

# **FINANCIAL INTELLIGENCE AGENCY BERMUDA**



**ANNUAL REPORT**

**2016/2017**







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**2016 / 2017**

**ANNUAL REPORT**

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**Sinclair White**  
Director

## Director's Report 2016/2017

The Financial Intelligent Agency (FIA) Bermuda is now in its ninth year of operations and will shortly reach its tenth anniversary milestone. As the FIA Director I am pleased to present this annual report on the operational functions of the agency. Highlighting within this report is activity inclusive of and not limited to the gathering and exchange of information, statistics, trends and case studies.

The FIA has been involved in a number of important activities germane to its operation and most importantly the 2018 Mutual Evaluation of Bermuda. The FIA recognizes that with the increase in its mandated function – intelligence gathering and compliance function, the agency has now increased in Bermuda financial and business reputation.

As Bermuda prepares itself for the 2018 Mutual Evaluation the FIA has found itself playing a pivotal role and becoming more focused on its preparatory work for compliance during the Mutual Evaluation examination. The management team involving the Senior Legal Counsel, the Head of Analysis and myself have become deeply involved in the 2017 Nation Risk Assessment which is a wide reaching comprehensive update to the 2013 Risk Assessment. The agency has also been multi-tasked and actively participating in various NAMLC working group meetings which are driving the various operational legislative and supervisory functions of Bermuda's AML/CFT regime. This work has been greatly assisting and driving NAMLC with its policies and legislative recommendations to the Government of Bermuda. In order that the FIA is committed to its functions, as Director I have been providing weekly updates to Cabinet via the NAMLC Office on the agency's preparedness for Bermuda's Mutual Evaluation review consisting of its legislative and operational functions. The FIA Board of Directors remains vigilant and active giving policy and management direction. An example can be noted to the implementation of the AML/ATF supervisory regime for the Dealer in High Value goods. This gigantic achievement was accomplished

*“The FIA Board of Directors remains vigilant and active giving policy and management direction. An example can be noted to the implementation of the AML/ATF supervisory regime for the Dealer in High Value goods.”*

by the FIA Legal Counsel with the assistance of a Consultant. During this period NAMLC engaged the services of a Consultant to assist Bermuda competent authorities with the 2018 ME preparatory work. As mentioned in the 2015/2016 report the FIA management team became actively involved in Bermuda’s 2017 National Risk Assessment with other local competent authorities and stakeholders.

I would like to take this opportunity to acknowledge and thank the FIA Board of Directors for their guidance and oversight in managing the affairs and business of the FIA as mandated in legislation.

The FIA will continue its hard work commitment and dedication with law enforcement, FIUs, other competent authorities and reporting entities and other key stakeholders to gather, analyze, disclose and exchange information to combat money laundering and terrorist financing.

A handwritten signature in black ink, appearing to read 'S. White', enclosed within a large, stylized, circular flourish.

**Sinclair H White**  
Director

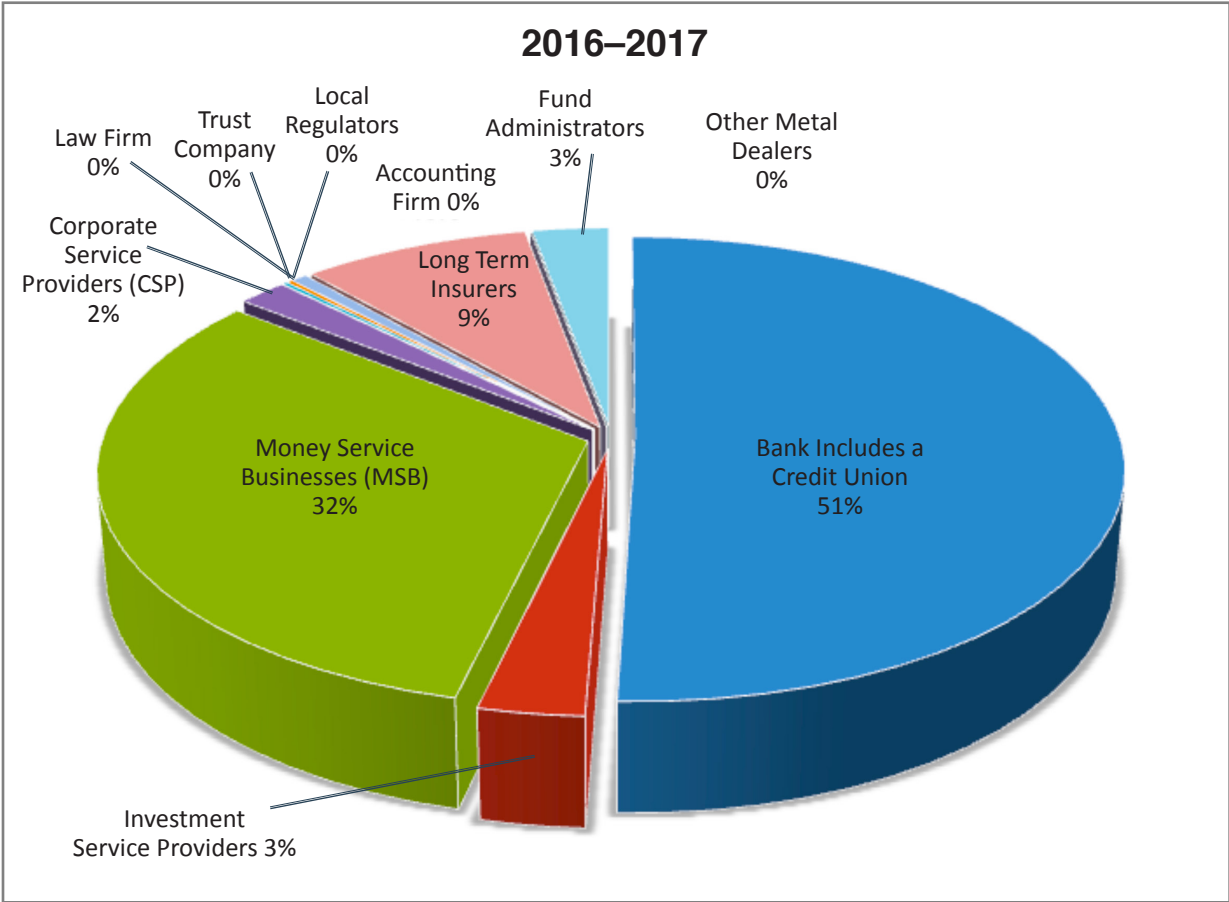
# FIA STATISTICS

1<sup>st</sup> April 2016 – 31<sup>st</sup> March 2017 (the “Reporting Period”)

## SARs FILED

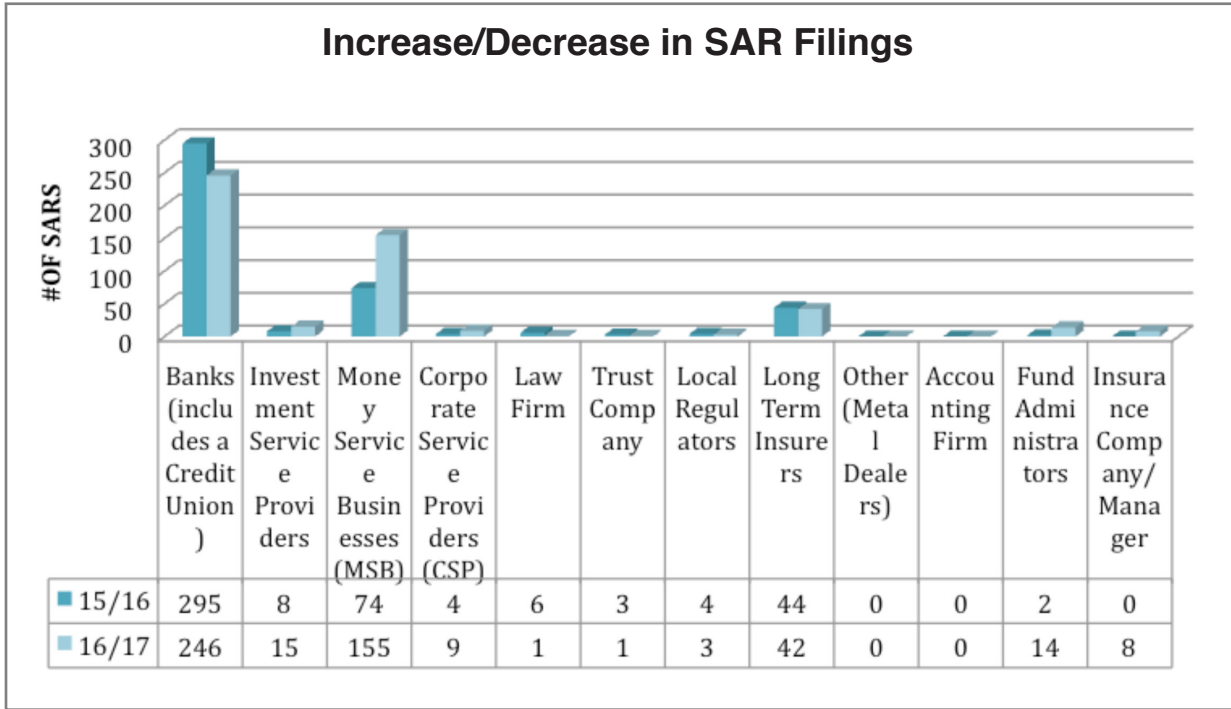
During the Reporting Period, a total of **494** Suspicious Activity Reports (SARs) were filed with the FIA as compared to **440** filed during 2015/2016. The major contributor of SARs filed during this Reporting Period continues to be the Banks. Following are the MSBs and Long Term Insurers.

Chart 1



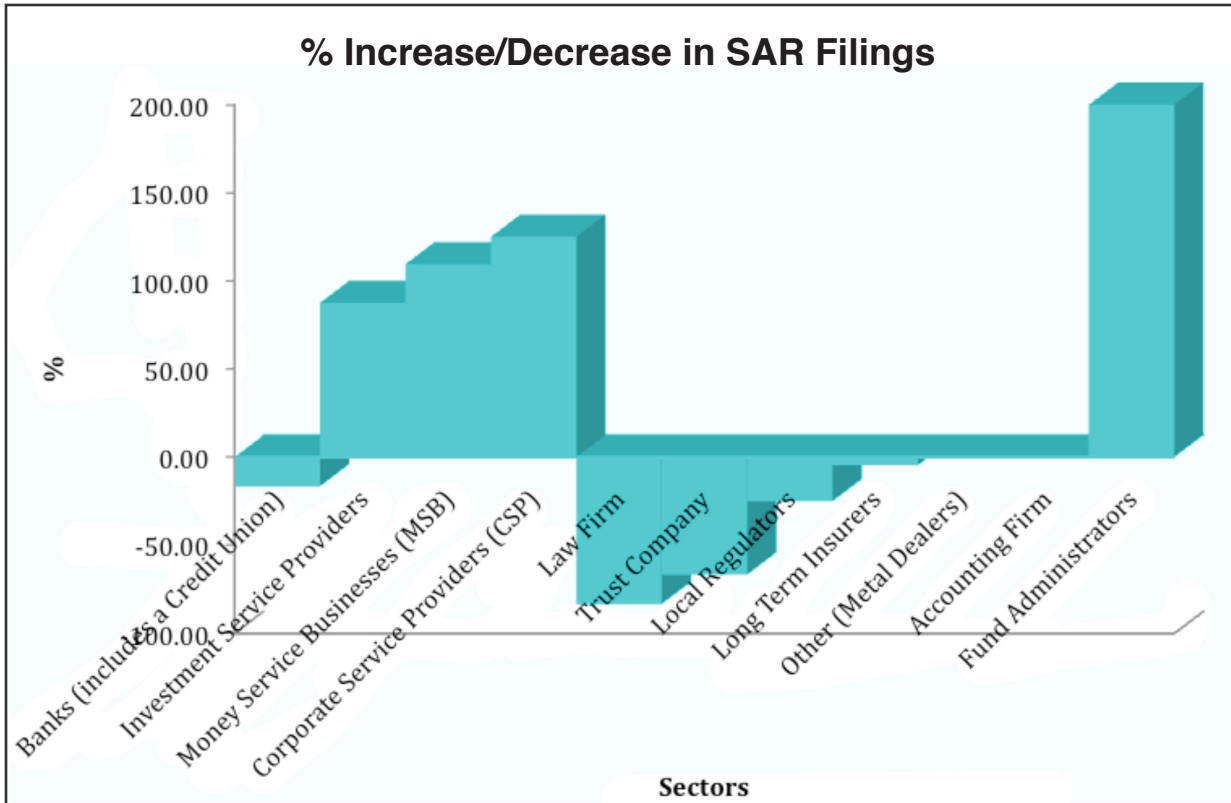
The FIA reports SAR filings broken down into 12 reporting sectors. We are pleased to report that 10 of these sectors filed SARs during the Reporting Period with all sectors seeing an increase in filings. There were no filings in the Accounting and Dealers in Precious Metals and Stones sectors during the Reporting Period.

Chart 2



Overall the FIA saw a modest **12%** increase in SAR reporting. Whilst there were significant increases in SAR filings by the Insurance Company/Manager, Fund Administrator, Corporate Service Provider, Investment Service Provider and Money Service Businesses, there were, in some cases, substantial reduction in filings across all other sectors as compared with 2015/2016.

Chart 3



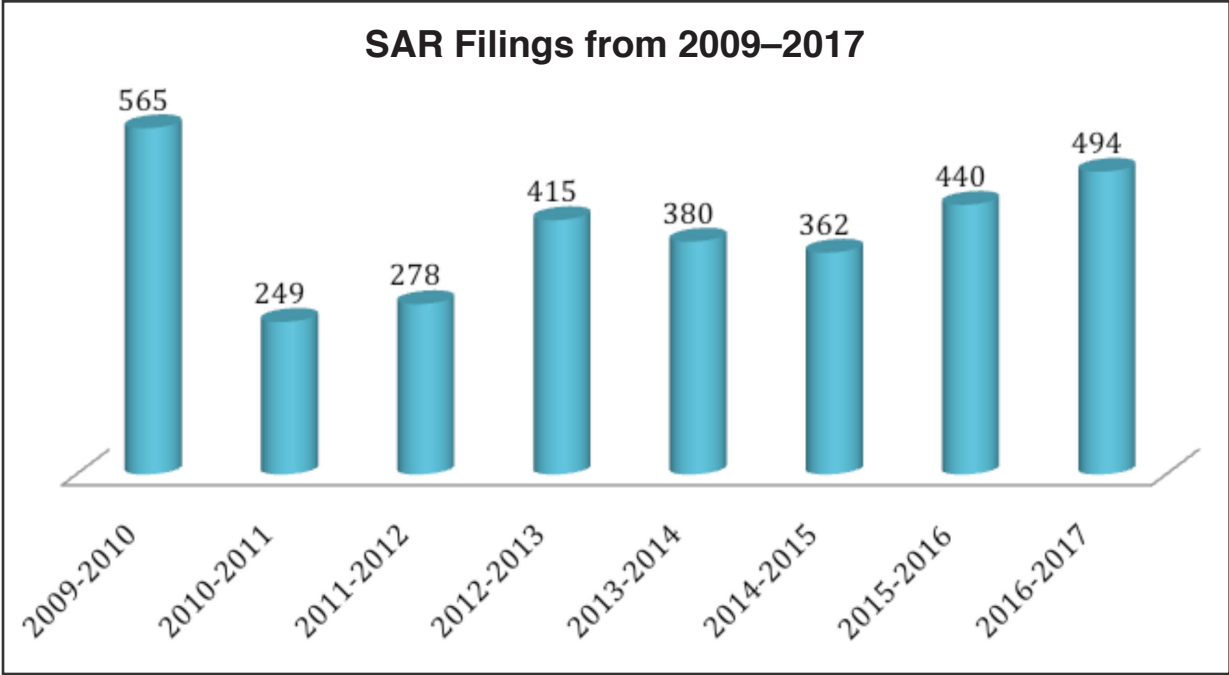
Contained within these SARs were **10,368** transactions for a total value of **\$564,249,836.00 BMD** of which 40 of the SARs reported involved amounts in excess of a million dollars. These included the Banks, Investment Firms, Fund Administrator, Insurance Manager, Long Term Insurers and Corporate Service Provider. The majority of SARS filed with the FIA continue to be of a quality standard with few requiring the reporting entity to be contacted.

We are pleased to report that 2016/2017 is the second year in a row that we are seeing an increase in SAR filings. This can be attributed to the continued training and presentations provided by the FIA which has assisted in improved SAR filings. Also, due to the training and presentations given to new entities, different sectors started to identify suspicious activity within their businesses and filed SARS accordingly. It was evident from the presentations given that many sectors were hesitant to file as they did not have an understanding of money laundering or the role of the FIA.

Training and presentations given to the Reporting Entities concerning SAR filing, KYC, Money Laundering, Terrorist Financing and the use of goAML, useful policies and procedures have also been introduced to assist the Reporting Entities’ staff in identifying and dealing with suspicious activity. We are pleased to see the positive results from this training.

Below is a Comparison Chart outlining the number of SARs filed with the FIA during previous reporting periods.

**Chart 4**  
**Cash Exchange SARs**

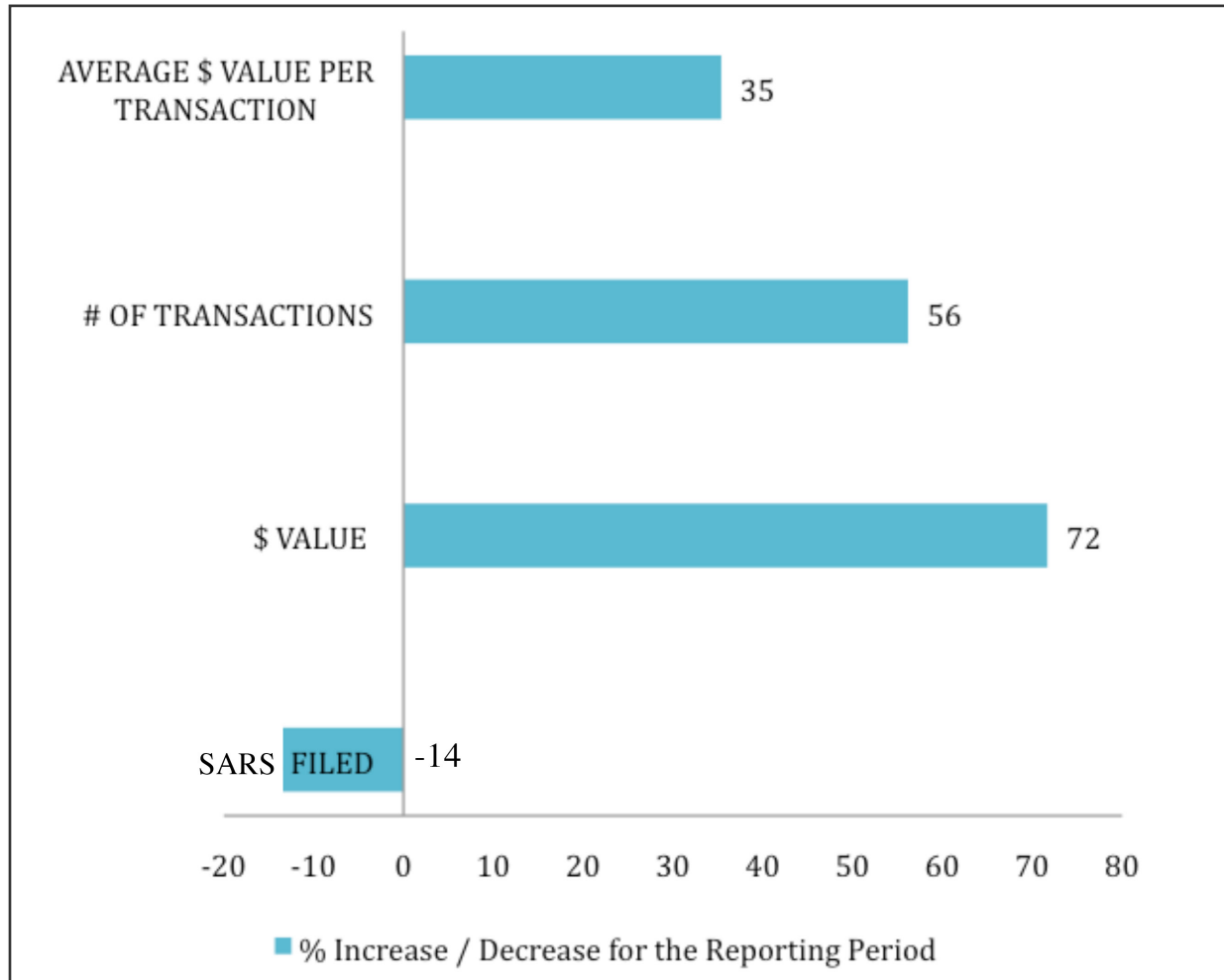


Cash exchanges of Bermuda currency for a foreign currency, usually US dollars is still the most reported activity to the FIA from the Reporting Entities. During this Reporting Period **165** SARs involved suspicious cash exchange at financial institutions (Banks) totaling **\$22,113,861.00 BMD** in **8322** transactions at an average of **\$2,657.28 BMD** per transaction. This represents a substantial increase in reporting in comparison to 2015/2016.

The 2<sup>nd</sup> and 4<sup>th</sup> Quarters saw a significant increase in the monetary value of the transactions being reported as suspicious.

## Chart 5

### Wire Transfer SARs

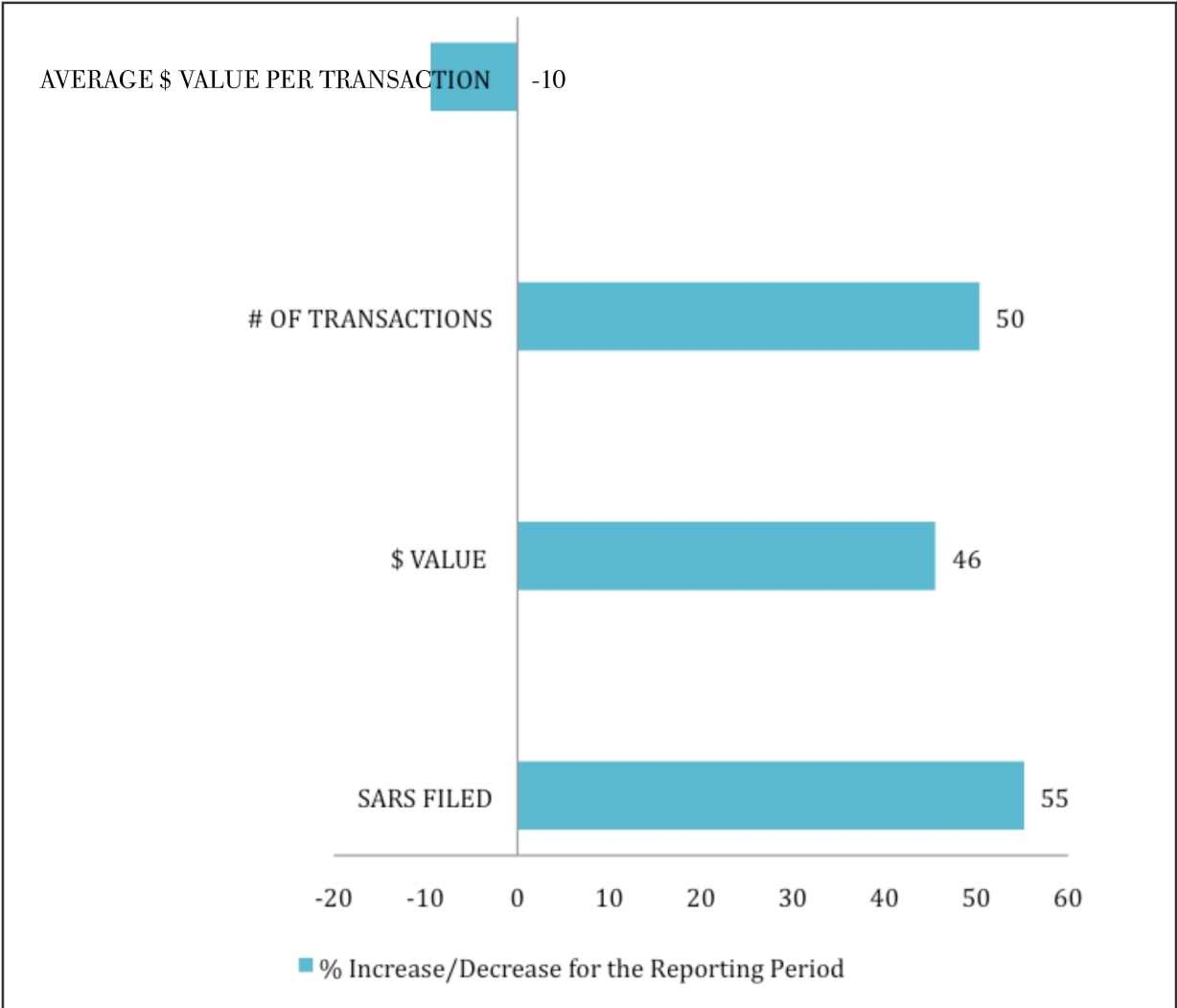


Also, **154** SARs involved suspicious wires out of Bermuda using Money Service Businesses as their transmitter for a total value of **\$419,713.00 BMD** in **304** transactions at an average of **\$1,380.63 BMD** per transaction. These continue to be the prevalent trends seen by the FIA through their analysis.

As with the reporting of suspicious cash exchanges, there was a substantial increase in the number of SARs filed along with an increase in the monetary value that was filed during this Reporting Period.

This increase in filings can be contributed to the fact that some of the SARs filed are reflective of a back review by the MSB over a period of 3-4 months of transactional activity. Subjects being identified are relaying suspicious activity over a number of transactions.

Chart 6



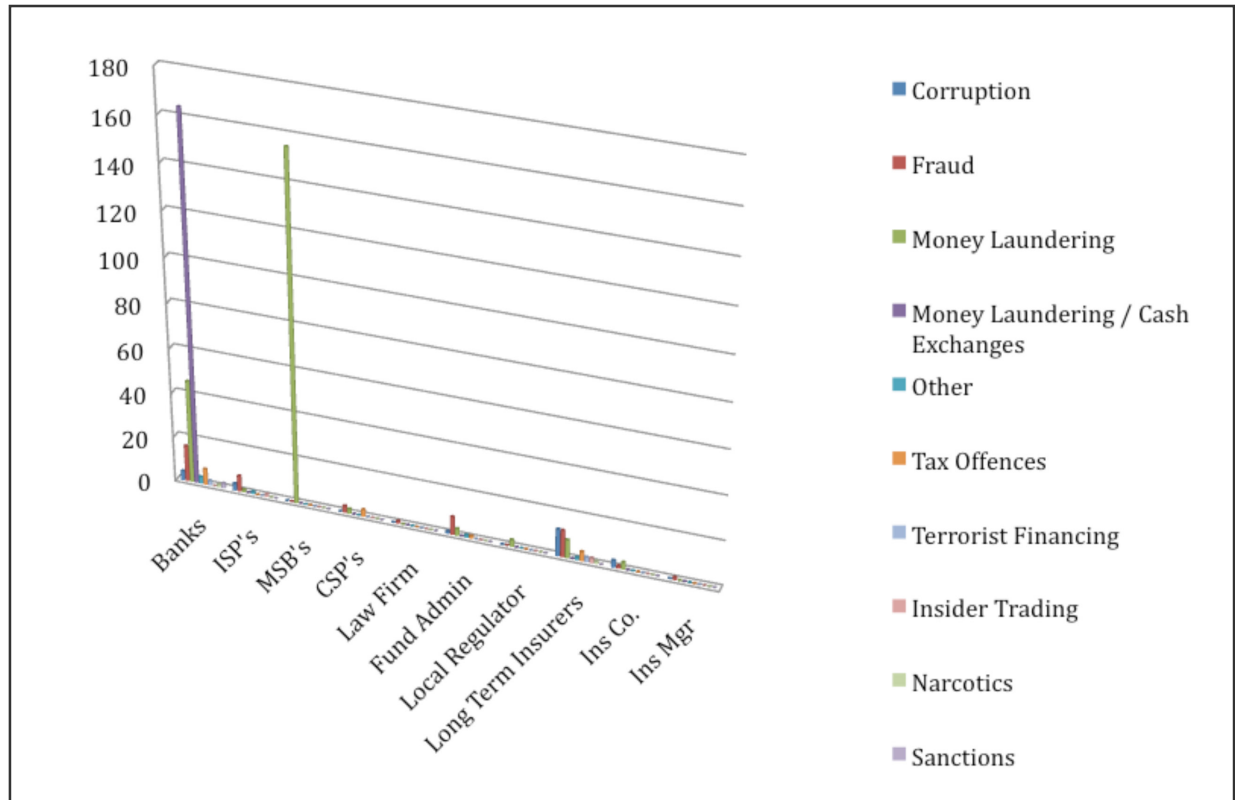
### REPORTING INDICATORS AND TRENDS

SARs filed with the FIA tend to follow one of 7 main reporting indicators which the FIA have listed as

1. Corruption,
2. Fraud,
3. Money Laundering,
4. Money Laundering /Cash Exchanges,
5. Tax Offences
6. Terrorist Financing
7. Insider Trading

Charts (7) and (8) below show the number of SARs filed as it relates to the main reporting indicators. Basic Money Laundering and Money Laundering /Cash Exchanges were filed the most followed by basic Corruption and Fraud.

**Chart 7**



**Chart 8**

REPORTING INDICATORS	BANKS	ISP'S	MSB'S	CSP'S	LAW FIRM	FUND ADMIN	LOCAL REGULATOR	LONG TERM INSURERS	TRUST CO	INS MGR
Corruption	4	3	0	0	0	1	0	12	3	0
Fraud	16	7	0	3	1	8	0	12	1	1
Money Laundering	46	1	155	2	1	3	3	8	3	0
Money Laundering/ Cash Exchanges	164	0	0	0	0	0	0	0	0	0
Other	3	1	0	0	0	1	0	1	0	0
Tax Offences	7	0	0	3	0	1	0	4	0	0
Terrorist Financing	2	0	0	0	0	0	0	2	0	0
Insider Trading	0	1	0	0	0	0	0	2	0	0
Narcotics	1	0	0	0	0	0	0	1	0	0
Sanctions	2	0	0	0	0	0	0	0	0	0

A summary of two of the reporting indicators highlighted in the SARs filed during this Reporting Period is shown below.

## CORRUPTION

The FIA have received **23 SARs** this Reporting Period, that referenced corruption from the Banks (including Credit Union), Fund Administrators, Insurance Company, Investment Service Providers and Long Term Insurer Sectors totaling in the amount of **\$71,563,174.00 BMD**. This is an decrease from the last Reporting Period by **4.17%** The majority of these SARs were filed as a result of entities conducting due diligence checks after their clients' supplied withdrawal requests from accounts they held and based on relevant publicized media events .

## FRAUD

The FIA have received **49 SARs** that reference Fraud from eight sectors namely, Banks (including a Credit Union), Corporate Service Provider, Fund Administrator, Insurance Company, Insurance Manager, Investment Service Provider, Law Firm and Long Term Insurers. The total amount involved was **\$395,678,936.00 BMD**. This increased by **68.97%** since the last reporting period. Within these SARs the following red flags were identified:-

- Non-Bermudian clients
- Failed KYC checks eg. When opening an account
- Criminal associations
- Numerous allegations and civil lawsuits
- High risk jurisdiction
- False documents
- Inadequate explanations
- Theft
- Defrauding investors
- Phishing – email scams

## OVERALL TRANSFERS OF MONIES OUT OF BERMUDA 2016-2017

During this Reporting Period, the FIA have received numerous SARs relating to wires (EFTs) to numerous jurisdictions, mainly filed by the MSBs. The total dollar value of wires being sent out of Bermuda totals **\$420,773.00BMD** in comparison with **\$226,909.00 BMD** being sent out of Bermuda in 2015/2016. This represents a **85.44%** increase in the value of suspicious EFTs. This trend is clearly on the rise as the value of suspicious EFTs continues to increase. This is only reflective of what has been reported as suspicious. In the Chart 9 below, see a summary of the 37 countries identified as recipients of suspect wires:

Chart 9

Destination Country		Destination Country	
1	ALBANIA	20	NETHERLANDS
2	ARUBA	21	NETHERLANDS ANTILLES
3	BENIN	22	NICARAGUA
4	BRAZIL	23	NIGERIA
5	BULGARIA	24	PANAMA
6	CANADA	25	PHILIPPINES
7	CHINA	26	RUSSIAN FEDERATION
8	COLOMBIA	27	SAINT LUCIA
9	COSTA RICA	28	SIERRA LEONE
10	DOMINICAN REPUBLIC	29	SINGAPORE
11	FRANCE	30	SURINAM
12	GHANA	31	SWITZERLAND
13	GUYANA	32	TRINIDAD AND TOBAGO
14	HONG KONG	33	TURKEY
15	INDIA	34	UKRAINE
16	JAMAICA	35	UNITED ARAB EMIRATES
17	JORDAN	36	UNITED KINGDOM
18	LEBANON	37	UNITED STATES
19	MALAYSIA		

## DISPOSITION OF SARs DURING THE REPORTING PERIOD

All SARs received by the FIA are analysed and subjected to an initial review, after which they are either filed for intelligence or assigned to a case for further analysis and potential disclosure to the FIA’s partner agencies.

During the Reporting Period, the FIA has made **97** disclosures. There were **85** local disclosures and **12** made overseas with the majority made locally to the BPS. Used within these disclosures were **371** SARs. This can be compared to 2015/2016 where the FIA made **134** disclosures containing **454** SARs, 102 disclosures were made locally and 32 were made overseas.

## GATHERING POWERS

As it relates to the FIA utilising its gathering powers under Section 16 of the FIA Act, **613** “**Notice to Provide Information**” letters were sent to **17** separate entities during this Reporting Period. This represents a 79% increase in the issuance of Section 16 Notices.

This power is only utilised when the FIA have escalated a SAR to be a case requiring further analysis.

## DISCLOSURE STATISTICS

During this Reporting Period, the FIA made **97 disclosures** of classified information/intelligence to local and foreign partners. These disclosures consisted of information received by the FIA via SARs (**371 SARs** were disclosed); information/intelligence obtained by the FIA further to its information gathering powers under Section 16 of the FIA Act, and OSINT. Most importantly, all of these disclosures contained analysis conducted by the FIA’s staff in our efforts to provide useful intelligence to the FIA’s local and foreign partners.

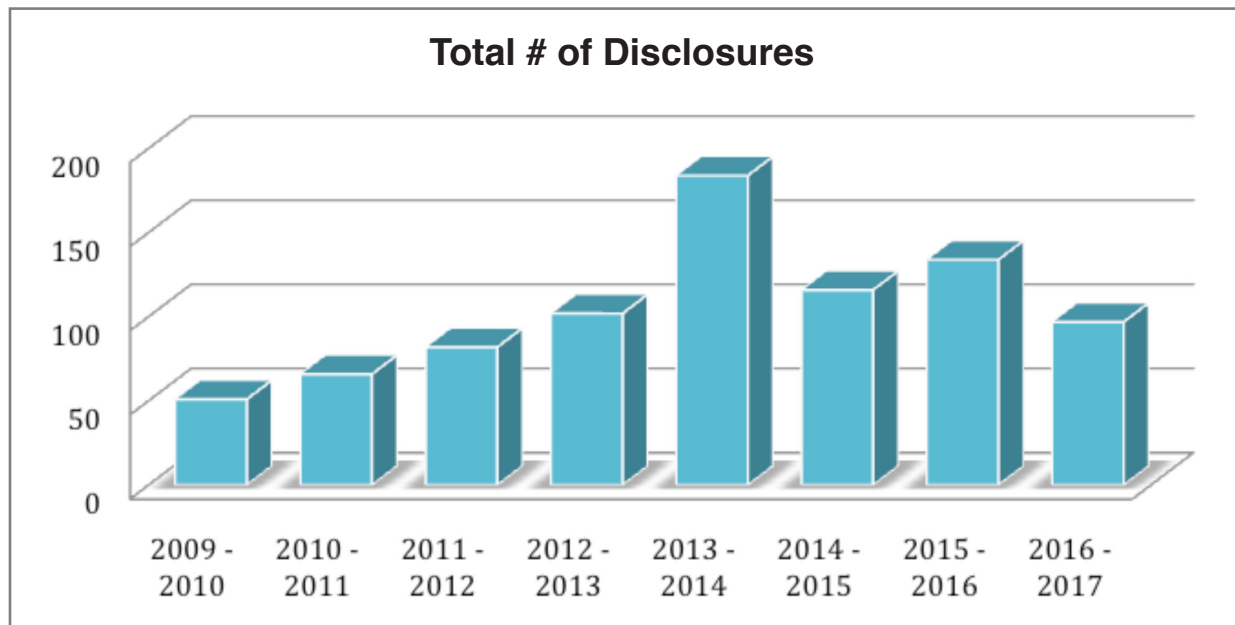
Chart 10 below compares the total Disclosures and SARs utilised between this Reporting Period and the FIA Annual Report for 2015–2016.

**Chart 10**

	1 <sup>ST</sup> QUARTER		2 <sup>ND</sup> QUARTER		3 <sup>RD</sup> QUARTER		4 <sup>TH</sup> QUARTER		TOTAL	
DISSEMINATIONS	15/16	16/17	15/16	16/17	15/16	16/17	15/16	16/17	15/16	16/17
Total Disclosures	52	21	23	29	27	30	32	17	134	97
Total SARs disclosed	145	119	36	118	147	84	126	50	454	371

Chart 11 illustrates the total number of disclosures from 2009–2017.

**Chart 11**



## INTERACTION WITH FOREIGN FIUs

Sections 14 and 18 of FIA Act establishes the lawful basis for the FIA to provide international co-operation to foreign FIUs as well as foreign non-counterparts. The FIA has autonomous authority to determine how to exercise its functions. The FIA adheres to the Egmont Group of Financial Intelligence Units' Charter and Principles of Information Exchange between FIUs which directs the efficient use of cooperation.

During the current Reporting Period, the FIA received **30** Incoming Requests for Information (IRI) from foreign FIUs listed below in the table. See Chart 12 below outlining the jurisdictions and Number of IRIs submitted.

## Chart 12

JURISDICTIONS	NO. OF REQUESTS	JURISDICTIONS	NO. OF REQUESTS	JURISDICTIONS	NO. OF REQUESTS
Anguilla	1	Turks and Caicos	1	Romania	1
Bangladesh	5	Azerbaijan	1	Latvia	1
United States	2	Nepal	5		
Canada	1	Philippines	1		
Belgium	1	Switzerland	4		
France	2	Saint Maarten	1		
United Kingdom	2	Ukraine	1		

In keeping with EGMONT FIU agreements, the FIA considers all IRIs from foreign FIUs as containing classified information.

In addition to responses to requests made by other entities to the FIA, the FIA also made a number of spontaneous disclosures of information to foreign partners. Of the **97** disclosures made by the FIA during the current Reporting Period, **12** of the disclosures were made to foreign FIUs, which are listed below in Chart 13.

## Chart 13

JURISDICTION	JURISDICTION
Turks and Caicos	United Kingdom
Ukraine	Panama
Canada	Romania
Romania	
United States	
Costa Rica	
Venezuela	

The FIA does not require any agreement to enable it to exchange information with foreign FIUs as this is permissible by virtue of Section 14 of the FIA Act. The FIA will rapidly conclude MOUs with those countries that require an MOU. Section 19 of the FIA Act states that the FIA may, in connection with the exercise of its functions under this Act, enter into arrangements for cooperation with bodies or persons (in Bermuda or elsewhere) which it considers appropriate.

Currently the FIA has signed 40 MOUs with foreign FIUs since its establishment in November 2008. The FIA has also received confirmation from a further 14 FIUs that an MOU is not required by their FIU to facilitate international co-operation.

# IMPLEMENTING A SUPERVISORY REGIME FOR THE OVERSIGHT OF DEALERS IN HIGH VALUE GOODS

## 1. Background

Over the years, Bermuda has enjoyed a high standard of living, due in part to its position as a premier international financial centre. In keeping with this, Bermuda has committed itself to having a strong and robust framework to combat crimes such as money laundering and terrorist financing. The international body responsible for such matters, the Financial Action Task Force (FATF), requires jurisdictions to impose appropriate customer due diligence and other such requirements on entities in the financial sector and certain designated non-financial businesses and professions (DNFBP).

The majority of DNFBP sectors in Bermuda (real estate agents, lawyers, accountants, corporate service providers) are already regulated or are in the process of having their anti-money laundering/ anti-terrorist financing (AML/ATF) oversight regime implemented. Bermuda is now taking steps to extend, as appropriate, the relevant legislative provisions to other sectors which are either required by the FATF or are seen to pose a potential high risk for money laundering and terrorist financing in Bermuda. In particular, the focus at this time will be on entities in the high value dealers (with particular emphasis, in the first instance, on those entities in the motor and marine vehicle businesses, jewelers, antiques and auctioneers) and dealers in precious metals and stones (collectively referred to as High Value Dealers (HVD))

To progress this initiative, round table discussions between persons from the relevant sectors and representatives of the relevant competent authorities, including the Office of the National Anti-Money Laundering Committee (NAMLC); the Financial Intelligence Agency (FIA); the Registrar of Companies (RoC) and the Bermuda Monetary Authority (BMA) took place in October 2014. These sessions allowed the relevant authorities and industry to exchange information on the international requirements in a cooperative and constructive manner. It is also assist in gaining a better understanding of the potential risks and challenges in the relevant sectors in relation to the prevention and detection of money laundering and terrorist financing.

To ensure that the meetings were as productive as possible, the members from the relevant sectors completed questionnaires prior to the meeting, which gave the competent authorities an indication of key AML/ATF risk factors, such as the use of cash in the purchase of goods and services.

## 2. Money Laundering Assessment of HVD

The following currently comprise the typical HVD sectors.

- Gold Exchange Dealer
- Jewelers
- Antiques & Auctioneers
- Precious Metals Dealers & Manufacturers
- Car Dealers
- Boat Dealers
- Cycle Dealers

Information<sup>1</sup> provided by the Department of Statistics showed that each category's contribution to the national GDP is very small, less than 1%.

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<sup>1</sup> The data is sourced from the 2013 Employment Survey and the 2014 Economic Activity Survey (which captures 2013 data).

The feedback provided to date indicates that many of the entities in these sectors have informal policies in place preventing the acceptance large amounts of cash. Cash transactions within the \$1,000 – \$4,999 occur occasionally yet these typically represent less than 5% of total sales for certain sectors. The majority of cash transactions fall below \$1,000 however, they still represent a small proportion of the total sales.

Despite the minimal impact the HVD sectors have on the Bermuda economy and low vulnerability to money laundering due to the informal controls voluntarily put in place by vendors, Bermuda must implement some form of oversight of this sector.

### 3. Consultation Paper

In April 2016, the FIA released a Consultation Paper. The intent of this paper was to outline the mechanism by which HVD in Bermuda can be brought into compliance with Bermuda’s AML/ATF regime in a manner that is both consistent with FATF standards yet takes into account the risks that exist in Bermuda along with the costs of conducting such business. The intent was to formulate an acceptable policy and implement a robust regime that is not cost prohibitive to the ordinary course of conducting business in Bermuda. The public was invited to provide comments on proposals contained within the Consultation Paper.

### 4. Legislative Amendments

Following the conclusions of the consultation process, the legislature enacted amendments in July 2016 to Bermuda’s AML/ATF legislation, amongst which were provisions to bring in scope dealers in high value goods; and empowering the FIA to undertake the supervision of businesses which make up that group. These legislative provisions came into effect on December 1, 2016. Dealers in High Value Goods are defined in the legislation to include:

- Jewellery dealers;
- Car, boat and motorcycle dealers;
- Precious metal and stone dealers;
- Antique dealers; and
- Auctioneers.

The supervisory framework for these sectors will be unique. Businesses will have the opportunity to organise their operations in a way that will obviate the need for them to be registered and be subject to supervision by the FIA. This is because the supervisory regime will only be focussed on those businesses that wish to be able to accept cash payments totalling \$7,500 or more, or the equivalent in any other currency, for a single transaction or series of related transactions.

Therefore, businesses that make a commitment to exclude from their operations these high risk cash transactions at or above that threshold, will be excluded from the registration requirements and will only occasionally be required to demonstrate that they continue to adhere to that commitment. For those businesses that do wish to undertake cash transactions above the threshold, they will be required to register with the FIA and therefore will be subject to the applicable requirements in the AML/ATF laws. These specify the preventive controls that must be implemented by these entities in order to reduce their risk of being abused for money laundering and terrorist financing.

### 5. Guidance Notes and Commencement of the Regime

Since the amendments were enacted, the FIA has carried out a number of administrative and outreach activities to prepare themselves and the relevant sectors for the commencement of the supervisory framework. To that end the FIA prepared draft Guidance Notes, which was circulated to the sectors on August 26, 2016 for consultation. The consultation period lasted until September 30<sup>th</sup>. During that time the FIA also conducted training sessions with the dealers in high value goods, as well as had outreach with the banking sector to update them on this development.

Feedback provided to the FIA by industry and by the membership of NAMLC, was taken into account in updating the draft Guidance Notes. The final draft was submitted to the Attorney General for review and approval.

On December 1, 2016 the Attorney General confirmed is approval in writing of these Guidance Notes and have requested that they be published in the Official Gazette and an electronic copy be made available on the website of the Financial Intelligence Agency.

Although the provisions of the legislation came into effect on December 1, 2016, the Attorney General gave approval for the deferral of the commencement of the registration process until January 2, 2017.

Going forward, the FIA will continue their outreach and training sessions with these sectors to enhance their understanding of the regime and to empower them with the information necessary to facilitate compliance with the requirements.

## **FIA ACTIVITIES**

### **TRAINING**

#### **Q1**

The FIA conducted 6 training sessions relative to Money Laundering, Terrorist Financing, Risk Assessment and the use of goAML (our operating software). These presentations were made to a Trust Company, Money Service Businesses (2), Long term Insurer (2) and Insurance Company.

In May, the Director, Senior Legal Counsel and Head of Analysis took part in a two day self-assessment training and preparation for Bermuda's Fourth Round Mutual Evaluation.

Between June 27 to 29, 2016, an Analyst from the FIA along with Supervisory staff from the BMA, Registrar of Companies, the Gaming Commission and the Registrar General attended a Suspicious Transaction Reporting workshop for the for Caribbean FIUs and AML/CFT supervisory authorities, in Miami. This was hosted by Canada and the USA FIUs, namely FinTRAC/FinCEN respectively. The aim of this workshop was to share insight and best practices from FinTRAC/FinCEN's recent work with their reporting entities (RE) and to enhance the quality of the SAR's received and the sharing of information between the relevant competent authorities. The outcome of this training will be the future production of Strategic Analysis covering Virtual Currencies/Bitcoins, Civil Asset Forfeitures, Money Laundering convictions stemming from FIA disclosures and Correspondent Banking/De-risking. The course was very informative and well received by all that attended and deemed to be a success.

#### **Q2**

The FIA conducted 5 training sessions. Two were considered high level as these were presented to the BAR/ICAB Board and the DPP and its Management team. These two sessions went well as the FIA have been asked to present to other members of Bar/ICAB and as it relates to the DPP to the remaining staff in their office. The last training session was presented to the compliance team from a local bank.

#### **Q3**

The FIA conducted 3 training sessions. One was considered high level as this was a presentation to the Ministry of Economic Development. This session went well as the FIA have been asked to present to other members of staff. The remaining two were given to an Insurance Company and Law Firm re: SAR reporting.

Staff took part in further training relative to the Regulate Compliance Authority and others attended a conference hosted by Bermuda Drug Enforcement Network (BerDIN).

## Q4

The FIA conducted 6 training sessions. One was considered high level as this was a presentation to His Excellency the Governor John Rankin and Deputy Governor Jinny Ferguson. The formal meeting took place at the FIA on February 27, 2017. Board member Anthony Whaley represented the Board of Directors at this meeting. This session went well as further training is to be provided to certain members of staff. The remaining five were given to an Insurance Company, Trust Company, Investment Service Provider and the FIA assisted in training to the Real Estate Sector.

FIA staff also met with the Bankers Association to discuss relevant matters arising and with NAMLC's consultant, Manuel Vasquez, as it pertains to Bermuda's pending mutual evaluation.

## MEETINGS

The FIA continue to have monthly and quarterly meetings with our partners, i.e. Police and BMA to discuss matters of concern relating to disclosures, statistics, feedback and other operational matters. The FIA also met with the Deputy Attaché from the Department of the Treasury, USA, who is based in Barbados. Discussions revolved around intelligence and the sharing of information.

The FIA attended the XLII CFATF Plenary and 24<sup>th</sup> Heads of FIU Forum, Montego Bay, Jamaica. At the Heads of FIU Meeting, the Financing of Terrorist Fighters within the region and globally was discussed. Also talked about were the recently concluded Mutual Evaluations (MEs) of Trinidad and Tobago and an update on Jamaica. We were advised that the FATF will be a standard reviewer on all MEs in FSRBs. Other matters discussed were National Risk Assessments being conducted by member jurisdictions and the critical role FIUs play during the process. The issue of De-risking was also discussed and what some FIUs have seen in relation to the actions taken by some global Financial Institutions in the region. There was healthy dialogue on the Supervisory role of FIUs. The heads of FIUs were also advised on the review of Recommendation 6 with respect to Targeted Financial Sanctions Related to Terrorism and Terrorist Financing and the move by the FATF to making Recommendations 24 and 25 addressing Transparency and Beneficial Ownership of Legal Persons and Legal Arrangements core issues.

During the last quarter, the FIA has been involved in a series of work shop meetings with respect to Bermuda's preparation for its mutual evaluation. They were as follows:

- Terrorist Finance National Risk Assessment
- NAMLC Operational Working Sub-Group
- NAMLC Legal Working Sub-Group
- Mutual Evaluation Self-Assessment
- NAMLC
- NAMLC Terrorist Financing Working Sub-Group
- NAMLC Heads of Department Strategic Working Sub-Group

Other meetings with KPMG and the Financial Institutions also took place during the months of August, September and October.

The Head of Analysis also participated in an International User Group Meeting with respect to GoAML. All the members involved use goAML as their operating software or parts thereof and this group was created to ensure new features are introduced to benefit all also to assist in prioritizing many of the new features being requested.

## LIST OF ABBREVIATIONS

AML/ATF	Anti-Money Laundering/Anti-Terrorist Financing
BMA	Bermuda Monetary Authority
BMD	Bermuda Dollar
BPS	Bermuda Police Service
CFATF	Caribbean Financial Action Task Force
CUSTOMS	H.M. Customs
EGMONT	The Egmont Group of Financial Intelligence Units
EFT	Electronic Funds Transfer
FATF	Financial Action Task Force
FIA	Financial Intelligence Agency
FIU	Financial Intelligence Unit
IMF	International Monetary Fund
IRI	Incoming Requests for Information
KYC	Know Your Customer
MER	Mutual Evaluation Report
MOU	Memorandum of Understanding
MSB	Money Service Businesses/Bureau
NAMLC	National Anti-Money Laundering Committee
POCA	Proceeds of Crime Act 1997
RFI	Request for Information
SAR	Suspicious Activity Report
UNODC	United Nations Office on Drugs and Crimes
UK	United Kingdom
USA	United States of America
USD	U.S.A. Dollar



