Pakistan	1	10%	0	0%
England	1	10%	0	0%
Uzbekistan	1	10%	0	0%
Tunisia	1	10%	0	0%
Afghanistan	1	10%	0	0%
<b>Total</b>	<b>10</b>	<b>100%</b>	<b>10</b>	<b>100%</b>

## e) Nationality and domicile of beneficial owner

<b>Country</b>	<b>Nationality</b>		<b>Domicile</b>	
Switzerland	0	0%	7	70%
UAE	0	0%	1	10%
Italy	1	10%	1	10%
Kosovo	1	10%	1	10%
Somalia	2	20%	0	0%
Albania	1	10%	0	0%
Pakistan	1	10%	0	0%
England	1	10%	0	0%
Uzbekistan	1	10%	0	0%
Tunisia	1	10%	0	0%
Afghanistan	1	10%	0	0%
<b>Total</b>	<b>10</b>	<b>100%</b>	<b>10</b>	<b>100%</b>

## 2.5. Detailed statistics

### 2.5.1 Home canton of reporting financial intermediary

#### What the chart represents

This chart shows the cantons where the reporting financial intermediaries who filed SARs are based. Compare this chart with the *Prosecuting authorities* chart (chart 2.5.11), which indicates the cantons where the prosecuting authorities receiving forwarded SARs are based.

#### Chart analysis

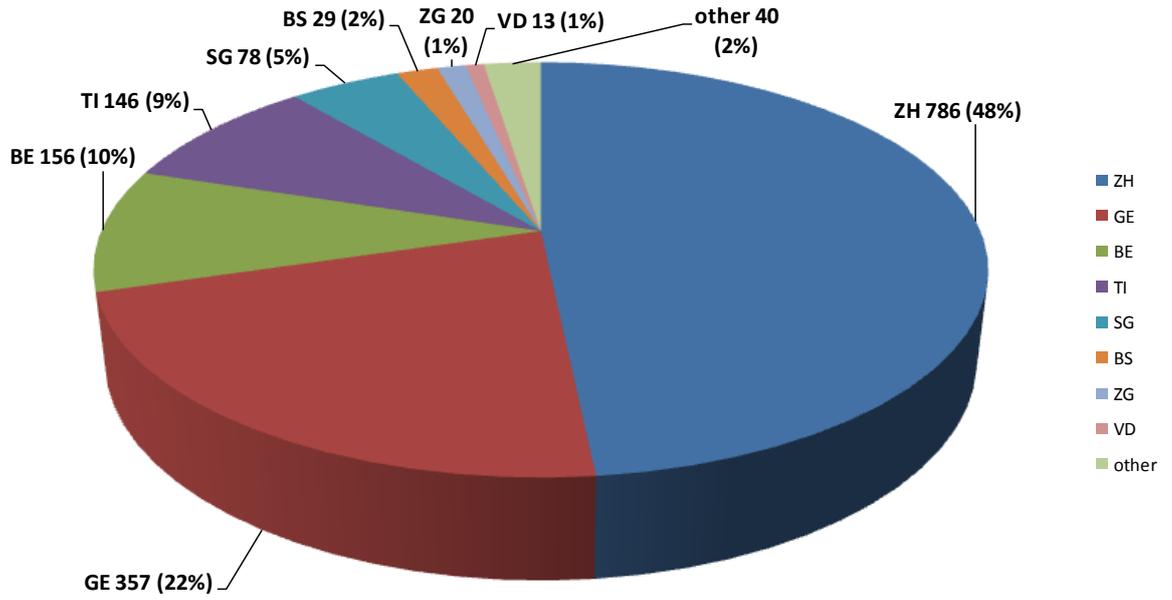
*More than 95 percent of all SARs came from 6 cantons with a highly-developed financial services sector or with centralised compliance centres.*

As to be expected, the majority of SARs in 2011 came either from those cantons with a highly-developed financial services sector or with centralised regional or national compliance centres. Thus, 1,552 (more than 95 percent) of the 1,625 SARs were submitted by financial intermediaries from the cantons of Zurich, Geneva, Bern, Ticino, Basel-Stadt and St. Gallen.

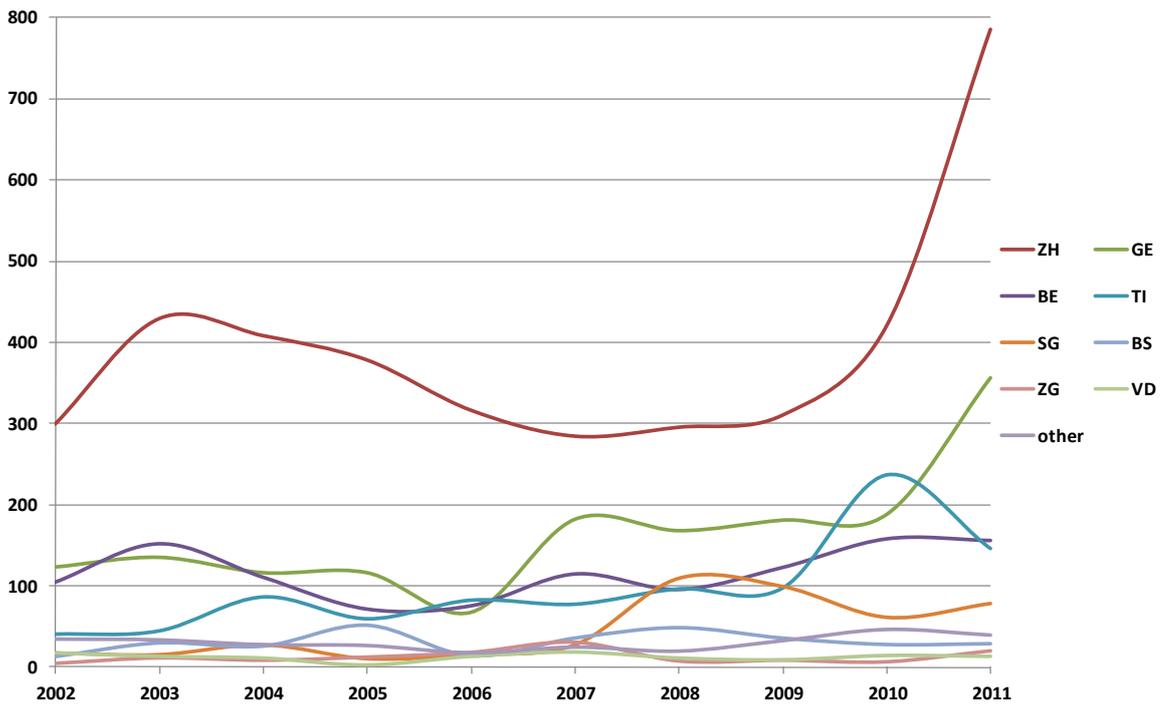
In 2011, MROS did not receive a single SAR from financial intermediaries from the cantons of Thurgau, Schwyz, Obwalden, Glarus, Valais, Appenzell Inner Rhoden and Uri. This may be due, in part, to the centralisation of compliance centres (see chapter 2.5.2), and also to the orientation of the financial sector in these cantons according to individual local or regional needs.

#### Legend

AG	Aargau	GR	Graubünden	SZ	Schwyz
AI	Appenzell Inner Rhoden	JU	Jura	TG	Thurgau
AR	Appenzell Ausser Rhoden	LU	Lucerne	TI	Ticino
BE	Bern	NE	Neuchatel	UR	Uri
BL	Basel-Landschaft	NW	Nidwalden	VD	Vaud
BS	Basel-Stadt	OW	Obwalden	VS	Valais
FR	Fribourg	SG	St. Gallen	ZG	Zug
GE	Geneva	SH	Schaffhausen	ZH	Zurich
GL	Glarus	SO	Solothurn		



2002 to 2011



**For comparison 2002 – 2011**

<b>Canton</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>Total</b>
ZH	299	429	408	378	316	284	295	310	420	786	<b>3925</b>
GE	123	135	116	116	67	182	168	181	188	357	<b>1633</b>
BE	105	152	111	72	76	115	96	123	158	156	<b>1164</b>
TI	40	44	86	59	82	77	96	97	237	146	<b>964</b>
SG	17	15	27	10	15	27	109	99	61	78	<b>458</b>
BS	13	30	26	52	14	36	49	36	28	29	<b>313</b>
ZG	4	11	8	12	18	31	7	8	6	20	<b>125</b>
VD	17	13	11	3	13	18	11	9	14	13	<b>122</b>
NE	1	7	3	6	2	7	6	7	12	4	<b>55</b>
AG	12	3	2	1	3	1	3	6	3	7	<b>41</b>
GR	8	3	5	1	2	4	3		7	5	<b>38</b>
FR	2	3	9	8	2	1			2	8	<b>35</b>
LU		1	1	3	5	5	1	5	7	5	<b>33</b>
TG	4	6	3		2	1	1	2			<b>19</b>
SZ	2			3	1	2	1	3	7		<b>19</b>
BL			2	2		1		1	2	3	<b>11</b>
SO	1	5		1			1	1		1	<b>10</b>
NW	1	1		1			1	2		3	<b>9</b>
JU		1					2	1	1	2	<b>7</b>
SH		1		1		1		2	1	1	<b>7</b>
OW		1	1			1		1	2		<b>6</b>
GL	2	1	1				1	1			<b>6</b>
VS	2	1	1		1						<b>5</b>
AI						1		1	3		<b>5</b>
AR										1	<b>1</b>
<b>Total</b>	<b>653</b>	<b>863</b>	<b>821</b>	<b>729</b>	<b>619</b>	<b>795</b>	<b>851</b>	<b>896</b>	<b>1159</b>	<b>1625</b>	<b>9011</b>

## 2.5.2 Location of suspicious business connection

### What the chart represents

The chart shows the cantons where the reporting financial intermediary managed accounts or business connections mentioned in an incoming SAR. This chart is intended to complement the previous chart 2.5.1 *Home canton of reporting financial intermediary*.

### Chart analysis

*The headquarters of a reporting financial intermediary is not a definite indication of the actual location of the account or business connection at the time the SAR was submitted.*

It is mainly the major banks and major payment services providers that have established regional compliance centres. The financial intermediaries based in the various cantons send their reports to the appropriate regional compliance centre, which then drafts the SAR to MROS. However, these SARs do not necessarily concern the home canton of the reporting financial intermediary. This can lead to a distorted picture of the geographical distribution of money laundering cases in Switzerland. Moreover, a direct comparison with the statistics on the prosecuting authorities involved (see chapter 2.5.11) is not possible. This is partly because MROS does not forward all incoming SARs to the prosecuting authorities, and partly because under Article 24 of the Criminal Procedure Code<sup>2</sup> jurisdiction for criminal justice is no longer connected to the location of the account or business connection alone. This fact is illustrated by the previous chart on *Home canton of reporting financial intermediary* (chapter 2.5.1). While over 95 percent of all SARs in 2011 (as in previous years) came from financial intermediaries domiciled in Zurich, Geneva, Bern, Ticino, St. Gallen and Basel-Stadt, only around 82 percent of the reported business connections actually took place in these six cantons.

In 2011, MROS did not receive any SARs from financial intermediaries based in the canton of Uri.

The significant increase in the number of business connections reported from the cantons of St. Gallen, Vaud and Aargau is due to one financial intermediary from the payment services sector who is domiciled in the main centre of these cantons and who cleaned up his accounts. This was also the reason for the increase in Zurich. The twofold increase in the number of business connections reported from the canton of Geneva can be explained by the number of SARs in connection with political events in several countries

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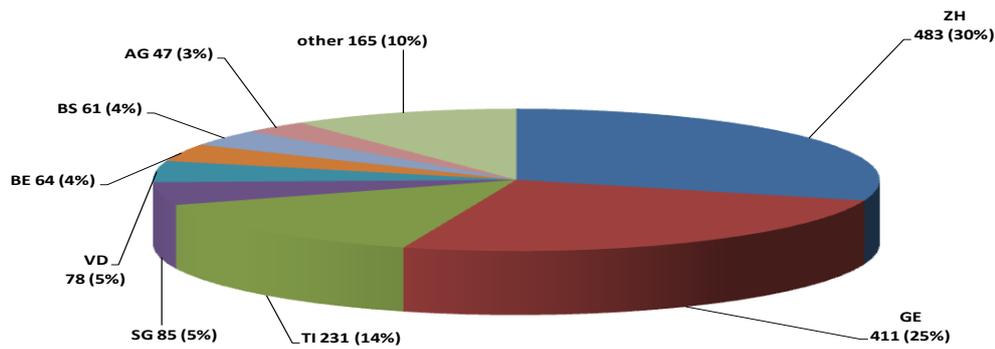
<sup>2</sup> Criminal Procedure Code of 5 October 2007 (CrimPC; SR 312.0)

particularly in North Africa and the Middle East, since people from this part of the world prefer to establish business connections in Geneva for reasons of language.

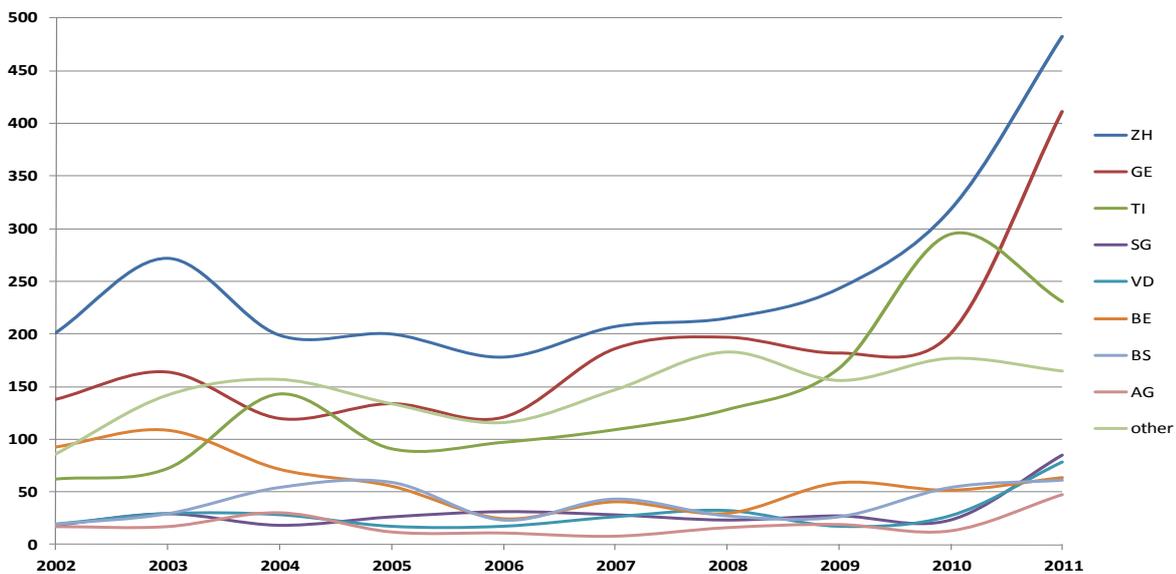
**Legend**

AG	Aargau	GR	Graubünden	SZ	Schwyz
AI	Appenzell Innerrhoden	JU	Jura	TG	Thurgau
AR	Appenzell Ausserrhoden	LU	Lucerne	TI	Ticino
BE	Bern	NE	Neuchâtel	UR	Uri
BL	Basel-Landschaft	NW	Nidwalden	VD	Vaud
BS	Basel-Stadt	OW	Obwalden	VS	Valais
FR	Fribourg	SG	St. Gallen	ZG	Zug
GE	Geneva	SH	Schaffhausen	ZH	Zurich
GL	Glarus	SO	Solothurn		

**2011**



**2002 - 2011**



**For comparison: 2002 - 2011**

<b>Canton</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>Total</b>
ZH	201	272	199	200	178	207	215	243	318	483	<b>2516</b>
GE	138	164	120	134	121	186	197	182	200	411	<b>1853</b>
TI	62	72	143	91	97	109	128	167	295	231	<b>1395</b>
BE	93	109	72	56	25	41	30	59	52	64	<b>601</b>
BS	19	29	54	59	23	43	27	26	54	61	<b>395</b>
SG	18	29	18	26	31	28	23	27	23	85	<b>308</b>
VD	19	29	28	17	17	26	32	17	27	78	<b>290</b>
LU	16	19	31	23	31	19	47	18	39	22	<b>265</b>
ZG	8	16	15	22	40	40	19	10	22	28	<b>220</b>
AG	17	17	30	12	11	8	16	19	13	47	<b>190</b>
FR	7	4	29	15	5	16	19	41	24	24	<b>184</b>
NE	12	23	11	22	12	12	10	8	13	6	<b>129</b>
SO	7	20	12	10		6	20	12	9	13	<b>109</b>
BL	4	3	4	5	1	7	23	21	24	14	<b>106</b>
VS	5	15	9	11	10	10	6	3	10	11	<b>90</b>
TG	7	14	6	7	7	7	7	18	3	5	<b>81</b>
GR	8	10	14	2	3	5	5	5	9	16	<b>77</b>
GL	4	5	8	4	2	9	6	6	6	6	<b>56</b>
SZ	4	2	5	5	2	6	4	4	9	3	<b>44</b>
JU	1	6	10	4	3	1	5	2	3	2	<b>37</b>
SH		3	1	2		3	1	2	1	6	<b>19</b>
NW	1	1	1	1			3	2		6	<b>15</b>
OW		1	1			1	6	2	2	1	<b>14</b>
AI						4		1	3	1	<b>9</b>
UR	1					1	2	1			<b>5</b>
AR	1			1						1	<b>3</b>
<b>Total</b>	<b>653</b>	<b>863</b>	<b>821</b>	<b>729</b>	<b>619</b>	<b>795</b>	<b>851</b>	<b>896</b>	<b>1159</b>	<b>1625</b>	<b>9011</b>

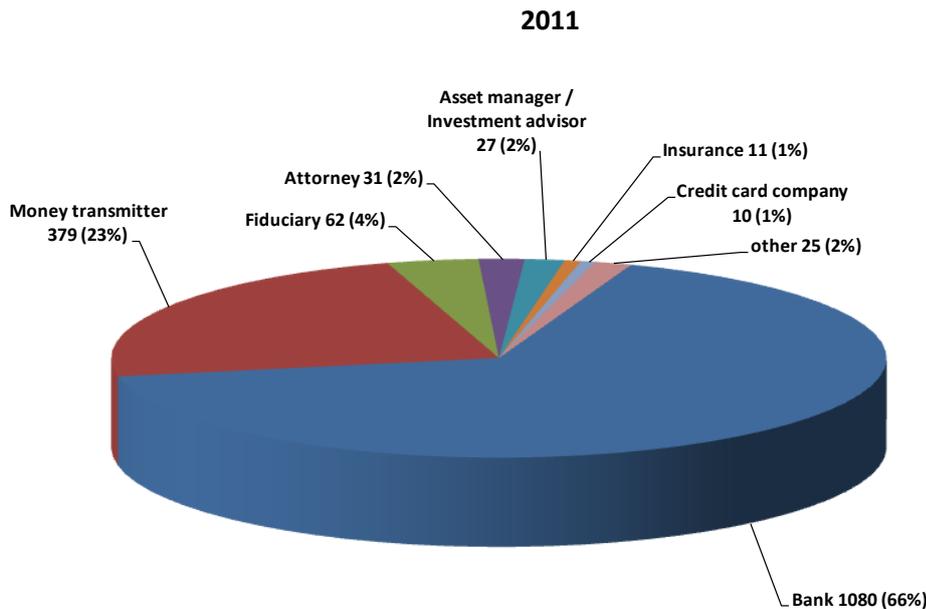
### 2.5.3 Type of financial intermediary

#### What the chart represents

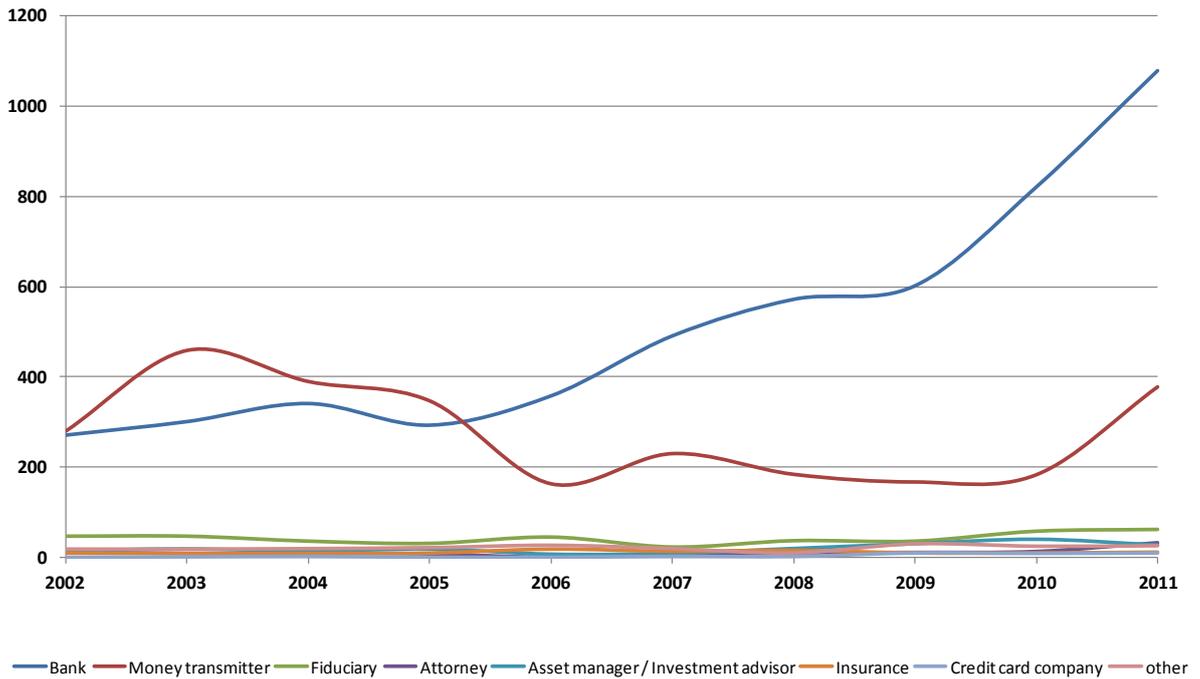
This chart shows the various types of financial intermediary that submitted SARs to MROS.

#### Chart analysis

- SARs from the banking sector exceed 1,000 for the first time since the Anti-Money Laundering Act came into effect.
- Two-thirds of incoming SARs from the banking sector.
- Twofold increase in SARs from payment services sector.
- Absolute and relative increase in SARs from attorneys.



**2002 - 2011**



**Proportion of SARs forwarded to the prosecuting authorities in 2011 by category**

Financial intermediary category	% forwarded	% not forwarded
Bank	93.0%	7.0%
Casino	50.0%	50.0%
Foreign exchange trader	57.1%	42.9%
Loan, leasing and factoring business	100.0%	0.0%
Credit card company	100.0%	0.0%
Attorney	93.5%	6.5%
Commodity and precious metal trader	100.0%	0.0%
Fiduciary	83.9%	16.1%
Other FI	100.0%	0.0%
Asset manager/Investment advisor	92.6%	7.4%
Insurance	54.5%	45.5%
Payment services	86.3%	13.7%
<b>Total</b>	<b>90.5%</b>	<b>9.5%</b>

## For comparison: 2002 - 2011

<b>Financial intermediary category</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>Total</b>
Bank	272	302	342	294	359	492	573	603	822	1080	<b>5139</b>
Payment services	281	460	391	348	164	231	185	168	184	379	<b>2791</b>
Fiduciary	47	47	36	31	45	23	37	36	58	62	<b>422</b>
Asset manager/Investment advisor	14	18	13	18	6	8	19	30	40	27	<b>193</b>
Attorney	12	9	10	8	1	7	10	11	13	31	<b>112</b>
Insurance	9	8	8	9	18	13	15	9	9	11	<b>109</b>
Casino	4	8	2	7	8	3	1	5	8	6	<b>52</b>
Credit card company		1	2			2	2	10	9	10	<b>36</b>
Loan, leasing and factoring business	1	2	1	1	8	4	1	11	1	5	<b>35</b>
Foreign exchange trader	2	2	1	1	1			5	6	7	<b>25</b>
Other FI	4	1	7		1	2		1	4	2	<b>22</b>
Securities trader			2	2		2	5	2	4		<b>17</b>
Currency exchange	1		3	3	2	1	1	1		3	<b>15</b>
Distributor of investment funds	2	3	3	5		1					<b>14</b>
Self-regulating organisation	1	1		1	3	1		4		1	<b>12</b>
Commodity and precious metal trader	1	1			1	5	1		1	1	<b>11</b>
Supervisory authorities	2			1	2		1				<b>6</b>
<b>Total</b>	<b>653</b>	<b>863</b>	<b>821</b>	<b>729</b>	<b>619</b>	<b>795</b>	<b>851</b>	<b>896</b>	<b>1159</b>	<b>1625</b>	<b>9011</b>

## 2.5.4 SARs from the banking sector

### What the chart represents

This chart shows the types of banks that submitted SARs to MROS.

### Chart analysis

- Record high in the number of SARs from the banking sector.
- Proportion of SARs from the banking sector falls to two-thirds of overall reporting volume.
- Most SARs from foreign-controlled banks and major banks.
- Increase in SARs from Raiffeisen banks.

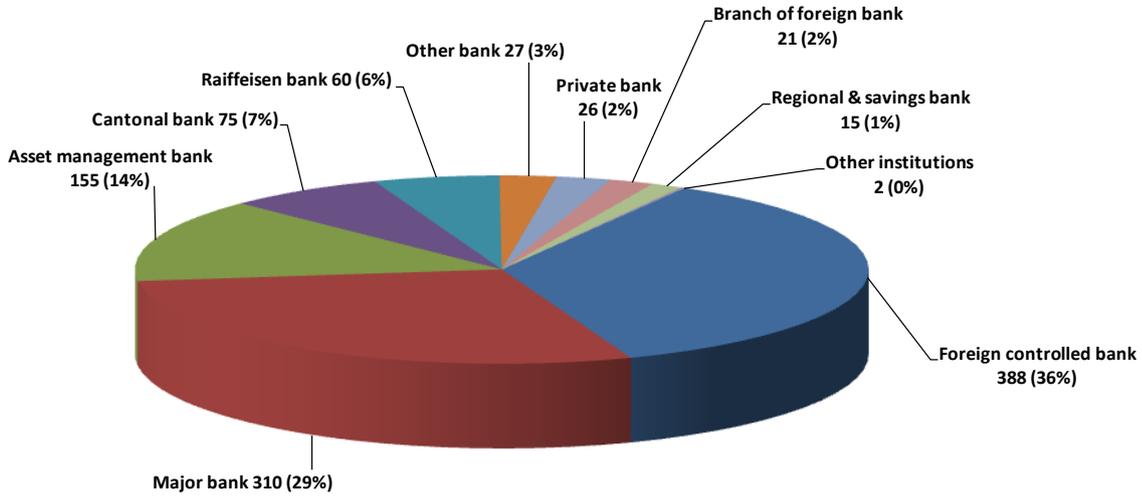
This is the first time MROS has received more than 1,000 SARs from the banking sector since the Anti-Money Laundering Act came into force on 1 April 1998. However, compared to the total reporting volume, the proportion of SARs from this sector has fallen to 66 percent from 71 percent in 2010. This is due to the twofold increase in the number of SARs from the payment services sector.

Year	Total number of SARs	SARs from the banking sector	Percentage of SARs from the banking sector
2002	653	272	42%
2003	863	302	35%
2004	821	342	42%
2005	729	294	40%
2006	619	359	58%
2007	795	492	62%
2008	851	573	67%
2009	896	603	67%
2010	1159	822	71%
2011	1625	1080	66%

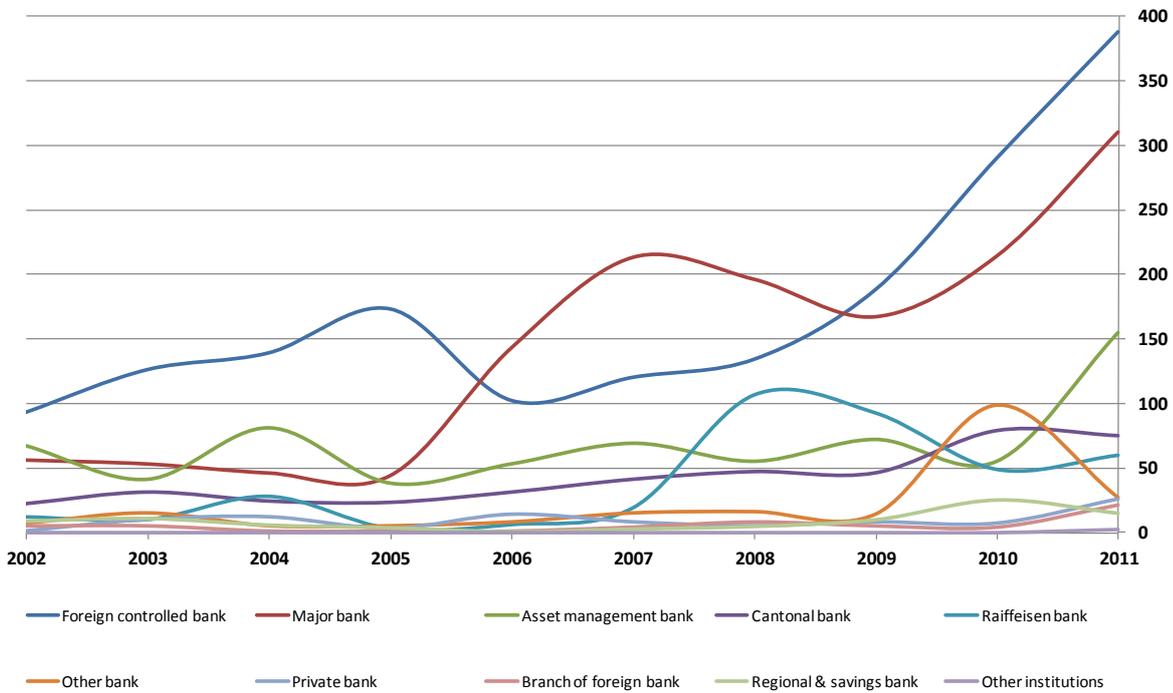
Unlike the years 2006 to 2009, most of the SARs submitted to MROS in 2011 from the banking sector came from *foreign-controlled banks*, with 36 percent (2010: 32 percent). In second place were the *major banks* in Switzerland, with a share of nearly 29 percent (2010: 26 percent). There was a dramatic increase in SARs from *asset management banks* that submitted SARs involving numerous business connections, leading to a near threefold increase from this category. The fall in the number of SARs from *other banks* to pre-2009 levels can be explained by one major case from 2010 that generated numerous SARs and led temporarily to an unexpected fluctuation in

2010. The fluctuations in the other categories of banks are within reason, considering the record number of incoming SARs in 2011.

**2011**



**2002 - 2011**



**For comparison: 2002 - 2011**

Type of bank	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	Total
Foreign-controlled bank	93	126	139	173	102	120	134	188	290	388	<b>1753</b>
Major bank	56	53	46	44	143	213	196	167	214	310	<b>1442</b>
Asset management bank	67	41	81	38	53	69	55	72	55	155	<b>686</b>
Cantonal bank	22	31	24	23	31	41	47	46	79	75	<b>419</b>
Raiffeisen bank	12	10	28	3	6	19	107	93	49	60	<b>387</b>
Other bank	7	15	5	5	8	15	16	14	99	27	<b>211</b>
Private bank	1	10	12	3	14	8	5	8	7	26	<b>94</b>
Regional and savings bank	9	11	6	4	1	3	5	10	25	15	<b>89</b>
Branch of foreign bank	5	5	1	1	1	4	8	5	4	21	<b>55</b>
Other institution										2	<b>2</b>
Bank with special business circle										1	<b>1</b>
<b>Total</b>	<b>272</b>	<b>302</b>	<b>342</b>	<b>294</b>	<b>359</b>	<b>492</b>	<b>573</b>	<b>603</b>	<b>822</b>	<b>1080</b>	<b>5139</b>

## 2.5.5 Factors arousing suspicion

### What the chart represents

This chart shows what suspicions prompted financial intermediaries to submit SARs to MROS.

### Chart analysis

- *More than two-thirds of all SARs were triggered by external indications and information (2010: 71 percent).*
- *Significant increase in category cash transactions as factor arousing suspicion.*
- *Dramatic increase in category difficult countries as factor arousing suspicion*

The main factor arousing suspicion in 2011 was, once again, *media reports*. In second place was, also once again, *information gleaned from third parties*. In third place again was *information from prosecuting authorities*, which was based on disclosure or confiscation orders by prosecuting authorities or other information from the authorities. The significance for financial intermediaries of the category *information gleaned from third parties* becomes apparent if we consider all three main categories – *media reports, third-party information and information from prosecuting authorities*. Together these categories triggered more than two-thirds of all SARs submitted to MROS in 2011 (2010: 71 percent). These figures show that financial intermediaries use modern resources and consult external sources in order to gather information for their inquiries, which is then evaluated and condensed into a considerable number of SARs sent to MROS.

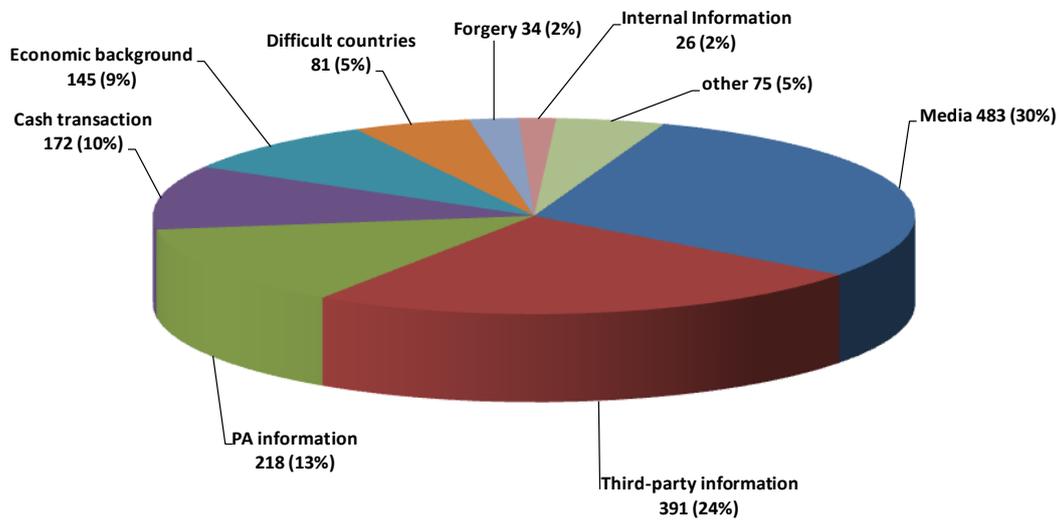
The increase in the figures from cash transactions and high-risk countries are due to the clean-up of accounts by one financial intermediary from the payment services sector.

### Legend

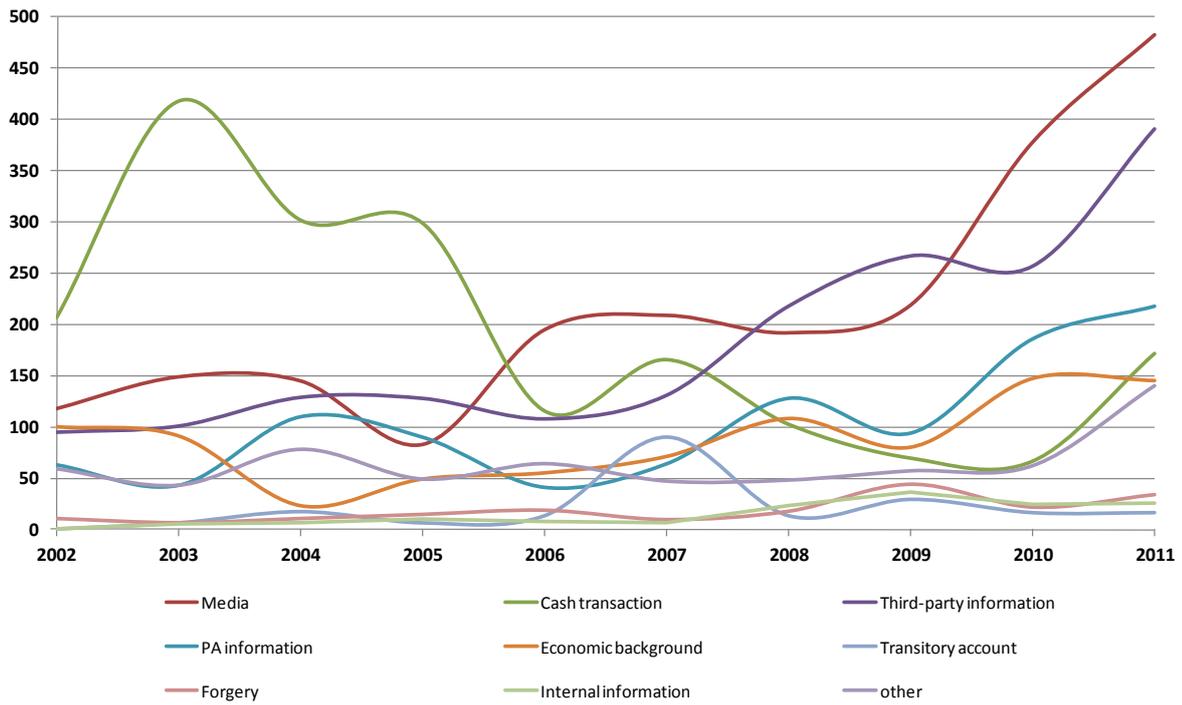
Unclear economic background	The economic background of a transaction is either unclear or cannot be satisfactorily explained by the customer.
Information from prosecuting authorities	Prosecuting authorities initiate proceedings against an individual connected with the financial intermediary's client.
Media	The financial intermediary finds out from media reports that one of the people involved in the financial transaction is connected with illegal activities.
Third-party information	Financial intermediaries receive information from outside sources or from within a business about

	clients who could pose problems.
Other	Included in this category are topics which were listed separately in previous MROS statistics such as cheque transaction, forgery, high-risk countries, currency exchange, securities, smurfing, life insurance, non-cash cashier transactions, fiduciary transactions, loan transactions, precious metals and various.

**2011**



For comparison: 2002 - 2011



**For comparison: 2002 - 2011**

<b>Factors</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>Total</b>
Media	118	149	145	83	195	209	192	219	378	483	<b>2171</b>
Cash transaction	207	418	302	299	116	166	103	70	67	172	<b>1920</b>
Third-party information	95	101	129	128	108	131	218	267	257	391	<b>1825</b>
PA information	63	43	110	90	41	64	128	94	186	218	<b>1037</b>
Economic background	100	91	23	49	55	71	108	80	147	145	<b>869</b>
Transitory account		6	17	6	13	90	13	29	16	16	<b>206</b>
Forgery	11	7	11	15	19	10	18	44	22	34	<b>191</b>
Internal information		5	6	10	8	7	23	36	24	26	<b>145</b>
Various	13	15	32	7	5	5	8	3	9	14	<b>111</b>
High-risk countries	10	2	3	3	1	1	2	2	3	81	<b>108</b>
Currency exchange	7	8	3	6	12	11	9	9	23	14	<b>102</b>
Opening of account			18	9	13	21	13	9	13	5	<b>101</b>
Cheque transaction	13	8	8	8	4	4	1	7	4	20	<b>77</b>
Securities	7	3	5	12	10	3	13	12	4	2	<b>71</b>
Audit/supervisory board					7	1		10	2		<b>20</b>
Loan transaction		2	3		7		1	4	1	1	<b>19</b>
Smurfing	6		1	3					1	1	<b>12</b>
Precious metals		1	3		1	1		1	1	1	<b>9</b>
Life insurance	1	2	1	1	2				1		<b>8</b>
Trust activity	1	1			2		1				<b>5</b>
Non-cash cashier transaction	1	1	1							1	<b>4</b>
<b>Total</b>	<b>653</b>	<b>863</b>	<b>821</b>	<b>729</b>	<b>619</b>	<b>795</b>	<b>851</b>	<b>896</b>	<b>1159</b>	<b>1625</b>	<b>9011</b>

## 2.5.6 Suspected predicate offences

### What the chart represents

This chart shows the predicate offences that were *suspected* in the SARs that MROS forwarded to prosecuting authorities.

It should be noted that MROS's legal assessment of the suspected predicate offence is based solely on the financial intermediary's assumption as well as on MROS's own assessment of the facts. When a SAR is forwarded to a prosecuting authority, it is bound neither to the findings of the financial intermediary nor to MROS's legal assessment.

The *not classifiable* category includes cases where a variety of possible predicate offences are suspected. The *no plausibility* category includes those cases that do not fall into any visible predicate offence category, although the analysis of the transaction or of the economic background cannot exclude the criminal origin of the money.

### Chart analysis

- Increase in reports with "fraud" as the suspected predicate offence to 500 SARs, reaching a new record level in absolute terms.
- Increase in category "criminal organisation" to pre-2010 levels.
- Increase in predicate offence category "drugs".
- Increase in predicate offence categories "money laundering", "bribery" and "embezzlement".

In 730 of the 1,625 SARs submitted in 2011, or 45 percent (2010: nearly 55 percent), the predicate offence was *crimes against property*. This relative decline is due, amongst other things, to the increase in the number of SARs from the payment services sector and to the increase in SARs from the associated categories *drugs* and *money laundering*.

Since 2006, *fraud* has been the most frequently suspected predicate offence; this category accounted for nearly one-third of all SARs submitted in 2011 (2010: nearly 39 percent). This can be explained partly by the fact that this category includes many kinds of fraud, from big-time investment fraud such as organised cybercrime, down to numerous instances of petty fraud such as petty Internet crime.

For the second time in 2011 the category *fraudulent misuse of a computer*, which mainly comprises "phishing" cases, appears (retroactively for the years 2007, 2008 and 2009) in the statistics. Up to 2009, this category had been classified under *fraud*. The increase in this category over the previous reporting period shows that "phishing" remains a topical subject and that financial intermediaries consistently report the account details of financial agents or "money mules" to MROS.

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The category *money laundering* comes in second place with a total of 252 SARs (2010: 129). These SARs were not actually considered by MROS as definite predicate offences, despite the fact that the modus operandi suggested acts of money laundering. The increase is due not only to one reported case involving numerous business connections, but also to the general increase in the number of SARs in 2011.

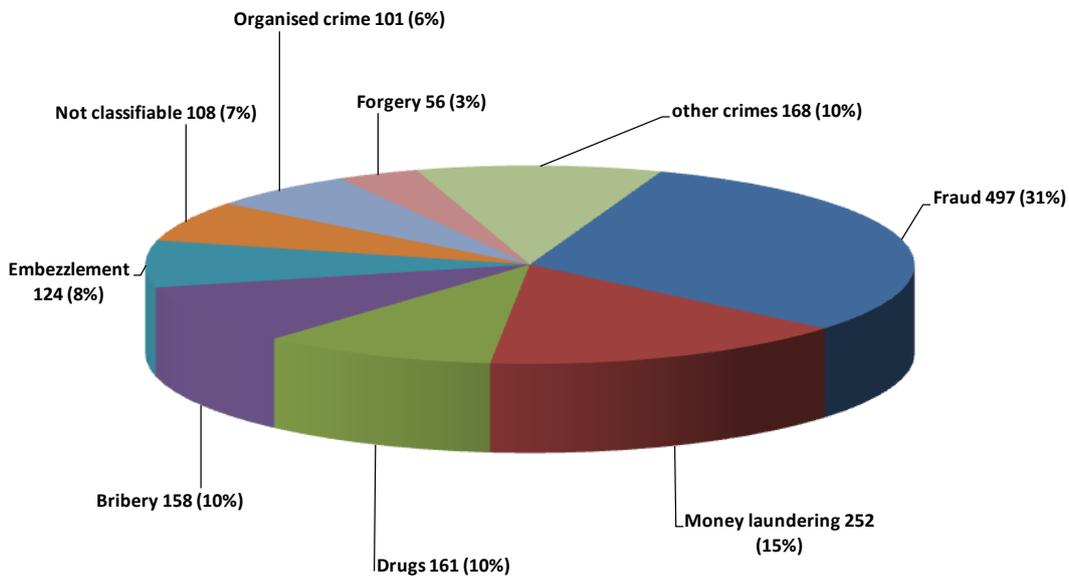
In third place, as last year, is the category *drugs*. This category frequently includes SARs in connection with the street sale of drugs by nationals of sub-Saharan African states and the financial transactions associated therewith (money exchange, money transmitting).

The significant increase in the category *bribery* can be partly explained by the political events surrounding the Arab Spring and the subsequent submission of SARs. These events also had an influence on the category *embezzlement*, since embezzling public funds and corruption are typical offences committed by the ruling authoritarian elite.

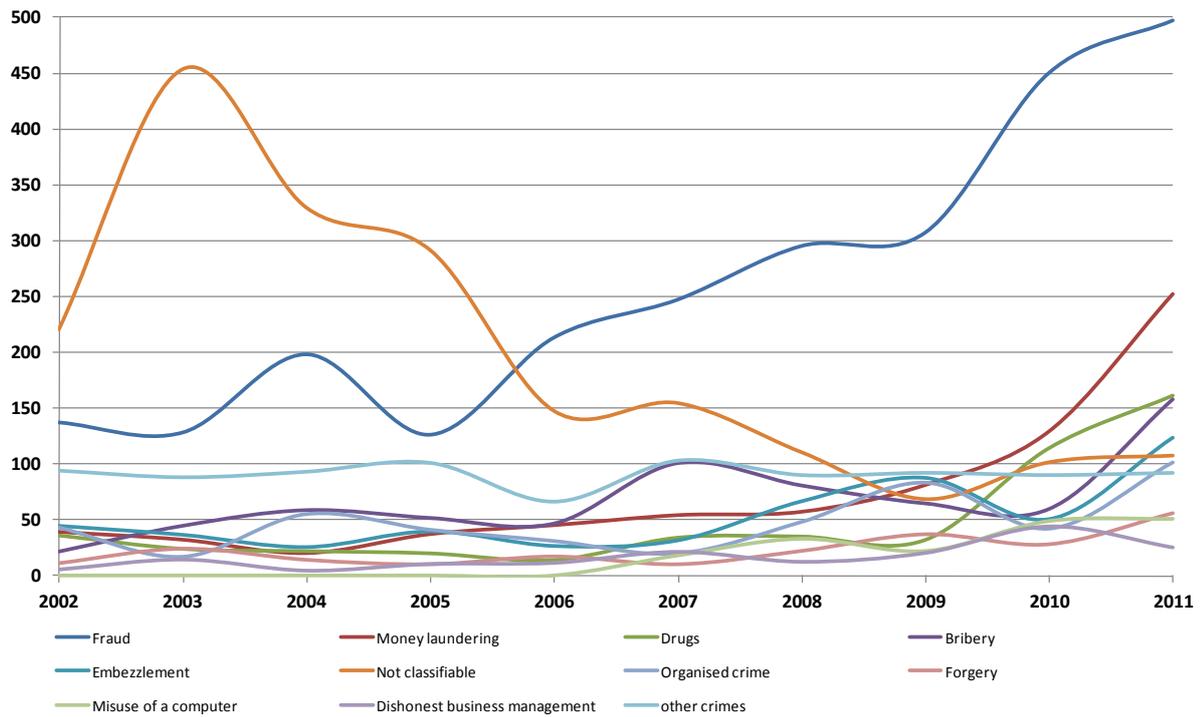
With regard to the other predicate offence categories, there was more than a 50 percent increase in the number of SARs from the category *criminal organisation*: from 42 SARs in 2010 to 101 in 2011. This dramatic increase is due to several complex cases generating numerous SARs. The classification of SARs under this offence is usually a result of newspaper articles in the foreign press, which generate a SAR but do not explicitly mention any other predicate offence to money laundering besides organised crime. In this sense, therefore, this category can be considered an omnibus clause.

With regard to the category *document forgery*, it should be pointed out that this offence alone does not generate criminal assets according to Article 9 AMLA or Article 305<sup>ter</sup> paragraph 2 SCC. Rather, this category is defined by the offence that is at the fore of the report and that may potentially yield illicitly-gained assets (e.g. forged cheques or bank guarantees).

2011



2002 - 2011



**For comparison: 2002- 2011**

<b>Predicate offence</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>Total</b>
Fraud	137	128	198	126	213	247	295	307	450	497	<b>2598</b>
Not classifiable	221	454	330	292	148	155	111	69	102	108	<b>1990</b>
Money laundering	39	32	20	37	45	54	57	81	129	252	<b>746</b>
Bribery	22	45	59	52	47	101	81	65	60	158	<b>690</b>
Embezzlement	45	37	26	40	27	32	67	88	51	124	<b>537</b>
Drugs	36	24	22	20	14	34	35	32	114	161	<b>492</b>
Organised crime	43	17	55	41	31	20	48	83	42	101	<b>481</b>
No plausibility	32	34	37	54	25	50	27	21	13	23	<b>316</b>
Forgery	11	24	14	10	17	10	22	37	28	56	<b>229</b>
Fraudulent misuse of a computer						18	33	22	49	51	<b>173</b>
Dishonest business management	5	14	4	10	11	21	12	20	44	25	<b>166</b>
Other crimes against property	7	7	14	12	13	22	22	36	10	7	<b>150</b>
Terrorism	15	5	11	20	8	6	9	7	13	10	<b>104</b>
Theft	8	17	6	9	8	4	3	4	12	19	<b>90</b>
Other crimes	18	5	9	2	9	3	3	5	5	3	<b>62</b>
Arms dealings	4	9	6		1	12	8	3	4	9	<b>56</b>
Blackmail	1	2	3	1	1		4	2	20	6	<b>40</b>
Violent crimes	5	2	2	1		1	9		1	1	<b>22</b>
Sexual crimes	2	2	3	1		3	4	3	3	1	<b>22</b>
Organised smuggling								5	7	3	<b>15</b>
Counterfeiting	2	3		1				4			<b>10</b>
Robbery		2	2			1	1		2	1	<b>9</b>
Counterfeit consumer goods										4	<b>4</b>
Abuse of authority										4	<b>4</b>
Product piracy								2			<b>2</b>
Lack of due diligence in handling assets					1	1					<b>2</b>
Smuggling of migrants										1	<b>1</b>
<b>Total</b>	<b>653</b>	<b>863</b>	<b>821</b>	<b>729</b>	<b>619</b>	<b>795</b>	<b>851</b>	<b>896</b>	<b>1159</b>	<b>1625</b>	<b>9011</b>

### 2.5.7 Domicile of clients

#### What the chart represents

This chart shows the physical or corporate domicile of the clients mentioned in SARs from financial intermediaries.

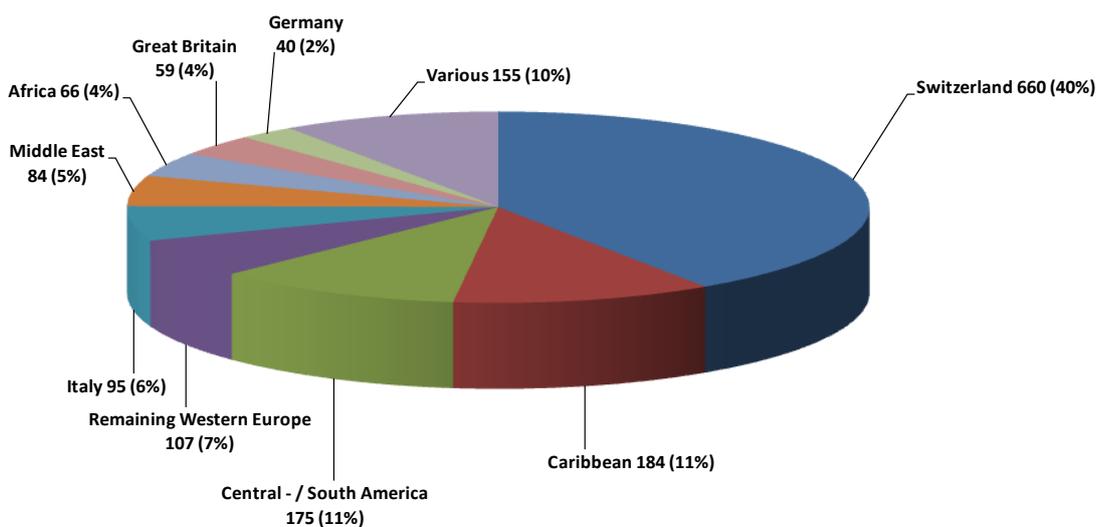
#### Chart analysis

- *Despite the dramatic increase in overall reporting volume, the relative number of clients domiciled in Switzerland fell to just below 41 percent (2010: 45 percent).*
- *Increase in the number of clients domiciled in the Caribbean, and Central and South America due to the increase in the number of registered domicile companies.*
- *Relative decrease in the number of clients domiciled in Western Europe from just below 74 percent in 2010 to just below 62 percent in 2011.*

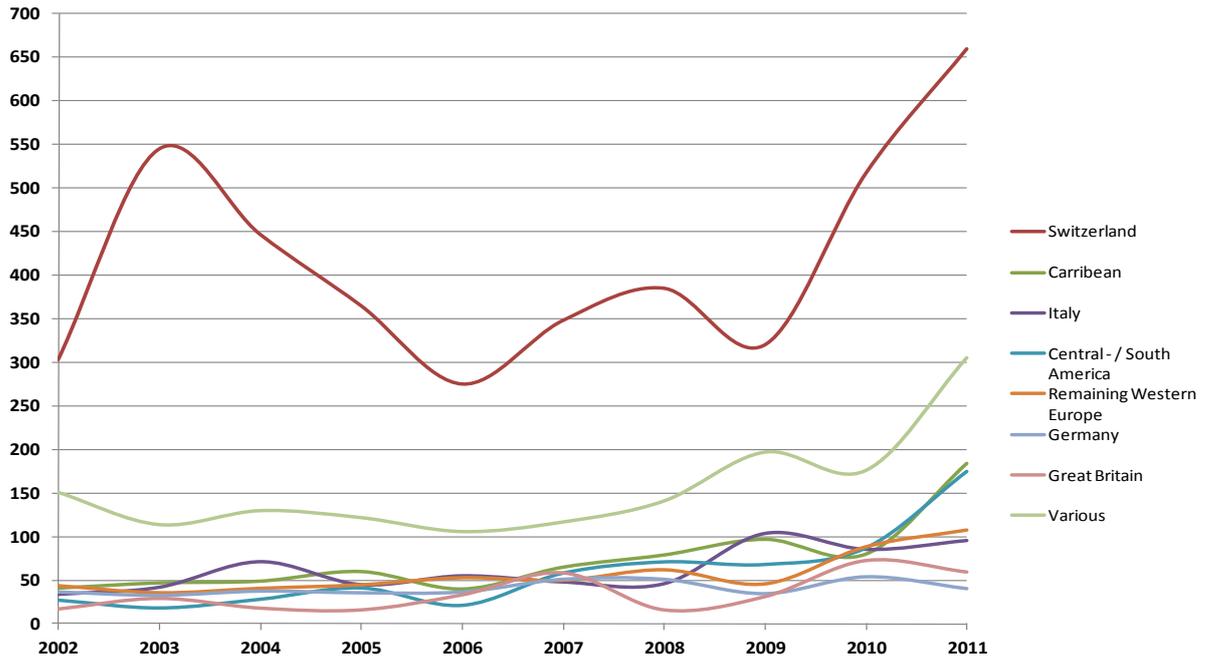
#### Legend

Rest of Western Europe	Austria, Belgium, Spain, Liechtenstein, Greece, Luxembourg, Malta, Monaco, Netherlands, Portugal and San Marino
Various	France, Africa, Asia, Eastern Europe, Scandinavia, C.I.S., Australia/Oceania and Unknown

2011



**2002 - 2011**



**For comparison: 2002 – 2011**

Domicile of client	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	Total
Switzerland	303	545	447	365	275	348	385	320	517	660	<b>4165</b>
Caribbean	41	47	49	60	40	65	79	97	80	184	<b>742</b>
Italy	34	42	71	45	55	48	46	103	85	95	<b>624</b>
Central / South America	27	18	28	41	21	58	71	68	87	175	<b>594</b>
Remaining Western Europe	44	36	41	45	53	50	62	46	88	107	<b>572</b>
Germany	36	32	37	35	36	51	51	34	54	40	<b>406</b>
Great Britain	17	29	18	16	33	58	16	31	72	59	<b>349</b>
Middle East	31	19	16	17	9	20	19	22	27	84	<b>264</b>
North America	21	11	19	25	25	20	23	23	48	38	<b>253</b>
France	21	14	18	17	12	18	22	58	26	32	<b>238</b>
Africa	31	24	18	13	8	12	11	16	22	66	<b>221</b>
Asia	17	11	12	15	26	19	22	29	16	17	<b>184</b>
Eastern Europe	12	11	17	13	14	9	10	10	11	17	<b>124</b>
C.I.S.	7	9	15	2	7	3	13	15	9	21	<b>101</b>
Australia /Oceania	3	5	9	6	1	7	13	17	5	17	<b>83</b>
Scandinavia	2	4	5	6	3	8	5	6	10	7	<b>56</b>
unknown	6	6	1	8	1	1	3	1	2	6	<b>35</b>
<b>Total</b>	<b>653</b>	<b>863</b>	<b>821</b>	<b>729</b>	<b>619</b>	<b>795</b>	<b>851</b>	<b>896</b>	<b>1159</b>	<b>1625</b>	<b>9011</b>

### 2.5.8 Nationality of clients

#### What the chart represents

This chart shows the nationality of financial intermediaries' clients. While it is possible for a natural person's nationality to differ from his/her domicile, no such distinction exists between the nationality and domicile of a legal entity.

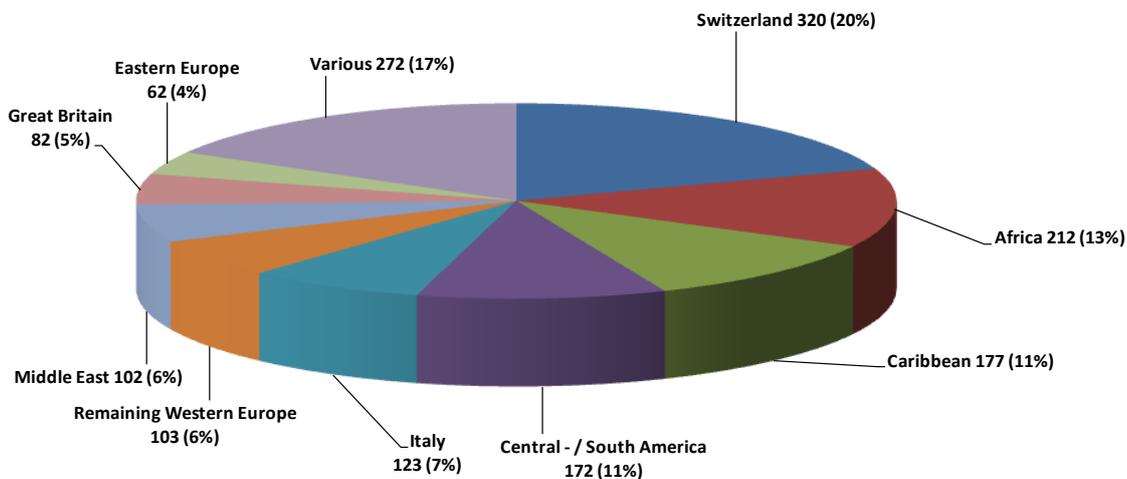
#### Chart analysis

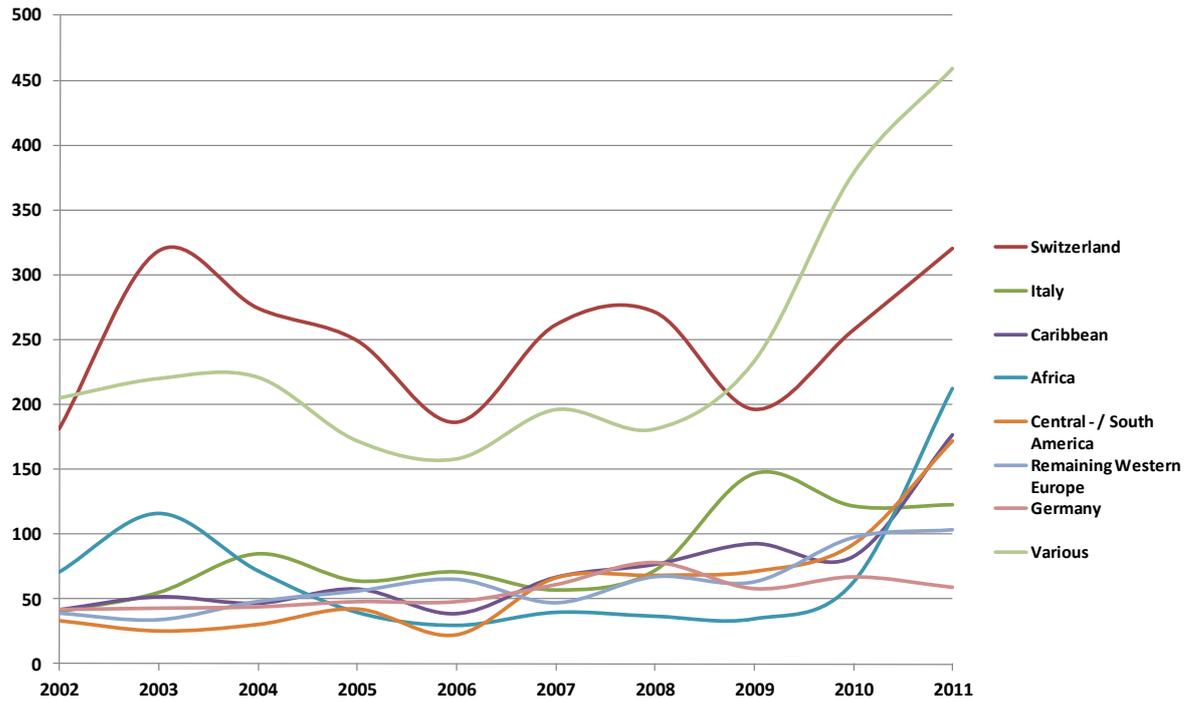
- *Despite an increase in overall reporting volume, there was a relative decrease in SARs involving clients who were Swiss nationals, from 22 percent in 2010 to 20 percent in 2011.*
- *More than a threefold increase in the number of SARs involving African clients in connection with suspected drugs offences.*
- *Increase in the number of SARs involving clients from the Caribbean or from Central or South America who were legal entities based in these countries or regions.*

#### Legend

Rest of Western Europe	Austria, Belgium, Spain, Liechtenstein, Greece, Luxembourg, Malta, Netherlands, Portugal and San Marino
Various	North America, France, Middle East, Eastern Europe, C.I.S., Scandinavia, Australia/Oceania and Unknown

2011





For comparison: 2002 – 2011

Nationality of client	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	Total
Switzerland	181	318	274	249	186	261	271	196	257	320	2513
Italy	40	55	85	64	71	57	72	147	122	123	836
Caribbean	42	52	47	58	39	67	77	93	83	177	735
Africa	71	116	72	40	30	40	37	35	63	212	716
Central / South America	33	25	30	42	22	66	68	71	92	172	621
Remaining Western Europe	39	34	48	56	65	47	67	63	97	103	619
Germany	42	43	44	48	48	61	78	58	67	59	548
Middle East	49	57	49	33	16	22	21	31	38	102	418
Great Britain	21	33	22	15	34	56	11	33	73	82	380
Eastern Europe	30	38	40	35	25	24	25	27	36	62	342
Asia	29	18	24	22	26	29	23	23	103	45	342
France	22	15	19	18	19	19	28	42	45	55	282
North America	25	21	23	28	24	23	24	29	48	37	282
C.I.S.	17	20	23	8	8	8	24	18	15	49	190
Australia /Oceania	4	6	11	5	1	6	12	17	6	16	84
Scandinavia	2	9	8	3	4	9	10	11	12	10	78
unknown	6	3	2	5	1		3	2	2	1	25
<b>Total</b>	<b>653</b>	<b>863</b>	<b>821</b>	<b>729</b>	<b>619</b>	<b>795</b>	<b>851</b>	<b>896</b>	<b>1159</b>	<b>1625</b>	<b>9011</b>

### 2.5.9 Domicile of beneficial owners

#### What the chart represents

This chart shows the domicile of the natural persons or legal entities that were identified as beneficial owners of assets at the time the SARs were submitted to MROS.

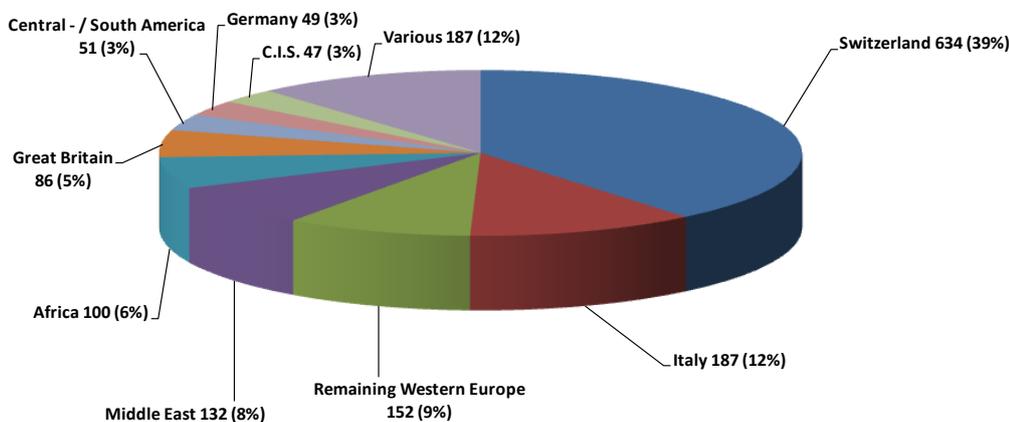
#### Chart analysis

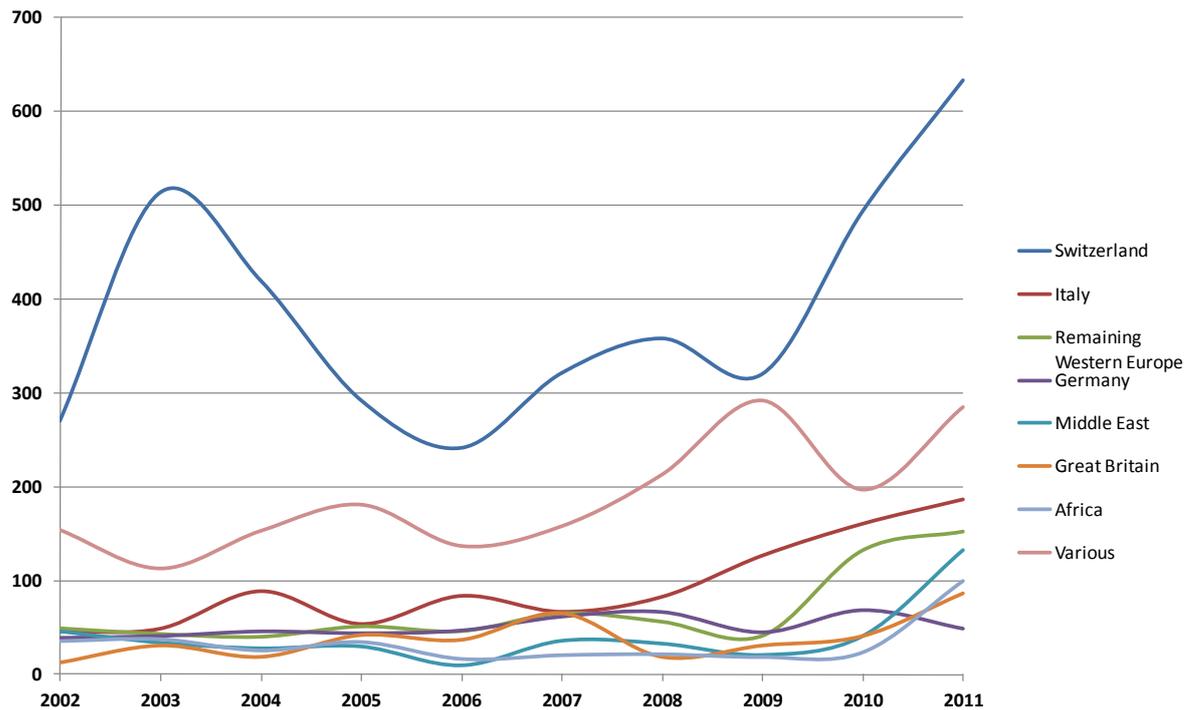
- *Despite dramatic increase in overall reporting volume, relative decrease in the number of Swiss-based beneficial owners, from 43 percent in 2010 to 39 percent in 2011.*
- *Dramatic increase in the number of beneficial owners based in Africa and the Middle East.*
- *Proportion of SARs involving European-based beneficial owners (not including C.I.S. nations considered part of Europe) falls to just below 74 percent (2010: more than 83 percent).*

#### Legend

Rest of Western Europe	Austria, Belgium, Spain, Liechtenstein, Greece, Luxembourg, Netherlands, Portugal and San Marino
Various	Africa, Asia, C.I.S., Eastern Europe, Scandinavia, Caribbean, Unknown and Australia/Oceania

2011





#### For comparison: 2002 – 2011

Domicile of beneficial owner	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	Total
Switzerland	270	514	420	292	241	321	358	320	494	634	<b>3864</b>
Italy	46	49	89	54	84	67	83	127	161	187	<b>947</b>
Remaining Western Europe	49	43	40	51	46	65	56	41	132	152	<b>675</b>
Germany	39	41	46	44	47	62	67	45	69	49	<b>509</b>
Middle East	46	34	28	30	10	36	33	21	41	132	<b>411</b>
Great Britain	13	31	19	42	37	65	19	31	41	86	<b>384</b>
Africa	36	38	26	35	17	21	22	19	24	100	<b>338</b>
Central / South America	20	14	27	32	14	35	64	39	32	51	<b>328</b>
France	39	18	20	29	18	23	26	63	35	45	<b>316</b>
North America	23	16	32	29	32	27	28	34	48	45	<b>314</b>
Asia	21	14	14	24	29	27	24	49	23	23	<b>248</b>
C.I.S.	15	13	18	8	15	7	31	52	21	47	<b>227</b>
Eastern Europe	17	15	20	33	22	13	18	24	21	32	<b>215</b>
Scandinavia	2	5	5	11	4	21	5	7	12	12	<b>84</b>
Caribbean	2	4	7	4	1	2	6	21	3	18	<b>68</b>
unknown	13	8	1	7	1	1	3	2	2	6	<b>44</b>
Australia/Oceania	2	6	9	4	1	2	8	1		6	<b>39</b>
<b>Total</b>	<b>653</b>	<b>863</b>	<b>821</b>	<b>729</b>	<b>619</b>	<b>795</b>	<b>851</b>	<b>896</b>	<b>1159</b>	<b>1625</b>	<b>9011</b>

## 2.5.10 Nationality of beneficial owners

### What the chart represents

This chart shows the nationality of those individuals who were identified as the beneficial owners of assets at the time the SARs were submitted to MROS. No distinction is drawn between the nationality and domicile of legal entities. Often the identity and nationality of the actual beneficial owners of these legal entities can only be determined by prosecuting authorities.

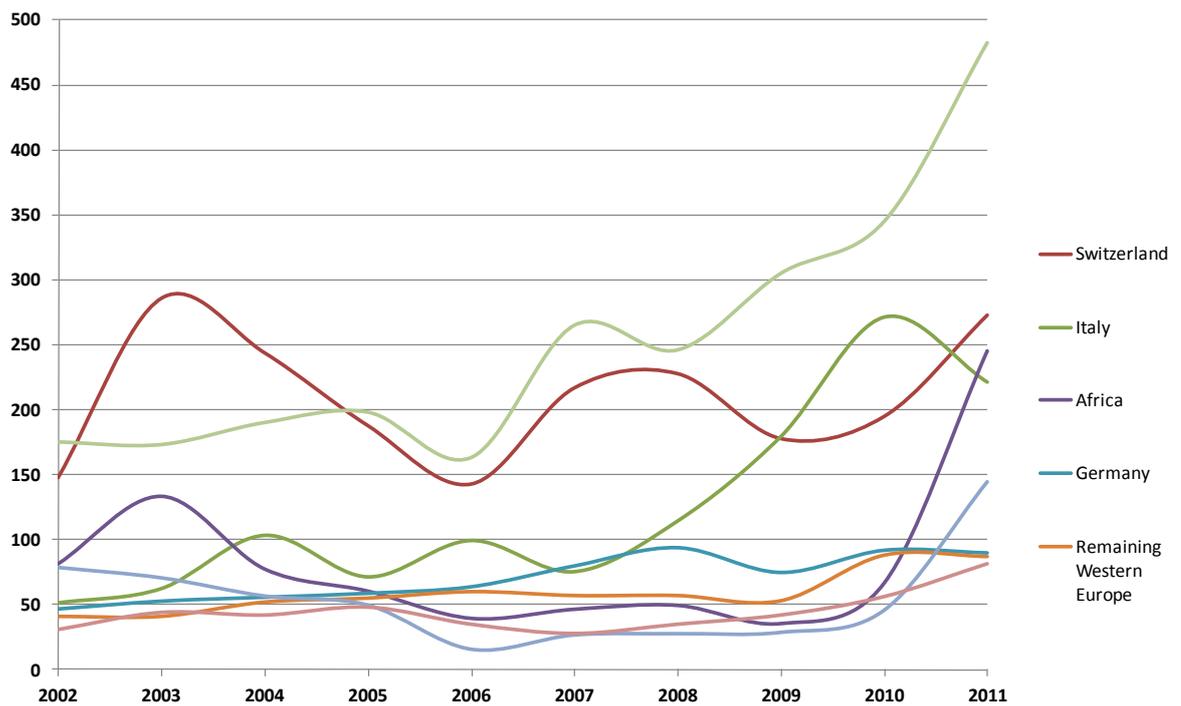
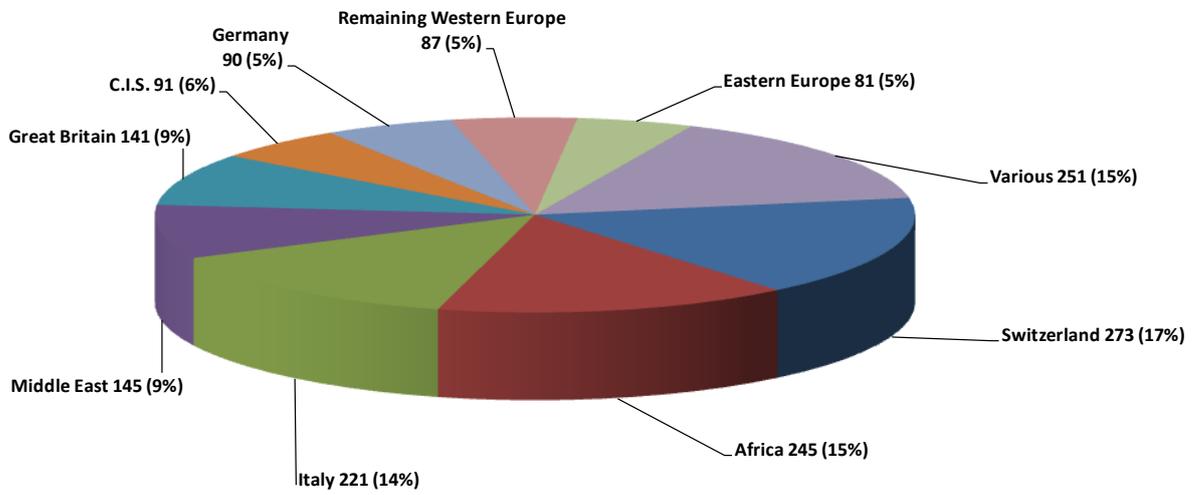
### Chart analysis

- *Relative decline in the number of SARs mentioning Swiss nationals as beneficial owners despite a dramatic increase in the overall number of incoming SARs.*
- *Near fourfold increase in African nationals as beneficial owners based on SARs in connection with suspected drugs trafficking.*
- *Threefold increase in beneficial owners from the Middle East due to political events.*
- *Increase in British nationals as beneficial owners due to one case generating numerous SARs.*

### Legend

Rest of Western Europe	Austria, Belgium, Spain, Liechtenstein, Greece, Luxembourg, Netherlands, Malta and Portugal
Various	Eastern Europe, North America, Middle East, Central- / South America, Great Britain, C.I.S., Scandinavia, Caribbean, Unknown and Australia/Oceania

2011



**For comparison: 2002 – 2011**

<b>Nationality of beneficial owner</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>Total</b>
Switzerland	148	286	244	188	143	217	228	178	195	273	<b>2100</b>
Italy	51	62	103	71	99	75	114	179	271	221	<b>1246</b>
Africa	81	133	77	60	39	46	49	35	66	245	<b>831</b>
Germany	47	53	56	59	64	80	94	75	92	90	<b>710</b>
Remaining Western Europe	41	41	52	55	60	57	57	53	88	87	<b>591</b>
Middle East	79	71	57	50	16	27	28	29	46	145	<b>548</b>
Eastern Europe	31	44	42	48	35	28	35	42	56	81	<b>442</b>
Great Britain	18	32	17	23	38	83	16	33	39	141	<b>440</b>
Asia	33	20	27	27	28	40	33	44	110	51	<b>413</b>
North America	24	28	34	42	35	31	31	55	47	50	<b>377</b>
France	25	20	23	42	27	30	36	43	57	69	<b>372</b>
C.I.S.	29	23	30	17	16	17	43	60	30	91	<b>356</b>
Central- / South America	25	21	31	31	11	37	60	43	39	44	<b>342</b>
Scandinavia	2	10	8	6	5	21	12	12	14	19	<b>109</b>
Caribbean	3	9	3	3		4	5	9	6	14	<b>56</b>
Australia/Oceania	3	7	15	3	2	2	7	3	1	3	<b>46</b>
unknown	13	3	2	4	1		3	3	2	1	<b>32</b>
<b>Total</b>	<b>653</b>	<b>863</b>	<b>821</b>	<b>729</b>	<b>619</b>	<b>795</b>	<b>851</b>	<b>896</b>	<b>1159</b>	<b>1625</b>	<b>9011</b>

## 2.5.11 Prosecuting authorities

### What the chart represents

This chart shows where MROS forwarded the SARs it received from financial intermediaries. The choice of prosecuting authority depends on the nature of the offence. Article 24 et seq. (federal jurisdiction) and Article 27 et seq. (cantonal jurisdiction) of the Code of Criminal Procedure serve as the frame of reference.

### Chart analysis

- Increase in proportion of forwarded SARs.
- Increase in the number of SARs forwarded to the Office of the Attorney General.
- Increase in expended resources by the cantonal prosecuting authorities due to more SARs.

MROS received a total of 1,625 SARs in 2011 (2010: 1,159). Following careful analysis, it forwarded 1,471 of these reports to prosecuting authorities (2010: 1,003). This represents a noticeable increase in the proportion of forwarded SARs to 91 percent (2010: approx. 87 percent). For further information relating to forwarded SARs see chapter 2.2.5.

In 2010, MROS forwarded 467 SARs (2010: 361) to the Office of the Attorney General of Switzerland (OAG). In relative figures this represents an increase of more than 29 percent and is due to political events mainly in North Africa and the Middle East. However, the overall proportion of forwarded SARs fell from 36 percent in 2010 to approximately 32 percent in 2011, due the overall increase in total reporting volume

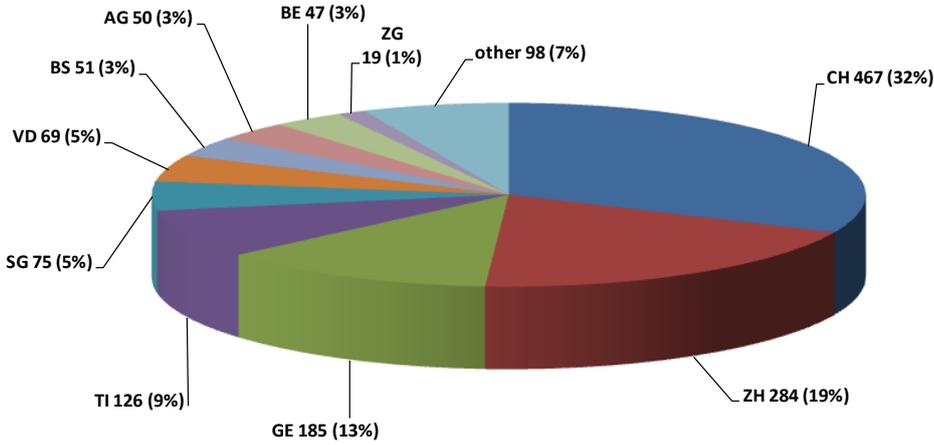
The remaining 970 SARs were forwarded to 24 cantonal prosecuting authorities. The noticeable increase in forwarded SARs to the prosecuting authorities of St. Gallen, Vaud and Aargau is due to the clean-up operation by one financial intermediary from the payment services sector. Around 39 percent (561 reports) of the 1,437 SARs were forwarded to the prosecuting authorities in the cantons of Zurich, Geneva and Ticino (2010: 41 percent).

### Legend

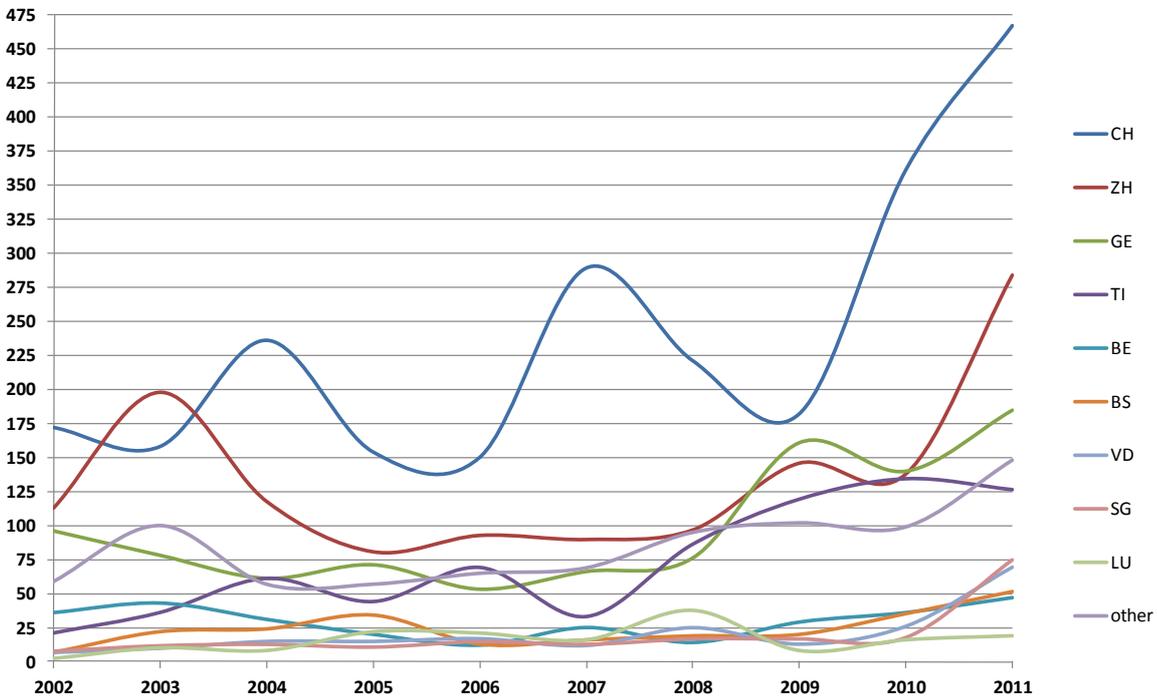
AG	Aargau	GL	Glarus	SO	Solothurn
AI	Appenzell Innerrhoden	GR	Graubünden	SZ	Schwyz
AR	Appenzell Ausserrhoden	JU	Jura	TG	Thurgau
BE	Bern	LU	Lucerne	TI	Ticino
BL	Basel-Landschaft	NE	Neuchâtel	UR	Uri
BS	Basel-Stadt	NW	Nidwalden	VD	Vaud
CH	Switzerland	OW	Obwalden	VS	Valais
FR	Fribourg	SG	St. Gallen	ZG	Zug

GE	Geneva	SH	Schaffhausen	ZH	Zurich
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**2011**



**For comparison 2002 - 2011**



## For comparison 2002 – 2011

<b>Canton</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>Total</b>
CH	172	158	236	154	150	289	221	182	361	467	<b>2390</b>
ZH	113	198	118	81	93	90	97	146	138	284	<b>1358</b>
GE	96	78	61	71	53	66	76	161	140	185	<b>987</b>
TI	21	36	61	44	69	33	86	119	134	126	<b>729</b>
BE	36	43	31	20	12	25	14	29	36	47	<b>293</b>
BS	7	22	24	34	13	16	19	20	35	51	<b>241</b>
VD	7	10	15	15	17	12	25	13	26	69	<b>209</b>
SG	8	12	13	11	15	13	17	17	18	75	<b>199</b>
ZG	2	10	8	22	21	16	38	8	16	19	<b>160</b>
AG	2	10	12	5	13	10	9	9	14	50	<b>134</b>
LU	8	8	10	11	17	14	25	11	13	9	<b>126</b>
NE	7	19	8	16	4	5	8	9	7	10	<b>93</b>
SO	7	19	8	4	4	3	13	12	6	12	<b>88</b>
BL	5	4	2	4	4	10	18	13	13	7	<b>80</b>
TG	5	4	1	3	4	3	3	22	8	6	<b>59</b>
SZ	6	3	6	2	7	4	2	5	8	8	<b>51</b>
VS	3	13	3	1	5	5	1	3	9	7	<b>50</b>
GR	7	6	2	4	3	2	2	5	9	6	<b>46</b>
FR	4	2	2	4	3	4	2	5	5	12	<b>43</b>
NW		2	1				2	1	1	9	<b>16</b>
SH		2		1		1	1	1	2	8	<b>16</b>
JU	1	4	1	1	1		2	2	1	1	<b>14</b>
OW		2	1			1	6	3		1	<b>14</b>
GL	3	1		1		3		1			<b>9</b>
AI						3			2	1	<b>6</b>
UR	1					1	1				<b>3</b>
AR		1							1	1	<b>3</b>
<b>Total</b>	<b>521</b>	<b>667</b>	<b>624</b>	<b>509</b>	<b>508</b>	<b>629</b>	<b>688</b>	<b>797</b>	<b>1003</b>	<b>1471</b>	<b>7417</b>

## 2.5.12 Status of forwarded SARs

### What the chart represents

This chart shows the current status of the SARs that were forwarded to federal and cantonal prosecuting authorities. The chart distinguishes between the Office of the Attorney General of Switzerland (OAG) and the cantonal prosecuting authorities. It is important to note that MROS only began gathering statistics on SARs forwarded to the OAG in January 2002, when federal prosecuting authorities were given jurisdiction over organised and economic crime by virtue of Article 24 Criminal Procedure Code<sup>3</sup>.

### Chart analysis

*Nearly 39 percent of all SARs forwarded to federal and cantonal prosecuting authorities since 2000 are still pending.*

By virtue of Article 23 paragraph 4 AMLA, MROS determines which SARs should be forwarded to which prosecuting authorities (i.e. cantonal or federal). The current statistics only cover the last ten years because the information regarding SARs from before this time has been deleted for reasons of data protection. For practical reasons, therefore, only electronically available data is used for drawing comparisons.

From 1 January 2002 to 31 December 2011, MROS forwarded a total of 7,417 SARs to prosecuting authorities. By the end of 2011, decisions had been reached in 4,536 cases (61 percent). These decisions are described below:

- in 6.5 percent (296 cases) of all forwarded SARs, the courts delivered the following verdict: 19 acquittals from the charge of money laundering, 11 acquittals from all charges (no charge of money laundering), 139 convictions including of money laundering, and 127 convictions for offences other than money laundering;
- in 42.6 percent (1,934 cases) of all forwarded SARs, criminal proceedings were initiated but later suspended, after criminal investigations revealed insufficient evidence of wrongdoing;
- in 41.4 percent (1,880 cases) of all forwarded SARs, no criminal proceedings were opened in Switzerland following preliminary investigations. The cantonal authorities have different practices with regard to decisions on dismissals. Thus, some judicial authorities do not actually initiate proceedings, but under the provisions of Art. 67a IMAC<sup>4</sup> voluntarily pass on information to foreign judicial

<sup>3</sup> Swiss Criminal Procedure Code dated 5 October 2007 (CrimPC; SR 312.0)

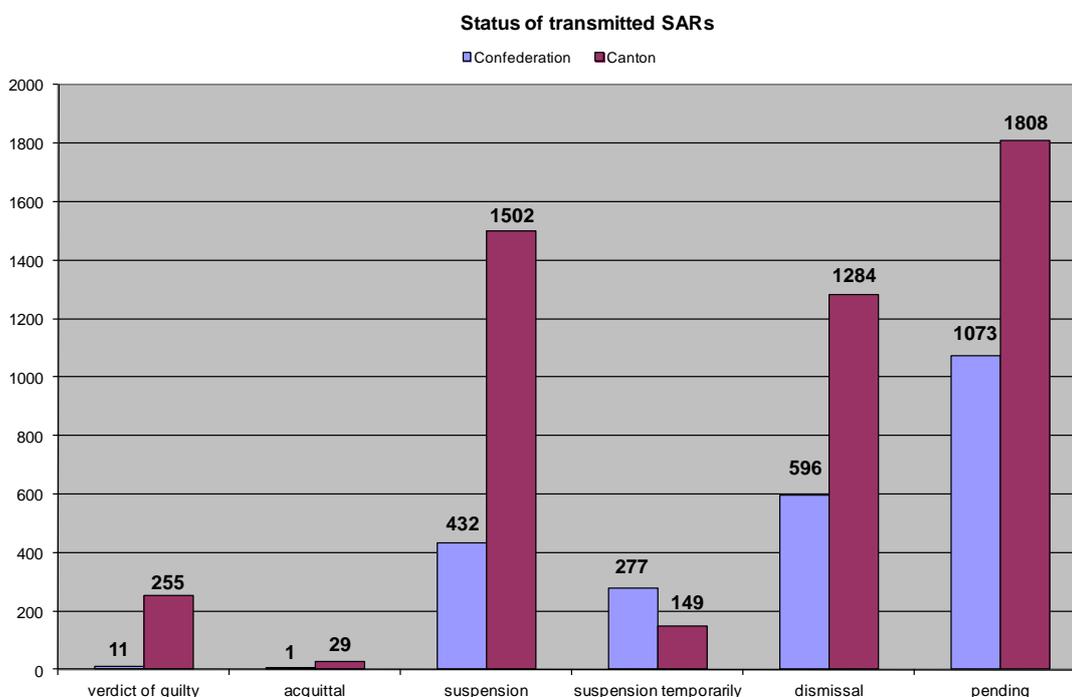
<sup>4</sup> Federal Act on International Mutual Assistance in Criminal Matters (International Mutual Assistance Act, IMAC; SR 351.1)

authorities enabling the latter to submit a request to Switzerland for international mutual assistance. Most of the cases that were dismissed concerned SARs from the payment services sector (money transmitters).

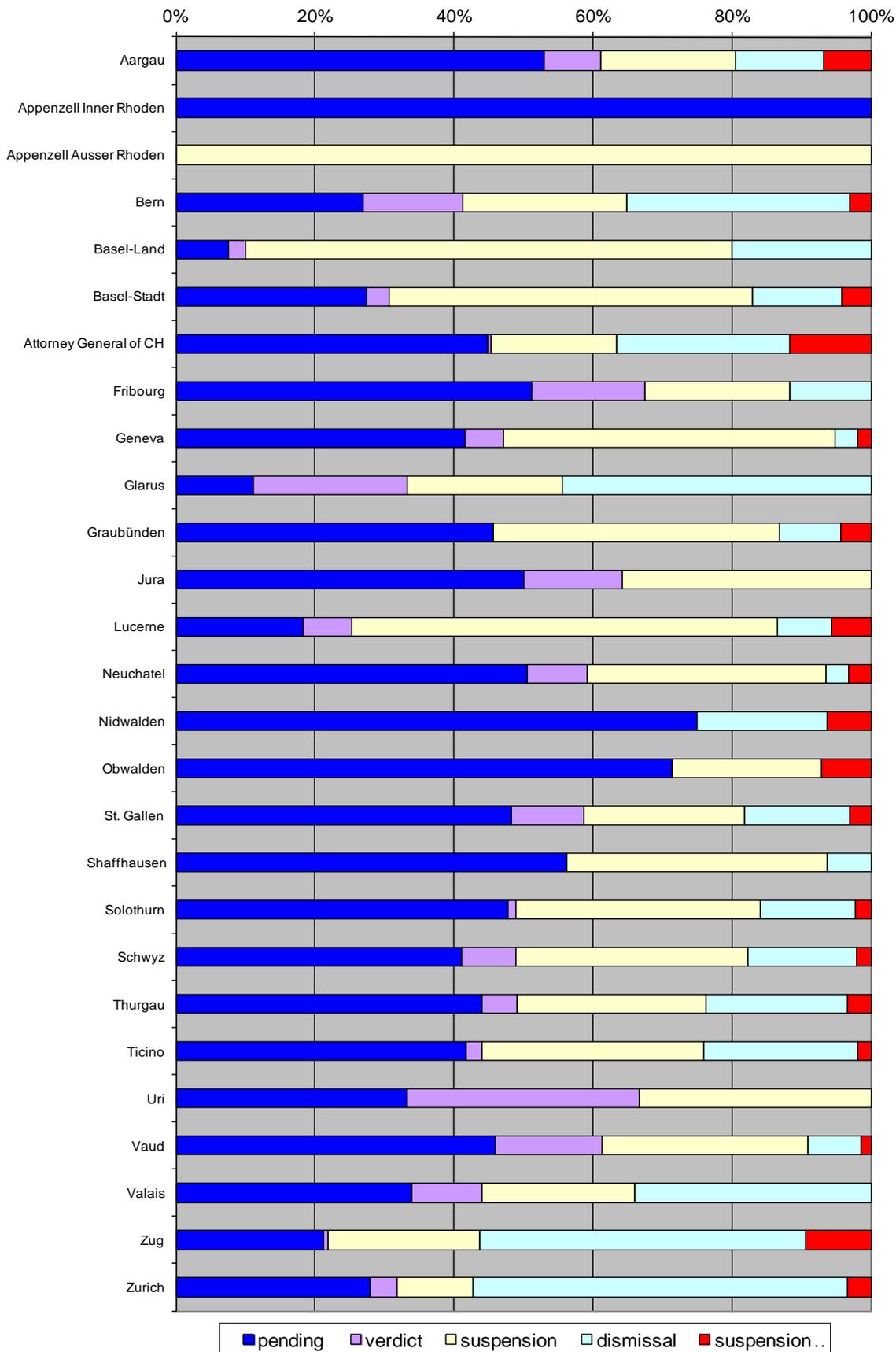
- in 9.4 percent of cases (426 SARs) criminal proceedings were suspended because proceedings had already been initiated in another country.

Although the prosecution authorities have continuously processed the number of pending cases, 39 percent of forwarded SARs (2,881 cases) are still pending (2010: 32 percent). It is difficult to draw conclusions as to the reasons due to a multifold of factors:

- Money laundering and terrorist financing cases often have international connections, and the resulting international investigations tend to be tediously protracted and difficult;
- Experience has shown that mutual legal assistance tends to be a very labourious and time-consuming affair;
- Some of the pending SARs have already led to a conviction, but MROS has not yet been notified of this fact because Article 29 paragraph 2 AMLA only requires cantonal authorities to provide MROS with updates on pendings SARs that relate specifically to Article 260<sup>ter</sup> paragraph 1 (criminal organisation), Article 305<sup>bis</sup> (money laundering) or Article 305<sup>ter</sup> (lack of due diligence) Swiss Criminal Code;
- In addition we still assume that cantonal prosecuting authorities do not always fulfil their obligation to inform MROS under Article 29a paragraph 2 AMLA.



**Status of forwarded SARs by canton 2002-2011**



**Status of forwarded SARs by canton 2002 - 2011**

Authority	Pending		Dismissal		Suspension		Suspension temporary		Verdict		Total	
AG	71	52.99%	17	12.69%	26	19.40%	9	6.72%	11	8.21%	134	100.00%
AI	6	100.00%	0	0.00%	-	0.00%	-	0.00%	-	0.00%	6	100.00%
AR	-	0.00%	0	0.00%	3	100.00%	-	0.00%	-	0.00%	3	100.00%
BE	79	26.96%	94	32.08%	69	23.55%	9	3.07%	42	14.33%	293	100.00%
BL	6	7.50%	16	20.00%	56	70.00%	-	0.00%	2	2.50%	80	100.00%
BS	66	27.39%	31	12.86%	126	52.28%	10	4.15%	8	3.32%	241	100.00%
CH	1'073	44.90%	596	24.94%	432	18.08%	277	11.59%	12	0.50%	2'390	100.00%
FR	22	51.16%	5	11.63%	9	20.93%	-	0.00%	7	16.28%	43	100.00%
GE	411	41.64%	33	3.34%	470	47.62%	18	1.82%	55	5.57%	987	100.00%
GL	1	11.11%	4	44.44%	2	22.22%	-	0.00%	2	22.22%	9	100.00%
GR	21	45.65%	4	8.70%	19	41.30%	2	4.35%	-	0.00%	46	100.00%
JU	7	50.00%	0	0.00%	5	35.71%	-	0.00%	2	14.29%	14	100.00%
LU	23	18.25%	10	7.94%	77	61.11%	7	5.56%	9	7.14%	126	100.00%
NE	47	50.54%	3	3.23%	32	34.41%	3	3.23%	8	8.60%	93	100.00%
NW	12	75.00%	3	18.75%	-	0.00%	1	6.25%	-	0.00%	16	100.00%
OW	10	71.43%	0	0.00%	3	21.43%	1	7.14%	-	0.00%	14	100.00%
SG	96	48.24%	30	15.08%	46	23.12%	6	3.02%	21	10.55%	199	100.00%
SH	9	56.25%	1	6.25%	6	37.50%	-	0.00%	-	0.00%	16	100.00%
SO	42	47.73%	12	13.64%	31	35.23%	2	2.27%	1	1.14%	88	100.00%
SZ	21	41.18%	8	15.69%	17	33.33%	1	1.96%	4	7.84%	51	100.00%
TG	26	44.07%	12	20.34%	16	27.12%	2	3.39%	3	5.08%	59	100.00%
TI	305	41.84%	161	22.09%	233	31.96%	14	1.92%	16	2.19%	729	100.00%
UR	1	33.33%	0	0.00%	1	33.33%	-	0.00%	1	33.33%	3	100.00%
VD	96	45.93%	16	7.66%	62	29.67%	3	1.44%	32	15.31%	209	100.00%
VS	17	34.00%	17	34.00%	11	22.00%	-	0.00%	5	10.00%	50	100.00%
ZG	34	21.25%	75	46.88%	35	21.88%	15	9.38%	1	0.63%	160	100.00%
ZH	379	27.91%	732	53.90%	147	10.82%	46	3.39%	54	3.98%	1'358	100.00%
<b>Total</b>	<b>2'881</b>	<b>38.84%</b>	<b>1880</b>	<b>25.35%</b>	<b>1'934</b>	<b>26.08%</b>	<b>426</b>	<b>5.74%</b>	<b>296</b>	<b>3.99%</b>	<b>7'417</b>	<b>100.00%</b>

### 2.5.13 Inquiries from foreign FIUs

Financial intelligence units (FIUs) are MROS's counterpart agencies in other countries with which a formal exchange of information by virtue of Article 32 AMLA and Article 13 MROS Ordinance takes place. This exchange of information mainly occurs between the member states of the Egmont Group<sup>5</sup> and is an important instrument in the fight against money laundering.

When MROS receives an inquiry from a foreign FIU, it runs a computer check on the natural person or legal entity to see whether their name is already listed in existing databases. The natural person's or legal entity's details are then entered into MROS's own money laundering database (GEWA database). MROS checks the names of all natural persons or legal entities mentioned in the SARs it receives from Swiss financial intermediaries. If a name is found in the GEWA database, MROS knows that the natural person or legal entity in question is already suspected of possible criminal activity abroad.

#### What the chart represents

This chart shows which FIUs submitted inquiries to MROS. It also indicates how many natural persons and legal entities were mentioned in these inquiries.

#### Chart analysis

- *The number of natural persons and legal entities who were the subject of inquiries from foreign FIUs increased by nearly 10 percent.*

In the 2011 reporting year, MROS replied to 564 inquiries from FIUs in 80 countries. This is slightly less than in 2010 (577 inquiries). In contrast, there was an increase in the number of natural persons and legal entities mentioned: 2,123 in 2011 compared to 1,937 in 2010.

There was a decrease in the number of foreign FIU inquiries that MROS had to turn down on formal grounds (2011: 48, 2010: 77). Most of these inquiries either had no direct connection to Switzerland (so-called fishing expeditions), or concerned specific financial information that may only be provided by virtue of a mutual legal assistance request. Whenever sufficient legal grounds are lacking in an FIU inquiry, MROS's policy is not to disclose the requested information (see chapter 5.1).

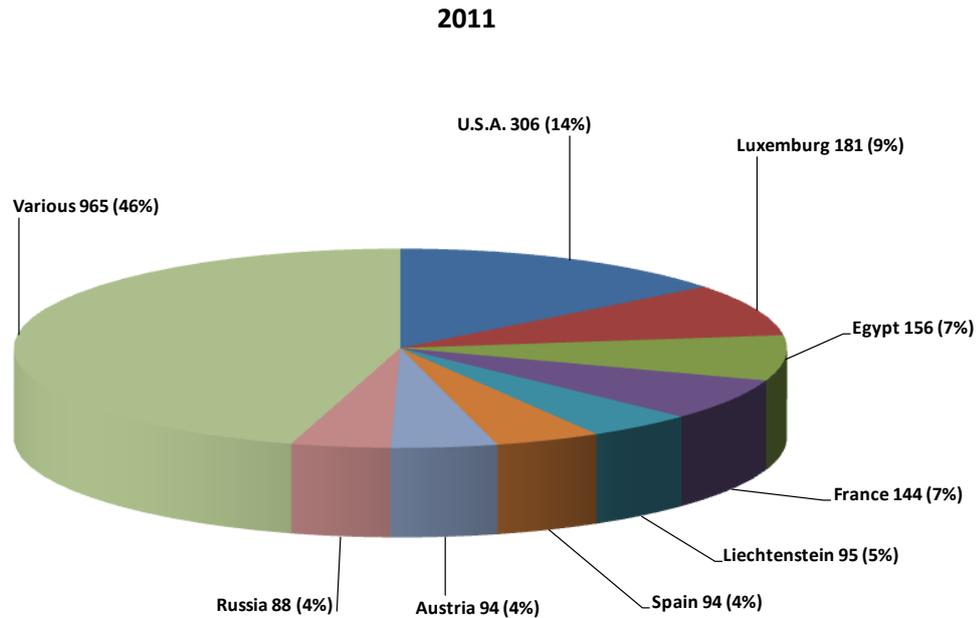
In 2011, MROS responded to FIU inquiries within an average of five working days following receipt. This was slower than in 2010 (four working days) but still lies well within the 30 days defined in the Egmont Group's Best Practice Guidelines.

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<sup>5</sup> [www.egmontgroup.org](http://www.egmontgroup.org)

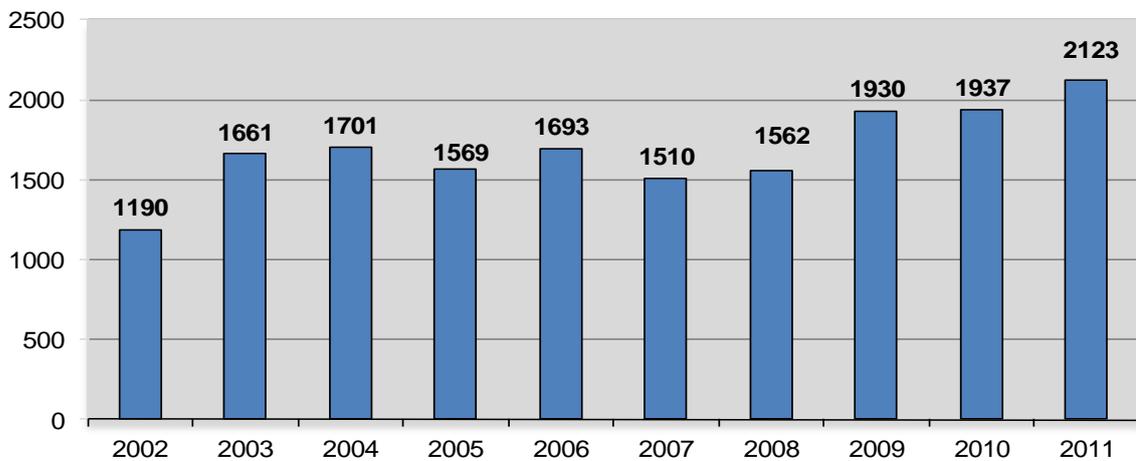
In response to incoming FIU inquiries MROS ran computer checks on an average of 177 natural persons or legal entities each month. This is a slight increase over 2010 (+16 persons).

**2011: 2123 natural persons/legal entities**



**For comparison 2002 - 2011**

**Number of natural persons/legal entities mentioned in foreign FIU inquiries to MROS**



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## 2.5.14 MROS inquiries to foreign FIUs

Whenever a financial intermediary in Switzerland submits an SAR mentioning a natural person or legal entity domiciled outside of Switzerland, MROS may send an inquiry to a foreign FIU to obtain information about that natural person or legal entity. MROS uses the information it receives to analyse the SAR in order to determine what action needs to be taken. Since many incoming SARs have an international connection, the information MROS receives from foreign FIUs is important.

### What the chart represents

This chart shows the foreign FIUs to which MROS sent inquiries to obtain information about natural persons and legal entities. The chart also indicates the number of natural persons and legal entities mentioned in these inquiries.

### Chart analysis

*Slight decrease in the number of natural persons/legal entities mentioned in MROS inquiries to foreign FIUs*

In the 2011 reporting year, MROS sent 159 (2010: 157) inquiries on 999 natural persons or legal entities (2010: 1,033) to 53 foreign FIUs. The foreign FIUs took an average of approximately 25 working days to reply; that is three days more than in 2010. The Egmont Group's "Best Practice Guidelines" recommend a response time of no more than 30 working days. The FIUs in some countries fail to adhere to these guidelines, which means that MROS often has to wait several months or even longer for a reply. In comparison, MROS response time to inquiries from foreign FIUs is very fast (see chapter 2.5.13).

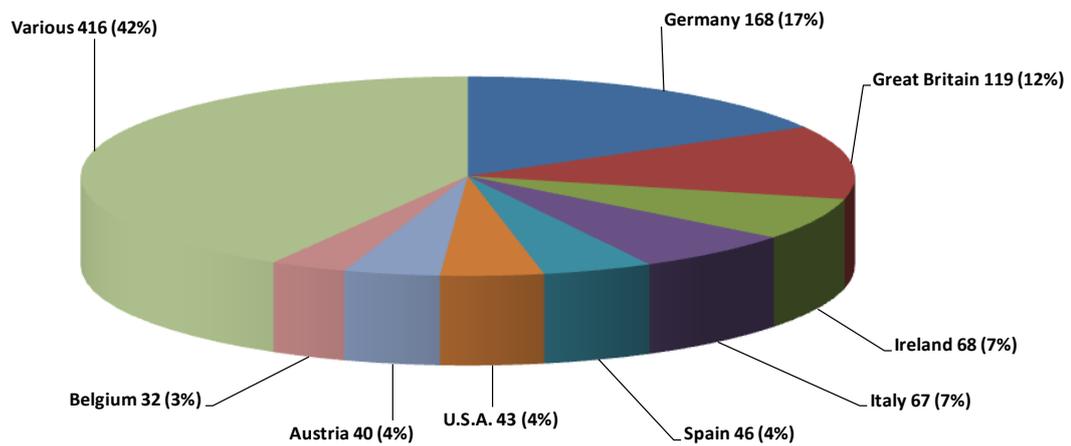
MROS's key partners in this respect are the FIUs in the following countries: Germany, Great Britain, Ireland, Italy and Spain.

MROS sent inquiries to foreign FIUs to obtain information regarding an average of 83 natural persons or legal entities each month compared to 86 in 2010.

MROS sent inquiries to foreign FIUs in relation to 159 of the 1,625 SARs it received in 2011 (nearly 10 percent of all incoming SARs).

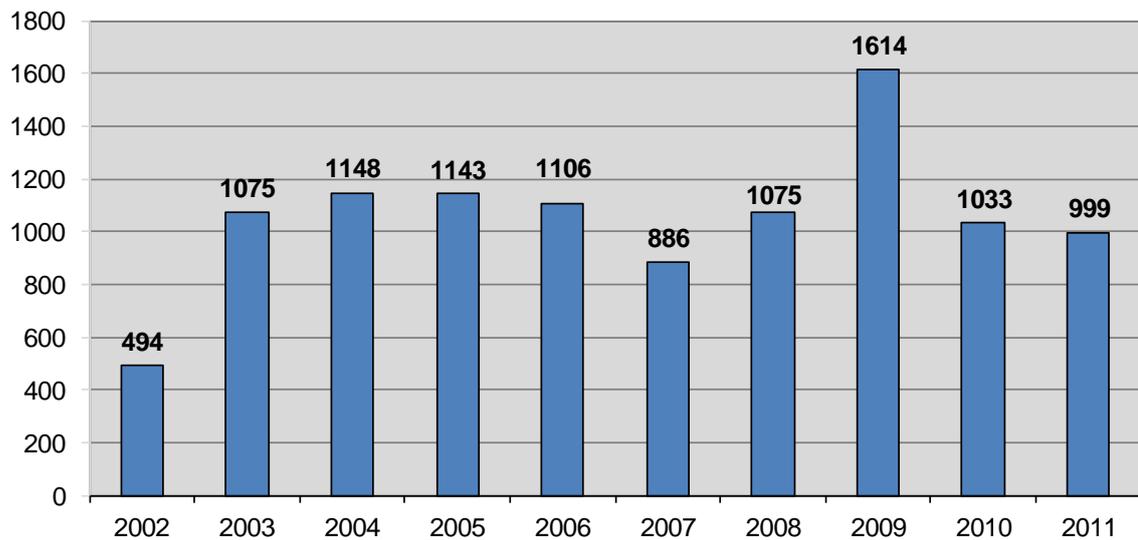
**2011: 999 natural persons/legal entities**

**2011**



**For comparison: 2002 - 2011**

**Number of natural persons/legal entities mentioned in MROS inquiries to foreign FIUs**



### **3. Typologies (selection of cases from 2011 reporting year)**

#### **3.1. *Dubious cash deposits***

A financial intermediary requested clarification after several hundred thousand Swiss francs in cash were deposited into the account of a client. The client explained that her father and husband had given her most of the cash for investment purposes. However, she was unable to provide a plausible explanation as to where the money had come from. She even stated that she had more large sums of cash at home. A portion of this money had been saved up. In addition, she explained that her husband was going to lend her tens of thousands more. The reporting financial intermediary found it rather contradictory when the client requested that her husband, who lives abroad, should not be provided with any information about the account. After investigating the matter further, the financial intermediary discovered that, several years ago, the husband had been strongly suspected of involvement in property crime totalling several hundred thousand Swiss francs. Since the financial intermediary was unable to exclude a possible causal link between the property crime perpetrated several years earlier and the cash deposit, a voluntary SAR was submitted to MROS. An MROS investigation revealed that the criminal proceedings relating to the property crime in question had been put on hold and that the several hundred thousand Swiss francs had not yet been found. Moreover, the client's husband's name appeared in several police and judicial records. MROS decided to forward the SAR to the cantonal prosecution authorities, which initiated criminal proceedings.

#### **3.2. *Attempted cheque fraud***

At the end of 2011, a law firm received an e-mail message from a company purporting to be from Asia. The company wanted the law firm to collect payment of several hundred thousand US dollars from a well-known Swiss company. However, no follow-up mandate was given to the law firm since the Asian company had apparently decided in the meantime to give the Swiss company more time to make the outstanding payment. The law firm therefore found it both surprising and implausible when, a few days later, it received a cheque in its name for the amount due. This cheque had been issued by a foreign bank and delivered via a courier service. The letter accompanying the cheque indicated a North American address and the name of a supposed foreign subsidiary of the Swiss company appeared on the envelope. In the absence of an official mandate, and given the suspicious circumstances, the law firm contacted the Swiss company, which replied that the letterhead font did not match the one used by the Swiss company and that the cheque was a fake. An SAR was submitted to MROS, which was unable to uncover any other relevant details. The SAR was then forwarded to the cantonal prosecution authorities, which had already initiated criminal proceedings for a similar case of fraud. The authorities surmised that the intent had been for the law firm to deposit the cheque

into its bank account and then expedite payment of the “collected funds” to its “client” (i.e. the Asian company) while waiting for the cheque to clear. The law firm would have discovered too late that the cheque was a fake.

### **3.3. *Improbable payment from abroad***

In early 2011, a foreign client received a wire transfer of USD 300,000 on behalf of a law firm in his home country. The compliance division asked the client advisor to obtain additional clarification regarding the economic background of this deposit. The client explained that the payment related to a contractual obligation with a well-known law firm that also represented his country in various matters. The client advisor requested more details regarding the contractual obligation between the client and the law firm. The client advisor forwarded these details to the compliance division along with the client’s request that the details of the transaction remain confidential. After examining the documentation, the compliance officer concluded that the documentation was not detailed enough. Additional searches of public sources revealed that the law firm in question had been involved in criminal activities such as misappropriation of public funds in the client's home country. In addition, the owner of the law firm was a close legal representative of the President of the client's home country. The client advisor contacted the client again but was still unable to determine the economic background of the incoming payment. Certain statements made by the client also indicated that some of the deposited funds might actually have been derived from influence peddling. An SAR was therefore submitted to MROS. However, examination of police and judicial records and subsequent investigation of the persons named in the SAR did not reveal any relevant details. For motives of convenience, a decision was reached not to contact the FIU in the client's home country but rather to forward the SAR to the Office of the Attorney General of Switzerland.

### **3.4. *Money transfers in connection with human trafficking***

A money transmitter found the business relationship of a client suspicious because he regularly transferred cash to African countries. Examination of the list of transactions revealed that in less than two years the client had transferred over CHF 100,000. This sum had been broken down into around 200 transactions to nearly 30 people. The frequency of the transactions had been found during a routine check and the money transmitter felt that the total amount in question was not plausible. Although the money transmitter had had numerous opportunities to investigate the suspicious activity under Article 6 AMLA, the client had neither been asked about the origin of the money nor the economic background of the transfers. Subsequent investigation by MROS revealed that the client in question was being investigated for alleged involvement in migrant smuggling and human trafficking. He was suspected of smuggling asylum seekers from Africa into neighbouring countries and then forcing these asylum seekers into prostitution. Customs officers who inspected the client's vehicle at the Swiss border found tens of thousands of Swiss francs hidden beneath the passenger seat. The client was unable to credibly explain the origin of the cash. The attention of the authorities was also drawn to one of the cash recipients: an African national had received several thousand Swiss francs from the suspicious transferer

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and wanted to fly to Switzerland via a western European country in 2010. The police found the person's behaviour unusual and suspected involvement in drug trafficking. However, queries made in the customs and personal databases revealed nothing and the individual was allowed to enter Switzerland. It was suspected that the transferer might be a member of a criminal organisation responsible for smuggling people from West Africa to Europe and forcing them into prostitution. Since at least some of the money transfers sent via the money transmitter were likely to have been derived from criminal activities and since the transferer was already under criminal investigation, the SAR was forwarded to the cantonal prosecution services.

### **3.5. *Real estate purchase by a criminal organisation***

An employee of the reporting bank was contacted by a potential client from south eastern Europe. The individual wanted to take out a mortgage to buy real estate valued at a low seven-digit figure. The individual was willing to pay 25 percent of the purchase price and wanted a mortgage for the remaining 75 percent. To prove his liquidity, the individual produced an account statement from a bank in his home country. The reporting bank, however, had doubts as to the authenticity of the account statement. Searching the Internet, the bank employee discovered that the individual's name appeared in several publications in connection with an active terrorist organisation in Eastern Europe.

The bank immediately sent an SAR to MROS, since it suspected that the applicant had produced a false account statement to mislead the bank or intended to launder criminal proceeds by purchasing real estate in Switzerland. The bank therefore refused to provide a mortgage to finance the purchase.

Strangely enough, the applicant did not seem overly upset by this decision. The bank employee assumed that this was not the first time that the applicant had failed to obtain a mortgage from other banks. However, no other bank had reported any suspicious activity to MROS. MROS investigations substantiated the bank's initial impression that the individual could be a member of a criminal organisation:

A list published on the Internet included the names of over 100 individuals who had been members of an eastern European paramilitary organisation and had been involved in the murder of civilians as well as drug trafficking. The individuals on this list were also suspected of links with Islamic terrorists, who had apparently also trained them. The applicant's name was on this list. The background information provided by the applicant (date of birth, occupation, etc.) left no room for doubt that the individual was the same person. The reporting bank also discovered that the real estate purchase in question did not fit the applicant's profile. The bank knew that the applicant lived in modest circumstances and that his wife was a factory worker. The bank surmised that the applicant had made regular, proven stays in his home country, which would have enabled him to maintain contacts with criminal organisations. The bank suspected that the applicant was attempting to launder criminal proceeds by purchasing real estate in

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Switzerland.

Since the applicant most likely belonged to an internationally active terrorist organisation, MROS forwarded the SAR to the Office of the Attorney General of Switzerland (OAG). Upon completion of a preliminary investigation, the OAG decided to dismiss the case for lack of sufficient evidence that the applicant was actually involved in money laundering.

### **3.6. *Account opened using a stolen identity***

A financial intermediary sent MROS an SAR regarding a business relationship with one of its clients, a South American woman employed as a salesperson. The account balance showed tens of thousands of Swiss francs that had come from another account held by the client at a well-known lending institution. Apparently, the money in question was a loan that the client had asked to have credited to the reported account. A few days later, a Travel Cash Card provider informed the financial intermediary that the client had recently loaded tens of thousands of Swiss francs to her Travel Cash Cards from the reported account.

Based on this information, the financial intermediary took a closer look at the business relationship. It turned out that the client had actually stolen the identity of the real salesperson for the purpose of opening the account. The real salesperson informed the financial intermediary that she had never opened a bank account there nor had ever received correspondence or documents relating to this account. Comparison of the ID photos of the real salesperson and the client revealed that they were, in fact, two different people. Unknown third parties had opened the account via post and had sent a copy of the fake Swiss ID card with the account application. The copy of the Swiss ID card appeared to have been certified by a notary. However, closer investigation revealed that the notary who had certified the Swiss ID card did not exist.

The account documents sent via post had been removed from the salesperson's mailbox by the perpetrators of the fraud. All indications pointed to the fact that unknown third parties had used a stolen identity to open an account at a lending institution by fraudulent means, obtained a loan and then transferred the loan amount to the reported account – which had also been opened using the stolen identity. The money was immediately transferred to Travel Cash Cards and eventually withdrawn as cash from various automatic teller machines (ATMs).

Subsequent investigation by MROS proved unsuccessful since the names of the persons who had stolen and misused the salesperson's name were not known. The salesperson herself has no police record. Since the reported account had been used to channel incriminated assets, MROS forwarded the SAR to cantonal prosecution services.

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### **3.7. *An unusual case of phishing***

A financial intermediary was informed by another bank via SWIFT message that a payment credited to a client had been obtained through fraudulent means and the unwilling payer wanted the amount to be paid back. All indications pointed to a classical case of phishing. Closer examination revealed that the account in question belonged to a Swiss company that sold pre-paid cards over the Internet. Such cards and the pre-paid amounts can be used to purchase services (e.g. play poker on the Internet). The owner of the company in question is most likely not involved in the fraud described. Nevertheless, he had clearly neglected to take precautionary measures to ensure that clients purchasing pre-paid cards on his website would be adequately protected from identity theft. Phishing attacks ensued, with Trojan malware being used to log the name, address and bank account numbers of unsuspecting users. With this information, their accounts could then be "plundered". The reporting financial intermediary looked into the matter and contacted the Swiss Financial Market Supervisory Authority (FINMA), which stated that companies providing financial intermediation services must have a permit. However, the company in question had never applied for such a permit. Supervisory proceedings against the company are therefore likely. Given the described indications of phishing, MROS forwarded the SAR to the cantonal prosecution authorities, which then initiated a criminal investigation against the unknown parties for money laundering.

### **3.8. *Migrant smugglers or just good Samaritans?***

The reporting bank became aware of a suspicious business relationship after being contacted by the State Secretariat for Economic Affairs (SECO). For its part, SECO had been contacted by a group of experts monitoring compliance with UN sanctions against two African countries. The group of experts had discovered that despite international efforts to prevent an exodus of refugees from these countries, high-ranking military and security officials had taken part in migrant smuggling operations. In exchange for helping people to get out of the country, these officials had received payments from people who had the financial means to do so. This had also enabled people to escape the draft where they would have been forced to fight in the conflict involving the two countries. This migrant smuggling operation was worth millions.

Following investigation by the group of experts, both the cell phone and bank account number of a client of the bank were identified. The migrant smugglers had apparently used this account to receive incoming payments and then helped the refugees to exit the country. SECO asked the bank for information regarding the bank account in question and corresponding transactions. The bank therefore proceeded to analyse the business relationship.

After looking into the matter, the reporting bank saw that there had been numerous transactions on the account in December 2009. Payments had been made to the account from persons both in and outside of Switzerland, bringing the account balance to a six-digit figure within a year. Most of this money was then transferred in several wire transfers to

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two people abroad. The bank therefore decided to report the business relationship to MROS.

The MROS investigation revealed that SECO had also contacted the Swiss Federal Criminal Police (FCP) to obtain more information about the account holder. The FCP stated that there was still not enough information to initiate criminal proceedings against the account holder in question. After analysing the account statements and other facts, MROS concluded that there were nevertheless reasonable grounds for suspicion that the account holder was acting as an intermediary and had possibly helped to organise smuggling operations. The money had mainly come from nationals of the countries in conflict, who had already found asylum in a European country. MROS suspected that the foreign nationals in question had made payments on behalf of relatives who had already reached the Mediterranean coast of a North African country in preparation for their subsequent trip to Europe. MROS forwarded the SAR to the cantonal prosecution authorities.

### **3.9. *Lenders taken in by false collateral?***

In August 2011, the reporting bank's attention was drawn to a business relationship after the account holder received two large wire transfers for a total of CHF 400,000. The payments had come from two people with the same surname. When asked for clarification, the account holder provided the bank with imprecise information, evasive replies and various contradictory assertions. He nevertheless produced a lending agreement signed by the individuals who had made the incoming payments. This agreement indicated that the account holder had been given a loan of CHF 400,000 at an annual interest rate of 5 percent. The loan was to be paid back within three years. The agreement mentioned that a painting would be used as collateral. The lenders could keep this painting if the account holder failed to pay back the loan. The painting in question was the work of Andrea del Sarto entitled "Madonna della Scala".

The client also provided the bank with a copy of a contract, which stated that the painting actually belonged to a third party who had entrusted the painting to the account holder for the purpose of selling it. The bank conducted internal verifications and discovered that the "historical painting" was most likely not an original by Andrea del Sarto but rather, in the best of cases, the work of one of his students. The value of the painting was therefore in the four-digit range and was insufficient collateral to cover the amount of the loan. The bank concluded that the lenders had been misled by the account holder regarding the actual value of the painting and had therefore granted a (factually unsecured) loan under a mistaken impression.

The MROS investigation revealed that the reported account holder was known to the authorities. He had already been implicated in other fraudulent activities but had thus far managed to avoid conviction. Fedpol's coordinator of cultural assets was consulted and the expert confirmed that the painting used as collateral for the loan could not possibly be

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the 16th century original from Andrea del Sarto because the painting in question had long been on display at the Prado Museum in Madrid. Even the size of the original painting (1.77m x 1.35m) did not match the painting in the account holder's possession (178.5m x 1.38m). According to the specialist, the copy could not be worth more than CHF 30,000 (if it really was one of the ten official copies of the original painting). And even here, copies of such paintings could be ordered over the Internet. A "talented artist" would be able to paint a good-quality copy of a painting in 14-16 days for a few hundred Swiss francs.

According to jurisprudence of the Federal Supreme Court, loan fraud exists when a borrower has provided a lender with misleading information about his solvency for the purpose of obtaining a loan. If collateral is faked, giving the impression that a loan is secured when in fact it is not, then fraud loss occurs. The lenders in this case were misled regarding the real value of the painting, which prompted them to give the borrower the large loan. Thus, there were reasonable grounds for suspicion of fraud and embezzlement. Moreover, the painting in question apparently did not belong to the account holder but rather to one of his clients who had entrusted the painting to him for the purpose of selling it (and certainly not for the purpose of using it as collateral for a personal loan). The case is now being handled by the cantonal prosecution authorities.

### **3.10. Family ties**

A reporting financial intermediary was monitoring the transactions of various clients when it noticed an unusually large number of incoming payments for substantial amounts into a youth account. Closer examination revealed an incoming wire transfer of CHF 30,000. The parents of the account holder were contacted on several occasions to clarify the unusual transactions. The parents eventually explained that the money had come from the sale of a family-owned snack van. The money was intended for the son's education.

Subsequent to this, a significant portion of the proceeds from the alleged sale were withdrawn from the youth account and not set aside, as the parents had claimed, for the son's education. Among other things, rental costs and licensing fees were paid for a real estate business that the mother had recently started. Subsequent examination of the transactions by the financial intermediary revealed that the parents of the account holder had major financial problems and even owed money to the reporting financial institution. The outstanding debt had given rise to several debt collection proceedings against the parents, ultimately leading to issuance of a declaration of insolvency.

MROS contacted the debt collection office in the family's place of residence. It turned out that the family had a mountain of debt and had obtained numerous declarations of insolvency. In an effort to obtain cash, the parents finally decided to sell their snack van to a third party, which generated CHF 60,000. This amount would have been enough to pay down a sizeable portion of their outstanding debt. The debt collection office had not been informed of the sale and it seemed that at least part of the money had been concealed in the son's bank account.

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MROS concluded that the parents were in possible violation of Article 163 Swiss Criminal Code (fraudulent bankruptcy; felony against debt collection) by not disclosing the sale of assets to the debt collection office and by dissimulating the assets, thereby seriously harming the interests of creditors. The case was transferred to the cantonal prosecution authorities.

### **3.11. *Unscrupulous characters***

The economic beneficiaries of an account held at the reporting financial intermediary received large sums of money from a wealthy 95-year-old widow. The widow's husband had created a trust and named her as beneficiary to ensure that she would be financially secure after he died. Now very advanced in age, the widow has poor eyesight and no precise idea of the fortune that her husband had left to her after his death. Based on the information at the financial intermediary's disposal, the individuals surrounding the widow are secondary beneficiaries of the trust. While the identity of trust beneficiaries and the respective shares in the trust have changed since the husband's death, the trust's official records have not been adequately updated. Apparently, the secondary beneficiaries had abused the widow's confidence to derive substantial and unwarranted gains. The designated trustee at an asset management company may have also been involved in the scheme since he holds power of signature over both the trust account and the accounts of the secondary beneficiaries in question. Since the manager refused to provide the trust deed and subsequent revisions, the financial intermediary was unable to verify the validity of the changes made to the trust's official records. And yet, the widow signed documents on two occasions that led to major transfers of trust assets to the secondary beneficiaries and their companies. This raised serious doubts as to the widow's real capacity to sign documents relating to these transfers and to validly give her consent. The financial intermediary who holds accounts in the name of offshore companies belonging to the secondary beneficiaries therefore refused to transfer amounts from these accounts to the trustee's accounts at another financial institution, which is the trustee's new employer. MROS forwarded the SAR to the prosecution authorities under suspicion of fraud and/or profiteering.

### **3.12. *South American electrical equipment supplier involved in a case of high-powered corruption***

The financial intermediary became aware of an article in the foreign press implicating some of his clients in a case involving corruption of South American officials and international money laundering. The economic beneficiary of the account had received commissions from a foreign company involved in the supply of electrical equipment. The commissions were intended as kickbacks to South American public officials so that they would award contracts to the foreign company for work on behalf of a state-run power company. The financial intermediary suspected that the account opened in the name of an offshore company (that had also been implicated in the case) may have been used for the purposes of corruption. Analysis of the transactions carried out by the financial

intermediary revealed suspicious incoming payments from various counterparties in the energy sector. The financial intermediary began to analyse the transactions to determine whether certain public officials had derived any unwarranted gains from the offshore company's account. Focussing on the largest outgoing payments to South America, the financial intermediary found several suspicious transactions to luxury yacht dealers, car dealers and real estate agents and made a connection with the aforementioned article in the foreign press.

The financial intermediary requested clarification but received only a letter signed by the account holders requesting that the account be closed. A designated proxy also made several follow-up calls to ensure that the account would be closed.

The SAR was forwarded to the prosecution services under suspicion of corruption, money laundering and possible involvement in a criminal organisation.

### **3.13. *Very expensive studies indeed***

A financial intermediary detected an international wire transfer made by one of its clients to a person in an African country. The wire transfer was considered very high given the client's profile. Initial verifications uncovered other transfers that added up to a very large sum. The financial intermediary requested clarification from the client, who was unable to provide a convincing explanation. An SAR was sent to MROS.

In its analysis, MROS began checking the various transactions carried out on the client's account. There were frequent payments of small amounts from different payers. The sum of these amounts would then be sent to the said African country.

MROS noted that the explanations provided by the client were not plausible. He had explained that the small payments had been minor loans from friends as well as income from odd jobs such as tutoring. The client was nevertheless unable to provide any proof to back his claims. He justified the transfer of these amounts to the African country by saying that it was to pay back a loan for his education. However, there were no indications that the wire transfers related to reimbursement of a loan. Finally, the client was unable to explain why the payments were for such a high amount.

MROS was also struck by the fact that the financial intermediary had only discovered the case by accident. Since the sum of the amounts paid into this account was rather high, the financial intermediary should have realised earlier that the transactions were unusual. Analysis of the transactions revealed that they had all taken place within a period of several months and the total amount was very high. The client's profile could not possibly justify such income.

Unable to exclude a possible criminal origin of the funds, MROS forwarded the SAR to the prosecution authorities.

### **3.14. Taking the opportunity to invest in the company**

A financial intermediary reported the case of a foreign multinational company that held several accounts in its books. The employees of this multinational company, who were also foreign nationals, were generally hired on one-year contracts and would return to their home countries at the end of this period. The financial intermediary found it unusual that the accounts of former employees were closed and the balance transferred to the company director. After these transactions, an order was then given to transfer most of these amounts to the company's account held in a foreign bank (but not in the country of origin of the employees in question).

The financial intermediary contacted the person responsible for managing these accounts to obtain clarification and was told that the grouping of funds was intended to avoid large wire transfer costs. The person was nevertheless unable to provide a plausible explanation as to why a portion of the funds never left the company director's account.

After closer examination, the financial intermediary discovered that at the end of their contract, several employees wired large sums to the company's account held at a foreign bank. No direct link could be established between that company and the multinational in question. Some employees had even wired funds to the account of the former company director and others continued to wire funds to the account of the current one.

Moreover, the bank accounts where the employee salaries were paid had practically no transactions for the entire time of their employment in Switzerland. Only small monthly amounts were withdrawn by the person responsible for managing these accounts.

Even more surprising, the financial intermediary found that the employees themselves had not withdrawn any cash from their accounts when they left Switzerland nor even tried to repatriate a portion of their funds. The lack of a clear economic background prompted the financial intermediary to submit an SAR to MROS.

MROS verified information regarding the persons but came up with nothing unusual. MROS then turned its attention to the transactions. Its analysis confirmed the bank's observations. Unable to take the investigation further, MROS forwarded the SAR to the prosecution authorities. Possible infractions mentioned by MROS included breach of trust, fraud and human trafficking.

After having launched a criminal investigation and frozen the accounts, the public prosecutor called in the individuals concerned to give testimony. The individuals presented substantiating documents signed by the employees certifying that the transferred funds were to be invested in the company. The public prosecutor closed the case on the basis of these documents (some of which had been certified by a notary), the absence of any

complaints filed by the employees and the impossibility of proving the existence of a predicate offence to money laundering.

### **3.15. Safes do not last forever**

A company decided to lease a safe with a financial intermediary when opening its bank account (the balance of which has been negative for years). The account was left overdrawn and after five months without news from the company representative, the financial intermediary decided to break open the safe in 2006. Inside, the financial intermediary found a large sum of cash in a currency that is no longer in circulation but can still be converted.

In 2011, the economic beneficiary of the account entered the bank and asked to gain access to the safe. The financial intermediary asked the person to return later since the procedure required additional verification. During these verifications, the financial intermediary discovered that the economic beneficiary was a suspect in a vast investigation of fraud, corruption and other serious infractions in his country. Various civil servants and even politicians had been implicated in the case. Moreover, the financial intermediary suspected a possible criminal origin of the cash in the safe, given the economic beneficiary's activities as well as his ties with the legal representative of the company for which the account had been opened. The cash had been deposited a decade or so prior to the ongoing investigation. The financial intermediary therefore submitted an SAR to MROS.

After carrying out various verifications, MROS was able to clearly exclude any link between the funds kept in the safe and the recent investigation implicating the economic beneficiary in his country. Further investigation revealed that the economic beneficiary had also been the subject of criminal proceedings in his country back in the 1990s. At the time, the charges had been dropped due to a statute of limitations. Although the funds most likely originated from criminal activity carried out during the period in question, a court of law had decided to dismiss the case due to the statute of limitations. This meant that no criminal proceedings could be initiated against the economic beneficiary, which prompted MROS to disregard the SAR and take no further action.

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## **4. From the MROS office**

### **4.1. *Duty to report (Art. 9 AMLA) to MROS in relation to emergency ordinances issued by the Federal Council (sanctions against natural and legal persons, entities or bodies from Tunisia, Egypt, etc.)***

Invoking emergency law provisions (based on Art. 184 para. 3 of the Federal Constitution; SR 101), the Federal Council issued the following ordinances:

Ordinance of 2 February 2011 on Measures against Natural and Legal Persons, Entities or Bodies from the Arab Republic of Egypt (SR 946.231.132.1)

Ordinance of 19 January 2011 on Measures against Natural and Legal Persons, Entities or Bodies from Tunisia (SR 946.231.175.8)

Based on these Ordinances, financial intermediaries were instructed by the Federal Department of Foreign Affairs (DFA), through its Directorate for International Law (DIL) to report any business relationships with natural and legal persons, entities or bodies from the Arab Republic of Egypt or Tunisia and to freeze their assets.

At the same time, the Financial Market Supervision Authority (FINMA) published an announcement on its website stating that “financial intermediaries submitting reports to the DFA's Directorate for International Law by virtue of these ordinances are not freed of their obligation to submit SARs to MROS in accordance with Article 9 AMLA.”

The cases for which the duty to report under Article 9 AMLA (SR 955.0) applies are clarified below:

Financial intermediaries must report business relationships of natural and legal persons, entities or bodies listed in the annex of the aforementioned ordinances to the DFA's Directorate for International Law and must also freeze their assets. This action must be taken independently of the duty to report to MROS. Financial intermediaries are not required to provide MROS with a copy of the report submitted to the DFA's Directorate for International Law.

If the financial intermediary reports a business relationship to the DFA's Directorate for International Law, then it must also clarify this business relationship by virtue of Article 6 paragraph 2(b) AMLA. If there are no reasonable grounds for suspicion of the business relationship other than the fact that the name of the natural and legal person, entity or body appears on the list in the annex to the ordinances, then the financial intermediary has no duty to report the business relationship to MROS.

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If the name appears on the list of natural and legal persons, entities or bodies in the annex to the aforementioned ordinances and there are reasonable grounds for suspicion, then the financial intermediary must submit a mandatory SAR to MROS under Article 9 AMLA. Reasonable grounds for suspicion include: indications that a judicial investigation has been launched in Switzerland or in another country against the natural person or legal entity (see for instance “Council Regulation (EU) No 101/2011 of 4 February 2011 concerning restrictive measures directed against certain persons, entities and bodies in view of the situation in Tunisia” as well as the grounds for listing persons, entities and bodies in Annex I); a request for mutual legal assistance has been made; implausible transaction patterns or the existence of transitory accounts.

Simple cases of suspicion may be handled by submitting a voluntary SAR to MROS under Article 305<sup>ter</sup> paragraph 2 SCC.

The duty to report under Article 9 AMLA also provides for the freezing of assets under Article 10 AMLA. Given the fact that assets are to be frozen by virtue of the Ordinances issued by the Federal Council, freezing the same assets again under Article 9 AMLA may seem unnecessary. However, the freezing of assets in each case is carried out under different legal bases. For instance, if the reported natural person, entity or body is removed from the Federal Council's list, the initial freezing of assets will be lifted. However, if there are reasonable grounds for suspicion for a mandatory SAR under Article 9 AMLA, then the assets must remain legally frozen for five working days (Art. 10 AMLA).

#### ***4.2. Duty to report terminated negotiations aimed at establishing a business relationship and duty to report existing business relationships where no assets have yet been deposited***

Article 9 paragraph 1 (b) AMLA states that financial intermediaries must immediately submit a mandatory SAR if negotiations to establish a business relationship are discontinued because there are reasonable grounds for suspicion that the assets: are connected to a money laundering offence; are the proceeds of a felony; are subject to the power of a criminal organisation; or serve the financing of terrorism. If we take the wording of AMLA literally, then the financial intermediary does not have to submit a mandatory SAR under Article 9 AMLA for existing business relationships for which no assets have yet been deposited, even though Article 9 paragraph 1 (b) states that the duty to report applies when negotiations aimed at establishing a business relationship are terminated. At first glance, this may seem confusing or even paradoxical to financial intermediaries. However, considering the intention of lawmakers when drafting Article 9 AMLA and viewing letter (a) and (b) of Article 9 AMLA as a cohesive whole, MROS feels that the duty to report also applies to an existing business relationship for which no assets have yet been deposited if there are reasonable grounds for suspicion. This raises the following questions:

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**1) Assets were withdrawn before the financial intermediary had reasonable grounds for suspicion under Article 9 AMLA**

Legal experts agree that assets do not need to be present in the account in order to trigger an SAR. It is enough for the assets to have been in the account at a previous point in time (see Werner de Capitani, *Kommentar Einziehung/Organisiertes Verbrechen/Geldwäscherei, Band II, Schulthess Verlag, 2002*, on Art. 9 AMLA, N 49, page 1002; see also Daniel Thelesklaf, *Kommentar zum Geldwäschereigesetz, Orell Füssli Verlag AG, 2003* on Art. 9 AMLA, N8). This serves the purpose of anti-money laundering legislation, namely to trace and confiscate assets of criminal origin. Prosecution services are able to follow paper trails to gain access to transferred assets. Transaction records are also very important for criminal investigations.

**2) Assets have not yet been transferred to a new account but the financial intermediary now has reasonable grounds for suspicion under Article 9 AMLA**

It seems contradictory that the duty to report under Article 9 (a) AMLA would not apply in one case (i.e. when an account has been opened (i.e. existing business relationship) but no assets have yet been transferred at the time when the financial intermediary has reasonable grounds for suspicion) but not in another (i.e. when potential negotiations to establish a business relationship are interrupted for exactly the same reasons). In both cases, there are reasonable grounds for suspicion under Article 9 (a) AMLA. However, as Daniel Thelesklaf states in his *Kommentar zum Geldwäschereigesetz, Orell Füssli Verlag AG, 2. Auflage von 2009*, on Article 9 AMLA in N8: "if no assets are present, there can also be no suspicion that the assets in question: originate from criminal activities; are being used for the purpose of laundering money; are at the disposal of a criminal organisation; or are being used to finance terrorist activities." MROS feels that Thelesklaf's grammatical interpretation of Article 9 (a) AMLA is overly narrow and that Article 9 (a) and Article 9 (b) AMLA must be considered as a whole, not separately. The duty to report under Article 9 (b) AMLA expressly relates to the presence of reasonable grounds for suspicion under Article 9 (a) with full awareness of the fact that no assets can be transferred in the negotiation phase to establish a business relationship even though this is expressly mentioned in Article 9 (a). MROS therefore feels that the duty to report also applies if there are reasonable grounds for suspicion of an existing business relationship even if the assets have not yet been transferred to the account.

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## **5. International scene**

### **5.1. Egmont Group**

The Egmont working groups convened in Oranjestad, Aruba in the spring of 2011 as well as in Yerevan, Armenia in the summer of 2011, which coincided with the Egmont Group Plenary Meeting. The reports on the individual working groups and the development of the Egmont Group can be found on the Egmont Group website under <http://www.egmontgroup.org>.

#### **New members**

During its Plenary Meeting, the Egmont Group approved seven new members. The reporting offices in question come from the following jurisdictions:

##### **Azerbaijan**

FMS (Financial Monitoring Service); administrative FIU;

##### **Kazakhstan**

KFM (Committee on Financial Monitoring of the Ministry of Finance of the Republic of Kazakhstan), administrative FIU;

##### **Mali**

CENTIF (Cellule Nationale de Traitement des Informations Financières); administrative FIU;

##### **Marocco**

UTRF (Unité de Traitement du Renseignement Financier); administrative FIU;

##### **Samoa**

SFIU (Samoa Financial Intelligence Unit); administrative FIU;

##### **Solomon Islands**

SIFIU (Solomon Islands Financial Intelligence Unit, hybrid FIU (administrative/investigative));

##### **Uzbekistan**

FIU Uzbekistan (Department on Struggle against Tax, Currency Crimes and Legalisation of Criminal Incomes under the Prosecutor General's Office), hybrid FIU (law enforcement/judicial).

This brings the total members of the Egmont Group to 127 FIUs.

### **Revision of Egmont Group documents**

Given the growth of the Egmont Group since 2007, a decision was reached to revise existing documents. A project has been launched and a corresponding working group established. Switzerland's MROS is also represented in this working group.

### **Warning of suspension**

At the Plenary Meeting in Yerevan, Armenia, MROS received a “warning of suspension” of its membership to the Egmont Group. The justification given for this decision was the perception that MROS does not provide foreign FIUs with enough concrete financial information such as bank account numbers, transaction details or account balances. The Federal Council rightly responded to this warning and has taken steps to revise the AMLA so that the legal basis will exist for such an exchange of information.<sup>6</sup>

## **5.2. FATF/FATF**

The Financial Action Task Force (FATF) is an intergovernmental organisation. It was founded with the objective of analysing methods of money laundering and elaborating strategies against money laundering and terrorist financing at international level. MROS is represented within the FATF as part of the Swiss delegation.

### **Revision of FATF standards**

In preparation for the fourth round of FATF evaluations, the most important FATF standards (FATF standards include 40 recommendations and 9 special recommendations) will be reviewed by various working groups. The fourth round of evaluations should place greater emphasis on effective implementation of anti-money laundering and terrorist financing provisions in member countries. MROS will be represented on the various working groups and will actively contribute to revision of these standards.

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<sup>6</sup> <http://www.admin.ch/ch/d/gg/pc/ind2012.html>

[http://www.fedpol.admin.ch/content/fedpol/de/home/dokumentation/medieninformationen/2012/ref\\_2012-01-18.html](http://www.fedpol.admin.ch/content/fedpol/de/home/dokumentation/medieninformationen/2012/ref_2012-01-18.html)

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### **Third round of FATF evaluations**

In 2011, the Netherlands and France underwent an FATF evaluation, completing the third round of evaluations that began in 2005. The results can be found on [www.fatf-gafi.org](http://www.fatf-gafi.org).

In 2011, Switzerland submitted its two-year follow-up report, which was received without further discussion. Submission of follow-up reports at two-year intervals applies to those countries that already comply with FATF recommendations to an adequate level.

### **High-risk and non-cooperative jurisdictions**

FATF publishes and updates its list of countries whose anti-money laundering and terrorist financing legislation is deemed inadequate, overly vague and/or not transparent. The FATF identifies jurisdictions with strategic AML/CFT deficiencies that have provided a high-level of political commitment to address the deficiencies through implementation of an action plan developed with the FATF. It also identifies jurisdictions with strategic AML/CFT deficiencies that have not made sufficient progress in addressing the deficiencies or have not committed to an action plan developed with the FATF to address the deficiencies. The current list can be found on the FATF website<sup>7</sup>.

### **Typology publications**

All of the studies mentioned below were produced by the FATF during the reporting year and are posted on the FATF website.

During the Mexican presidency, the fight against corruption became an important theme at the FATF. The study on laundering the proceeds of corruption shows the main weaknesses of the current system to fight money laundering and terrorist financing. It also highlights the obstacles preventing the confiscation of assets derived from corruption. The various case studies show that corrupt PEPs, just like other refined criminals, use various methods to conceal the assets gained from corruption. Corrupt PEPs hide their ownership through company structures and trusts as well as key persons and front men to launder their proceeds through domestic and foreign financial institutions. They misuse their power to control law enforcement agencies, take ownership of banks and acquire state assets.

An increasing number of criminals are involved in human trafficking and smuggling, since these illegal activities are highly lucrative, generating assets that can then be introduced into the financial system. A study conducted by the FATF entitled

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<sup>7</sup> [http://www.fatf-gafi.org/pages/0,3417,en\\_32250379\\_32236992\\_1\\_1\\_1\\_1\\_1,00.html](http://www.fatf-gafi.org/pages/0,3417,en_32250379_32236992_1_1_1_1_1,00.html)

“Money Laundering Risks Arising from Trafficking of Human Beings and Smuggling of Migrants” describes the cash flows generated and attempts to assess the extent of the problem. The report contains a number of indicators on the countries of origin and destination as well as the sectors concerned. This information should make it easier for financial institutions to detect the associated financial activities.

The study entitled “Organised Maritime Piracy and Related Kidnapping for Ransom” provides an overview of this form of crime and analyses the associated cashflows. The study also shows how much income kidnapping for ransom generates for terrorist groups and criminal organisations and describes the role of the formal financial sector. It also mentions a few of the challenges in identifying, investigating and tracing illegal cashflows from maritime piracy and related kidnapping for ransom.

### **Current surveys on types of money laundering**

The following typology surveys are planned for next year:

- A working group is conducting a comprehensive study based on the report entitled “*Laundering the Proceeds of Corruption*”. This study focuses on the geographical and sectoral risks as well as the countries of origin and destination. This should provide detailed information on how existing systems to fight money laundering and terrorist financing can also be used to detect corruption.
- The FATF is working on a report on the risk of money laundering and terrorist financing through illicit tobacco trade at the global, regional and national levels.
- Another study is devoted to trade-based money laundering. This study should provide information on the extent and spread of this type of money laundering. At the same time, it should shed light on the techniques and trends of trade-based money laundering as well as the problems associated with investigating this form of crime and possible solutions.
- The Guidance on Financial Investigations provides countries with an overview of the main aspects that need to be considered in order to carry out financial investigations. This guidance presents the various concepts, strategies and techniques that may be used in different legal systems and operational procedures.
- The Guidance on Risk and Threat Assessment is currently being prepared. This guidance shows countries how to conduct national and sectoral risk analysis in relation to money laundering and terrorist financing. The results from risk analysis conducted by the corresponding authorities will serve as the basis for decisions on due diligence obligations and measures to be introduced.

## 6. Internet links

### 6.1. Switzerland

#### 6.1.1 Money Laundering Reporting Office

<a href="http://www.fedpol.admin.ch/">http://www.fedpol.admin.ch/</a>	Federal Office of Police / MROS
<a href="http://www.fedpol.admin.ch/fedpol/de/home/">http://www.fedpol.admin.ch/fedpol/de/home/</a>	SAR form MROS

#### 6.1.2 Supervisory authorities

<a href="http://www.finma.ch/">http://www.finma.ch/</a>	Swiss Financial Market Supervisory Authority FINMA
<a href="http://www.esbk.admin.ch/">http://www.esbk.admin.ch/</a>	Federal Gaming Commission

#### 6.1.3 Self-regulating organisations

<a href="http://www.arif.ch/">http://www.arif.ch/</a>	Association Romande des Intermédiaires Financières (ARIF)
<a href="http://www.oadfct.ch/">http://www.oadfct.ch/</a>	OAD-Fiduciari del Cantone Ticino (FCT)
<a href="http://www.oarg.ch/">http://www.oarg.ch/</a>	Organisme d'Autorégulation du Groupement Suisse des Conseils en Gestion Indépendants (GSCGI) et du Groupement Patronal Corporatif des Gérants de Fortune de Genève (GPCGFG) (OAR-G)
<a href="http://www.polyreg.ch/">http://www.polyreg.ch/</a>	PolyReg
<a href="http://www.sro-sav-snv.ch/">http://www.sro-sav-snv.ch/</a>	Self-regulating Organization of the Swiss Bar Association and the Swiss Notaries Association
<a href="http://www.leasingverband.ch/46/SRO.html">http://www.leasingverband.ch/46/SRO.html</a>	SRO- Schweizerischer Leasingverband (SLV)
<a href="http://www.treuhandsuisse.ch">http://www.treuhandsuisse.ch</a>	SRO-Schweizerischer Treuhänderverband (STV)
<a href="http://www.vsv-asg.ch/">http://www.vsv-asg.ch/</a>	SRO-Verband Schweizerischer Vermögensverwalter (VSV)
<a href="http://www.vqf.ch/">http://www.vqf.ch/</a>	Verein zur Qualitätssicherung von Finanzdienstleistungen (VQF)
<a href="http://www.sro-svv.ch/">http://www.sro-svv.ch/</a>	Self-regulation organisation of the Swiss Insurance Association

#### 6.1.4 National associations and organisations

<a href="http://www.swissbanking.org">http://www.swissbanking.org</a>	Swiss Bankers Association
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<a href="http://www.swissprivatebankers.com">http://www.swissprivatebankers.com</a>	Swiss Private Bankers Association
<a href="http://www.svv.ch">http://www.svv.ch</a>	Swiss Insurance Association

### 6.1.5 Others

<a href="http://www.ezv.admin.ch/">http://www.ezv.admin.ch/</a>	Federal Customs Association
<a href="http://www.snb.ch">http://www.snb.ch</a>	Swiss National Bank
<a href="http://www.ba.admin.ch">http://www.ba.admin.ch</a>	Office of the Attorney General of Switzerland OAG
<a href="http://www.seco.admin.ch/themen/00513/00620/00622/index.html">http://www.seco.admin.ch/themen/00513/00620/00622/index.html</a>	State Secretariat for Economic Affairs SECO / economic sanctions based on the Embargo Act
<a href="http://www.bstger.ch">www.bstger.ch</a>	Federal Criminal Court

## 6.2. International

### 6.2.1 Foreign reporting offices

<a href="http://www.egmontgroup.org/about/list-of-members">http://www.egmontgroup.org/about/list-of-members</a>	List of all Egmont members, partially with link to the homepage of the corresponding country
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### 6.2.2 International organisations

<a href="http://www.fatf-gafi.org">http://www.fatf-gafi.org</a>	Financial Action Task Force on Money Laundering
<a href="http://www.unodc.org/">http://www.unodc.org/</a>	United Nations Office for Drug Control and Crime Prevention
<a href="http://www.egmontgroup.org/">http://www.egmontgroup.org/</a>	Egmont Group
<a href="http://www.cfatf-gafic.org/">http://www.cfatf-gafic.org/</a>	Caribbean Financial Action Task Force

## 6.3. Other links

<a href="http://europa.eu/">http://europa.eu/</a>	European Union
<a href="http://www.coe.int">http://www.coe.int</a>	European Council
<a href="http://www.ecb.int">http://www.ecb.int</a>	European Central Bank
<a href="http://www.worldbank.org">http://www.worldbank.org</a>	World Bank
<a href="http://www.bka.de">http://www.bka.de</a>	Bundeskriminalamt Wiesbaden, Germany
<a href="http://www.fbi.gov">http://www.fbi.gov</a>	Federal Bureau of Investigation, USA
<a href="http://www.interpol.int">http://www.interpol.int</a>	INTERPOL
<a href="http://www.europol.net">http://www.europol.net</a>	Europol
<a href="http://www.bis.org">http://www.bis.org</a>	Bank for International Settlements
<a href="http://www.wolfsberg-principles.com">http://www.wolfsberg-principles.com</a>	Wolfsberg Group
<a href="http://www.swisspolice.ch">http://www.swisspolice.ch</a>	Conference of Cantonal Police Commanders

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