

# Anti-Money Laundering Intelligence Office



## Standard Operating Procedures

**January 2020**

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## Acronym/Abbreviation

AML/CFT	Anti-money laundering and combating the financing of terrorism
AMLIO	Anti money laundering Intelligence Office
BOL	Bank of the LAO PDR
CDD	Costomer Due Diligence
CPL	Criminal Procedure Law
CSP	Company service provider
CTR	Cash Transaction Report
DNFBP	Disignated Non-Financial Businessen and Professions
ERO	Enterprise Registration Office
FATF	Financial Action Task Force
FI	Financial Institution
FIU	Financial Intelligence Unit
FT	Financing of Terrorism
LEA	Law Enforement Agencies
MOF	Ministry of Finance
MOFA	Ministry of Foreign Affairs
MOJ	Ministry of Justice
MOU	Memorandum of Understanding
ML	Money Laundering
MLA	Mutual Legal Assistance
NPO	Non-Profit Organization
PACSA	Public Administration and Civil Service Authority
PEP	Politcally Exposed Person
SPPO	Supreme People’s Prosecutor
SEC	State Securities and Exchange Commission
SRO	Self Regulatory Organization
STR	Suspicious Transaction Report
UN	United Nation
UNSCR	United Nation Security Council Resolution
WTR	Wire Transfer Report

# **I. Overview**

## **1. Roles, Rights And Duties Of The Anti-Money Laundering Intelligence Office**

### **❖ Roles:**

Anti-Money Laundering Intelligence Office or “AMLIO” is an organization equivalent to technical department under direct supervision [and] guidance of the National Coordination Committee for Anti-Money Laundering and Counter and Financing of Terrorism (NCC), and ideologically led and financially supported by the Bank of Lao PDR.

The Anti-Money Laundering Intelligence Office is designated as chief of staff of and assist the National Coordination Committee for Anti-Money Laundering and Counter-Financing of Terrorism in the implementation of activities related to anti-money laundering and counter-financing of terrorism to ensure social order, public order and compliance with the laws and international standards.

### **❖ Rights and duties:**

1. To research and develop strategic plan, policy and legislation on anti-money laundering and counter-financing of terrorism in order to propose to the NCC for consideration;
2. To collect addition information that deems necessary from reporting entities and other related organizations in monitoring, inspecting, analyzing information on money laundering and countering of financing terrorism, which was informed or reported by individuals, legal entities or organizations and reporting entities;
3. To submit documents and create financial reports, if there is evidence to suspect that there would be money laundering and financing of terrorism, to the relevant investigation authority, and provide information on money laundering and financing of terrorism as required by the related investigation authority;
4. To coordinate with relevant ministries, authority supervising reporting entities and other related bodies in order to follow and inspect the implementation of activities related to anti-money laundering and counter-financing of terrorism;
5. To take administrative actions against reporting entities that violated the laws on anti-money laundering and counterFinancing of terrorism;
6. To summarize [and] report the performance of activities in each period, compile information and statistics on anti-money laundering and counter-financing of terrorism and evaluate the implementation the inspection of reporting entities to NCC;
7. To coordinate with relevant bodies to submit a list of terrorists, terrorist groups, terrorist organizations, or financer of terrorism and a list of suspicious persons to commit money laundering to reporting entities in order to follow and take appropriate measures on timely manner;

8. To provide trainings to staff regarding to anti-money laundering and counter-financing of terrorism in each period to upgrade capacity in performing their duties;
9. To organize seminars, meetings on anti-money laundering and counter-financing of terrorism and attend technical meetings organized by other relevant bodies related to their technical duties;
10. To disseminate, publicize and educate the State, government agencies and public on anti-money laundering and counter-financing of terrorism;
11. To further identify additional reporting entities, in coordination with supervision authority of reporting entities in order to propose NCC for consideration;
12. To perform duties on international cooperation and relations on anti-money laundering and counter-financing of terrorism;
13. To provide reports on financial intelligence to relevant bodies;
14. To perform other duties according to the laws.

***Visions*** of AMLIO is to combat criminals not to use reporting entities in Lao PDR to support money laundering and financing of terrorism (ML/FT) or illegal activities. AMILIO, as an intelligence agency and financial information supervisor related to Anti-money laundering and combating the financing of terrorism (AML/CFT), by coordinating with relevant ministries to comply with the laws, including the performance of investigation of suspicious cases as defined in the law. Participate in creating, supervising and maintaining of stability [and] eliminating activities that are money laundering and financing of terrorism activities across the country. It is also an obligation of the Lao PDR on an international platform to anti money laundering and financing of terrorism (ML/FT) which would enable Lao PDR efficiently implement activities on anti-money laundering and combating the financing of terrorism (AML/CFT) and would benefit relations of Lao PDR with other countries and international organizations.

In addition, AMLIO also has other rights and duties as defined in the Decision on the Organization and Duties of the Anti-Money Laundering Intelligence Office No.15/NCC, dated 08 November 2016. One of the duties is to collect, analyze financial transactions and summarize transactions that are suspicious as money laundering and financing of terrorism (ML/FT) in order to submit to the investigation agency to proceed in accordance with the law. Analyze other relevant information that AMLIO could access as defined in the Law on AML/CFT No.50/NA in order to provide strategic intelligence, including statistics, trends and other forms aiming at raising awareness of the public, reporting entities, international development partners and trends that would cause ML/FL in Lao PDR to government officials throughout the country.

## **2. Objectives and scope of rights of SOP**

In order to achieve the objectives of SOP such as the collection and analysis of information from various databases, including the AMILO's reporting transactions from

reporting entities, information from relevant authorities and ministries. Analyze such information by applying principles and SOP [and] compare to data that is accessible from public sources until it could prove the suspicion in committing any offense as define under the Law on AML/CFT or other Laws of Lao PDR. After that the AMILO would submit such information to the law enforcement agencies in order to support authorities who perform investigation of such illegal activities to bring such case into money laundering prosecution.

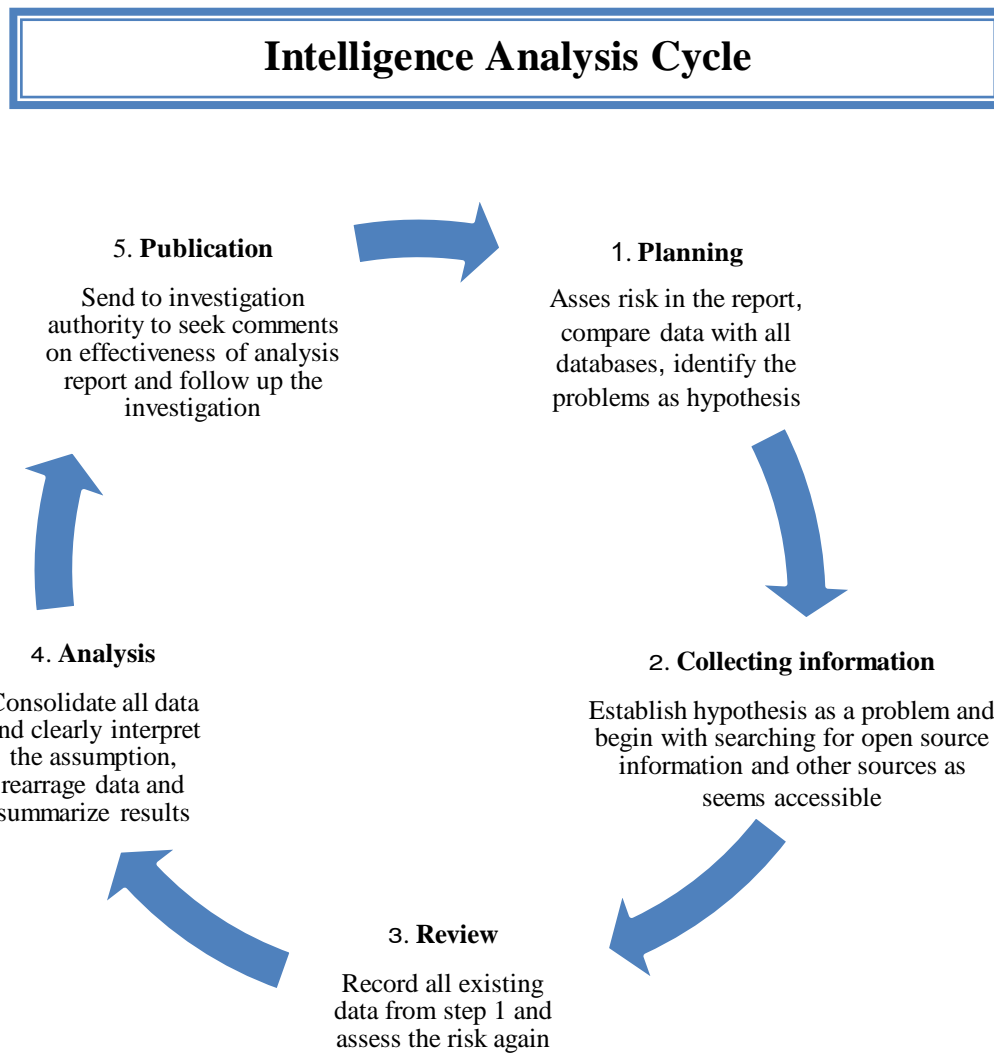
This SOP defines scope of activities, instructions and procedures that AMILO would apply to analyze and disseminate financial intelligence to both domestic and foreign stakeholders related to AML/CFL as define in the Law No.50/NA, dated 21 July 2014.

### **3. Principles and methods for analysis procedure**

This SOP defines rights and duties for AMILOs' analysts in order to be able to perform their roles and responsibilities that are in line with the existing regulations, especially to be able to carry out effective analysis in accordance with the instruction requirements of the international organizations, including proceures for receiving reports, methods for prioritizing suspicious cases, preparation, storage of nformation, approval, dissemination and evaluation of report data in which 3 main analysis procedures are defined as in the followings:

- 1) Tactical analysis is the preliminary step to collect information for creating a case, identifying and judging suspicions of people, places, times and reasons;
- 2) Operational analysis is the use of information from tactical analysis combines with other accessible sources and create possible assumption on activities of the suspects, create intelligence with complete supporting information and send to investigation officials;
- 3) Strategic analysis is information development procedure embeded in databases that would support the development of future programs to develop related workflows such as report on transactions, outlining trends and establishment of strategic policies.

**The following analysis cycle chart is detailing workflows that are specified in 3 analysis procedures above. Such operations would be used as standard operating procedures as specified in this manual:**



## **II. Legislation and principles on sharing information used as references in intelligence activities**

### **1. Laws, dicisions and related instructions**

- 1) Law on Anti-Money Laundering and Couter-Financing for Terrorism No.50/NA, dated 21 July 2014;
- 2) Agreement On Organization and Operations of the Anti-Money Laundering Intelligence Office, No.15/NCC, dated 08 November 2016;
- 3) Decision on Reporting Suspicious Transaction Relating to Money Laundering or Financing of Terrorism No.13/NCC, dated 19 October 2015;
- 4) Regulation on the Reporting of Cash Transactions Report No. 417/BOL, dated 05 June;
- 5) Instruction on Suspected Transaction Reporting on Money Laundering or Financing Terrorism No.42/AMLIU, dated 12 January 2016;



- 6) Decision On the Reporting of Wire Transfers in exceeding the specified limit No.963/BOL, dated 27 November 2015;
- 7) Regulation on the Declaration of Cash, Precious metals and Bearer Negotiable Instruments While En-tering/Exiting the Lao PDR No.06/NCC dated 19 May 2015;
- 8) Instruction on Indicators of Transactions Suspected of Money Laundering or Financing Terrorism No.41/AMLIU, dated 12 Jan 2016;
- 9) Agreement on Know Your Customers and Customer Due Diligence No.01/NCC, dated 15 January 2016;
- 10) Order of Chairman of the National Committee for Anti-Money Laundering and Counter-Financing of Terrorism on Increasing Monitoring and Inspection of Anonymous Accounts No.05/NCC, dated 19 May 2015;
- 11) Order on the Withholding, Freezing or Seizure of Funds Relating to Terrorist Financing (Revised) No.03/PM, dated 11 February 2016;
- 12) Instructions on the Application of Provisional Measures on Properties Related to Money Laundering or Financing of Terrorisism No.08/NCC, dated 30 March 2016;
- 13) Instruction on Application of Provisional Measures on Properties Relating to Money Laundering or Financing Terrorism No 08/NCC, dated 30 March 2016;
- 14) Internal Policy on Data Management and Entry Exit Analysis Division No.881/AMLIO, 13 June 2019.

## **2. Information sharing principles**

### **2.1. Information sharing with law enforcement agencies and related government agencies:**

- The objectives are to ensure effective cooperation between AMILO, law enforcement agencies and other related government agencies in implementing the Law on AML/CFT No.50/NA, dated 21 July 2014 and other relevant laws which define contents, methods, confidentiality and responsibility for such cooperation in a systematic and prompt manner aiming at ensuring public order and stability with regards to AML/CFT;
- The contents would be cooperation in the implementation of such contents, including the exchange of necessary information for both parties, confidentiality, responsibility in providing information and trainings;
- AMILO, law enforcement agencies and related government agencies are required to provide information to each other upon receiving each other requests, when fidning information on AML/CFT, when it is necessary to provide information related to the trends of ML/FT and other necessary information for both parties;
- The forms for requesting, reporting or providing information shall be made in writing with signatures of authorized persons from both parties and submitted in

writing or electronic format according to the information sharing platform in each period;

- After receiving a report or providing information upon request, the receiving party would use such information effectively in their duties and inform the party that provides information to be aware of the use of information effectively in the performance of activities in each period affectively or as requested by the party that provides information;
- In addition, AMILO, law enforcement agencies and related government agencies shall carry out other actions on sharing information as specified in the Memorandum of Understanding that is signed by the two parties.

## 2.2 Information Exchange with International FIU

- The main objectives is to create and strengthen international cooperation among the two FIU and toward effective outcome as well as ensure reciprocity by systematizes contents, method, confidentiality of mutual responsibility, without delay in order to support and improve its AML/CFT works toward international standard;
- **The scope of international cooperation is as following:** to provide necessary information to both jurisdiction where appropriate in order support each other operation, confidentiality, responsibility for providing information and training;
- The Lao FIU and its international FIU partner shall provide information to each other when: upon received of letter of request, where it is in need of providing information relating to ML/FT typology and other related information where involve with both jurisdiction upon mutual consents from time to time;
- Request of information methods, report or providing of information shall be conducted in writing form signed by signatory authority(s) within the two FIU and shall be dispatched on paper base or electronically depends on other information exchange system during each period;
- Upon the letter of request is received, the requested FIU shall promptly commence a search based on the information requested via diverse source such as FIU database, associated agencies database in both public and private (as authorized) and under the scope of the law that allows the AMLIO to get access to. On the other hand, the letter of request might get refusal in a case where such requested information is not consistent or alight on cooperation principle as defined in the MOU signed between the two FIU or other international cooperation principle that FIU is partied with;
- Upon the information is confirmed or information is provided as requested, the receiving jurisdiction will effectively make use of such information into its own operation and provide feedback to the providing jurisdiction of how the

information has been utilized in their operation from time to time or to provide feedback to the providing jurisdiction upon requested.

- Moreover, the Lao-FIU and its international FIU partner(s) shall conduct further operation regarding the exchange of information as defined in the MOU signed by both jurisdictions.

### **2.3 Information sharing with Reporting Entities**

- The main objectives is to utilize the existing AML/CFT Law, No. 50/NA, dated 21 July 2014 and other associated regulation and policies related to AML/CFT by determining contents, methods, confidentiality and mutual responsibility of information provided toward systematic and jiffy, with an aims to increase a substantial outcome of analytical performance, and enable to trace financial trail of suspect person(s) and to obtain a constructive FIR for the investigation authorities;
- Contents of information exchange includes: to report any transaction as defined by the AMLIO such as STR, CTR, WTR and others, personal surveillance activities record of natural person, legal person as requested by the AMLIO and other information;
- Methodology of information request, report or information provide shall be in a form of writing that signed by signatory authority(s) of the two jurisdictions and dispatch in a form of paper base or electronically depends on the development of the information exchange system of each jurisdiction in each period;
- Upon the AMLIO submit the letter of request to reporting entity(s), a person in charge of this work shall ensure that the requested reporting entity perform its right and obligations consistent with the Article 18-32 of the AML/CFT Law, No.50/NA, dated 21 July 2014 (providing of information on: confidentiality, record keeping, contents of requirement and etc.
- Upon the AMLIO received report or information from reporting entity(s) as requested, the AMLIO shall perform its right and duty as defined in the Internal Policy on information protection and entry-exit of Analysis Division Provision, No.881/AMLIO, dated 13 June 2019, and the AMLIO shall provide feedback on how the effective of information provided by the reporting entity(s), and how the provided information has been utilized in the investigation process from time to time or upon the decision of the court was convicted of ML/FT.

#### **❖ Remarks:**

*Legislation and information exchange principles mentioned above shall be references for the implementation of the AMLIO's standard operating procedures, the analysts shall be aware and strictly implement them in order to be able to perform activities in compliance with the defined procedures.*

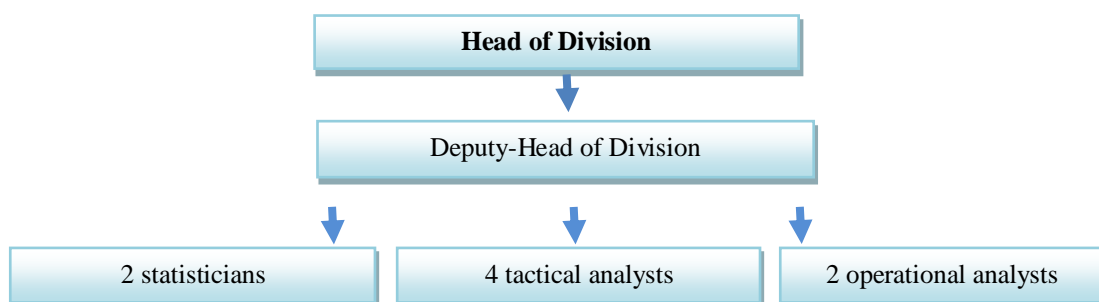
### **III. Roles, Standard Operating Procedures**

#### **1. Roles of Intelligent Division**

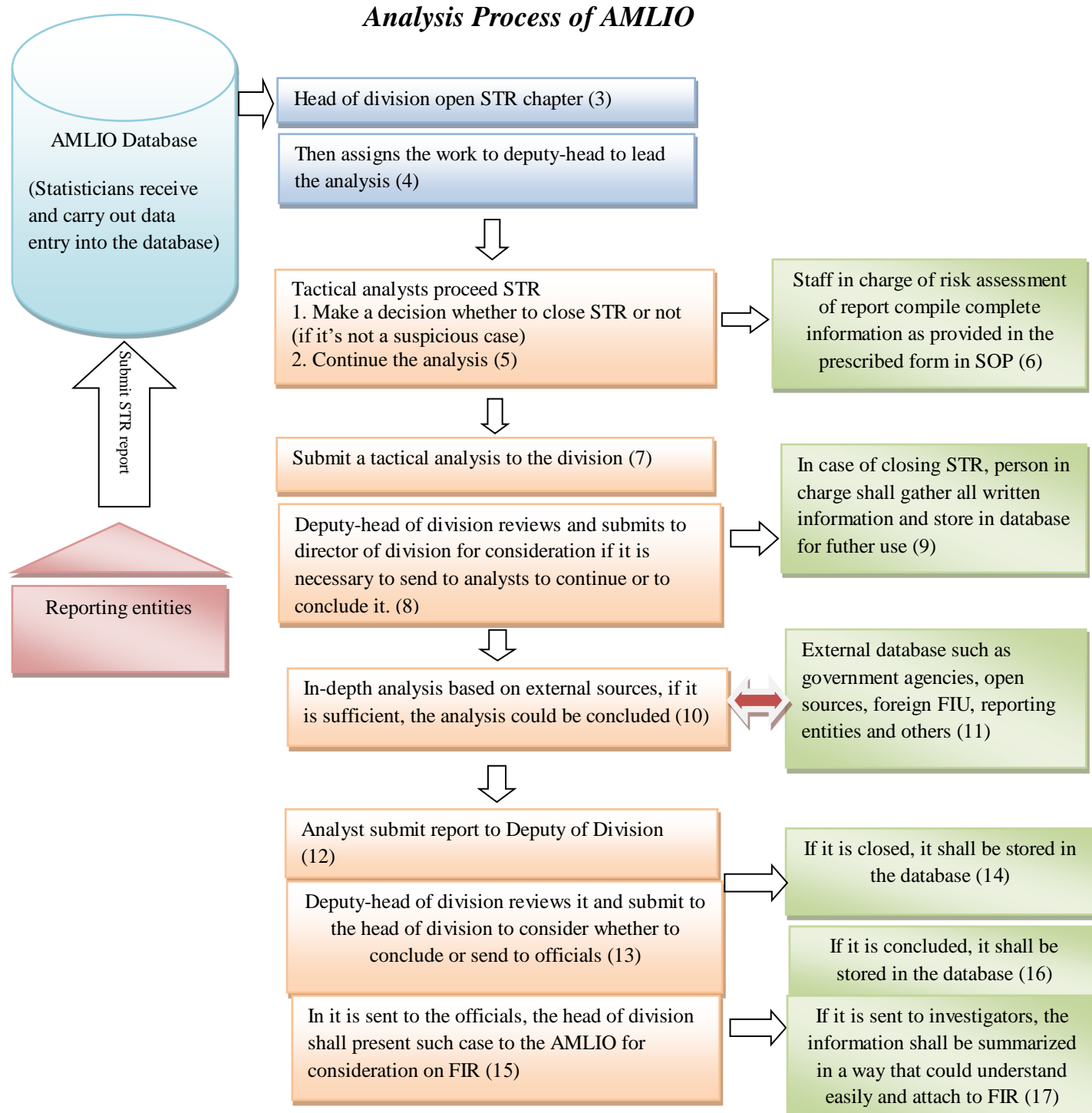
The Intelligent Division has duties and rights to collect, analysis and submit documents on suspicious transactions in money laundering or financing of terrorism (ML/FT), and submit to investigation body of competent authorities as following:

- To collect and require reports on suspicious transactions in money laundering and financing of terrorism (ML/FT), report on high value cash transaction, cross-border cash transaction report and other transactions including relevant information from reporting entities through computer system and document to carry out analysis;
- To summarize and report findings of analysis to the AMLIO committee on regular basis;
- To follow up suspicious transactions in money laundering or financing of terrorism, high value cash transaction, cross-border cash transaction and propose to conduct on-site inspection when it seems necessary;
- To collect and create financial intelligent report in order to propose to the AMLIO committee for consideration;
- To collect evidence, case file [and] submit to investigation authorities for money laundering prosecution;
- To keep confidentiality of information related to the reports in order to protect informants, persons who report such incidents to avoid affecte on the implementation of activities of AMILO including other stakeholders;
- To provide information and documents on money laundering or financing of terrorism (ML/FT) of individuals, legal entities or other organizations to the law enforcement agencies;
- To improve and develop reporting documents of AMLIO to be in line with actual situations in each period;
- To summarize and create work plan of the division in each period;
- To peform other rights and duties as assigned by the AMLIO.

### Organizational Structure of Analysis Division, AMLIO



### Analysis Process of AMLIO



## 2. Analysis Procedures

### 2.1 Statistics

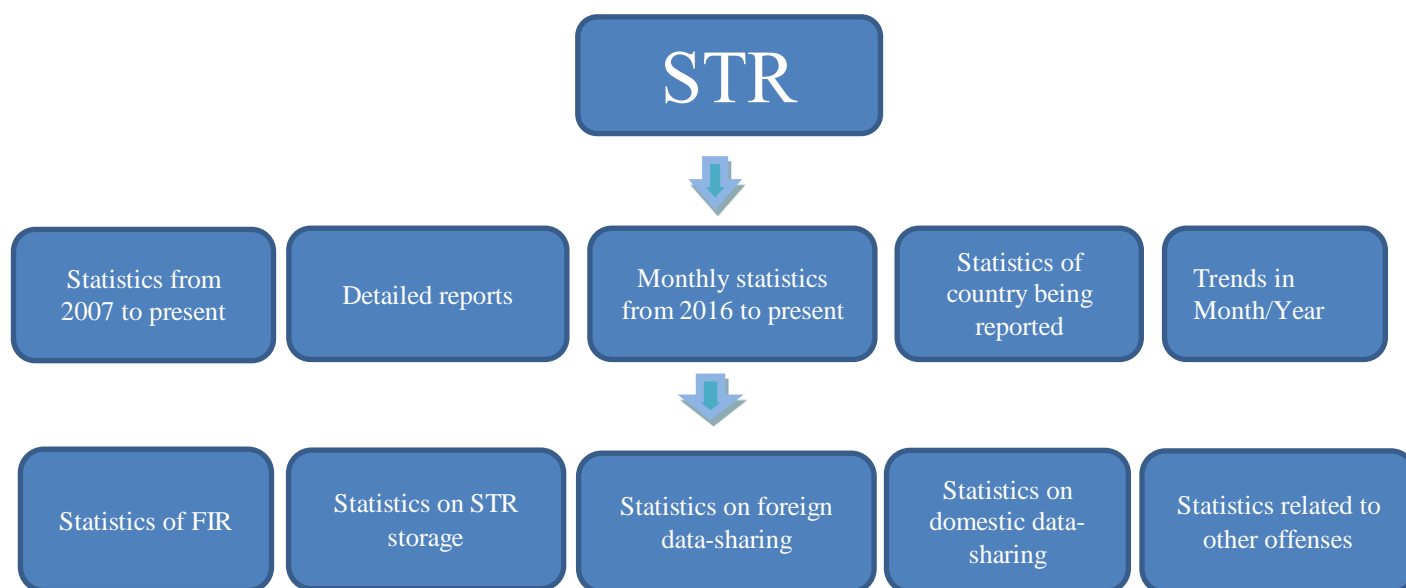
The activities as described under this section are to collect, record and store all information in AMLIO database which would be performed by 2 dedicated officers. The activities are as the followings:

#### 2.1.1 Receiving reports

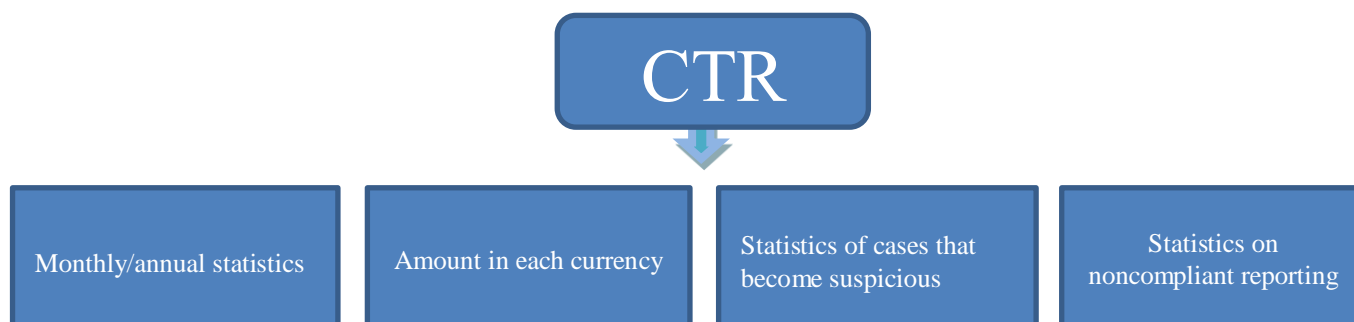
Currently, the management of reporting entities and customs authorities, Ministry of Finance submit all STRs, cash transaction report (CTR), cash border report (CBR) to AMLIO via 2 channels including STR ONLINE, an online electronic system launched on 01 January 2019 or in paper format through filling in the prescribed form with other supporting documents (STR, CTR, CBR forms as attached in Appendix 5, 6, 7, 8, 9).

After relevant bodies submitted reports to AMLIO, statisticians check for correctness of documents, fill in statistics and submit such report to the head of division for supervision of analysis.

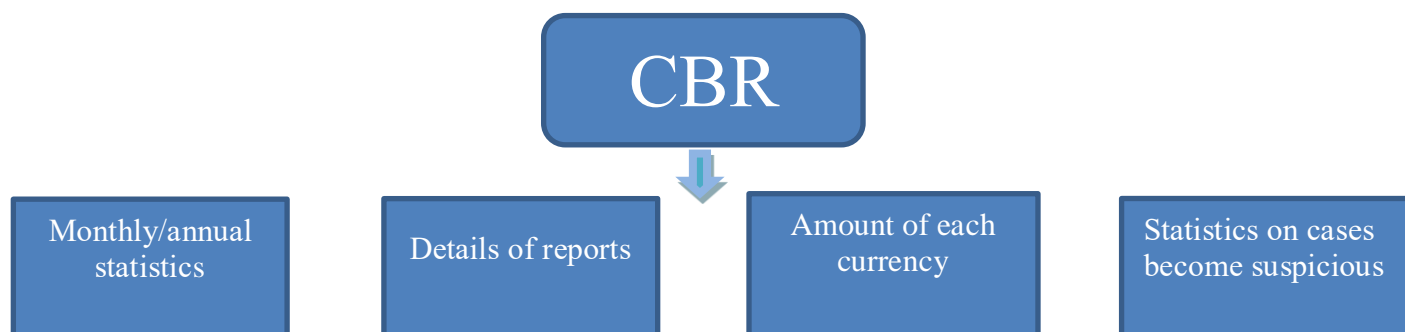
- **Statistics on STR**



- **Statistic on CTR**



- **Statistic on CBR**



The AMLIO database will be updated periodically based on the needs of activities, in which the responsible staff shall have a strategic plan or inventive idea to develop statistics in order to handle with changes of activities in each period.

**Only analysts are allowed to access to the database, areas that are authorized to assess to the system and granted username and password to access the system. AMLIO database is only accesses at the AMLIO's office (cannot be accessed from other places) and need to be authorized by the AMLIO before publishing to the public.**

## **2.2. Tactical analysis**

The AMLIO's tactical analysis (Tactical Analysis Form is attached in Appendix 11), in addition to receiving STR report from the reporting entities, there shall be tactical analysis on other existing reports, and if it is figured out that there are suspicious cases that need further analysis resulting from CTR, CBR, WTR reports. Requesting information from investigation authorities, foreign financial intelligence agencies and others that AMLIO received to establish suspicious cases and elaborate into financial intelligence report to submit to the investigators.

### **2.2.1 Step 1**

Review all reports that have been received, check the completeness and accuracy of reports whether they are consistent with the reporting requirements such as timing, reasons for the suspicion, appendix, quality of report information, etc. Record information after the review into the STR form as reference (Appendix 10);

Prioritize reports to identify the needs to analyze into 2 levels: 1) high priority reports as information from the review indicates a number of suspicions as compared with indicators and basic analytical assumptions (why, when, where, what, who). Those reports need to be analyzed immediately, 2) low priority reports as information from the review indicates no significant suspicion and may not need to be analyzed immediately. The responsible staff need to review small details of each report by screening information relating to indicators to trace the transactions for accuracy of report priority and integrity of data that would be used in the next step.

### **2.2.2. Step 2**

- Search for movements of suspected persons or entities and related transactions in all AMLIO databases;
- In case the analysis finds names of persons that have been reported earlier, comparison shall be made to find frequency of transactions, causes that relate to new, current reports how they are linked to each other and who are involved, other suspicious factors in order to establish assumptions of all activities;
- Find more information from [supporting] references attached to the reports, communicate with the reporting entities about suspicions that have been identified and verify accuracy of the documents to support the reports. In case the submitted documents are incomplete or there is something missing from the reporting entities, there shall be more request for additional information;
- Find information from public sources such as magazines, newspapers, Internet: World check, Google, Facebook or other open sources that could be available on the websites as specified in appendix 4;
- Analyze information related to all transactions of the reported person, especially financial transactions from secondary accounts in all currencies that have been reported, personal information, their relationships with relatives and others, etc;
- In case data is insufficient to justify the assumptions, additional necessary information may be requested from reporting entities such as accounting documents, necessary personal identity and personal information related to reported persons, etc;
- Consider causes of the suspicions received from reporting entities as the main reference on the establishment of assumptions to search for comparison and explanation on such causes that are related or identified as offenses against regulations or indicators that constitute the first instance offense of money laundering and violations against other regulations;
- Evaluate and identify offenses of the reported persons based on indicators from the laws, regulations and instructions relating to ML/TF as well as identifying ML offenses as the primary source of laws and regulations of Lao PDR.

### **2.2.3 Step 3**

- In case results of analysis do not find any irregularity or there is insufficient information, the deputy-head of division shall keep such reports in the database for statistics in the next analysis;
- In case results of analysis indicate many suspicions or there are suspicious acts that may violate the laws on AML/CFT or other laws that need to sufficiently prove findings of assumptions, the head of division shall send such reports to analysts for in-depth analysis.



## **2.3. Operational analysis**

In case the head of division decides to continue the analysis of suspicious case, it shall be given to the deputy-head of division to assign analysts to find out information and carry out indepth analysis (Financial Intelligence Form is attached in Appendix 13). In addition, a search and indepth analysis of data are required to record information and search for all detailed procedures in the table on data collection (**Appendix 12**). Detailed operational analysis procedures are implemented according to followings:

### **2.3.1 Infomation searching**

#### **❖ Domestic databases that are accesible by AMLIO**

The Law No.50/NA, dated 21 July 2014 has authorized analysts to request for and collect additional information to support the analysis. Information from external database may be requested if the requested information is relevant and would help AMLIO to perform its duties according to the Law No.50/NA regarding to receiving of reports, analysis and dissemination of financial information to the competent authorities involved in ML, criminal offences, terrorism and TF.

For request for information from external database, the head of division shall request to the head of the agency for approval and the request shall be made in writing to relevant bodies or reporting entities for additional information. In addition, providing and the use of information shall be done through paper or electronic documents according to the system as developed by AMLIO. To ensure confidentiality of all requested information and the receiving parties are required to comply with confidentiality requirements according to the Law No.50/NA, dated 21 July 2014.

#### **Domestic databases that AMLIO may access:**

- All reporting entities under the Law No.50/NA;
- Relevant ministries and sectors that have the following information:
  - Business registration;
  - ID card records;
  - Passport records;
  - Immigration record;
  - Law enforcement agencies;
  - Criminal records;
  - Court documents;
  - Customs and tax data;
  - Land title registration;
- Others as may be defined and the needs of AMLIO activities in each period.

❖ **Public sources, Internet.**

General public sources provide plenty of information available from the internet. However, any person can upload information on the internet. Therefore, it could not guarantee the accuracy of information. As a result, all information from the internet is required to justify for accuracy and reliability of their sources and existing information.

❖ **World Check one database.**

Analysts shall use such database for searching names and other information related to the suspicion in addition to the names that have been analyzed earlier for accuracy of additional information.

❖ **International Financial Intelligence Unit (FIU).**

In any suspicious cases, there might be related information from abroad to strengthen the analysis. The Law No.50/NA, authorizes AMLIO to have its financial information partners based on Memorandum of Understanding (MOU). Relevant information from abroad refers to some information in STR that has the international links to the transactions under review. All foreign information being shared shall be under supervision of the Director General of AMLIO. In addition, all requestes shall be recorded on a regular basis according to confidentiality perocedures.

AMLIO may also find additional information in the future if it becomes a member of Egmont Group. Furthermore, there are still open sources that could be access, including Interpol or Europol. The investigating unit communicates with International Police Office under the competent law enforcement authority in criminal prosecution depending on persons to support forwarding case files. For every request, the AMLIO shall establish procedures to ensure that such requested information is not disclosed to unrelated parties.

### **2.3.2 Evaluation of reliable data and validation.**

Once the analysts collected data, the next step is to evaluate data and identify which information is relevant that would be helpful in establishing suspicious case under analysis. The collected intelligence information is reviewed and the unused part is recorded and stored for futher use. While other data that is used in analysis shall be clearly recorded for both their sources and values to support the proceedings of such cases.

Once data is collected, main duties of analysts are to identify or determine the usefulness and quality of information. The quality of information depends on several factors:

- **Accuracy – incorrect information may lead to misleading analysis.**
- **Consistency – information shall be relevant to existing assumptions.**
- **Promptness – the status of information, if it is less meaningful or it is old received from unreliable sources and if it is only temporarily used, it might be inappropriate.**

When analyzing information sources, analysts shoud use the level of reliability and accuracy to determine the weight assigned to each source.

### **2.3.3 Determining indicator of STR**

The first step in screening data is the use of indicators from hypothesis that how much doubts to evaluate the importance of report from the analyst's view. The indicators show the probability of particular activities that have occurred. If there are many indications or suspicions of one particular activity, the probability of linking to ML/TF shall be high. Analysts shall state which indications relate to STR and review if there are other indications that are not included in the indicators (Appendix 3). This analysis is commonly used in the financial intelligence information unit within Egmont Group.

### **2.3.4 Determining kind of data on ML/TF**

Analysts shall review and evaluate intelligence information to identify main targets that is suspicious involving in criminal activities, circulation and source of money, links between the leader and individuals doing money laundering activities, analysts need to use diagrams showing sequences, diagram that shows the link of movements or other program to help identifying such links to be consistent and easy to understand the situations, (Reference 14).

### **2.3.5 Systematic information storage**

The operational analysts also have duties to store information that on the process of analysis confidentially and systematically that help them to find easily, for example, storing data that is prioritized as confidential such as which information is from the law enforcement entities, financial institutions, other sectors that are sensitive which the analysts shall store in a way that needs to use password or self-login and the documents on paper that shall also store properly.

### **2.3.6 Data interpretation**

Once the information is collected, deeper understanding on such information is needed. At this stage, the analysts shall review, reinterpretate the determination of consistency, conflicts, errors and gaps of information that may help in confirming or rejecting the hypothesis. The analysts may use the following questions as the guidance:

- Interpret information that could be analyzed;
- Why it happened like this?
- The link with other existing information is completed or not?
- Is the explanation reasonable that would be possible for all or not?

The evaluation of information would make analysts to be aware of the weighted estimation for each information section. The assessment of information would lead to confirmation or rejection of hypothesis.

### **2.3.7 Summary creation**

The final stage is to consolidate data to develop financial intelligence report based on results of analysis related to all hypothesis which provide sufficient information that could

create a short summary of what is happening? The components of short summary must contain the following information:

- Who – (important persons, related organizations);
- What – determining every related activity, some parts may be financial sector, some parts may be only what and who are allowed to do what at each point.
- When – the appropriate timeline for review and time when activities occur;
- Where – determining appropriate geographical location where activities happen;
- Why – what the important persons is trying to do; and finally;
- How – What approaches such important persons use for achieving motivation;
- Strongly confirm the trends based on indicators, laws, all existing data.

In the event that the analysts conducted in-depth analysis [and] such case is not suspicious, it shall be stored [and] the head of division should be advised to keep it for future reference. The head of division may approve the storage of such information, in case of any suspicion and must be submitted to the investigators, the head of division and the operational analyst shall present such case to the FIR committee of AMLIO before proceeding to the next step.

### **2.3.8 Intelligence report analysis committee**

Prior to submission of any financial intelligence report to the investigation authority, the management of AMLIO who supervises analysis shall convene a meeting to discuss the intelligence analysis with the AMLIO financial intelligence committee. The participants at each meeting shall include director or deputy-director general of department, heads of divisions under AMLIO as appointed by the Director General of AMLIO.

### **2.3.9 Security and Confidentiality of information received**

Pursuant to the AML/CFT Law No. 50/NA, the Anti-Money Laundering Intelligence Office shall, in conformity with any applicable laws and regulations, including, without limitation, laws and regulations on the protection of privacy and on computerized databases, operate a database containing all relevant information concerning reports as provided under this law. The officers, employees, agents or such other persons appointed to posts in the Anti-Money Laundering Intelligence Office shall be required to keep confidential any information obtained within the scope of their duties, even after the cessation of those duties within the Financial Intelligence Unit. Such information may not be used for any purposes other than those provided for by this Law and may not otherwise be disclosed except by order of a court of competent jurisdiction.

In the event that reports were received through post office, the security and confidentiality of requesting letter from LEAs should be the responsibility of AMLIO by referring to the security policies and AML/CFT Law No.50/NA, dated 21 July 2014.

## **2.4 Feedback form**

Feedback form is a means for seeking comments on financial intelligence report communicated with documents to the LEA, which is a document used to measure the completeness and effectiveness of intelligence that AMLIO provides to LEA. AMLIO shall follow up or bring the feedback form within 20 days from LEA to improve the quality of financial intelligence report (Appendix 15).

AMLIO shall evaluate and retain the feedbacks regularly to be a reference for evaluate analyst performance, SOP manual amendment and developing product. All comments are essential for AML/CFT input. The joint report or the request letter from the AMLIO to the high-ranking authority. The AMLIO product produces in variety as the demand of varies of consumer; the AMLIO shall review annually with the information receiver on improving the financial intelligence report.

## **2.5 Strategic analysis**

Participate in operational analysis that would be useful for AMLIO in varies way, aiming at identify trends and changes in the ML/FT from the reported information, create development policy and visions with consistency with the AML/CFT and develop foundation activities to progress and disseminate to related sectors, society and domestic and international counterparts.

The responsible officers would conduct strategic analysis by using statistics from the AMLIO database; produce results of the implementation of activities, especially strengths, weaknesses and challenges to better make planning to address the identified weaknesses and challenges, identify trends that would result ML/FT in certain business sectors, develop a policy to counter such trends as it would be appropriate with actual situations in the country. The strategic analysis of AMLIO would be conducted annually to follow up and solve the problems on timely basis. If there is a need to perform activities, a strategic analysis would be conducted to meet the needs of activities in each period.

### **❖ Ethics and Goals of Analysts**

All analysts shall be aware that the AMLIO's role, especially its duties are to provide financial information to LEA and other FIU as assigned in a treaty, to support and assist in activities of anti-money laundering and combating the financing of terrorism.

The priority of analysis is to review, analyze, identify and prepare financial information report that would continuously support investigation in ML/FT suspicious cases. The AMLIO's information is crucial, if it is analyzed in a timely [and] consistent basis and benefits authorities. Analysts shall regularly coordinate and collect feedbacks form law enforcement authorities in order to improve their analysis or exchange of information as to meet the needs of activities. Therefore, each time, before submitting analysis to investigators, the analysts shall attach the feedback form. (Feedback Form in Appendix 15).

**The targets of analysis activities of AMLIO's include:**

- Providing relevant financial information on timely and accurate basis to help the law enforcement authorities to conduct investigation duties on ML/FT;
- Supporting the law enforcement authorities to identify criminal actions on ML /FT (new target)
- Supporting the exchange of information on law enforcement that perform investigation on ML/FT on regularly basis;
- Providing important financial transactions information from AMLIO's database that would help the law enforcement authorities to identify and seize assets of ML/FT target's;
- Supporting the law enforcement authorities to access to financial information that they could not access directly;
- Supporting the law enforcement authorities to prioritize investigation such as set target on financial wealth that would be an indication of a suspicious case, nature of transaction, and etc.
- Identifying (assets) that obtained from criminal acts related to ML / FT;
- Convincing law enforcement authorities that it is capable to find domestic and international evidence, assets and investigation targets on the ML/FT.

**The analysts shall be trained continuously on:**

- **ML/FT principles and emerging trends;**
- **Software and use of IT equipment to create analysis report;**
- **Enforcement of the laws, especiall financial investigation techniques;**
- **STR evaluation and other FIU financial transactions;**
- **Development of analysis system based on comments from law enforcement authorities.**

## **IV. Analysis Tool and Case Statudy on FATF**

### **1. IT System**

The IT system is the main tool that may facilitate and accelerate the analysis, such as submitting online reports, the collection of information and process into statistics by modern system and risk assessment of the reports. According to the principles and working experience of the FIU in many countries, the development of analysis system is highly required. The standard systems that supports the analysis shall include:

- The backlist assessment system of other organizations;
- Modern, fast reporting system and secure confidentiality;
- Modern, fast information sharing system and secure confidentiality;
- Suspicious transaction integration system (analyst's suspicious information integration program)

- System that gathers news sources, information that is helpful for analysis that ensures accuracy and facts.

The analysis officers shall study and assess the use of system that would help in performing their work by IT system regularly, for instance, what kind of system that is appropriate for using in activities for each period to develop the analysis in their organization to reach the acceptable standards and recognized by relevant sectors.

## **2. Case studies on analysis procedures of FATF**

### **2.1. Strategic analysis**

The FATF determines strategic analysis as the “utilization of existing and newly obtained information”, as well as information that may be provided by the authority, to identify anti-money laundering and financing of terrorism associated with the trends and the kind of such information, then it would be used by the AMLIO or other government organizations to identify anti-money laundering and financing of terrorism connected with the risks. The strategic analysis may help to develop policy and targets for AML/CFT activities to the ministries and authorities.”

The strategic analysis conditions are mainly consisted of the follow up of indicators of suspicious cases, identifying trends, forms related to STRs and suspicious ML/FT, investigation, performing suspicious cases, results of strategic analysis and others which may be developed depending on the needs according to the guidance of the head of FIU of each country.

The analysis procedures as well as making written intelligence reports and approval of report shall apply the same procedures as prescribed in Parts 6 and 7. For the following instructions would explain details on data collection process that is necessary to conduct strategic analysis activities associated with the determination of trends as well as how to use annual reports to report findings of strategic analysis.

### **2.2 Monitoring of indicators for suspicious cases.**

Every year, the FIU would improve a list of indicators that has been used in STR's risk assessment. Such improvement is the result from review of suspicious activities in previous year, including feedbacks from organization that receive reports that would rely on the identification within the on-going performance of every suspicious transaction.

### **2.3 Tracking data trends.**

Additional information is entered into the STR databas by the financial analysts for the purposes of strategic analysis for each financial intelligence report: the first instance offense of person who exposed to information disclosure, methods/indicators of anti-money laundering, the timeliness of the discloser of information, product types and sector, the country of destination and origin country to evaluate the amount of money laundering and geographical location of actions within Lao PDR. This information would help FIU to identify unique trends under actual situations of the country. This information would be

analyzed to focus on specific transaction (for example, the movement of cash cross-border) or identify the trends in annual report.

#### **2.4 Annual report on the trends, suspicious cases that have been rejected, types and symbols**

FIU should publish annual report that determines the trends or the types of transactions that are suspicious and suspicions of ML/FT that were investigated in previous year. The report also contains distracted statistics of suspicious transactions as determined by the reporting entities in previous year. The list of latest improved indicators has been raised in previous subsection that is part of the report, annual report also provides detailed STRs statistic, cross-border report and the legal provisions on reporting that may be necessary in the further that are defined by the FIU.

Annual report should include examples of the ML/FT that have been investigated or have been reviewed for suspicions. This may apply suspicious cases that have been eliminated or specific analysis types-symbol when many suspicious cases have shown common methods of money laundering and the types-symbol that have been specified in annual reports should be used in the latest improved STR indicators and also types-symbol documents.

Vientiane Capital, date 15 January 2020

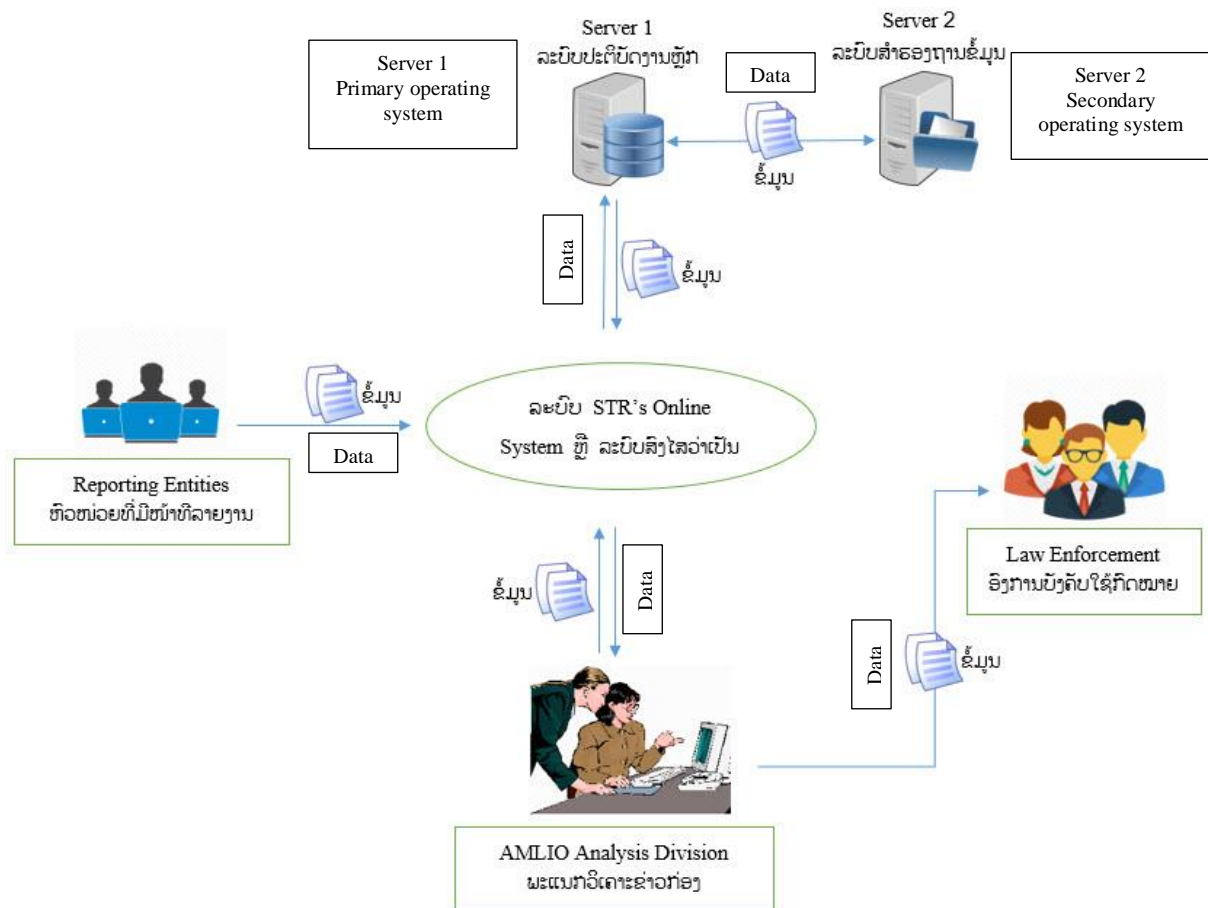
**Director General**  
**Anti-Money Laundering Intelligence Office**

Phengsy Phengmuong



## Appendix 1 – Financial Information Analysis Procedures

Overview on transaction analysis in compliance with the Law No.50/NA.



## Appendix 2 – Risk classification

### **RISK = LIKELIHOOD + CONSEQUENCES**

Risk refers to the likelihood that negative impacts would occur (when review indicators of suspicious case); and consequences refers to severity of negative impacts that would occur. The likelihood that they would occur is measured from:

- Rare (1) – a transaction that occurs under special circumstances;
  - Not likely (2) – a transaction that is not likely to occur in the course of review;
  - Likely (3) – a transaction that is likely to occur in the course of review;
  - Most likely (4) – a transaction that is most likely to occur in the course of review; up to
  - Very likely (5) – a transaction that very likely to occur in the course of review.
- Consequences resulted from the measurement:
- Trivial (1) – if a transaction occurs, it would not cause any significant impact;
  - Minor (2) – if a transaction occurs, it would cause limited impacts on individuals or organizations;
  - Moderate (3) – if a transaction occurs, it would cause some impacts on individuals or organizations;
  - Major (4) – if a transaction occurs, it would cause significant impacts, such as huge financial losses, death or injuries of many people; up to
  - Extreme (5) – if a transaction occurs, it would cause severe impacts, such as deaths or injuries at national or global level.

The risk levels related to each STR are measures by investigation legal advisor by comparing each of consequent to the likelihood/probability to occur. The aggregate of their combination would indicate the risk levels. The risks would range from minimum of (2) to maximum (10) as are shown in the risk classification table below.

### Figure 1. Example of Risk Classification Table

Probability	Verly likely 5					10 High risk
	Likely 4				8	
	Moderate 3			6		
	Unlikely 2		4			
	Rare 1	Low risk				
		Trivial 1	Minor 2	Moderate 3	Major 4	Extreme 5
		Impact				

Based on the risk classification table, risks are classified into the following classes:

- 10 Extreme
- 8-9 Major
- 5-7 Moderate
- 3-4 Minor
- 2 Trivial

STRs is classified as level 5 or higher is subject to detailed analysis. However, the head/director may define that any case may start even if it is defined as low risk or trivial , the level of efforts in analyzing STR should be proportionate to the risk level (such as it may use more times for STRs with higher risk).

- An application of LEA shall be reviewed by the Director General of AMLIO and provide recommendations to head/director of analysis division who would assign an appropriate analyst to monitor (depending on the types of information on FT or ML) every information to be disclosed should be approved by the Director General of AMLIO.

## **Appendix 3 List of Indicators of ML /FT**

### **Indicators for General Cases**

1. Cash deposit in different bank branches in short periods;
2. The look of banknotes indicates suspicion (old, covered by dust);
3. Insufficient economic explanation;
4. Transfer of money to bank accounts that have no other transactions;
5. Transfer of money to bank accounts which is followed by withdrawal;
6. There are more concerns on speed than expenses;
7. There are irregularities compared to transactions of normal activities;
8. Activities do not match history/nature of clients;
9. It is related to many bank accounts opened under different names/depositors;
10. Bank drafts are withdrawn in cash in foreign currency/ies;
11. Deposit in domestic bank account, in which money to be withdrawn from ATMs in foreign country/ies;
12. Cheques that have been issued to family member of such person;
13. Multiple times of large amount of cash deposits and receive many cheques to withdraw from such bank account;
14. Withdrawal of insurance ahead of the fixed date that lead to huge losses;
15. Complicated capital movement through multiple accounts;
16. Frequent advanced repayment of credit;
17. The subject of money transfer from relatives is frequently states as capital;
18. Frequent transfer of bond holders, such as drafts from overseas;
19. Fund that has been transferred to foundation;
20. Transport of gold by individual that has been purchased by money withdrawn from the company account;
21. Depositing large amount of capital in prepaid cards;
22. There is high number of transactions in a short period;
23. Cheques that have been issued to family members;
24. Insurance policy being closed upon withdrawal request to pay to the third party;
25. The executives transfer capital to the third party's account/s;
26. Fund that has been sent from countries under suspicions;
27. Large amount of cash used to buy insurance;
28. Large amount of money from suspicious country has been transferred to bank account;
29. Large amount of cash is used in investment;
30. Large amount of cash deposited in the company account;
31. Large amount of cash has been exchanged to traveler's cheques;
32. Large amount of cash from unidentified sources;
33. Many people have transferred funds to one recipient;
34. Many cheques registered in a single bank account;
35. Multiple credits have been granted in a short period with repayment in cash;

36. Many credit and debit cards could be accessed in overseas;
37. There are many similar transactions occurred on the same day at different locations;
38. Apply for loan and repay in cash;
39. Purchase high value assets (cars) and immediately sell them soon after that buy asking for payment in cheques;
40. Purchase high value assets in cash such as diamond rings, gold bars, cars, [other] properties;
41. Purchase insurance and sooner after that return them;
42. Purchases and withdrawal of cash from casino chips without playing any gambles;
43. Purchase many money orders;
44. Using credit cards to withdraw money from overseas regularly;
45. Allocating cash to purchase traveler's cheques;
46. Allocating cash deposits / cash withdrawals;
47. Issuing invoices lower and higher than prices of goods; ١٣
48. Purchase immovable assets in cash;
49. The values of immovable asset transactions are lower than the market prices;
50. Purchasing immovable assets and reselling them immediately where the reselling price is higher than reality;
51. Deos not pay income tax;
52. Use services from foreign exchange agents that are not supervised / audited at the border checkpoints;
53. Use services from non-existing company in free zones;
54. Importing and exporting goods in free zones by money curriers;

### **Indicators for suspected cases relating to reliability and service providers**

55. Transactions that require the application of complicated preparations and organizations that lack of legal transparent;
56. Payment of "consulting service charges" to nonexistent company established under foreign laws or under legal framework that is recognized that there are markets that establish many nonexistent companies;
57. Transfer of fund in the form of "loan" to individuals from credit funds and non-banking, nonexistent companies. Such nontraditional "loans", then would facilitate normal transfer system to car dealers from "lending" to individuals in the form of "repayment of credits";
58. In case of corruption, in which the company pays bribes to secure contract or contract intermediary would help to ensure successes by using TCSP (Trust and Company Service Provider) in credit transactions with the fund existing in deposit account for the benefits of persons who approved the contract;

59. The use of TCSP under the mandate that does not require TCSP in seizing, detaining or sending to competent authorities regarding to information on benefits from ownership of company structure the they have established;
60. The use of legal entity and legal preparation in the establishment under existing legal framework or the law on AML/CFT is ineffective and/or the collection of information on inspection and monitoring of TCSPs is weak;
61. The use of legal entity or legal preparation that is enforced under jurisdiction that hidden by the laws;
62. The use of assignment agreement by potential customser to hide from TCSP on the ownership on interests of the company customers;
63. Credit transactions between companies and/or money transfers the banks to various areas without legal objectives or clear commercial objectives;
64. Customers require to use nonexistent company before the establishment in authorized jurisdiction but does not require to adjust information on their ownership;
65. TCSPs in which the market and/or jurisdiction favor in hiding and falsifying ownership of assets;

## Appendix 4 Websites that could search for information

### Open sources from the website/internet:<sup>1</sup>

<b>Websites</b>	www.mooter.com.au	<b>International websites</b>
www.about.com	www.kartoo.com	www.euroseek.com
www.ask.com	www.searchenginewatch.com	www.searchenginecolossus.com
www.bing.com	www.searchenginecolossus.com	<b>CORPORATE REGISTRIES</b>
www.google.com	www.museseek.com	http://en.wikipedia.org/wiki/List_of_company_registers
www.legalengine.com	www.worldcompliance.com	Seychelles (onshore businesses only) <a href="https://eservice.egov.sc/BizRegistration/WebSearchBusiness.aspx">https://eservice.egov.sc/BizRegistration/WebSearchBusiness.aspx</a>
www.search.com	www.wikipedia.org	
www.yahoo.com	www.investopedia.com	
www.peoplesearch.net	Translate.google.com	
people.search.com	Hi5.com	
www.yellowbook.com	<b>Various social media</b>	
http://news.google.com.bze/news	www.twitter.com	
www.archive.org	www.myspace.com	
www.babblefish.org	www.facebook.com	
www.cyndislist.com	www.google.com/+	
www.journalismnet.com	www.classmates.com	
www.spoke.com		

<sup>1</sup> The websites above, generally, are collected through Egmont Tactical Analysis Course.

## Appendix 5 Suspicious Transaction Report Form (STR)

### 1. Report Form for Individuals

**ຮ່າງແບບຝົມລາຍງານທຸລະກຳທີ່ມີລັກສະນະມາໃຫ້ລົງໄລ ລຳລັບຫົວໜ່ວຍທີ່ມີໜ້າທີ່ລາຍງານ \***

**ແບບຝົມລາຍງານ ບຸກຄົນ**

ສຳແນະນຳ: ໃຫ້ຕື່ມເນື້ອໃນໃນແບບຝົມລາຍງານນີ້ ຫຼາຍເທົ່າທີ່ຈະຫຼາຍໄດ້. ບ່ອນໃດທີ່ມີເຄື່ອງໝາຍ (\*) ແມ່ນຈຳເປັນຕ້ອງໄດ້ຕື່ມ, ໃຫ້ຕື່ມເຄື່ອງໝາຍ (X) ໃສ່ຫ້ອງໃດທີ່ເປັນອາໄສກະສັດກັບເນື້ອໃນ. ຕ້ອງໄດ້ສົ່ງແບບຝົມລາຍງານນີ້ໃຫ້ແກ່ ສຳນັກງານຂໍ້ມູນດ້ານການຝອກເງິນ (ສດຝງ) ໂດຍຕ້ອນຫຼັກຕາມຮູບຖ່າງທີ່ມີການໃຊ້ບໍລິການ ຫຼືມີທຸລະກຳເກີດຂຶ້ນ(ໃຫ້ຂັກສາຄວາມສັບພາຍຮູ້ສຳລັບການຕື່ມເນື້ອໃນລົງໃນແບບຝົມລາຍງານນີ້).

ເລກທີ (\*)

ລົງວັນທີ (\*)

ປະເພດສິ່ງໝວຍທີ່ມີໜ້າທີ່ລາຍງານ (\*)

1. ລາຍລະອຽດຂອງສິ່ງໝວຍທີ່ມີໜ້າທີ່ລາຍງານ

1. ສິ່ງໝວຍທີ່ມີໜ້າທີ່ລາຍງານ: (\*)

2. ລາຍເຊັນຝ່ອມສິ່ງກັມຝູ່ອະນຸມັດ: (\*)

3. ເລກບັດປະຈຳເດືອນຝູ່ອະນຸມັດ:

4. ລາຍເຊັນຝ່ອມສິ່ງກັມຝູ່ກວດກາ: (\*)

5. ເລກບັດປະຈຳເດືອນຝູ່ກວດກາ:

6. ສິ່ງສາເຫຼືອໝວຍທີ່ມີໜ້າທີ່ລາຍງານ:

7. ທີ່ຢູ່ຂອງສາຂາ:

8. ເປີໂທຂອງສາຂາ: (\*)

ເປີໂທຂອງສາຂາ:

9. ປະເພດການເຄື່ອນໄຫວທຸລະກຳ:

2. ລາຍລະອຽດກ່ຽວກັບບຸກຄົນທີ່ມີໜ້າທີ່ລາຍງານຈຳກັດດ້ານເງິນທຸລະກຳທີ່ມີສິ່ງກັມຝູ່

2.1. ໃນກໍລະນີຂອງເຈົ້າຂອງບັນຊີ/ລູກທຳແມ່ນບຸກຄົນທີ່ຕິດຕໍ່

10. ສີ່ ແລະ ນາມສະກຸນ: (\*)

12. ເພດ: ☒ ຊາຍ ☐ ບິງ

14. ອາວຸດ: (\*)

16. ວັນ, ເດືອນ, ປີ ເກີດ:

17. ທີ່ຢູ່ຕາມເອກະສານຢັ້ງຢືນ:

11. ສັນຊາດ: (\*)

13. ບ່ອນເຮັດວຽກ:

15. ສະຖານທີ່ເກີດ:

18. ທີ່ຢູ່ອາໄສຖານອອນ ໃນ ສປປ ລາວ:

19. ທີ່ຢູ່ອາໄສຖານອອນ ຕາງປະເທດ ຖ້າມີ:

20. ເປີໂທລະສັບບ້ານ:

ເປີໂທສຳລັບການ:

ເປີໂທລະສັບມືຖື:

21. ປະເພດເອກະສານຢັ້ງຢືນບຸກຄົນ:

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22. ລາຍລະອຽດເອກະສານຢັ້ງຢືນບຸກຄົນ:

ບັນຊາອາວຸດ	<input type="text" value="ປປປປ-ປປ-ປປ"/>		ເລກທີ	<input type="text"/>	ສະຖານທີ່ອອກ ບັດ	<input type="text"/>
ບັນຊາບິດອາຍຸ	<input type="text" value="ປປປປ-ປປ-ປປ"/>		ເລກລົງທະບຽນ	<input type="text"/>	ສະຖານທີ່ ລົງທະບຽນ	<input type="text"/>
ອີເມວ	<input type="text" value="ຖ້າມີ"/>					

3. ລາຍລະອຽດຜູ້ຊື້ບັນທຶກໃຫຍ່/ຜູ້ຊື້ບັນທຶກນ້ອຍ

49. ຜູ້ຊື້ບັນທຶກໃຫຍ່: (*)	<input type="text"/>		
50. ສັນຊາດ: (*)	<input type="text" value="ສັນຊາດ"/>		
51. ທີ່ຢູ່ຕາມເອກະສານຢັ້ງຢືນ:	<input type="text"/>		
	<input type="text" value="ແຂວງ"/>	<input type="text" value="ເມືອງ"/>	<input type="text" value="ບ້ານ"/>
52. ເບີໂທລະສັບບ້ານ:	<input type="text"/>	ເບີໂທລະສັບການ:	<input type="text"/>
	<input type="text"/>	ເບີໂທລະສັບມືຖື:	<input type="text"/>

4. ລາຍລະອຽດບຸກຄົນທີ່ສົ່ງໃຫ້

53. ບັນດີ ເຮັດທຸລະກິດ: (*)	<input type="text" value="ປປປປ-ປປ-ປປ"/>		54. ບັນດີສົ່ງໃຫ້: (*)	<input type="text" value="ປປປປ-ປປ-ປປ"/>	
55. ເລກບັນຊີ: (*)	<input type="text"/>		56. ບະນດ ບັນຊີ: (*)	<input type="text"/>	
57. ບັນດີບັນຊີ: (*)	<input type="text" value="ປປປປ-ປປ-ປປ"/>				
58. ບຸກຄົນທີ່ສົ່ງໃຫ້ທຸລະກິດ: (*)	<input type="text" value="ກະຊວງໃສ່ຕົວເລກທີ່ຢືນ"/>				
59. ບຸກຄົນທີ່ສົ່ງໃຫ້ທຸລະກິດ:	<input type="text" value="ກະຊວງໃສ່ຕົວເລກທີ່ຢືນ"/>	ສະກຸນເງິນ	<input type="text"/>		
	<input type="text" value="ກະຊວງໃສ່ຕົວເລກທີ່ຢືນ"/>	ສະກຸນເງິນ	<input type="text"/>		
	<input type="text" value="ກະຊວງໃສ່ຕົວເລກທີ່ຢືນ"/>	ສະກຸນເງິນ	<input type="text"/>		
60. ບະນດທຸລະກິດ: (*)	<input type="text"/>				
61. ຂະໜົບການກຽມຕົວທຸລະກິດ: (*)	<input type="text" value="ຂະໜົບການກຽມຕົວທຸລະກິດ"/>				
62. ເຫດຜົນທີ່ມາໃຫ້ສົ່ງໃຫ້: (*)	<input type="text" value="ເຫດຜົນທີ່ມາໃຫ້ສົ່ງໃຫ້"/>				
ເອກະສານດັດຊັດບໍ່ເກີນ 20 MB	ບໍ່ມີເອກະສານດັດຊັດ...				

ກະຊວງເຈົ້າໜີ້ເອກະສານດັດຊັດ (File Upload) ເປັນຕົ້ນສັກສອນມາສາສົ່ງຕົວເທົ່າ

ບຸກຄົນທີ່ບໍ່ໄດ້ຮັບການສະກັດກັ້ນ ການຊຸກຍູ້ ແລະ ການສະໜອງບັນທຶກການກຽມຕົວທຸລະກິດ 60/ສະຊ ລົງບັນດີ 21 ກໍລະນີ 2014 ທີ່ກຽມຕົວບາດຕະການກຽມຕົວທຸລະກິດ ສະກັດກັ້ນ ການຊຸກຍູ້.

⌂ ມາດຕະການ

✓ ສົ່ງລາຍງານ

## 2. Report Form for Legal Person

**ຮ່າງແບບລາຍງານທຸລະກຳທີ່ມີລັກສະນະມາໃຫ້ລົງໄສ ສຳລັບຫົວໜ່ວຍທີ່ມີໜ້າທີ່ລາຍງານ \***

**ແບບລາຍງານ ປີຕົ້ນປີ**

ສຳແປງນຳໃຫ້ເຕັມເນື້ອໃນໃນແບບລາຍງານນີ້ ຫຼາຍເທົ່າທີ່ຈະຕ້ອງການໄດ້. ບ່ອນໃດທີ່ມີເຄື່ອງໝາຍ (\*) ແມ່ນສຳປັນຕ້ອງໄດ້ເຕັມ, ໃຫ້ເຕັມເຄື່ອງໝາຍ (X) ໃສ່ຫ້ອງໃດທີ່ເຫັນວ່າເໝາະສົມກັບເນື້ອໃນ. ຕ້ອງໄດ້ລົງແບບລາຍງານນີ້ໃຫ້ແກ່ ສຳນັກງານຊີ້ນຳການຄ້າລາວ (ສກລງ) ໂດຍຕອນທີ່ຊຸດລາຍງານທີ່ມີການໃຊ້ບໍລິການ ຫຼືມີທຸລະກຳເກີດຂຶ້ນໃນໃຫ້ສັກສາດອາໄສພາຍຫຼັງສຳເລັດການເຕັມເນື້ອໃນລົງໃນແບບລາຍງານນີ້).

ເລກທີ (\*)

ລົງຕື້ນທີ (\*)

ບະນດາຫົວໜ່ວຍທີ່ມີໜ້າທີ່ລາຍງານ (\*)

**1. ລາຍລະອຽດຂອງຫົວໜ່ວຍທີ່ມີໜ້າທີ່ລາຍງານ**

1. ຊື່ຂອງຫົວໜ່ວຍທີ່ມີໜ້າທີ່ລາຍງານ: (\*)

2. ລາຍເຊັນຝ່ອມຊື່ເກີນຝູ່ຂະໜາດ: (\*)

3. ເລກບັດປະຈຳຕົວຝູ່ຂະໜາດ:

4. ລາຍເຊັນຝ່ອມຊື່ເກີນຝູ່ຄອດກ: (\*)

5. ເລກບັດປະຈຳຕົວຝູ່ຄອດກ:

6. ຊື່ສາຂາຫົວໜ່ວຍທີ່ມີໜ້າທີ່ລາຍງານ:

7. ທີ່ຢູ່ຂອງສາຂາ:

8. ເປີໂທຂອງສາຂາ: (\*)

ເປີໂທຂອງສາຂາ:

9. ບະນດາການເຄື່ອນໄຫວທຸລະກຳ:

2.2. ໃນກໍລະນີຂອງເຈົ້າຂອງບັນຊີລູກຄ້າ ເປັນບັນຊີບຸກຄົນ ຫຼືບໍລິສັດທຸລະກຳ

2.2.1. ລາຍລະອຽດບັນຊີບຸກຄົນ

23. ຊື່: (\*)

24. ຊຸບແບບທາງທຸລະກຳ: (\*)

25. ທີ່ຕັ້ງສຳນັກງານ:

26. ວັນທີອະນຸຍາດໃຫ້ຕຳແໜ່ນທຸລະກຳ: (\*)

27. ທຳນິດທະພຽນ: ຈຳນວນ   
 ສະກຸນເງິນ

28. ບະນດາການເຄື່ອນໄຫວ ອົງການໃນທະບຽນວິສາຫະກິດ: (\*)

29. ເລກທະບຽນວິສາຫະກິດ: (\*)

30. ວັນທີ ແລະ ສະກຸນເງິນທີ່ລົງທະບຽນ:

31. ເລກປະຈຳຕົວຝູ່ສະພາຄອບ:

32. ບະນດາ:

33. ເລກລະຫັດ:

34. ເປີໂທລະສັບບ້ານ:

ເປີໂທທຸກຄົນ:

ເປີໂທລະສັບມືຖື:

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2.2.2. ລາຍລະອຽດຂອງບຸກຄົນທີ່ວ່າມີຄຸນສົມບັດ

35. ຊື່ ແລະ ນາມສະກຸນ: (\*)

36. ສັນຊາດ: (\*)

37. ເພດ: (\*) ☐ ຊາຍ ☐ ບິງ

38. ສະຖານທີ່ເຮັດວຽກ:

39. ອາຊີບ: (\*)

40. ສາຍພົວພັນກັບບຸກຄົນທີ່ວ່າມີຄຸນສົມບັດ: (\*)

41. ປັນ, ເດືອນ, ປີ ເກີດ:

42. ສະຖານທີ່ເກີດ:

43. ທີ່ຢູ່ຕາມແຮກສານຢັ້ງຢືນ:

44. ທີ່ຢູ່ອາໄສຖານອອນ ໃນ ສປປ ລາວ:

45. ທີ່ຢູ່ອາໄສຖານອອນ ຕ່າງປະເທດ ຖ້າມີ:

46. ເປີໂທລະສັບບ້ານ:  ເປີໂທລະສັບອຸກການ:  ເປີໂທລະສັບມືຖື:

47. ປະເພດແຮກສານຢັ້ງຢືນບຸກຄົນ:

48. ລາຍລະອຽດແຮກສານຢັ້ງຢືນບຸກຄົນ:

ປັນອອກມາ:   ເລກທີ:  ສະຖານທີ່ອອກ:

ປັນໝົດອາຍຸ:   ເລກສົ່ງທະບຽນ:  ສະຖານທີ່ສົ່ງທະບຽນ:

ອື່ນໆ ຖ້າມີ:

3. ລາຍລະອຽດຜູ້ຮັບຜິດຊອບຕາມກົດໝາຍ

49. ຊື່ຜູ້ຮັບຜິດຊອບຕາມກົດໝາຍ: (\*)

50. ສັນຊາດ: (\*)

51. ທີ່ຢູ່ຕາມແຮກສານຢັ້ງຢືນ:

52. ເປີໂທລະສັບບ້ານ:  ເປີໂທລະສັບອຸກການ:  ເປີໂທລະສັບມືຖື:



## Appendix 8 Cover Page of Transaction Report on Over Value Cash

Lao People's Democratic Republic  
Peace Independence Democracy Unity Prosperity

---

Name of Reporting Entity:

No. ....

Vientiane Capital, date: .....

### Report Form

**To:** Director General of AMLIO of the Bank of Lao PDR

**Subject:** Report on transactions of cash that has over value (100 million) for ... (month) ...

- Pursuant to the Regulation on the Reporting of Cash Transactions Report No. 417/BOL, dated 05 June 2015.
- Pursuant to the Notice of Anti-Money Laundering Intelligent Office No.860/AMLIO, dated 10 August 2015.
- Pursuant to Internal Regulations of the Reporting Entity (if any)

The .....(Bank).....

1. Individual: Transaction .....

- LAK: ... (amount) ... transaction; total amount ... (amount) ... KIP
- THB: ... (amount) ... transaction; total amount ... (amount) ... Baht
- USD: ... (amount) ... transaction; total amount ... (amount) ... \$
- **Other currency (if any) ... (amount) ...**

2. Legal entity: Transaction .....

- LAK: ... (amount) ... transaction; total amount ... (amount) ... KIP
- THB: ... (amount) ... transaction; total amount ... (amount) ... Baht
- USD: ... (amount) ... transaction; total amount ... (amount) ... \$
- **Other currency (if any) ... (amount) ...**

Therefore we would like to report you for information.

General Managing Director

..... Bank

[name, signed and stamp sealed]

## Appendix 9 Declaration Report Forms on Cash, Valuable Objects and Financial Means at the Arrival in and Departure from Lao PDR

Lao People's Democratic Republic  
Peace Independence Democracy Unity Prosperity

Ministry of Finance

Department of Customs

Name of Check Point: .....

**Table – Collection of Information on Declaration of Personal Belongings of Inbound-Outbound Passengers**

[illegible]

Contact point: Analysis Division

Phone: (021) 264 506

Fax: (021) 265 307

E-mail: mai\_hvong@hotmail.com

Vientiane Capital, date: .....

Head of Internatinal Checkpoint: .....

## Appendix 10 Form for Recording Assessment Findings for Suspicious Transaction Reports (STR)

Form for recording information – quality assessment of STR

Contents	High	Medium	Low
Assessment of quality			
<b>1. Completeness of reporting</b>			
Filling in the form is correct			
Information in key boxes (*) is complete			
<b>2. Compliance with reporting requirements</b>			
Reports are received on time as defined in regulations			
Reporting process has analysed suspicious information according to the customer learning regulations			
Reporting process, has been passed the supervisor as defined in the internal regulations within the unit, is complied with regulations			
The platform of submitting reports is appropriate			
Supporting documents are complete			
<b>3. Usefulness of reports</b>			
Explanation on report's transactions is clear and is able to indicate the extent of reporter's understanding			
Grounds that make such information suspicious that corresponds to suspicion of reporter			
Quality reports may be used as good intelligence in analysis			
Understanding, cooperation on analysis of reporting entity's staff			
Comments on the report      Requiring to resubmit a report <input type="checkbox"/> Useful and may apply in analysis <input type="checkbox"/> ..... ..... .....			
<b>Information collection record that is used in tactical analysis</b>			
Additional information from reporting entity:    Yes <input type="checkbox"/> No <input type="checkbox"/> Useful <input type="checkbox"/> Date: ..... contacted ...(name) .....and received information on ..... .....			
<b>Information collection record that is used in tactical analysis</b>			

<p><b>Additional information from AMLIO database:</b>    Yes <input type="checkbox"/>       No <input type="checkbox"/>       Useful <input type="checkbox"/></p> <p>... (date) ... found information on the database .....and received information on .....</p> <p>.....</p> <p>... (date) ... found information on the database .....and received information on .....</p> <p>.....</p>
<p><b>Additional information from open sources:</b>    Yes <input type="checkbox"/>       No <input type="checkbox"/>       Useful <input type="checkbox"/></p> <p>... (date) ... searched information from ..... and received information on .....</p> <p>.....</p> <p>... (date) ... searched information from ..... and received information on .....</p> <p>.....</p>
<p><b>Additional information from other sources:</b>    Yes <input type="checkbox"/>       No <input type="checkbox"/>       Useful <input type="checkbox"/></p> <p>... (date) ... searched information from ..... and received information on .....</p> <p>.....</p> <p>... (date) ... searched information from ..... and received information on .....</p> <p>.....</p>

**Tactical analyst**



## Appendix 11 Tactical Analysis Form

### Table - Report Risk Assessment

Name of reporting entity: .....  
 Subject / No. of report: .....  
 Date of recording: .....

I. Information			
No.			
1.	Name of person being reported: xxxxxxxxxxxx xxxxxxxxxxxx		
2.	Personal identification	Date of birth: ..... Nationality: ..... Sex: .....	
		Village/District/Province: .....	
		Occupation: .....	
		Passport number: .....	
		Bank account no. ....	Date of opening: .....
		Type of bank account .....	
3.	Reasons lead to suspicion of reporting entity		
4.	Value of suspicious transactions		
5.	Individuals/legal entities involved		
6.	Reasons of involvement		
7.	Searching for identification on AMLIO database		
8.	Information obtained from newspaper		
9.	Information obtained from the Internet		
10.	Information obtained from notification of government agency/ies		
11.	Information obtained from other sources		
II. Analyst comments			
1	Completeness of report		
	Report was filled in with complete key information	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	Comments:		
	Tactical report is quite detailed		
	Timeliness		

2	Date of report and date of receiving a report are in the same month		Yes <input type="checkbox"/>	No <input type="checkbox"/>
	Comments:			
	.....			
3	Linking causes leading to suspicion and information collected			
	Comments:			
		A. Fully reliable (clear information, clear and correct history. Transactions are corresponding)	<input type="checkbox"/>	
		B. Mainly reliable (some suspicions but the available information is already reliable)	<input type="checkbox"/>	
4	Level of suspicion	C. Quite reliable at certain level (there is suspicion on information accuracy. There is no reliability on existing information)	<input type="checkbox"/>	
		D. Mostly unreliable (unclear history. Transactions are not corresponding ...)	<input type="checkbox"/>	
		E. Unreliable (high suspicion in information received)	<input type="checkbox"/>	
		F. could not make decision (insufficient information, information could not be as reference for making decision)	<input type="checkbox"/>	
5	Results/findings of tactical analysis	There is no suspicion	<input type="checkbox"/>	
		There is suspicion	<input type="checkbox"/>	
6	Summary	Closing analysis	<input type="checkbox"/>	
		Carry out further analysis	<input type="checkbox"/>	
	<b>Comments of tactical analyst:</b>			
Name and signature of tactical analyst:				
Comments of deputy-head of analysis division:				
Signature of deputy-head of analysis division:				
Comments of head of analysis division:				
Signature of head of analysis division:				
<b>Appendixes from information as specified in the Table:</b>				
1.				
2.				
3.				

## Appendix 12 Information Collection Form of Operational Analyst

Relevant entities	Requested information	References of request	Date of request submission	Date of latest follow up	Date of receipt of information	References in providing information
<b>Reporting entities</b>						
Commercial Bank						
Financial institution						
Insurance						
<b>Reporting entity management authorities</b>						
Commercial Bank Supervision Department						
Enterprise Management and Registration Department						
Land Management Department						
Insurance Management Department						
Monetary Policy Department						
<b>Law enforcement authorities</b>						
Court						
Economic Policy Department						
[Illicit] Drug control Department						
Family Registration Department						
Customs Department						
<b>Foreign FIU</b>						
Vietnam						
China						
Thailand						
<b>Other domestic entities</b>						

**Operational Analyst**

## Appendix 13 Financial Intelligent Report Form

Lao People's Democratic Republic  
Peace Independence Democracy Unity Prosperity

Bank of Lao PDR  
Anti-Money Laundering Intelligence Office  
Analysis Division

### Financial Intelligent Report

- Pursuant to the Law on Anti-Money Laundering and Counter-Financing of Terrorism No.50/NA, dated 21 July 2014;
- Pursuant to the Report of .....

The Analysis Division, Anti-Money Laundering Intelligence Office (AMLIO) of the Bank of Lao PDR is honored to report the analysis to you on suspicious activities of ..... After analysis, coordination with relevant bodies and monitoring of information collection on continual basis for a certain period of time, it is concluded that such suspicious activities have the following details:

#### I. Identification of person being reported:

First and family name: .....  
Nationality: .....  
Date of birth: .....  
Address of stay in Lao PDR: .....  
Occupation: .....  
Passport No. ....  
Phone: .....

#### II. Grounds causing suspicions according to the following brief report:

.....  
.....  
.....

#### III. Additional information from relevant agencies on background of a person being reported

##### 1. Data in the AMLIO database

.....  
.....  
.....

##### 2. Information from social media

.....  
.....  
.....

##### 3. Information from reporting entity

.....  
.....  
.....

**4. Information from other entities**

.....  
.....  
.....

**IV. Results from analysis of suspicious activities:**

.....  
.....  
.....

**V. Comments of analyst:**

.....  
.....  
.....

**VI. Comments of the Head of Intelligent [Analysis] Division:**

.....  
.....  
.....

**VII. Comments of the management of AMLIO in charge of intelligent analysis:**

.....  
.....  
.....

Vientiane Capital, date: .....

Director General of AMLIO

## Appendix 14 Drawing a link chart and standard mark

A good link chart shall be drawn upon support from IT software. The objective of a link chart is to support analysts to present the collected intelligence in the course of analysis process in “picture mode” (financial transactions inserted into Excel spreadsheet and collection of other information) to help analysts identifying suspicious transactions, types and kinds of financial transactions, persons who conducted transactions, relevant banks or reporting entities, linkages between the targets and sequential of incidents

In general, the picture has values that could be explained in thousands of words. The objective of presenting the picture is to clarify information being explained that have multiple relationships among individuals, organizations and/or agencies. **Appendix 7** has laid out principles for drawing a link chart.

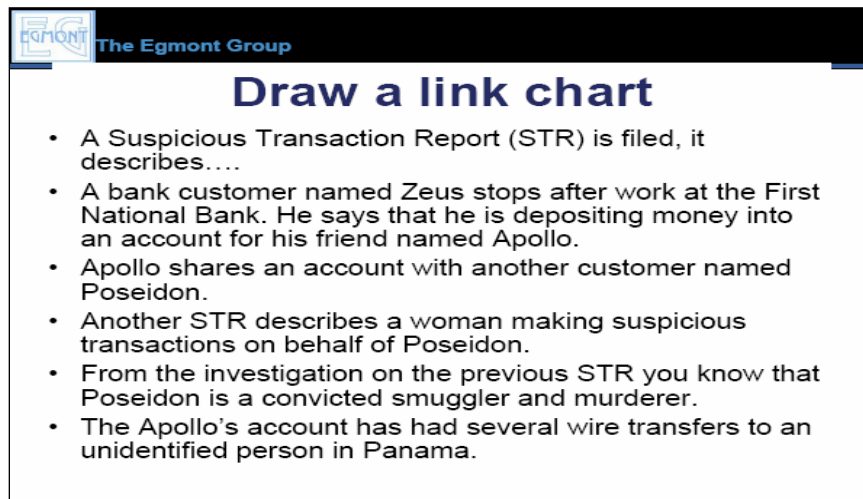
Where it is relevant, the analysis should develop a chart for the presentation in a form of picture on relationships between topics and financial transactions. The following steps should be followed when developing a picture presentation in a form of link chart or operational chart.

- Specify various legal provisions;
- Information gathering;
- Drawing a chart;
- Clarifying and positioning of points in the chart.

Finally, ensuring the use of standard mark that is used by financial analysts, such as round lines for known persons or summary and others. It could be found at Egmont Group from Tactical Analysis Course as attached.

***Remark: all analysts are required to be trained how to draw a link chart and how to use Excel, i2 or other software to operate and draw financial transaction chart, targets and incidents.***

An example of how to use data received during the presentation of STR and transfer of data into the link chart to make it clearer.



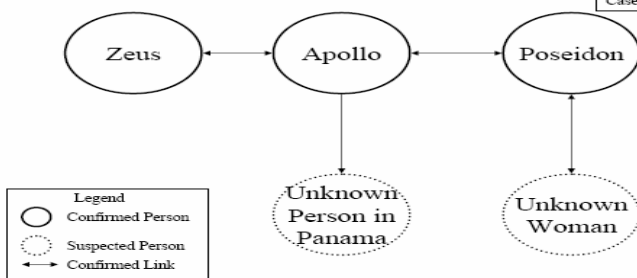
**The Egmont Group**

### Draw a link chart

- A Suspicious Transaction Report (STR) is filed, it describes....
- A bank customer named Zeus stops after work at the First National Bank. He says that he is depositing money into an account for his friend named Apollo.
- Apollo shares an account with another customer named Poseidon.
- Another STR describes a woman making suspicious transactions on behalf of Poseidon.
- From the investigation on the previous STR you know that Poseidon is a convicted smuggler and murderer.
- The Apollo's account has had several wire transfers to an unidentified person in Panama.

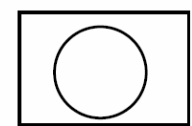
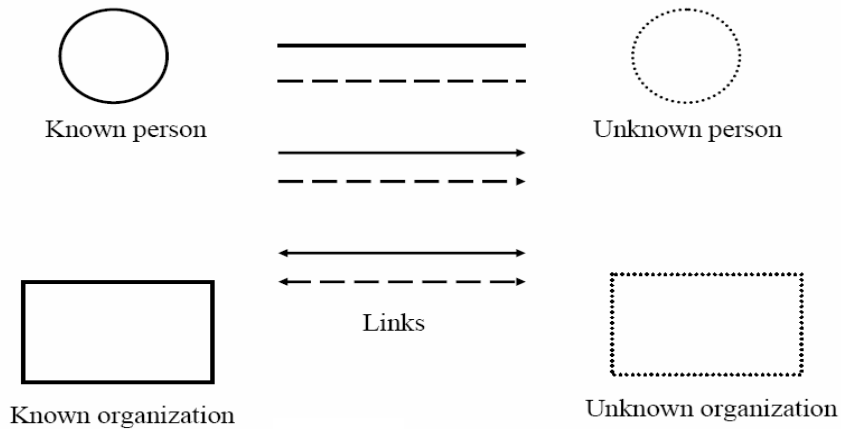
## Your chart

Name: The analyst  
Financial Intelligence Unit  
Date: February 29, 2010  
Case: 12345

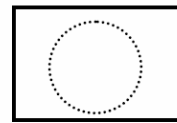


27

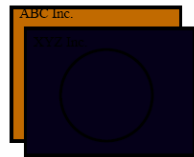
## Symbols



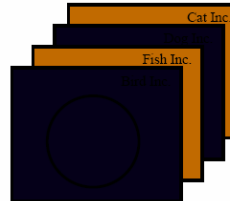
Person who owns a business



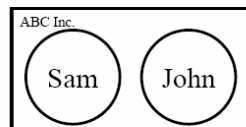
Person suspected of owning a business



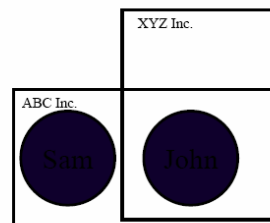
Person who owns two companies



Person who owns several companies

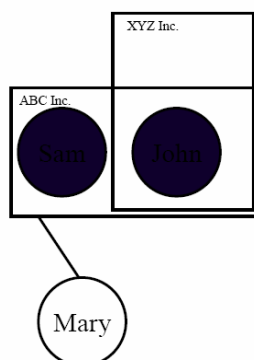


Sam and John are involved in ABC Inc.



Sam and John are involved in ABC Inc.  
John is also involved in XYZ Inc.

Mary has some type of relationship with ABC Inc. but no confirmed relationship with the owners.



John is the Treasurer of ABC Inc. and the President of XYZ Inc.



## Appendix 15 Feed Back Form

### FEED BACK FORM PROCEDURES

- Analyst shall complete the Feed Back Form for every suspicious case that would be included in the report.
- Refer to SOP for instructions on how to deal with form.

### XXXX FIU REPORT FEEDBACK FORM GENERAL INFORMATION FOR LAW ENFORCEMENT OR FIU FOREIGN QUERRY

#### *GENERAL GUIDELINES FOR COMPLETING FORM*

- The enclosed AMLIO Report Feedback Form provides XXXX with a consistent way of tracking the effectiveness of its AMLIO Report product. Your feedback within 20 days of receipt of the AMLIO Report will also assist XXXX in enhancing its AMLIO Report product and process by better understanding our international partners' use of financial intelligence provided by XXXX. You may also use this form for subsequent feedback on the same AMLIO Report at any time following the initial 20-day submission. Please indicate whether this is either an initial or follow-up feedback under *Originator Information*. Over time, XXXX will be interested in further feedback on this AMLIO Report. In the future, a XXXX staff member may contact you to follow up on the information provided in the completed form.

#### *WHERE TO SUBMIT COMPLETED FORM*

Please submit completed forms to the **AMLIO** by courier or in person at XXXX  
If you have any questions or concerns regarding this feedback form, please contact XXXX at

## AMLIO Feedback Form

\*\*\* Please complete and submit this form within 20 days of receipt of a XXXX AMLIO Report \*\*\*

### Originator (AMLIO Report Recipient) Information

Name of AMLIO:	Country/Jurisdiction:	XXXX AMLIO Report (DC#):	Types of comments <input type="checkbox"/> Preliminary <input type="checkbox"/> Follow up
Name and title of contact person:		Telephone and email of contact person:	
Date of comments: (dd/mm/yyyy):	Date of receipt report from AMLIO XXXX (dd/mm/yyyy):	AMLIO File #:	

### 1. Did this information (check all that apply)

- ☐ A Provide new information regarding persons or businesses / entities of interest
- ☐ B Provide a major contribution to your analysis / investigation
- ☐ C Provide a minor contribution to your analysis / investigation
- ☐ D Provide you with names of, or leads on, previously unknown persons or businesses / entities
- ☐ E Confirm information already known to you
- ☐ F Provide very limited or no value (see question 2)
- ☐ G Other (please comment below)

Remarks:

### 2. If the information provided very limited or no value, it was because (check all that apply)

- ☐ H The substantive offence was unknown
- ☐ I Persons or businesses / entities unknown
- ☐ J Contained no new intelligence
- ☐ K Not timely/not currently relevant (see question 4)
- ☐ L Other (please comment below)

Remarks:

### 3. If a query was submitted, how would you describe the timeliness of XXXX's response?

- ☐ Excellent
 ☐ Good
 ☐ Medium
 ☐ Weak

Remarks:

### 4. What was the most useful component of this AMLIO Report package? (please comment)

- ☐ Table on transactions
 ☐ I2 Chart
 ☐ General informaiton
 ☐ Arrangement

Remarks:

**5. Have you sought consent to further disclose this information to domestic agencies?**

☐ Yes

☐ No

**If consent was given, please provide any feedback received from domestic agencies on the value of the information provided by XXXX:**

**6. General feedback (quality of the [AMLIO](#) Report, relevance to your priorities, met expectations or not, how can we improve this product – substantive, format or process changes) please comment below:**

**Remarks:**