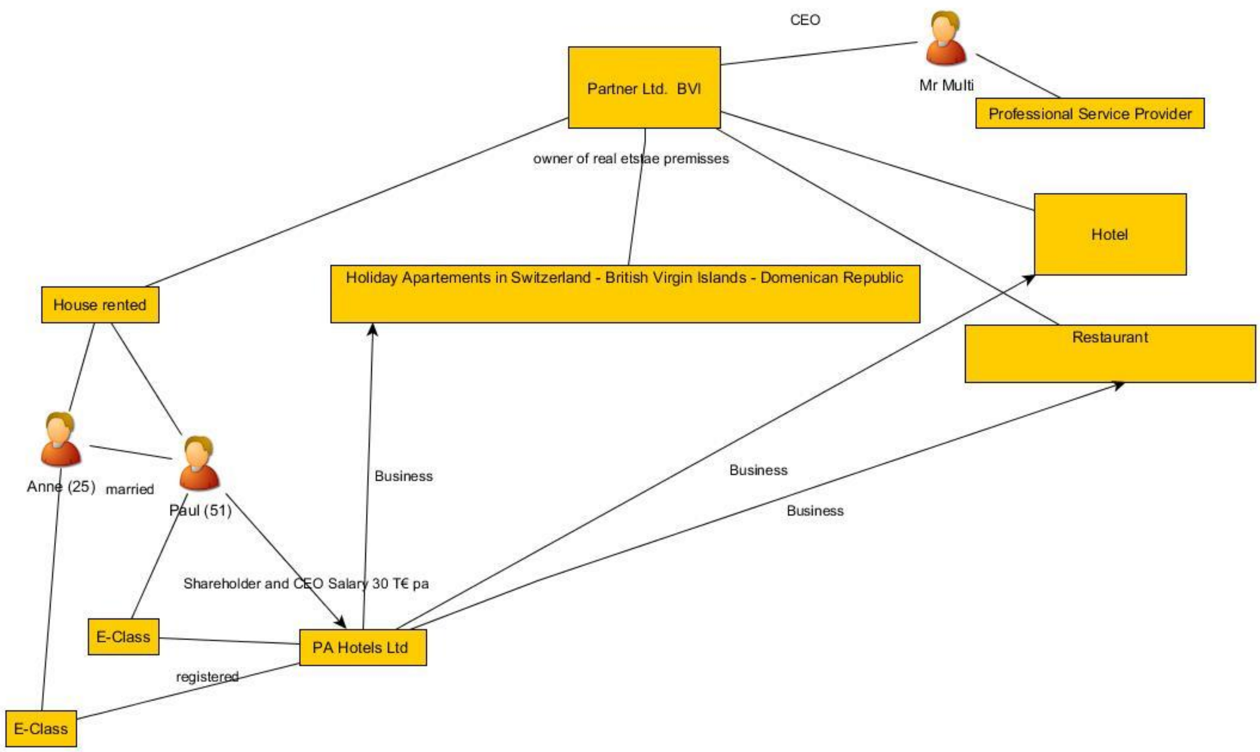
Case description:

Paul 51 is the CEO and shareholder of a restaurant and hotel business "PA Hotels and Restaurant Ltd.", with a single restaurant within the hotel. Additionally, there are 3 holiday apartments, which are located in 3 different countries – Switzerland, BVI and the Dominican Republic. The restaurant and hotel business ("PA Hotels and Restaurant Ltd.") are all in country A where Paul lives.

Paul's salary is about 30,000 Euro a year and he is married to Anne 25. Both have no children. Anne is a housewife with no income. Both live in a rented house of 350 square metres, with a swimming-pool in the backyard. They both drive Mercedes E-Class cars. The cars are registered to the company. Paul and Anne regularly file tax declarations in country A as required. Based on the single income salary for the family, the tax assessment resulted in a zero-tax assessment (under the threshold). The company generates a turnover of about 1,5 million Euro a year. All taxes by the company are declared and paid on time.

The hotels, restaurant, and holiday apartments are situated on rented real estate / property, owned by "Partner Ltd. BVI". The same company is also the owner of Paul's house. The CEO of "Partner Ltd. BVI" is Mr Multi. He is a professional service provider. Shareholders of "Partner Ltd. BVI" are not published. The tax declarations for the rental businesses in country A are regularly filed and all taxes are paid on time.



1. Do you find / see possible indicators of ML? Why or why not for your country?
2. Which phase of ML do you assume / see in what parts of the business-structure shown above?
3. What will be your next steps as investigators regarding ML?
4. What benefits can you see from starting a ML investigation?