

## SPECIAL CURRENCY POLICE UNIT Analysis Office



# THE CURRENT SYSTEM FOR ANALYSING AML/CTF INFORMATION

Col. t.ISSMI Antonio Sassi
Head of the Analysis Office
Special Currency Police Unit of the
Guardia di Finanza
Via Marcello Boglione n. 84 - 00155 Roma Sassi.Antonio@gdf.it

#### ITALIAN NATIONAL AML/CTF ANALYSIS SYSTEM

### **AGENDA**



#### NATIONAL AML/CTF SYSTEM



THE ROLE OF THE GUARDIA DI FINANZA AND THE SCPU



STRs AND INFO FROM FOREIGN FIUs: ANALYSIS METHODS AT THE SCPU



IT TOOLS, FEATURES, NUMBERS AND FIGURES





#### ITALIAN NATIONAL AML/CTF PREVENTION SYSTEM







**FINANCIAL ANALYSIS** 

CRIMINAL ANALYSIS

ANTI-MAFIA INVESTIGATION DIRECTORATE

SPECIAL CURRENCY
POLICE UNIT

ANTI-MAFIA AND ANTI-TERRORISM DIRECTORATE

G. di F. ECO-FIN
POLICE/TERRITORIAL UNITS

**SCPU OPERATIONAL BRANCHES** 

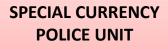
AND...
Other italian Specialized LEAs

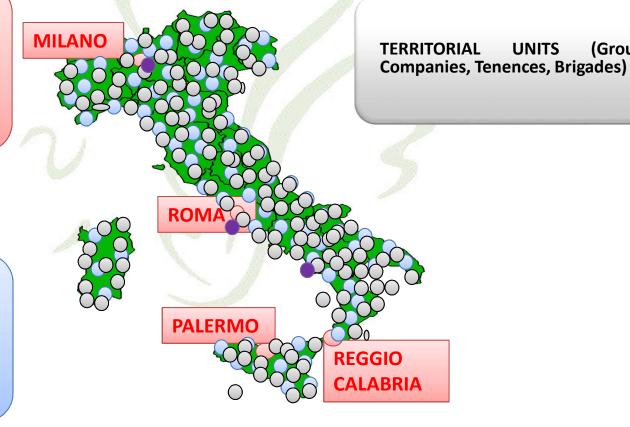


#### **GUARDIA DI FINANZA AML/CTF STRUCTURE – GENERAL OVERVIEW**



(Groups,





**ECONOMIC-FINANCIAL POLICE UNITS** 

**SPECIAL OPERATIONAL SECTIONS AGAINST TF** 

**UNITS** 



#### SPECIAL CURRENCY POLICE UNIT - OVERALL INFORMATION



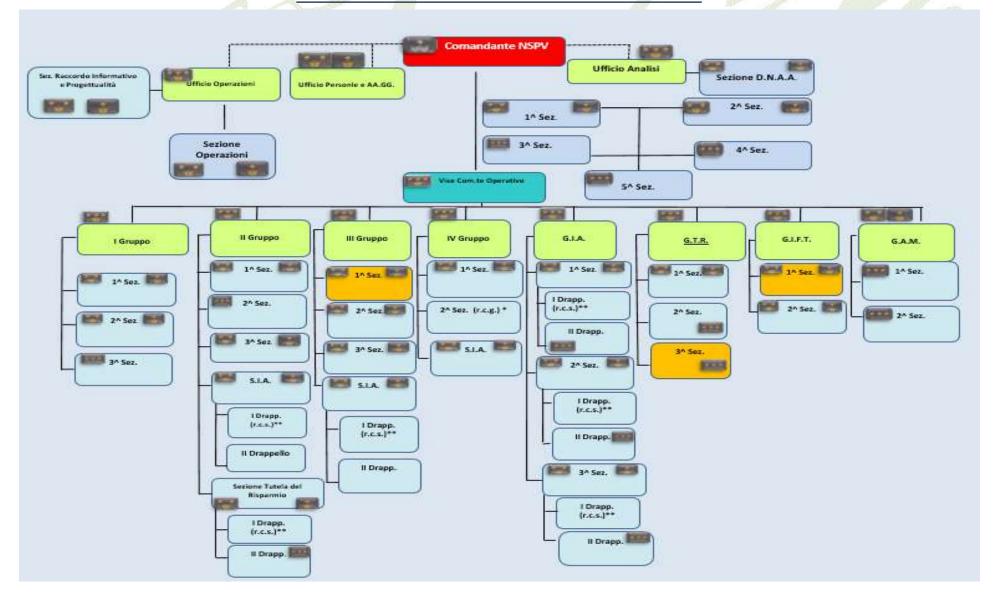




#### SPECIAL CURRENCY POLICE UNIT - OVERALL INFORMATION



#### **GOVERNING STRUCTURE AND STAFF**





#### SPECIAL CURRENCY POLICE UNIT – OVERALL INFORMATION



## STRs PRE-OPERATIONAL ANALYSIS

INFO COMING FROM FOREIGN FIUS PRE-OPERATIONAL ANALYSIS

ON-SITE INSPECTIONS
AND CHECKS

**VS. OBLIGATED PARTIES** 

NUCLEO
SPECIALE POLIZIA
VALUTARIA

RISK ANALYSIS
TASKS IN AML/CTF

INTERNATIONAL AND EU

POLICE COOPERATION

JUDICIAL POLICE INVESTIGATIONS

AT NAT./INTERNAT. LEVEL

NATIONAL FINANCIAL POLICE AUTHORITY FOR

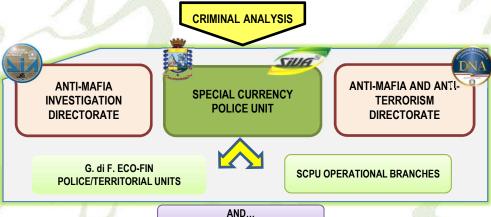
**COUNTERING TF** 



#### OPERATIONAL APPROACH - SCPU AND G. DI F. OPERATIONAL UNITS









**PRE-ANALYSIS** 



Other italian Specialized LEAs

**RESULTS** 





- DATABASE SEARCHES
- EVALUATION
- RANKING
- PROXY ASSIGNATION
- INTELLIGENCE SHARING

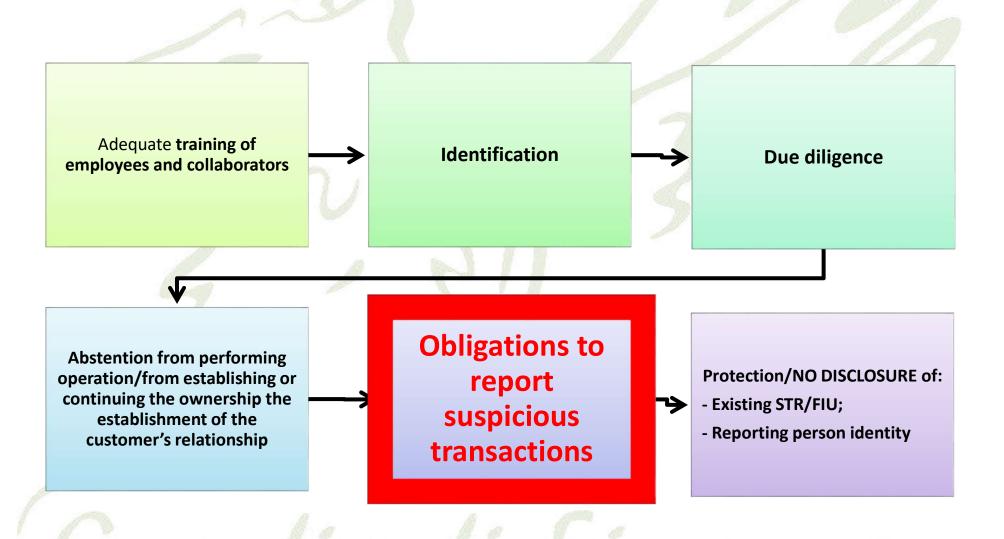
#### PERFORMED BY THE OPERATIONAL UNITS

- INFO REQs TO REPORTING PARTIES
- BANK ACCOUNT CHECKS
- INTERVIEWS
- ON-SITE INSPECTIONS

- POSITIVE FOR CRIMINAL PURPOSES
- POSITIVE FOR ADMINISTRATIVE PURPOSES
- NEGATIVE

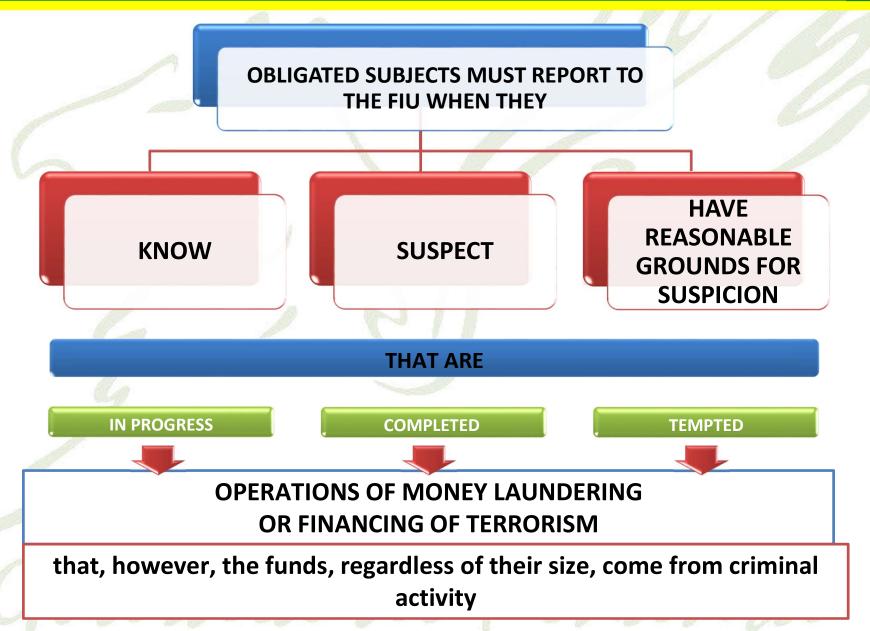
















It is not linked to the criminal concept of money laundering or terrorist financing

## IT IS NOT LINKED TO QUANTITATIVE AMOUNT LIMITS

NOT REQUIRED TO BE AN INVESTIGATOR



MUST BE SENT TIMELY, before carrying out the operation











## THE FIU (SOMETIMES) FITS THE REPORT WITH:

A **technical paper** containing the results of the financial analysis carried out



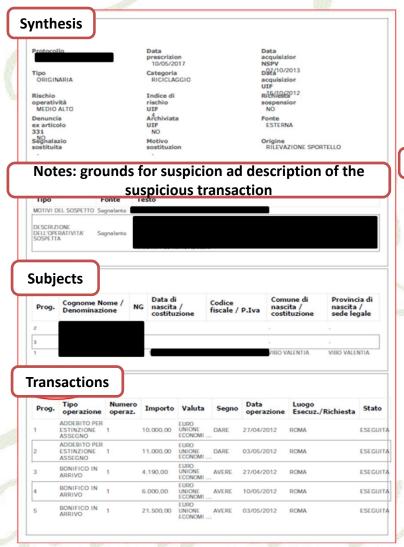
The **risk ranking** of the report, which can vary from **zero** (very low risk) to **five** (highest risk).







#### THE SUSPICIOUS TRANSACTION REPORT



Progr.	Categoria	rapporto	Numero	Stato	Intermediario
1	CONTO CORR	ENTE		ATTIVO	
2	CONTO CORR		0	NON APPLICABILE	CREDITO ARTIGIANO
3	CONTO CORR		0	NON APPLICABILE	CREDITO ARTIGIANO
4	CONTO CORR	ENTE	0	NON APPLICABILE	credito artigiano
	dimenti ento da visualizza	ro.			
enon		Fenomeno			Fonte contenuto
1	X07 F	REITERAZIONE OF	ERATIVITA GIA	SEGNALATA	INTERNA
2	Y01 5	OGGETTI INDAG	ATI		INTERNA
Collega	ate				
Docum	segnalazioni col	legate			
Docume			т	ро	
REL201311				azione Tecnica	
RECEDISIT	7542		Res	azione recinca	
Dati DI	A/DNA				
	A/DNA				
Dati DIA	A/DNA				
Dati DIA Richiesta Protocollo					
Protocollo richiesta D Data richie	DIA -				
Richiesta Protocollo richiesta Data richie	DIA -				
Richiesta Protocollo richiesta Data richie DIA Restituzio Protocollo	DIA - esta _				
Richiesta Protocollo richiesta D Data richie DIA Restituzio Protocollo restituzior	DIA - esta _				
Richiesta Protocollo richiesta E Data richie DIA Restituzio Protocollo restituzior DIA Data	DIA sesta .				
Protocollo richiesta D Data richie	DIA sesta .				
Richiesta Protocollo richiesta E Data richie DIA Restituzio Protocollo restituzior DIA Data restituzior DIA Data	oIA costa				
Dati DIA  Richiesta Protocollo richiesta I Data richie DIA Restituzio Protocollo restituzio DIA Data restituzior DIA  Dati DNA  Protocollo	DIA substa				
Richiesta Protocollo richiesta E Data richie DIA Restituzio Protocollo restituzior DIA Data restituzior DIA Dati DNA	DIA - sesta - ne - ne - ne - ni invio -				



#### IT TOOLS - RISK ANALYSIS



#### SIVA<sup>2</sup> - A COMPUTER-BASED PLATFORM THAT ALLOWS TO:

Manage STRs/FIUs through a fully automated and telematic process

Perform database searches on confidential and open source platforms

Preanalyze STRs/FIUs through a flexible and risk-based approach

#### Manage further phases of STRs/FIUs operational path such as:

- assignation of proxies to the Operational/Investigative Units
- reporting the results of the investigations

Share data and intelligence at national/international level



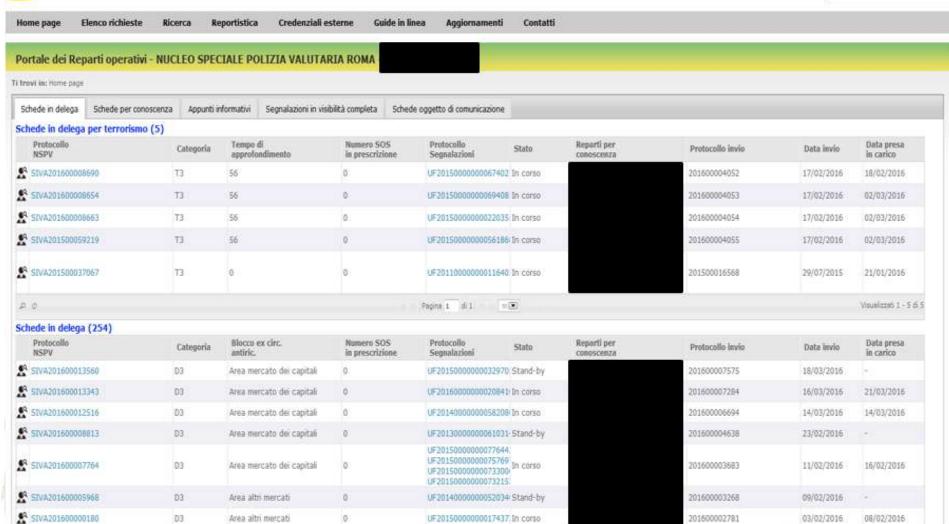
#### SIVa2 - MANAGING STRs AND FIUS





Sistema Informativo WAlutario<sup>2</sup>- v. 2.1

Guardia di Finanza - Nucleo Speciale Polizia Valutaria





#### SIVa<sup>2</sup> – DATABASE SEARCH





Carron matter electron



Moduli operativi ~

RM053 NUCLEO SPECIALE POLIZIA VALUTARIA ROMA





0





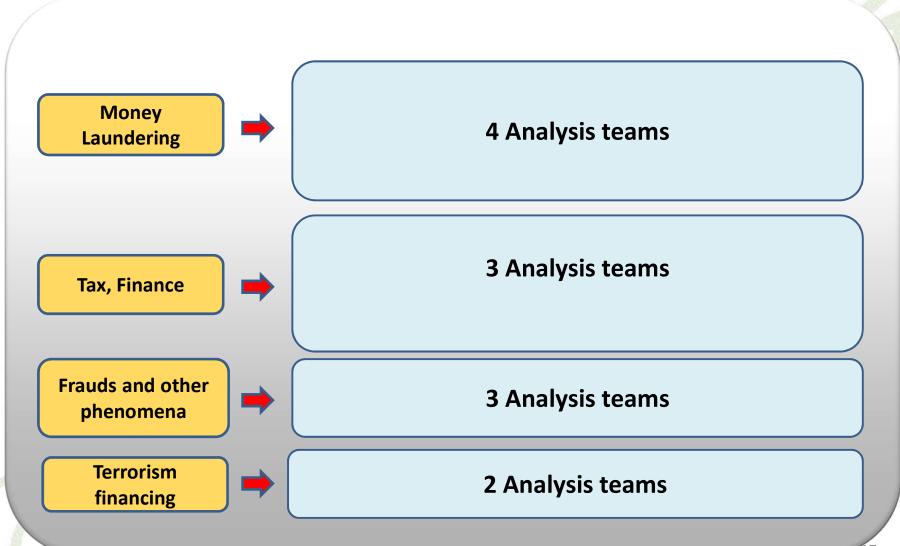
ONDO DI GARANCIA	0	Promised Seciti Ammir
Sa R.A.	0	Prontuerio Polizia Giust
acs .	0	PUNTO PISCO - SIATEL
SERRAS	0	BAKE
DESTORE SERVED ENERGETICS	0	BARKS
SE MARCO	0	REGISTRO NAZIONALE
SUBSPICIONE ASSESSMENT AND EDUCATION	0	BISIC
IVDBA - TELECOM	0	BUCI
NEOCAMERE IARGO, LILISSE, RICI	0	S.T.A.E. (Stoumente Ant
NNOLVA Corporate	0	SAFESCANET
THUDORS BLYIMAN	0	SAGE
Shirt	0	5000
SPCILITEL GURITEL	0	SCICO GEORGEFERENZIA
WASS	0	SCHIT
URS DATA MAIOR &	0	501
AW. WNOTHE	0	SERRICO
EGGLD ITALIA PROFESSIONALE	0	SID
LOVES	0	SIDET
OLIT Servicio Contratti Pubblici	0	5108
ORDAN	0	SIOPE (Sigtema Informa
MCTC INFO WEB	0	deali Enti Putatilici)
MINT GLOBAL (non più attivo - consultare DRBIS) 🛕	0	SIREND
MINET ITALY	0	SIRCO
MSPAAF Productti certificati DOP IGP STG	0	SISPED
MSE - Oceanistano orean	0	SISSEC 2019
MISE - Littlein Hallano Brevetti e Manchi	0	SISSEC 2020
MOCOR	0	SISSEC 2001
VANDO - Organismi suropei putificati	0	SISSEC 2022
DELAZIONI DOGANALI	0	Sixteena loformation Mi Incomunite
DIPC - INTERPOL	0	SISTEMA TRASPARENZ
DPEN B.D.A.P.	0	SISTER
DEEN CONSIE	0	SIVA2
DESM CUP	0	
DECRETARITE HE	0	SMART

Promised Seciti Amministrativi	0
Prontugrio Polizia Giuntiziaria	0
PUNTO PISCO - SIATEL	0
BAKK	0
BARK	0
REGISTRO NAZIONALE AIUTI DI STATO	0
BISC	0
ESIC)	0
S.T.A.E. Gitoenente Antifrodei	0
SAFESCANET	0
SAGE	0
SANA	0
SCICO GEOREFERENZIAZIONE	0
SCHIT	0
SIDE	0
SERRICO	0
SID	0
SIDET	0
5108	0
SIOPE (Sixtema informative shife Quenato deal) Enti Pubblick	o
SIREND	0
SHENE	0
SROS	0
SKEED	0
SISSEC 2019	0
SISSEC 2000	0
SHISEC 2001	0
SISSEC 2022	0
Sistema Informatico Monitoreggio Guere Incorpode	0
SISTEMA TRASPARENZA FINANZIARIA	0
SISTER	0



#### SUSPICIOUS TRANSACTIONS REPORTS – WORKING TEAMS







#### STRs/FIUs RISK ASSESSMENT



#### PRE - ANALYSIS



#### CENTRAL STAGE OF THE EXAMINATION OF THE S.T.R.

INFORMATION ENRICHMENT

ASSESSMENT OF THE SUM HANDLED AND MODUS OPERANDI RATING OF THE
TRANSACTION: TYPE,
SUBJECTS INVOLVED,
ANOMALY
INDICATORS, INDEPTH FINANCIAL
ANALYSIS (WHERE
APPLICABLE)





#### THE RISK INDEX OF THE REPORTS

#### Risk assessment of reported operations → <u>attributed by the reporting party</u>

Synthetic judgment on the reported operations, left to the autonomous appreciation of the reporting party.

It can assume the values: Low - Medium Low - Medium - Medium High - High

#### Risk profile → attributed by the FIU

Indicates the level of money laundering or terrorist financing risk of the subject, calculated during the due diligence on the basis of internal assessment systems.

It can assume a numerical value from 0 to 5, Low (0) - Medium Low (1-2) - Medium (3) - Medium High (4) - High (5)



#### STRs/FIUs RISK ASSESSMENT





## Risk assessment of the REPORTING PARTY



Low - Medium Low -Medium - Medium High - High

Risk assessment of the

**FIU** 

5 risk classes (1-5)







#### ☐ SCPU OPERATIONAL Risk Assessment

- 1: indication of a crime
- 2: judicial interest
- 3: high risk profiles

(both for Money Lanudering and Terrorism Financing)

A.F.I.: interest for institutional purposes/intelligence asset



#### STRs/FIUs RISK ASSESSMENT & PROXY ASSIGNATION



#### CRITERIA FOR ASSIGNMENT TO G. DI F. UNITS FOR DEEPENING:

1°

Residence (natural persons) or registered office (legal persons) of the subjects reported

29

Relevance of the reported operations to **ongoing criminal proceedings** 



#### STRs/FIUs RISK ASSESSMENT & PROXY ASSIGNATION



SIVA	Esegui controllo ortografico 🛡					
Collegamento con procedimento penale						
Numero proc. pen.	3408					
Anno proc. pen.	2022 🗸					
Procura presso la quale è instaurato il procedimento penale	NAPOLI NORD					
Categoria attribuita (*)	D2 - Riconducibilità a procedimenti penali già esistenti					
	Codice Descrizione					
Reparto per competenza (*)	CE117 GRUPPO AVERSA					
	♣ Aggiungi reparto competente					
	Codice Descrizione					
Reparti da interessare per conoscenza	CE121 COMPAGNIA MONDRAGONE					



#### STRs - NUMBERS AND FIGURES



	2006	2007	2008	2009	2010	2011	2012*	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
SOS Pervenute	11.493	11.793	13.377	18.839	26.962	29.982	61.861	91.245	75.877	84.614	103.994	92.603	84.837	106.318	113.643	138.482	153.412
SOS Analizzate	12.145	12.854	12.635	18.863	24.181	21.558	17.245	85.483	85.581	76.414	84.959	147.436	91.683	82.810	137.211	192.131	151.126





#### INFO COMING FROM FOREIGN FIUS - NUMBERS AND FIGURES



		2021		2022				
	RECEIVED	IN-DEPTH ANALIZED	DISSEMINATED	RECEIVED	IN-DEPTH ANALIZED	DISSEMINATED		
FIU	1.805	688	1.117	1.627	990	637		
Of which: COVID-19 RELATED	144	24	76	44	30	14		

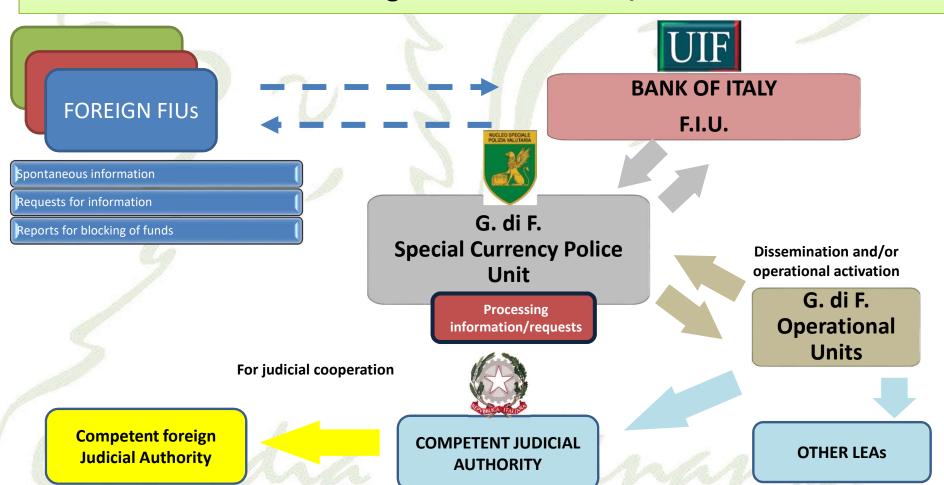


#### INVESTIGATIVE APPROACH – INTERNATIONAL LEVEL



#### **INTERNATIONAL COOPERATION WITH FOREIGN FIUS**

#### ART. 13 Legislative Decree 231/2007



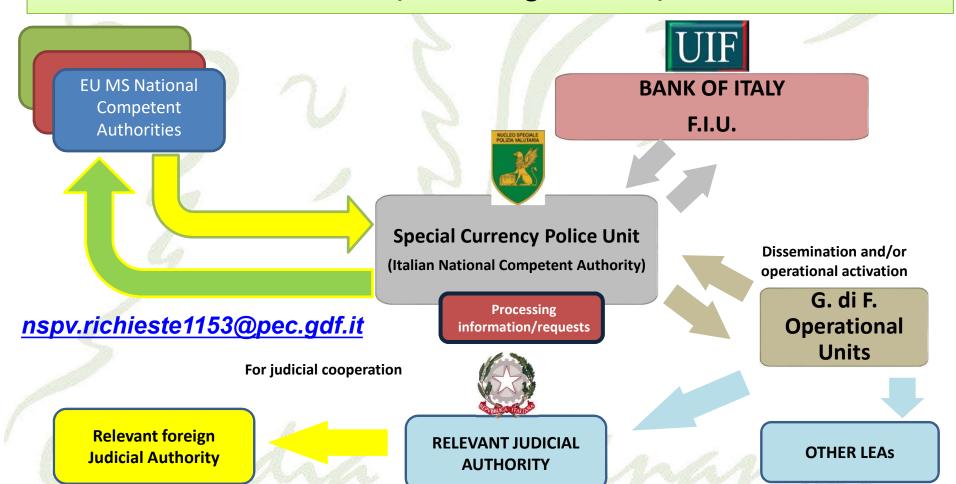


#### **INVESTIGATIVE APPROACH – EU LEVEL**



#### **EUROPEAN COOPERATION WITH RESPECTIVE NCAs**

EU Dir. 2019/1153 + Leg. Dec. 186/2021







# THANKS FOR YOUR ATTENTION

SEE, THIS IS THE THING THAT EVERYONE KNOWS AND NO ONE SAYS. YOU FOLLOW THE DRUGS, YOU GET A DRUG **CASE. YOU START FOLLOWING** THE MONEY, YOU DON'T KNOW WHERE YOU'RE GOING. **CEDRIC DANIELS** 

Guardia di Finanza