



MISSING TRADER / CAROUSEL FRAUD

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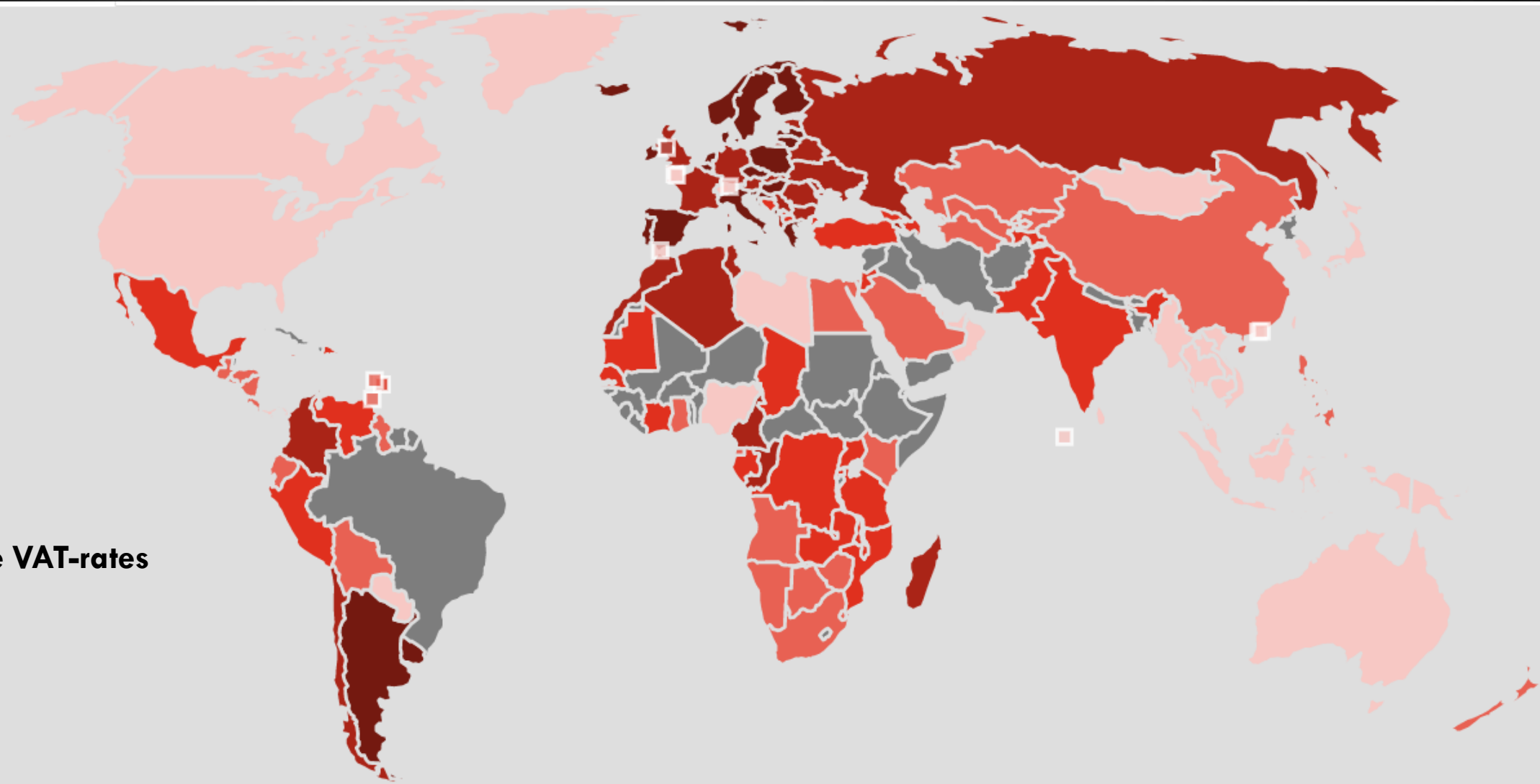
GRAND THEFT EUROPE

★ A CROSS-BORDER INVESTIGATION ★

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Worldwide VAT-rates



10

15

18

20

MOST IMPORTANT PRINCIPLE OF VAT?



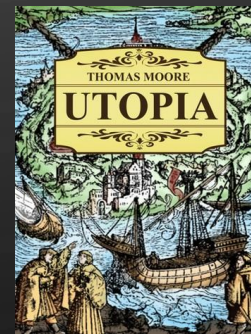
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Conducting Financial Investigations



MOST IMPORTANT PRINCIPLE OF VAT:

The VAT neutrality principle implies that the levying of VAT should be tax **neutral for businesses,** regardless of the objectives or results of the business activities. After all, it is **the consumer who has to bear** the value of VAT economically.



MOST IMPORTANT PRINCIPLE OF VAT:



MISSING TRADER

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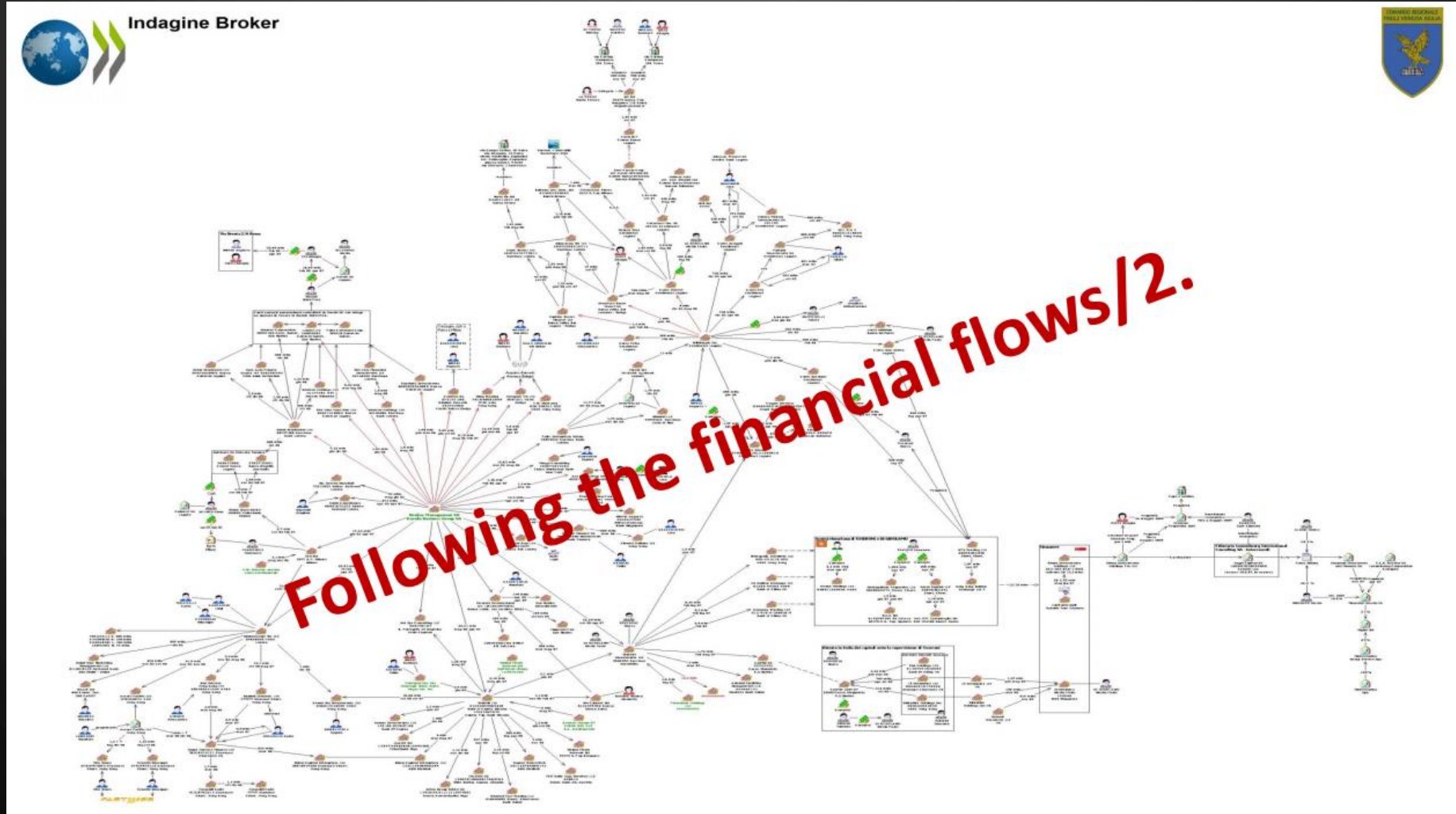
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MISSING TRADER

How
hard
can
it
be?

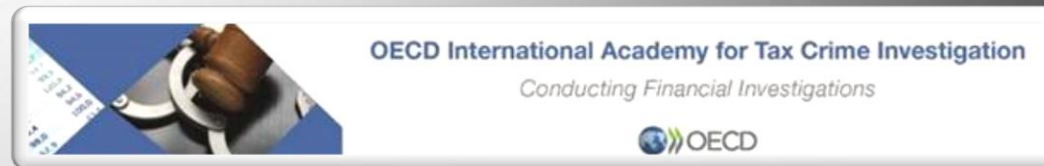


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MISSING TRADER



**A CHAIN IS ONLY AS STRONG AS
ITS WEAKEST LINK**

MISSING TRADER



FIND THE WEAK LINK

AND STAMP ON IT UNTIL IT BREAKS

MODUS OPERANDI? HOW DO THEY DO IT?

MISSING TRADER CAROUSEL FRAUD CROSS BORDER FRAUD

D can sell the goods back to A.
Because this is a cross-border sale
between 2 EU member states, D
does not charge A any VAT.

Business A



France

A delivers goods to B in the
Netherlands. Because this is a cross-border
sale within the EU, A does not
charge B any VAT!

Business D



The Netherlands

C has paid 21% worth of VAT to
B, which he can deduct in his VAT
return. C delivers the goods to D and
charges 21% VAT.

WHO'S THE MT?

**Business B, he will fail to remit the
VAT he received from C!**

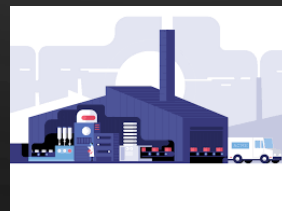
Business B



The Netherlands

B sells the goods to C and charges
him 21% VAT.
B has to remit this VAT to the
taxing authority.

Business C



The Netherlands

MODUS OPERANDI? HOW DO THEY DO IT?

1.000.000,00 EURO + 0% VAT

→ invoice totals: 1.000.000,00 euro

Business A



France

MISSING TRADER CAROUSEL FRAUD CROSS BORDER FRAUD

1.000.000,00 EURO + 0% VAT

→ invoice totals: 1.000.000,00 euro

Business D



The Netherlands

Business B



The Netherlands

Business C



The Netherlands

1.000.000,00 EURO + 21% VAT

→ invoice totals: 1.210.000,00 euro

1.000.000,00 EURO + 21% VAT

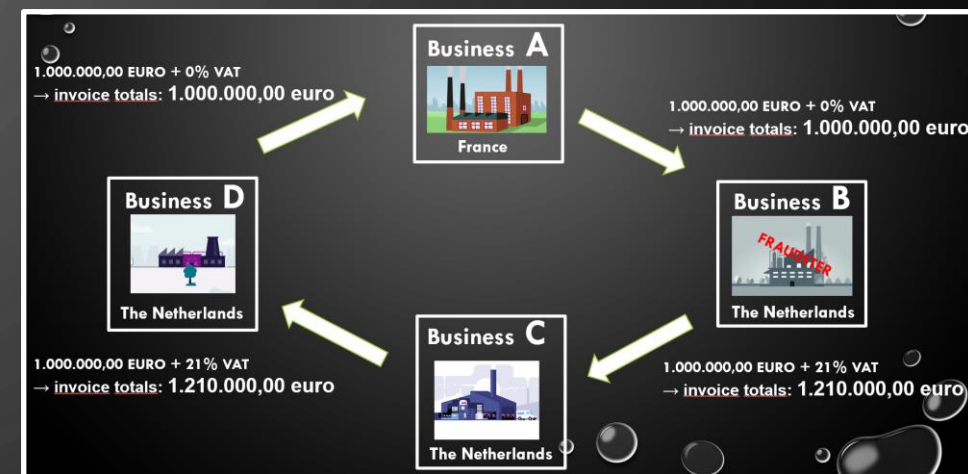
→ invoice totals: 1.210.000,00 euro

MODUS OPERANDI? HOW DO THEY DO IT?



MISSING TRADER CAROUSEL FRAUD

	IN	OUT	BALANCE
Business A:	1.000.000,00 € Received from B	1.000.000,00 € Paid to D	0,00 €
Business B:	1.210.000,00 € Received from C	1.000.000,00 € Paid to A 210.000,00 € Paid to taxing authority!	0,00 € + 210.000,00 €
Business C:	1.210.000,00 € Received from D	1.210.000,00 € Paid to B	0,00 €
Business D:	1.000.000,00 € Received from A 210.000,00 € Received from taxing authority as deductible VAT!	1.210.000,00 € Paid to C	0,00 €



MODUS OPERANDI? CHARACTERISTICS

MISSING TRADER CAROUSEL FRAUD

In VAT carousel fraud, the “missing trader” is probably the most important protagonist.

Usually the “missing trader” is led by an appointed straw man. Short duration of existence is frequent.

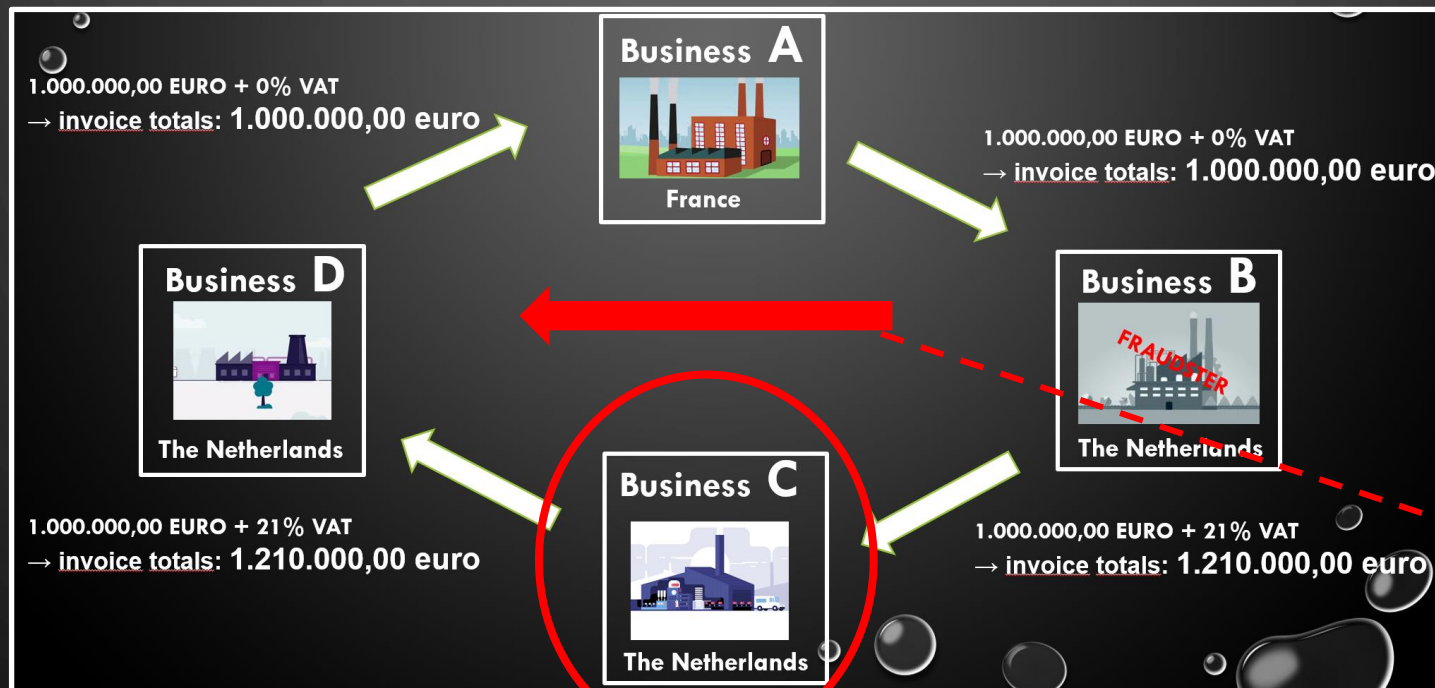
This typology of fraud is the result of abuse of the VAT regime on ICL / ICV (cross-border trade).

The missing trader does not pay VAT to his supplier and sells with VAT (invoices with VAT), knowing that he will never pay this VAT to the treasury.

MODUS OPERANDI? THE USE OF BUFFERS

MISSING TRADER CAROUSEL FRAUD

WHO'S THE BUFFER?



THE BUFFER



MODUS OPERANDI? THE USE OF BUFFERS

MISSING TRADER CAROUSEL FRAUD

Sells and purchases (often) for large amounts.



On 1st sight, he is not committing fraud and is acting in good faith.

Role: invoicing that appears credible, in order to make it more difficult to detect possible fraud.

MODUS OPERANDI? THE USE OF BUFFERS

MISSING TRADER CAROUSEL FRAUD



SMOKE

AND

MIRRORS



FRONT COMPANIES

CASH TRANSACTIONS

SHELL COMPANIES

IS CROSS BORDER TRADE NECESSARY?

MISSING TRADER

The Protagonist owns Business B and owns/controls C & D.

The Protagonist is the UBO of the stolen VAT through Business D.

Through a process of money laundering the money will end up with the Protagonist.

Legitimate business

Protagonist in the
MT-scheme

The Buffer

The MISSING TRADER

Business A



KENYA

invoice
+
VAT



Business B



KENYA

invoice
+
VAT



Business C



KENYA

invoice
+
VAT



~~Business D~~



KENYA

invoice
+
VAT



FINAL
CUSTOMER



Appears to be legit!

Appears to be legit!

VAT is lost!

MODUS OPERANDI?
THE USE OF BUFFERS
IT CAN GET COMPLICATED



MISSING TRADER

Legitimate companies



HE OWNS/CONTROLS POSSIBLY ALL OF THESE COMPANIES

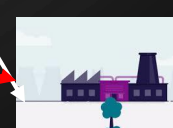
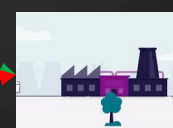
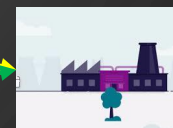
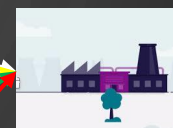
Protagonists



Buffers



MT's



**FINAL
CUSTOMER**

**FINAL
CUSTOMER**

**FINAL
CUSTOMER**

**FINAL
CUSTOMER**

MODUS OPERANDI? ONLY MT-FRAUD WITH GOODS?

MISSING TRADER

Subcontractor case:



Case circumstances:

Internet and mobile phone operators need to upgrade their network.

Internet operators/providers outsource the construction activity.



MODUS OPERANDI? ONLY MT-FRAUD WITH GOODS?

MISSING TRADER

Legitimate company



Use government money

SERVICE



Legitimate company



Engineer company

SERVICE



Legitimate company



Construction company

SERVICE

Subcontractor case:

MODUS OPERANDI? ONLY MT-FRAUD WITH GOODS?

MISSING TRADER

Legitimate company



Construction company



Suspicious company



Sub-Contractor

Hires out staff to the
contruction company.

SERVICE



Suspicious company



Sub-Contractor

Hires out staff to the
subcontractor.

SERVICE

MODUS OPERANDI? ONLY MT-FRAUD WITH GOODS?

MISSING TRADER

Contract flow



Invoice flow

Engineering & Construction

←
20.000.000,00 €
21 % VAT
= 4.200.000,00 €

Construction

←
5.100.000,00 €
VAT reverse charge
= 0,00 €

Posting of workers

←
5.050.000,00 €
21 % VAT
= 1.060.500,00 €

Posting of workers

←
5.000.000,00 €
21 % VAT
= 1.050.000,00 €

VAT Money Flow

Engineer company

+ 4.200.000,00 €
- 0,00 €

4.200.000,00 € VAT
VAT due

Construction company

+ 0,00 €
- 1.060.500,00 €

1.060.500,00 € VAT
VAT deductible

Subcontractor 1

+ 1.060.500,00 €
- 1.050.000,00 €

10.500,00 € VAT
VAT due

Subcontractor 2

+ 1.050.000,00 €
- 0,00 €

1.050.000,00 € VAT
VAT due

Subcontractor case:

MODUS OPERANDI? ONLY MT-FRAUD WITH GOODS?

MISSING TRADER

Legitimate company



Use government money



Legitimate company



Engineer company



Legitimate company



Construction company



Suspicious company



Sub-Contractor

Hires out staff to the
construction company.



Suspicious company



Sub-Contractor

Hires out staff to the
subcontractor.

VAT Money Flow

Engineer company

+ 4.200.000,00 €

- 0,00 €

4.200.000,00 € VAT

Construction company

+ 0,00 €

- 1.060.500,00 €

1.060.500,00 € VAT

Subcontractor 1

+ 1.060.500,00 €

- 1.050.000,00 €

10.500,00 € VAT

Subcontractor 2

+ 1.050.000,00 €

- 0,00 €

1.050.000,00 € VAT

Organizer

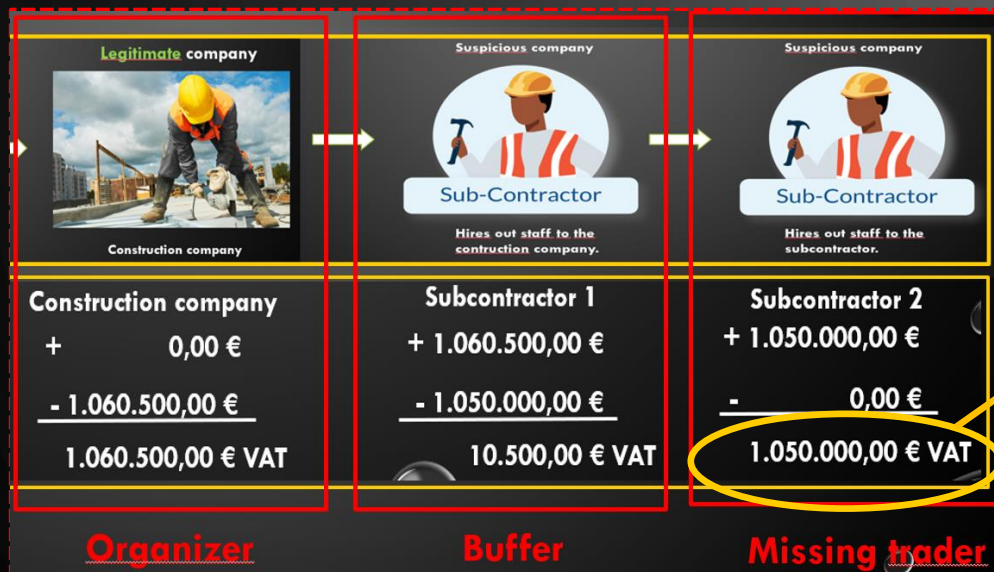
Buffer

Missing trader

Subcontractor case:

MODUS OPERANDI? ONLY MT-FRAUD WITH GOODS?

MISSING TRADER



VAT lost/stolen?

1.050.000,00 €

The missing trader will fail to pay his 1.050.000,00 € VAT due!

What with the workers (working for subcontractor 2)?

MODUS OPERANDI? ONLY MT-FRAUD WITH GOODS?

MISSING TRADER

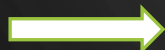
What with the workers (working for subcontractor 2)?

Legitimate company



Construction company

Organizer



Buffer

Second trimester

First trimester

Third trimester



Second trimester



First trimester



Third trimester

Pool of construction workers



Recruited in local coffee bars!

And so on...

Subcontractor case:



MODUS OPERANDI? ONLY MT-FRAUD WITH GOODS?

MISSING TRADER

Legitimate company





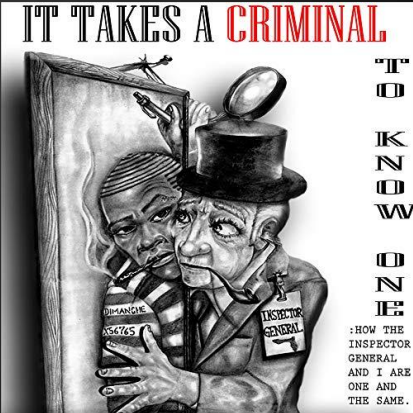
GROUP EXERCISE (ALL GROUPS)

MISSING TRADER



Get creative!

Draw up a MISSING TRADER scheme!



MODUS OPERANDI? ONLY MT-FRAUD WITH GOOD?

MISSING TRADER

A) SLAUGHTERHOUSE who does not make use of MISSING TRADERS:

Needs meat cutters/butchers.

Uses subcontractors/hires personnel.

The slaughterhouse uses for ex. a legitimate interim office. And lets say that the interim office wants at least 20.000.000,00 Shilling profit.

If the personnel costs for the interim office = 80.000.000,00 Shilling, interim office will send an invoice for 100.000.000,00 Shilling + 16% VAT.



MODUS OPERANDI? ONLY MT-FRAUD WITH GOOD?

MISSING TRADER

B) SLAUGHTERHOUSE makes use of **MISSING TRADERS**:

Needs meat cutters/butchers.

Uses subcontractors/hires personnel.

The slaughterhouse uses for ex. a malicious interim office. And lets say that the interim office wants at least 20.000.000,00 Shilling profit.

If the personnel costs for the interim office = 80.000.000,00 Shilling, interim office will send an invoice for approximately 87.000.000,00 Shilling + % 16 VAT.

MODUS OPERANDI? ONLY MT-FRAUD WITH GOOD?

MISSING TRADER

Who will the supermarket choose?

Slaughterhouse A: Invoice to supermarket → **116.000.000,00 Shilling**
 $= 100.000.000,00 + 16\% \text{ VAT}$
 Net profit $= 100.000.000,00 - 80.000.000,00 \text{ Shilling}$
 $= \mathbf{20.000.000,00 \text{ Shilling}}$

Slaughterhouse B: Invoice to supermarket → **100.920.000,00 Shilling**
 $= 87.000.000,00 + 16\% \text{ VAT}$
 Net profit $= 87.000.000,00 - 80.000.000,00$
 $+ \mathbf{13.920.000,00}$
 $= \mathbf{20.920.000,00 \text{ Shilling}}$

**B commits
VAT fraud
&
false competition!**

MODUS OPERANDI? THE CROSS INVOICER

MISSING TRADER

The CROSS INVOICER



MODUS OPERANDI? THE CROSS INVOICER

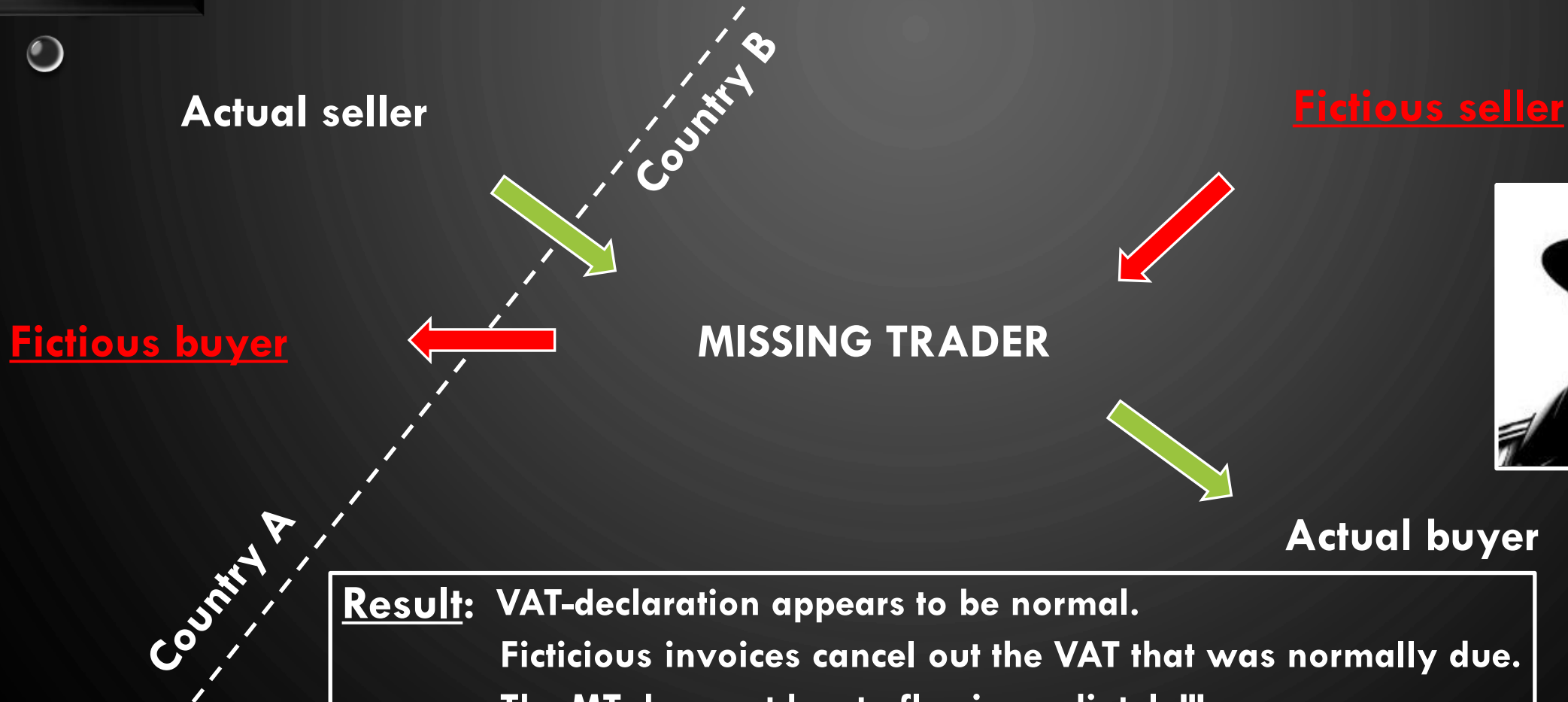
MISSING TRADER

The CROSS INVOICER



MODUS OPERANDI? THE CROSS INVOICER

MISSING TRADER



Result: VAT-declaration appears to be normal.
Fictitious invoices cancel out the VAT that was normally due.
The MT does not has to flee immediately!!!



MISSING TRADER

- | | | |
|--|-----------------|----------------------|
| 1) Invoice from actual seller to the MT (reverse charge = no VAT): | 100.000,00 euro | + 0,00 euro VAT |
| 2) Invoice from the MT to the actual (real) buyer (20% VAT rate): | 200.000,00 euro | + 40.000,00 euro VAT |
| 3) Invoice from fictitious seller to the MT (20% VAT rate): | 200.000,00 euro | + 40.000,00 euro VAT |
| 4) Invoice from the MT to the fictitious buyer (reverse charge/no VAT): | 100.000,00 euro | + 0,00 euro VAT |

Look at the invoice flow vs the money flow!



MODUS OPERANDI? THE CROSS INVOICER

Invoice flow vs money flow

MISSING TRADER

- | | | |
|---|-----------------|----------------------|
| 1) Invoice from actual seller to the MT (reverse charge = no VAT): | 100.000,00 euro | + 0,00 euro VAT |
| 2) Invoice from the MT to the actual (real) buyer (20% VAT rate): | 200.000,00 euro | + 40.000,00 euro VAT |
| 3) Invoice from fictitious seller to the MT (20% VAT rate): | 200.000,00 euro | + 40.000,00 euro VAT |
| 4) Invoice from the MT to the fictitious buyer (reverse charge/no VAT): | 100.000,00 euro | + 0,00 euro VAT |

INVOICE FLOW:

- | |
|----------------------------------|
| 1) Buying at: - 100.000,00 euro |
| 3) Buying at: - 200.000,00 euro |
| 2) Selling at: + 200.000,00 euro |
| 4) Selling at: + 100.000,00 euro |
| <hr/> |
| 0,00 euro |

MONEY FLOW:

- | |
|----------------------------------|
| 1) Buying at: - 100.000,00 euro |
| 2) Selling at: + 200.000,00 euro |
| 2) VAT: + 40.000,00 euro |
| <hr/> |
| + 140.000,00 euro |

VAT FLOW:

- | | |
|-------------------------------------|---------------|
| 1) Buying at: | 0,00 euro VAT |
| 2) Selling at: + 40.000,00 euro VAT | |
| 3) Buying at: - 40.000,00 euro VAT | |
| 4) Selling at: | 0,00 euro VAT |
| <hr/> | |
| 0,00 euro | |

MODUS OPERANDI? THE CROSS INVOICER

MISSING TRADER

INVOICE FLOW:	MONEY FLOW:	VAT FLOW:
1) <u>Buying</u> at: - 100.000,00 euro	1) <u>Buying</u> at: - 100.000,00 euro	1) <u>Buying</u> at: 0,00 euro VAT
3) <u>Buying</u> at: - 200.000,00 euro	2) <u>Selling</u> at: + 200.000,00 euro	2) <u>Selling</u> at: + 40.000,00 euro VAT
2) <u>Selling</u> at: + 200.000,00 euro	2) VAT: - 40.000,00 euro	3) <u>Buying</u> at: - 40.000,00 euro VAT
4) <u>Selling</u> at: + 100.000,00 euro	+ 140.000,00 euro	4) <u>Selling</u> at: 0,00 euro VAT
0,00 euro		0,00 euro

Cross invoicer benefits:

- 1) Everything looks normal...no red flags!
- 2) 40.000,00 euro VAT stolen!
- 3) MISSING TRADER can repeat this scheme over and over again!



Where is the weak link?

Follow the **money (flow)**!

The MISSING TRADER needs to get the 40.000,00 euro out of the company! Look for **CASH** withdrawals!

FRAUD DETECTION

MISSING TRADER



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INDICATOR 1

MISSING TRADER

Fraud-prone sectors!



The most sensitive sectors for VAT carousel fraud are: mobile telephony, microprocessors and computer chips, hi-fi equipment, perfume, new and second-hand cars, precious metals, works of art and antiques, the construction sector, the waste sector, and CO2 emission rights.

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INDICATOR 2

MISSING TRADER

Dormant company

Not carrying any business or operation.

No significant accounting transaction during the last two financial years.

Has not filed financial statements and annual returns during last two financial years.



Will be reactivated!

Has no real business structure!



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INDICATOR 3

MISSING TRADER

The bigger the better.



Missing traders like to operate out of big cities!

They enjoy the safe haven of a greater anonymity in big cities.

They make use of the apathy in bigger cities.

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INDICATOR 4

MISSING TRADER

The use of straw men

A straw man/front man is a person who acts under his own name, but acts as someone else's tool.

Look at who are shareholders of the company!

Look at the history of the company's shareholders.
Shareholdership can change quickly!

Look at the family link (spouse, son, daughter, nephew, niece).

Once you identify a straw man...use that intelligence!



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INDICATOR 5

MISSING TRADER

Accounting



It's hard to get hold of the accounting.
Even on unannounced visits.
Accounting is sometimes even non-existent.



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INDICATOR 6

MISSING TRADER

Numbers matter



A relatively limited number of companies represent a significant % of the turnover when it comes to in/outers.

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INDICATOR 7

MISSING TRADER

Sell at a loss



In this way, they ensure themselves that they will sell their goods/services.
Remember the false competition (slaughterhouses ex.).

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VAT/GST Fraud Investigations Programme



INDICATOR 8

MISSING TRADER

Follow the money



A lot of cash withdrawals.

They need to get the cash out of the company.

Cfr. OECD course on Money Laundering.



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INDICATOR 9

MISSING TRADER

Lightning-fast payments



The supplier is paid on the delivery day, or shortly after.

Not common in trade.



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INDICATOR 10

MISSING TRADER

Money abroad



MT's often use foreign bank accounts.

It's a common use that MT's use bank accounts in their country of origin.

MISSING TRADER

Keep it simple



Invoices are drawn up in a very simple form.

Compare the invoices through the chain of transactions...you might have a déjà vu.

Your company Name <i>[Your Company Slogan]</i> [Street Address] [City, ST ZIP Code] Phone [509.555.0190] Fax [509.555.0191]		INVOICE INVOICE # [100] DATE: OCTOBER 9, 2011	
TO: [Name] [Company Name] [Street Address] [City, ST ZIP Code] [Phone]		SHIP TO: [Name] [Company Name] [Street Address] [City, ST ZIP Code] [Phone]	
COMMENTS OR SPECIAL INSTRUCTIONS:			

SALESPERSON	P.O. NUMBER	REQUISITIONER	SHIPPED VIA	F.O.B. POINT	TERMS

QUANTITY	DESCRIPTION	UNIT PRICE	TOTAL
SUBTOTAL SALES TAX SHIPPING & HANDLING TOTAL DUE			

Make all checks payable to [Your Company Name]
 Payment is due within 30 days.
 If you have any questions concerning this invoice, contact [Name, phone number, e-mail]

 Thank you for your business!

INDICATOR 12

Eagle eye

MISSING TRADER



Take a closer look at all of the invoices.

Incorrect and/or fictitious information on the documents.



INDICATOR 13

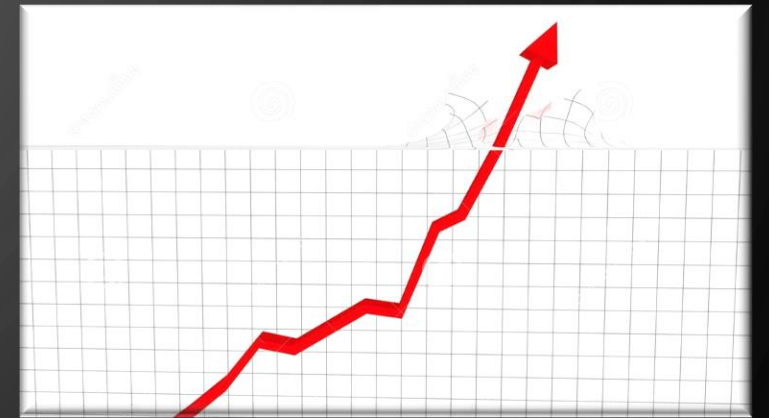
MISSING TRADER

The sky is the limit



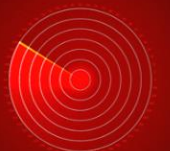
Sudden and sharp increase in turnover.

Some nobody might suddenly enjoy a much better standing in life.



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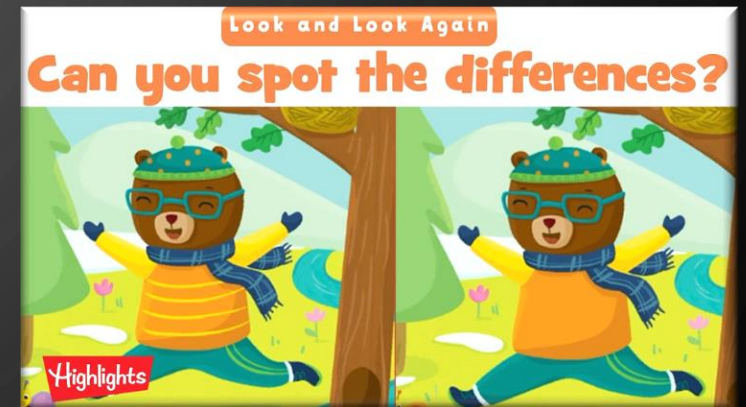
INDICATOR 14

MISSING TRADER

Spot the differences



Look at the difference between the VAT returns submitted and the actual transactions.
Try to follow the goods AND the money.



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INDICATOR 15

MISSING TRADER

Be persistent and act quickly

It takes one to know one.

Think outside the box (be creative).

Do not waste any time. Speed is of the essence!

NEVER EVER GIVE UP.



**PERSISTENCE IS FAR
MORE IMPORTANT
THAN PERFECTION**



**THINK
OUTSIDE
THE
BOX**

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Conducting Financial Investigations



SUPER- MACHINE

Est. 2019



OECD International Academy for Tax Crime Investigation

Conducting Financial Investigations



TRANSACTIONAL NETWORK ANALYSIS

In 2001 within the Belgian Special Tax Inspectorate: Special VAT-carousel-fraud unit!

Over 100 investigators!

**Knowledge is power.
Knowledge shared is
power multiplied.**

Robert Noyce



*SUPER-
MACHINE*

DATA ANALYTICS

TRANSACTIONAL NETWORK ANALYSIS

Special VAT-carousel-fraud unit!



50.000,00 euro

60.500,00 USD

6.666.666,67 Kenian Shilling

**SOMETIMES
YOU WIN,
SOMETIMES
YOU learn.**

NOT LOSE!



SUPER-MACHINE

DATA ANALYTICS

TRANSACTIONAL NETWORK ANALYSIS

Start at the beginning?

No refund, no carousel without VAT number?

Check the taxpayer when they register? Investigator needs to get into the field.

Smoke and mirrors! Being a bad guy is their job, so they are probably motivated not to get caught!

Remember 'dormant companies'!



SUPER-MACHINE

DATA ANALYTICS

TRANSACTIONAL NETWORK ANALYSIS

INDICATOR 1

MISSING TRADER

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Dormant Company



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INDICATOR 10

MISSING TRADER

Money abroad

MT's often use foreign bank accounts.

It's a common use that MT's use bank accounts in their country of origin.



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*SUPER-
MACHINE*

DATA ANALYTICS

TRANSACTIONAL NETWORK ANALYSIS

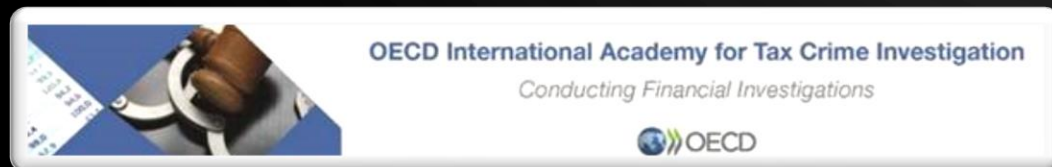
International information!!!

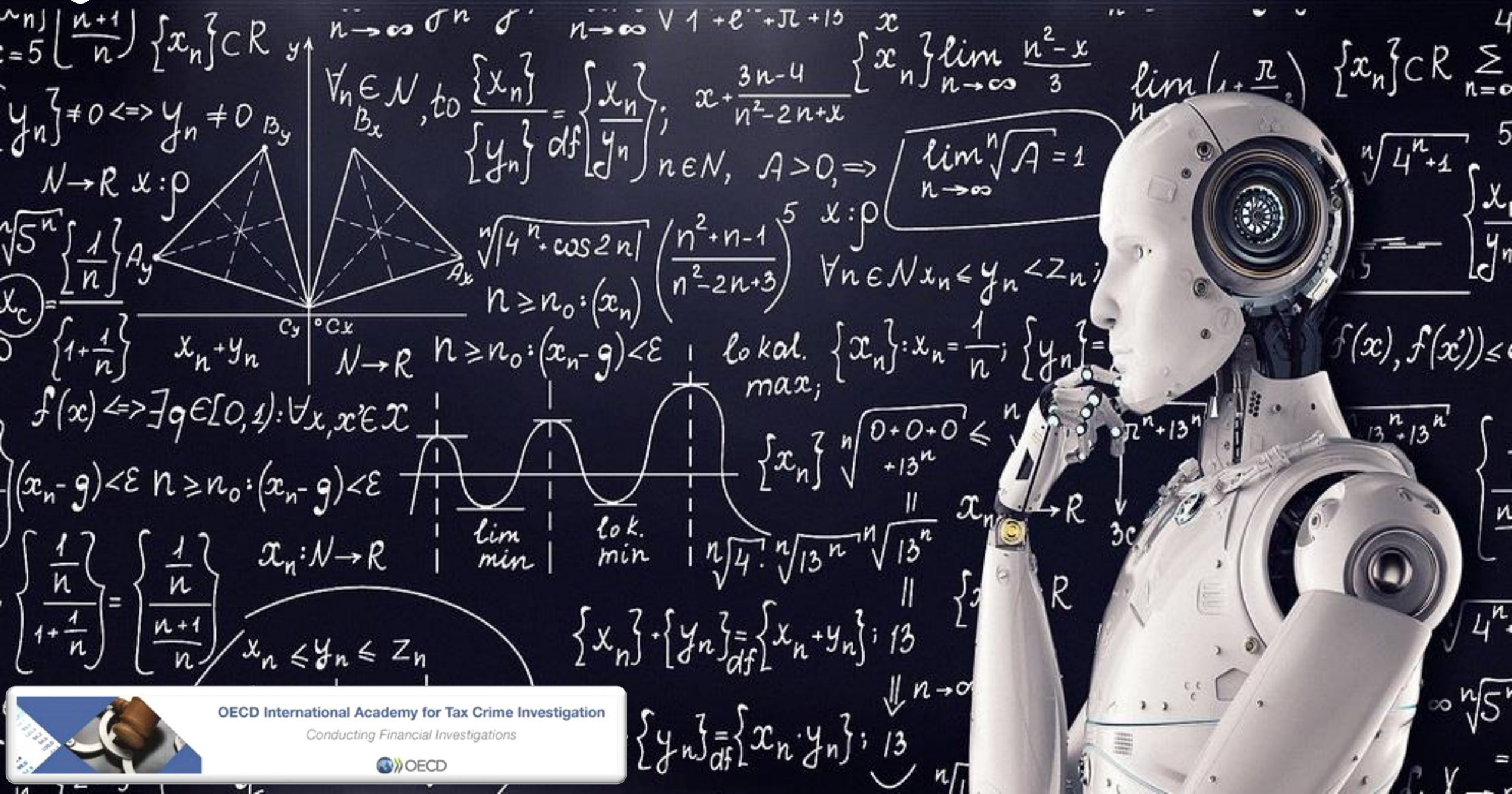


Exchange information between memberstates!

Report their IC transactions! IC-customer list.

Reproduces IC supplier list!





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*SUPER-
MACHINE*

DATA ANALYTICS

TRANSACTIONAL NETWORK ANALYSIS

All problems solved by this super-machine?

No input = no output

Bad guys are very well organized (lawyers/accountants/...).

New markets, no detection.

Hit and runs are unavoidable.

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SUPER-MACHINE

INDICATOR 15

MISSING TRADER

Be persistent and act quickly

It takes one to know one.

Think outside the box (be creative).

Do not waste any time. Speed is of the essence!

NEVER EVER GIVE UP.



**PERSISTENCE IS FAR
MORE IMPORTANT
THAN PERFECTION**

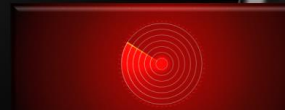


**THINK
OUTSIDE
THE
BOX**



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It took the EU 20 years!



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Any Questions

Thank you
for
listening 😊