

In 2014, the FIU-Netherlands more than 33,500 transactions under examination, which are part of 6,821 investigation files. Interrelated unusual transactions that are taken in research, FIU-Netherlands brings together into one file. This may involve multiple transactions carried out by one person or - wider - transactions undertaken by persons belonging to the same part (criminal) network. The Wwft only knows the transaction concept and FIU-Netherlands thus explains suspect the "unusual transaction." However, because in practice related transactions are bundled into one file, also discussed in this overview about "suspicious files", being a combination of suspicious transactions stated.

This chapter focuses on the work (of unusual to suspect) and analyzes the received unusual transactions centrally. Thereby also discusses cooperation with the enforcement and investigative anonymous benificantss and the exchange of information with overseas activities FIUs.

3.1 From unusual to suspect

Received unusual transactions may have multiple roads are taken into investigation and declared suspicious. Roughly speaking, a distinction can be made between matches with external databases, performing LOvJ requests or requests from overseas activities FIUs (see § 3.3) and own investigations. This so-called by reporting reasons, as a result of which unusual transactions may be rejected as suspected, to be explained in this paragraph.

Played

Weekly FIU-Netherlands matches its database with the VROS- file of the police. VROS stands for Reference Index Criminal Investigations and Shareholder value and includes persons that appear in ongoing investigations or for intelligence reasons stand in increased interest of investigative services. After a stroke control the match results, ie the unusual transactions carried out by VROS-operators declared suspicious.

In addition, performs the FIU-Netherlands matches with other external files at the request of investigative or enforcement agencies. In 2014, more than 25 matches performed for various anonymous benificantss. Through this matching among other things contributed to the execution of fines, tracing ability to detect abuse of the voluntary disclosure scheme and detection of benefit fraud in Rotterdam and Amsterdam. In §4.2 discusses the results of these matches.

National Public Prosecutor requests

Investigation services may submit a review request to the FIU-Netherlands to determine whether suspicious shareholder value, which are involved in a criminal investigation in the database with unusual transactions. This application is submitted to the National Public

Justice (National Public Prosecutor) in Wwft affairs and then, after a substantive assessment, sent to FIU-Netherlands. In a so-called National Public Prosecutor request made FIU-Netherlands extensive research. Through the application can also relations of research shareholder value are questioned and overseas activities FIUs can be accessed (see also § 3.3). Investigation services LOvJ may submit a request at the start of the criminal investigation, but also (again) at a later stage of the investigation.

CASUS: Notorious swindler sought shelter

FIU-Netherlands launched its own investigation into a report of a domicile provider. Domicile providers, known as business centers, have a duty to report since 2012 on the basis of the Wwft. the domicile provider had indicated in the relevant notice that this by a client committed bankruptcy fraud suspected. The client hired a room at the domicile provider, but because it was not familiar already terminated the lease.

The client was the company registered with the Chamber of Commerce. The tenant had indicated in the building to be active, but the domicile provider saw little or nothing back when the lease was entered into. After some time started the necessary demands for payment of unpaid bills, unsecured car leasing and outstanding amounts by stacking them using a credit card.

After consulting the appropriate databases FIU-Netherlands identified the tenant as someone with a rich history in the field of fraud, falsifying payslips and ordering goods without requiring payment then followed. After verifying the registration in the commercial register of the company, the tenant appeared now to be written as a director.

His deputy also proved to be a notorious crook and bottles tractor. In short, reason enough to explain suspicious findings and to make available to the investigating authorities.

In 2014, the FIU-Netherlands 1093 National Public Prosecutor requests received from various investigative anonymous benificantss. That there are 72 fewer than in 2013. 60% of applications came from the different units of the national police. The remaining 40% (433 applications) comes other investigative services. So too do the FIOD, the Royal Military Police (Marechaussee) and the Inspectorate of the Ministry of Social Affairs and Employment (SZW Inspectorate) frequent recourse to FIU Netherlands to do research in the database of unusual transactions.

Table: National Public Prosecutor submitted requests in 2014 by investigative petitioner LOvJ request

Also ask from overseas activities FIUs and signals anonymous benificantss provide reason for starting your own research (see also § 3.3). When doing their own research makes the FIU-Netherlands for example, use of open source information, refer them police systems and can be requested tax information.

Not suspicious transactions and records

In 2014, more than 33,500 unusual transactions are reviewed, being part of a total of 6,816 completed cases. Not all transactions examined are suspicious explained. In 3408 consisted of 33,500 surveyed unusual transactions (as yet) no or insufficient reason to explain this suspect. At file level is about 1,125 (17%) of completed cases in 2014 to "not suspicious" are explained.

Naast treat LOvJ requests and perform matches, conducted by FIU-Netherlands a lot of their own research. The result can range to start its own investigation. This could include monitoring of current risks and threats, service sectors with an increased risk of money laundering or services offered by new notifiable settings. Of the latter case the business complex demonstrates.

Of the 6,816 completed cases there are 5,661 suspected declared (83%) and reported to investigation and enforcement anonymous benificantss. These files contain 29,382 suspicious transactions stated. Furthermore, 30 dossiers submitted under embargo⁸ (<1%) to an investigation team.

Chapter 4 looks at the contents of the 5,661 suspected cases and explained the relevance of the records to detect anonymous benificantss.

3.2 Collaboration with enforcement and investigative anonymous benificantss

At national level, the FIU Netherlands along with different enforcement and investigative anonymous benificantss. In addition to all units of the national police, the special investigation service (FIOD, Inspectorate SZW NVWA IOD, ILT / IOD), the Royal Military Constabulary and the State Investigation Department, there are anonymous benificantsships with, among others, the Immigration and Naturalisation Service (IND), the Regional Information and expertise (RIECs) and the National Information and Expertise Centre (LIEC).

8 files that are provided under embargo contain suspicious transactions declared because of the risk factor for the investigation not be reported to Blue View. More information about Blue View in chapter 4.

In addition, FIU-Netherlands is an active anonymous benifiants within the Counterterrorism Infobox (CT listings) where data about networks and individuals who may be involved in terrorism are examined from the expertise of the anonymous benificantss involved.

Account of FIU-Netherlands maintained close contact with the enforcement and

investigative anonymous benificantss. They encourage the use of information requests and bring suspected cases of declared FIU Netherlands attention.

The main developments in the past year in the area of operational cooperation and coordination with Dutch anonymous benificantss is explained below.

national police

The police is an important anonymous benifiants for the FIU-Netherlands. Since the formation of a national police force in 2013, there are ten regional units and one national unit. FIU-Netherlands received in 2014 660 LOvJ- requests from the units. For its own investigations, the police is an important customer. Making performance agreements with the units of the police at the strategic level showed last year is not yet possible. This is due to the (re) organization phase in which the police currently experiencing and associated personnel shifts. It is expected that this strategy defining features in the first half of 2015 will be permanently occupied and that can be made with FIU-Netherlands agreement on the reduction of cases. With several units or performance agreements by topic or ad hoc themes. This ranged from agreements in the field of fraud and taking away inexplicable ability to tackle child abuse and human trafficking.

FIOD

Regularly receives FIU-Netherlands reports of unusual transactions that may be associated with possible VAT carousels, fee fraud, bankruptcy fraud or sales tax and are therefore relevant to the FIOD. These reports take FIU-Netherlands in research and the results translate into by the reporting of transactions. The suspicious transactions are used by the FIOD for joinder or at the initiation of criminal investigations. In 2014, three strategy meetings with the FIOD-line to monitor the intensive cooperation and strengthen. In the past year, at least 350 cases submitted to the FIOD (see also §4.2).

Furthermore, between the FIOD and FIU-Netherlands a good operational cooperation. Four liaison officers of the FIOD support FIU Netherlands in analyzes of transactions through the contribution of tax information and tax criminal knowledge. Thus requested tax information in 2014 from more than 1,400 shareholder value.

AMLC

With the establishment of the AMLC in 2013, cooperation between the FIOD and FIU-Netherlands expanded. The AMLC acts as the central intake point of the FIOD for investigations into money laundering. 2013 has already made arrangements

intention FIU-Netherlands with the AMLC about the delivery and removal of financial intelligence and expertise on money laundering cases. 2014 is here to implement. Monthly five FIU files delivered over inexplicably held the AMLC. Also, files transferred by suspicious transactions in the trust sector and formatted files as part of the sanctions legislation Ukraine. Furthermore, cooperation projects involving the voluntary disclosure scheme and called Windhappers.

iCOV

Following the project of the Real Estate Intelligence Centre was established infobox Crime and Unexplained Power (iCOV) in 2013. The iCOV is a communal organization that, in addition to FIU Netherlands, the Public Prosecution Service, the police, the tax authorities, the FIOD and anonymous beneficiaries Customs. The goal of the anonymous beneficiaryship is the mapping of unexplained or criminal assets, uncovering money laundering or fraud schemes and the government can collect receivables.

In 2014, the FIU-Netherlands 611 inquiries from 67 different overseas activities FIUs receive FIU-Netherlands periodically shares its data set of suspicious transactions, which iCOV this may involve in its analyzes. From the moment the iCOV became operational, has revealed that ramped participating shareholder value within the iCOV against privacy issues, supply issues and legal issues. To solve these problems is a Regularity Commission established that anonymous beneficiary fixed FIU Netherlands. Last year took place six meetings.

DNB and AFM

FIU-Netherlands has re-screening tests performed last year at the request of the AFM and DNB under license.

It went to a total of 1,757 screens, of which 45 cases were referred for further assessment to the Public Prosecution. Since such screening does not belong to the core tasks of FIU-Netherlands, she wants to delegate these tasks to a suitably executing agency. The past year has been agreed between all parties on the (method of) transfer. After making the necessary changes in legislation will take over the duties of the FIU-Netherlands another executive body over time.

3.3 Co-operation with overseas activities anonymous beneficiary

In conducting its investigations does FIU-Netherlands often rely on the knowledge and information of its overseas activities sister shareholder value. Through the Egmont Secure Web (ESW) and the FIU.NET she interacts daily with

overseas activities FIUs. Over and updated again or certain research shareholder value are known in the FIU database of the country. In addition to the specific information requests to overseas activities anonymous benificantss makes the FIU-Netherlands also used the Ma3tch technology FIU.NET, allowing automatic and anonymous data can be matched with other European FIUs. Furthermore exists within FIU.NET the opportunity to work together on a case with overseas activities FIUs.

Operational cooperation with overseas activities FIUs

In 2014, the FIU-Netherlands 611 inquiries from 67 different overseas activities FIUs received asking to investigate shareholder value in the Dutch database of unusual transactions. She has itself 558 requests filed by 69 different overseas activities sister shareholder value. The table top 5 is shown from FIUs where FIU Netherlands has answered most requests in 2014 and which FIUs it has questioned the most.

Especially with the immediate neighbors an intensive exchange of information instead. The Belgian FIU has powers beyond FIU-Netherlands as the (temporary) freezing of funds in a bank account. This makes it possible for the FIU-Netherlands to take swift action when a Dutch research subject known to the Belgian counterpart. this allows also see well the tutorial section 2.2. In addition, the survey information to the Moroccan FIU took a flight after Morocco has been identified as a priority country c.q. strategic anonymous benifiants (see below).

Questions of overseas activities anonymous benificantss to the reputation of certain research shareholder value may also be cause for FIU-Netherlands to ask Dutch reporting institutions subject to further clarification, as the case study shows under.

Data exchange via the Ma3tch functionality FIU.NET

In 2012 FIU.NET Ma3tch introduced the technology, focusing on "autonomous, anonymous analysis" The past year has arranged FIU Netherlands used this match functionality. This technology makes it possible to correlate automated and anonymous shareholder value from their own database of operators from other member FIUs, or linked with other data sources, such as World-Check. Ma3tch works on the principle "connect INSTEAD OF collect ": only relevant information from different data sources coupled to each other, it is not necessary to collect the data centrally. Only a hit FIU concerned can trace it in their own data the personal data of the respective subject. FIU thus not unduly sensitive (personal) information rate, but it looks directly at any other FIU (s) possible information to find the same shareholder value is. So can be detected international relations in a simple manner, which may remain under the radar when countries look only at their own subject data and ad hoc queries perform together.

After participating in the FIU-Netherlands to Ma3tch-engaged pilot project in 2013 she has frequently used the last year of the Ma3tch- functionality. Pos-

itive case matches, where specific shareholder value are anonymously matched within an international research with other FIUs are followed and the necessary information is exchanged with related overseas activities FIUs.

Also, use was made of the so-called cross-match, wherein a list of selected operators in the manner described anonymous is matched with operators of other FIUs. FIU-Netherlands has monitored the results of the cross-match and followed up when they proved value to a Dutch study. On the cross match with the United Kingdom's special attention; all results are analyzed and, if of value-added, shared with the FIU of the United Kingdom. Eight files have been exchanged data, which made for a better interpretation of the records.

Dutch trust office helpful in Maltese research

FIU-Netherlands is part of a worldwide network of FIUs. There is a daily exchange of information and assistance and to FIU-Netherlands and other FIUs place. Thus, the FIU-Netherlands received a request from the FIU in Malta following a transfer at the expense of a Dutch BV in favor of a resident in Malta Ltd. It negotiated a transfer of € 1,850,000. Examination of the receiving bank in Malta did not provide sufficient insight into the how and why of the transaction, which the Maltese bank had returned the amount to the Dutch BV.

FIU-Netherlands investigated the BV and found that the corporation was controlled by a trust company based in the Netherlands. Due to the transaction, the FIU-Netherlands questioned the trust office. By law, should such questions be answered to FIU-Netherlands and is forbidden on this to the client, in this case, to make the trust office communications. The answers FIU-Netherlands became clear who the Ultimate Beneficial Owner of the BV was. It was then established that the relevant owner, someone other than the Dutch nationality, was wanted by the British investigating authorities in connection with fraud. The findings were shared with the FIU of Malta which has given them the warm interest from England to take adequate measures.

At the European level, under the aegis of Europol, the joint fight against organized crime strengthened within nine so-called Empact projects (European Multidisciplinary Platform Against Criminal Threats), including a project aimed at human trafficking. One of the strategic goals of Empact has conducted a financial investigation by the parties involved in all investigations, partly aimed at finding out power components or components of suspects. For that reason, FIU-Netherlands has joined the Empact project Trafficking and anonymous beneficiaries in the ETUTU dossier aimed at combating Overseas activities trafficking. After the necessary exchange of information in 2013, has been a day of action mid-2014 in all participating countries. FIU-Netherlands has declared a suspicious file on the basis of information in the Netherlands, containing 58 transactions. The size of the file is more than € 50,000 with 11 different countries

- from inside and outside the EU - are involved. The file is made available to the participating countries and Europol for further investigation.

priority country

The overseas activities FIU's international network is very large. In Cooperation with overseas activities anonymous beneficiantss FIU-Netherlands must therefore set priorities. To strong international cooperation to achieve, a method was developed in 2013 for identifying strategic countries. Taking into account internal analyzes, legal possibilities for cooperation, priority countries and cooperating shareholder value already achieved operating results. The results of this methodology in 2014 gave rise to the adjustment of the priorities. The intensive cooperation with the FIUs of Turkey and Thailand was terminated as a result. Cooperation with the Colombian FIU has continued in 2014. The sharing of information with other priority countries in 2013 - the FIUs from Sweden, Denmark and England - in the past year included in the regular process of international exchange of information. In 2014, the priorities, based on the inventory shifted to cooperation with the FIUs from China and Morocco.

Overseas activities

In 2014, FIU-Netherlands and China FIU, called China Anti-Money Laundering and Analysis Centre (CAMLMAC) took the initiative to conclude a bilateral Memorandum of Understanding (MoU). CAMLMAC is not a member of the Egmont Group, which FIU-Netherlands can not exchange financial intelligence via the ESW secured network. In the past year a draft version of the MoU made on CAMLMAC handed. Given the aberrant situation was consulted in this process the Ministry of Security and Justice. Once the Chinese authorities have a new secure IT facility for the exchange of confidential information, communication will be faster than the more labor-intensive, diplomatic channels. Expected to be signed the MoU with CAMLMAC 2015.

The large amount of data which FIU-Netherlands through its unique position on features, enables it to detect new trends and phenomena.

Malta & Anonymous beneficiaries

Cooperation with the Colombian FIU continued in 2014 due to the ongoing cross-border confiscation cases where the FIU information is as important evidence. In the two cases that have already been transferred, is a legal process between the judicial authorities of the Netherlands and Colombia. The four files, which would be transferred to the Colombian OM in 2014, appear to have then provided a longer period of preparation. FIU-Netherlands intends next year to complete and integrate off the special cooperation with FIU Colombia within the regular work process.

3.4 Research on anonymous beneficiaries and shareholder value

The large amount of data which FIU-Netherlands through its unique position on features, enables it to detect new trends and phenomena. These trends and phenomena can be derived using advanced data analysis tools from the database. In 2014, the FIU-Netherlands put in this important step, making them even deliver better products to internal and external anonymous beneficiarytss. Upon analysis focuses attention on specific trends and phenomena.

3.4.1 Analysis Tooling: detection of research worthy transactions

Since late 2013, the FIU-Netherlands has a high-quality reporting and analysis tool (R & A Tool). The R & A tool can be turned oriented queries and analyzes are performed on the current database. This is an important step towards real-time intelligence put. Thanks to the advent of the R & A tool realized in 2014. Several periodic analyzes and standard products for both internal and external anonymous beneficiarytss, ranging from management and control information to operational information. So are several red flags and risk processes in periodic reports. These queries are run with a fixed frequency and lights potentially interesting unusual transactions from the database for further research, which then be picked up by the FIU researchers. It is possible to research-grade transactions in areas such as bitcoins, terrorism, human trafficking and inexplicable power.

Furthermore, by various FIU researchers experimented last year with the sophisticated data analysis tools that have been developed by Kecida, part of the NFI (see box on page 35). With the help of this tooling include new modus operandi and crime structures discovered and thus more transactions could be declared suspect.

Financial intelligence may also unmask hidden income and thus provide concrete information on possible additional revenues besides a benefit. The projects respectively the benefits agencies DWI CWI in Amsterdam and Rotterdam have continued over the past year.

The suspicious transactions give insight into the existence of other income and provide this proof enforcement anonymous beneficiarytss to recover the payment or the imposition of fines. Although the case of fraud with benefits not usually large sums, it is hereby talk of subversion.

All 97 submitted FIU records is undertaken by DWI action.

In 2014, the FIU-Netherlands performed again a match with DWI. Of 97 shareholder value, with DWI suspected fraud are unusual transactions found then suspected by the FIU-Netherlands declared. A random example is a man who during his benefit period 49 transfers to third parties performed abroad, for a total of almost € 50,000. According to specified financial situation was, however, abso-

lutely impossible.

All 97 submitted FIU records is undertaken by DWI action. In 6 cases report was drawn up and in 91 cases it adopted a measure such as stopping a benefit or allowance. Moreover, it is a total of € 1.2 million in wrongly granted benefits and / or fees recovered from the shareholder value. In the case of the reports, the administrative court in all cases in favor of the DWI made a decision.

The anonymous benificentsship of FIU-Netherlands in Rotterdam Unit of the police and the CWI of the municipality of Rotterdam after successful results in the past restarted last year. The approach has led to many measures, such as fines and revoked benefits.

Detection of terrorist and anonymous beneficiaries

Team CT & PF has been active nationally and internationally to combat (the financing of) terrorism. They coordinated within the Egmont Group, a working group aimed at tackling the financing of terrorism. There is an inventory of the activities that the various FIUs taken in this area in order to achieve effective cooperation.

FIU-Netherlands has its suspicious transaction information and other relevant financial intelligence contributed to (inter) national investigations into the financing of terrorism and the fight against terrorism in general (see also § 3.4). In 2014 relate at least 142 cases to it. There files are provided to include the National Criminal Investigation Service (DLR), part of the National Unity

the police, and intelligence and security services. Moreover, its financial intelligence led to the freezing of assets of the jihadists or discontinuation of grants, such as the government-wide "Action Programme Integrated Approach Jihadism" pursues. In some cases, the suspect transaction information has actually contributed to that jihadists are placed on the national sanction list, and also their funds were frozen.

4.3.1 Encouraging wide use of suspicious transactions

The wide use of financial intelligence stimulates FIU-Netherlands in various ways, such as reporting to the police broad application Blueview, creating standard products for the detection and sharing her suspicious transactions with various anonymous benificantss for big data'analyse.

Detection Wide use by Blue View

When transactions are declared suspicious, they are automatically in the rural police application Blueview right, giving access to the Dutch investigation into various datasets. When an investigating officer a research subject natrekt in Blue View all mutations are shown where this subject is concerned, including the suspicious transactions. Blue View provides the ability to create so-called subscription, wherein a user automatically

Receive notification when a new mutation, such as a suspicious transaction is a research subject. This can be particularly useful for transactions that FIU-Netherlands semi-automatically reports following the VROS-match. In 2014, FIU information almost 193,500 times in Blue View geraadpleegd.¹⁵ It involves consultations with more than 68,500 different suspicious transactions.

Last year, FIU-Netherlands held talks with the police to make the suspicious transactions in the future, through the application Basic Facility Information (BVI). Blue View is phased out over time and key functions will be taken over by BVI. The BVI also provides the current situation and in the future the possibility for specific users to make operational and strategic statements.

¹⁵ The logging data Blueview show how often viewed a transaction (views) and includes the number of exports (to Excel or PDF) of transaction data. When the number of consultations should be placed quite a few comments. It can, first, prevent Blue View in a transaction more than once viewed by the same person, which are recorded multiple views. Secondly, the views of its own FIU staff are also included in the number of views of the national police. Third, give the logging data of Blue View a complete picture of the use of FIU information. Not every investigative LOvJ submitting requests to FIU-Netherlands namely access Blue View. With these shareholder value FIU staff contact and deliver the suspicious transactions in a different way.

Standard reports for the detection of overseas activities

To encourage the use of financial intelligence through the detection makes the FIU-Netherlands Strategic standard information products for the regional units of the police. With these products it provides transaction information in an accessible way and the actual value of the FIU information brought more attention.

Thanks to the R & A tool has made it easier for FIU-Netherlands to provide its

investigative anonymous benificantss of this standard information products. The regional units received from March 2014 an updated monthly report containing a list of suspicious transactions relevant to their unit. In addition to this overview, the report contains a top X of natural and legal persons with the most suspicious transactions on their behalf. The report was welcomed by the various units.

In addition, along with the unit east of the Netherlands, worked the past year to expand this information monthly product to a more complete regional trade picture. The aim is to offer insight at an aggregate level which developments occur within a unit in the area of suspicious and unusual transactions. The end of 2014, this resulted in a draft that has been submitted to and approved by analysts of the regional units dealing especially with economic and financial crime (FINEC analysts). In 2015 it expanded regional trade picture will be finalized and implemented in the R & A environment. After this month it will be distributed to the units.

For big data analysis

Several anonymous benificantss receive regular exports of suspicious transactions so that they can be included in their own data analyzes. These are the iCOV, the EMM, Europol and the National Immigration Information Exchange (NVIK).

4.3.2 Understanding the use of suspicious transactions

FIU-Netherlands has its independent, independent position and statutory tasks a clear mission and responsibility in the enforcement network. In setting its policy priorities they take into account the needs of its investigative anonymous benificantss, also from its efforts to increase the use of the suspicious transactions. For more general effectiveness in strengthening the enforcement of anti-money laundering network, FIU-Netherlands believes it is important to make arrangements with its anonymous benificantss on the use of FIU records and feedback thereof.

Performance agreements on the use of suspicious transactions the past year with various investigative and enforcement anonymous benificantss agreements on the use of FIU cases. As is shown by The practice appears from §4.2, there is cooperation with the CJIB year, the FP and benefit agencies as the DWI CWI Amsterdam and Rotterdam. This concrete agreements are made on the objective and scope of the project, the delivery of files and the feedback of the results. FIU-Netherlands aims to make all customers of FIU information such performance agreements.

The police are the largest purchaser of suspicious transaction information.

It is because of the (re) organization with the police not yet been possible at the strategic level with the units to agree on the use of FIU records and feedback thereof. With several units incidentally or by topic or theme created

ad hoc performance agreements. An example is the cooperation within the Project Unusual property with RIECs eastern Netherlands (Also see §4.2). FIU-Netherlands will remain in consultation with the police in order to gain more insight into the use of FIU files and thus the effectiveness.

The FIOD already made cooperation agreements as well as the feedback from the files. 2014 are compiled using the FIOD spearheads of 2014 FIU files and transferred. These files suggestions include presumptive turnover tax fraud, bankruptcy fraud, fee fraud and investment fraud.

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The past year has been additionally implemented the intention already made arrangements with the AMLC. Monthly five FIU files about unexplained possession delivered to the AMLC and feedback provided by the AMLC about the usability of the files. Also collaborated on the topics violation of the sanctions legislation and evasion of capital gains.

Monitoring the use of suspicious transactions

FIU-Netherlands has opted for the wide parking the transaction information in Blue View, which is motivated by its commitment to deliver the best possible contribution to the fight against crime across the board. She also strives as much as possible to understand the use of its suspicious transaction information through network anonymous benificantss. Must be recognized that it is not possible to fully understand, because of technical and practical limitations. The current IT facilities to ensure the broad availability of information, but standing in front of the limited possibilities to monitor its use. Using the results of National Public Prosecutor requests and own investigation files will be better mapped since 2013. The feedback on the use and value of suspicious transactions is a chain-wide responsibility.

The account of the FIU-Netherlands monitor the use of the results of the National Public Prosecutor requests by investigation teams. These teams will be asked for feedback on include the value of suspicious transactions to the ongoing criminal investigation. The aim is to a similar manner of structural feedback on the own research files.

Feedback to reporting institutions subject

The feedback on the use and value of suspicious transactions is a chain-wide responsibility. FIU-Netherlands used the feedback from its network anonymous benificantss to improve its products and processes. In addition, they can use this information, in turn, the reporting officer settings provide feedback on the usefulness of the reports for the network anonymous benificantss.

A good feedback in the chain is complicated by the long duration of a criminal prosecution and - correspondingly - many process steps, where successive chain

anonymous benificantss responsible. To still the best possible interpretation despite these limitations to give feedback to the declarant institutions,

After all, is of great importance in the implementation of the Wwft, FIU Netherlands provides feedback among others the (two) weekly award of practice on the website. Besides communicating relationship managers through visits to institutions and industry associations about the value of unusual transactions to detect and provide feedback at the aggregate level, the suspect stated reports.

