Kingdom of Saudi Arabia

Ministry of Interior

Financial Investigation Unit



Financial Investigation Unit

2014 Annual Report

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Financial Investigation Unit

Introduction A word from the Director General of the Financial Investigation Unit

A word from the Director General of Saudi Arabia Financial Investigation Unit

Since the beginning of the year 2014, SAFIU has been working continuously in achieving its plans in the field of reports handling and analyzing, cooperation with supervisory and regulatory authorities, and training program that could contribute in achieving the objectives of the FIU. It has maintained cooperation with authorities which supervise and regulate reporting agencies according to strategic plans that aim at improving the efficiency of reporting which is getting better from year to another.

During the year 2014, experts in SAFIU have trained employees from relevant authorities, and held Anti-money Laundering and Financing of Terrorism training courses, a specialized course on "Organizing of Cross Border Cash Movement" has been held in Naif Academy for National Security and some international airports in the Kingdom for (359) trainees from all relevant authorities. For the first time, number of female inspectors who work at international airports have been trained. On the other hand, a training course was held prior to Haj time for personnel from King Abdulaziz International Airport in Jeddah ,Prince Mohammed Bin Abdulaziz International Airport in Madinah, and some Land Ports on "Disclosure and its Risks during Seasons of Haj and Omra" ,the course was presented by specialists from SAFIU

On the basis of the continuing joint international cooperation and to enhance the efforts of the kingdom in combating the crime of Money Laundering and Financing of Terrorism, SAFIU has signed two memorandums of understanding (MOUs) to exchange information with other counterparts.

Finally, I would like to thank His Royal Highness, Minister of Interior (may Allah protect him) for his support, follow-up, and continuous direction to FIU's work.

And Allah is the grantor of success,

Director General of SAFIU

Major General

Fahad bin Abed Al-Aziz Al-Maglooth

Chapter 1 FIU Overview

Introduction to FIU:

First: "Establishment of the Unit"

Money laundering cases used to be handled via established committees consisting of several governmental agencies. And to standardize the money laundering efforts, the money laundering regulation was issued under the Royal Decree # m/39 dated 25/6/1424 H that included in Article 11 the establishment of a unit to combat money laundering and was named "Financial Investigation Unit (FIU)". Located in Riyadh, the unit commenced its activities on 6/8/1426 H.

Second: "Definition of FIU"

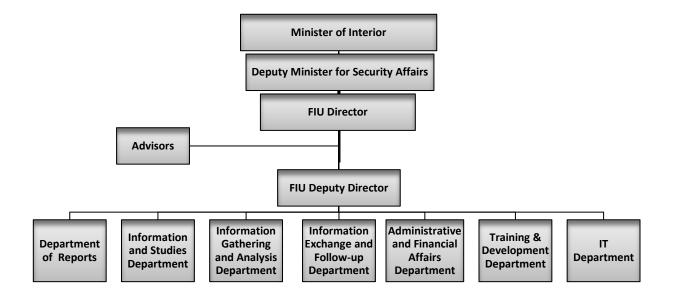
FIU is a hybrid (administrative – police) unit at MOI, which operates independently as a central national apparatus that receives, analyzes, disseminates and directs Suspicious Activity Reports as well as other money laundering related activities.

Third: "The Unit's Mandate"

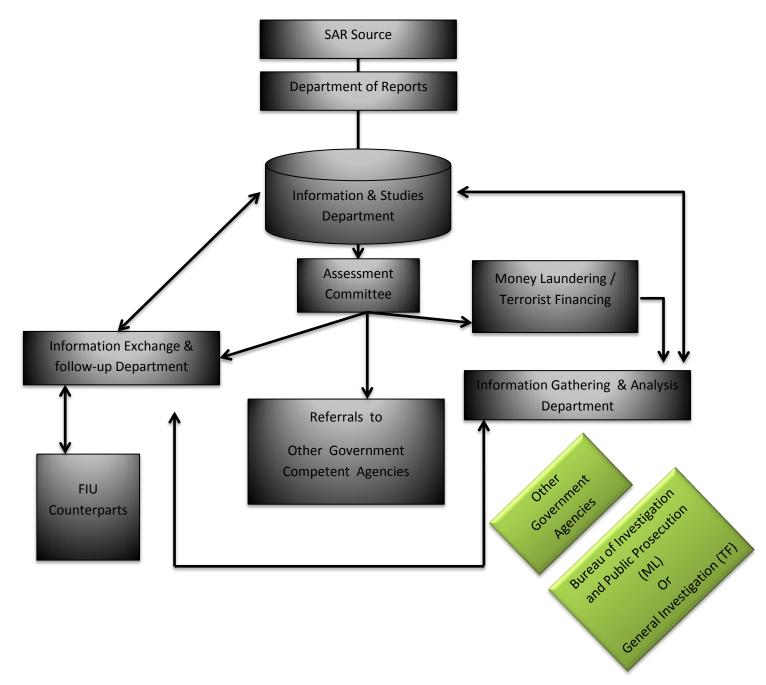
The following can summarize FIU's specialties:

- 1. Receive incoming reports from financial and non-financial establishments, government agencies, and individuals regarding ML/TF suspected financial operations and crimes.
- 2. Developing a database for all reports and money laundering and terrorist funding information, and respectively updating this information while keeping its secrecy and availability to the relevant authorities.
- 3. Request from and exchange information with stakeholders and take necessary actions to counter money laundering.
- 4. Request from and exchange information with other FIU's regarding anti money laundering in accordance with Article 25 of the executive anti money laundering regulations.
- Developing of reporting forms (SARs) used by financial and non-financial establishments. This includes forms
 which assist the unit to collect, analyze, investigate, maintain the data base, and update the information if
 necessary.
- 6. Collect and analyze SAR's. The unit has the right to seek the help of proper stakeholder SMEs' of this purpose.
- 7. FIU conducts field investigations and has the right to request such investigations from security agencies at MOI sectors. Once there is sufficient evidence leading to a relationship between SARs and ML crime, FIU refers the evidence to the proper investigative entity accompanied with a detailed report that contains enough data about the crime, the criminals, and an explanation of the evidence as well as recommendations and all related attachments.
- 8. Request from BIPP Precautionary seizure of funds, assets and all resources related to the suspicious activities in accordance with Article 14 of the regulations.
- 9. Dispose of SAR's which analysis does not lead to evidence or suspicion of a crime or wrongdoings as described in Article 2 of the regulations.
- 10. Coordinate with agencies that regulate financial and non-financial establishments to formulate the methods to ensure the establishment's compliance with the rules, regulations, and instructions associated with anti-money laundering.
- 11. Participate in preparing anti money laundering related awareness programs.
- 12. FIU may conclude MOUs with other FIUs in accordance with applicable procedures and regulations.

Fourth: "FIU Organizational Structure"

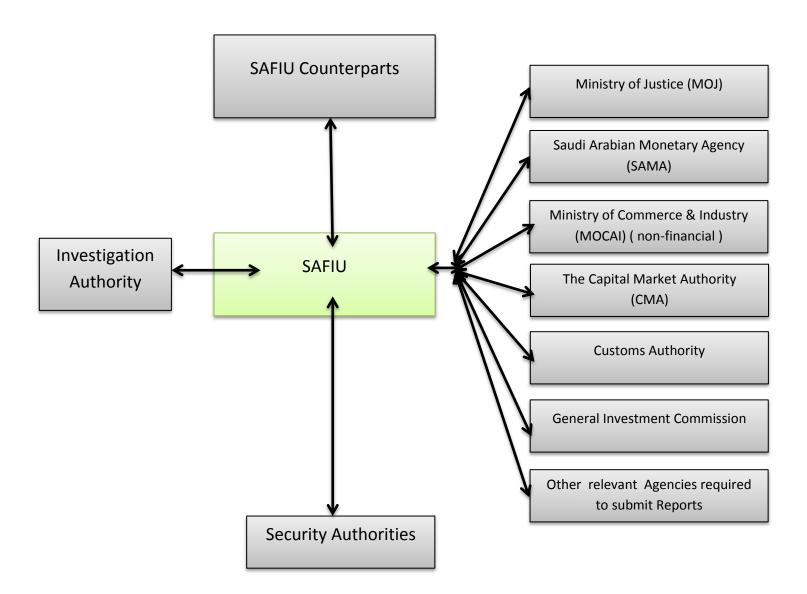


Fifth: "Managing Reports at FIU"



Sixth: "SAFIU's relationship with other relevant agencies"

SAFIU's relationship with other relevant agencies



Chapter 2 Local & International Activities

"Training & Participation in Regional & International Meetings & Conferences"

During the year 2014, experts in SAFIU have trained employees from relevant authorities, and held Anti-money Laundering and Financing of Terrorism training courses, a specialized course on "Organizing of Cross Border Cash Movement" has been held in Naif Academy for National Security and some international airports in the Kingdom for 359 trainees from all relevant authorities. For the first time, number of female inspectors who work at international airports have been trained. On the other hand, a training course was held prior to Haj time for personnel from King Abdulaziz International Airport in Jeddah, Prince Mohammed Bin Abdulaziz International Airport in Madinah, and some Land Ports on "Disclosure and its Risks during seasons of Haj and Omra", the course was presented by specialists from SAFIU. The following are the most prominent courses that SAFIU has hosted:

First: " On the national Level "

Local Training Courses:

| Course Name | Type of Participation | Location | Number of Trainees | Duration |
|--|--------------------------|---|--------------------|----------|
| Financial Analysis Techniques | Course | Security Forces Officers Club | 29 | 5 Days |
| Principles of Management in Financial Analysis | Course | OPM/MOI- Training Center King Fahad Security College | 18 | 5 Days |
| Basics Instructor Training BIT | Course | OPM/MOI- Training Center King Fahad Security College | 18 | 5 Days |
| Safety & Security | Course | Civil Defense Institute | 1 | 5 Days |
| Introduction to Computer Sciences | Course | MOI | 4 | 30 Days |
| Editing Official Letters and Presentations | Course | Al-Imam Muhammad Ibn Saud Islamic University | 1 | 6 weeks |
| Introduction to Computer Sciences | Course | MOI | 1 | 30 Days |

Local Training Courses(continued):

| Course Name | Type of Participation | Location | Number of Trainees | Duration |
|--|--------------------------|---|-----------------------|----------|
| Analyses of Financial & Monetary Policies | Course | Security Forces Officers Club | 1 | 5 Days |
| Office Management | Course | Training Center and Community Service, KSU | 3 | 3 months |
| Modern HR Management | Course | Training Center and Community Service, KSU | 3 | 3 months |
| Implementation of UN Security Council Resolutions | Workshop | Naif Arab university for Security Sciences | 1 | 3 Days |
| Creativity in Planning and Building Plans for Organizations & Individuals | Session | MOI | 1 | 3 Days |
| Applied Computer Diploma | Workshop | Training Center and Community Service, KSU | 3 | 6 months |
| Office Management - advanced | Course | Training Center and Community Service, KSU | 2 | 6 months |
| Introduction to Computer Sciences | Course | MOI | 1 | 30 Days |
| Diploma In Administrative Leadership | Course | Al-Imam Muhammad Ibn Saud Islamic University | 2 | 6 months |
| Modern HR Management | Course | Al-Imam Muhammad Ibn Saud Islamic University | 1 | 3 months |
| Basics of Computer | Course | Al-Imam Muhammad Ibn Saud Islamic University | 1 | 3 months |
| English Language | Course | Al-Imam Muhammad Ibn Saud Islamic University | 2 | 3 months |

Local Training Courses(continued):

| Course Name | Type of Participation | Location | Number of Trainees | Duration |
|---|-----------------------|---|-----------------------|----------|
| Total Quality Management | Course | Al-Imam Muhammad Ibn Saud Islamic University | 2 | 3 months |
| Disclosure and its Risks during seasons of Haj and Omra | Course | Security Forces Officers Club | 2 | 3Days |
| Disclosure and its Risks during seasons of Haj and Omra | Course | Security Forces Officers Club | 6 | 3Days |
| Database Management System - Oracle | | Institute of Public Administration (IPA) | 1 | 3Days |
| Editing Official Letters and Presentations | Course | Al-Imam Muhammad Ibn Saud Islamic University | 2 | 6 weeks |
| Total Number of Trainees | 108 | | | |



Side of scientific application (case study) that are presented to trainees to raise the efficiency of dealing with cases that are handled during the search, inquiry, and investigation.

Second: "On the Regional & International Levels"

In 2014, SAFIU has participated in a number of international training courses, the following are the most prominent international training courses in which SAFIU has participated:

International Training Courses:

| Course Name | Type of Participation | Location | Number of Trainees | Duration |
|---|-----------------------|----------------------------|--------------------|----------|
| Investigation in Combating Financing of Terrorism | Course | Cambridge | 1 | 12 Days |
| Contemporary Forms of Secretaryship Using Cutting –edge Technology of Information Systems | Course | Kuala lumpur - Malaysia | 1 | 12 Days |
| The Preparation of Correspondence & Reporting Skills | Course | Amman | 2 | 5 Days |
| Methods of Detection of Counterfeiting & Forgery | Course | Dubai | 1 | 12 Days |
| New Means and Methods of Detection of Counterfeiting & Forgery | Course | Istanbul | 1 | 12 Days |
| Developing Skills of Administrative Communications Staff & Simplification of Procedures | Course | Dubai | 1 | 12 Days |
| Information & Documents security | Course | Dubai | 1 | 5 Days |
| Modern Methods of Measuring and Assessing Staff & Corporate Performance | Course | London | 1 | 12 Days |
| Total Number of Trainees | | 9 | | |

International Conferences and Meetings:

| Meeting Name | Type of Participation | Location | Duration |
|--|--------------------------|-----------------------|----------|
| Field Meeting of the Interpol Working Group on Counter-terrorism | Meeting | Kingdom of Bahrain | 3 Days |
| Transnational Crime Investigation | Workshop | Taiwan | 10 Days |
| Combating weapons of mass destruction | Workshop | Kuwait | 3 Days |
| New Crimes in light of National & International Transformation | Forum | Jordan | 3 Days |



SAFIU hosting a workshop for a number of counterparts in (Combating Money laundering & Terrorism Financing) and international cooperation in this regard.

"Memorandums of Understanding with FIU Counterparts"

SAFIU has signed two MOUs on the sidelines of Egmont meetings with the following counterparts :

- 1. National Agency for Financial Investigation (NAFI) Chad.
- 2. Bangladesh Financial Intelligence Unit (BFIU) (Bangladesh Bank).



Side of signing MOU

"2014 Statistics"

A. Statistics on Money Laundering

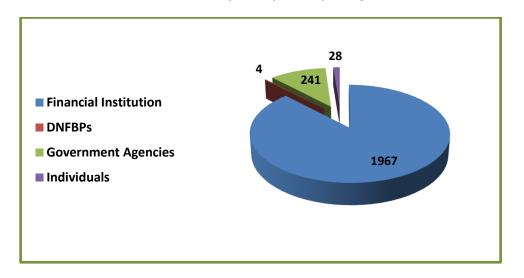
First: "Total Number of received Reports in 2014"

| Type of Reports | Number of ML Reports |
|--|----------------------|
| Number of Analyzed Reports | 2240 |
| Number of Reports Referred to Investigation Authorities | 136 |

Second: "Number of Submitted Reports by the Reporting Entities in 2014"

| Reporting Entity | Number of ML Reports |
|-----------------------|----------------------|
| Financial Institution | 1967 |
| DNFBPs | 4 |
| Government Agencies | 241 |
| Individuals | 28 |
| Total | 2240 |

The following chart shows the number of Submitted Reports by the Reporting Entities in 2014:



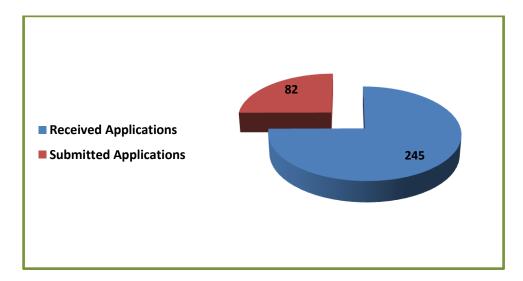
Third: "Number of Bank Account/ Statement Applications from Saudi Arabian Monetary Agency (SAMA) in 2014"

| Type of Procedures | Number of Applications |
|--------------------------------------|------------------------|
| FT/ML Accounts studied | 2285 |
| Bank Statement Applications by SAFIU | 505 |
| Total | 2790 |

Fourth: "Number of Information Exchange Requests with FIUs in 2014":

| Information Exchange Applications | Number of ML Applications |
|-----------------------------------|---------------------------|
| Received Applications | 245 |
| Submitted Applications | 82 |
| Total | 327 |

The following chart shows the number of information exchange Requests with FIUs in 2014:



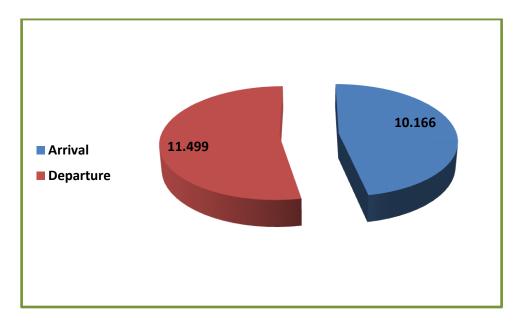
Fifth: "Number of Feedbacks in 2014":

| Type of Operation | Number of Feedbacks |
|-------------------|---------------------|
| ML | 2240 |

Sixth: "Number of Declarations in 2014"

| Type of Action | Number of Cases |
|----------------|-----------------|
| Arrival | 10.166 |
| Departure | 11.499 |
| Total | 21.665 |

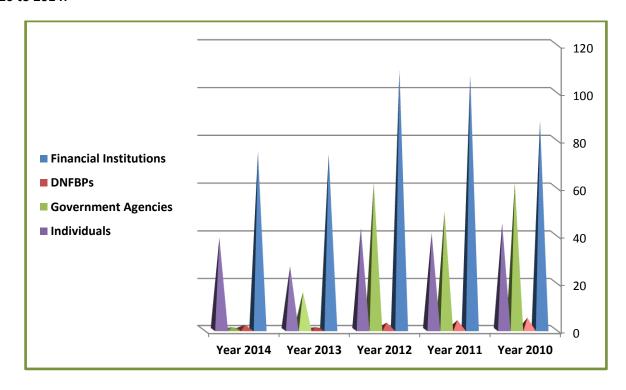
The following chart shows the number of declarations 2014:



Seventh: "Comparison Between the Number of Reports issued by Reporting Entity from 2010 to 2014":

| Reporting Entity | Year 2010 | Year 2011 | Year 2012 | Year 2013 | Year 2014 |
|------------------------|-----------|-----------|-----------|-----------|-----------|
| Financial Institutions | 1137 | 1694 | 1954 | 2039 | 1967 |
| DNFBPs | 1 | 10 | 6 | 2 | 4 |
| Government Agencies | 109 | 176 | 209 | 300 | 241 |
| Individuals | 9 | 69 | 17 | 38 | 28 |
| Total | 1168 | 1842 | 2077 | 2379 | 2240 |

The following chart shows a comparison between the number of reports issued by the reporting entity from 2010 to 2014:



B- Statistics on Terrorism Financing:

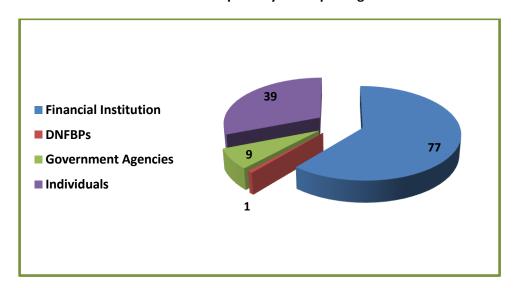
First: "Total Number of received Reports in 2014"

| Type of Reports | Number of TF Reports |
|--|----------------------|
| Number of Analyzed Reports | 126 |
| Number of Reports Referred to Investigation Authorities | 37 |

Second: "Number of Submitted Reports by the Reporting Entities in 2014"

| Reporting Entity | Number of TF Reports |
|----------------------------|----------------------|
| Financial Institution | 77 |
| DNFBPs | 1 |
| Government Agencies | 9 |
| Individuals | 39 |
| Total | 126 |

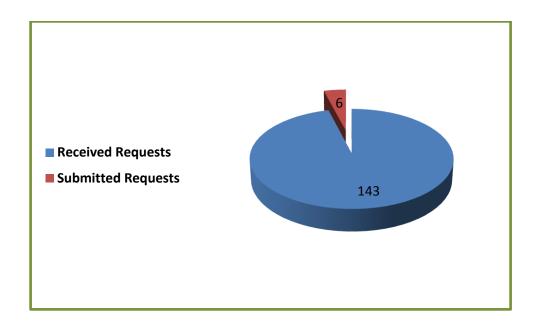
The following chart shows the number of Submitted Reports by the Reporting Entities in 2014:



Third: "Number of Information Exchange Requests with FIUs in 2014":

| Information Exchange Requests | Number of TF Requests | |
|-------------------------------|-----------------------|--|
| Received Requests | 143 | |
| Submitted Requests | 6 | |
| Total | 149 | |

The following chart shows the number of information exchange Requests with FIUs in 2014:



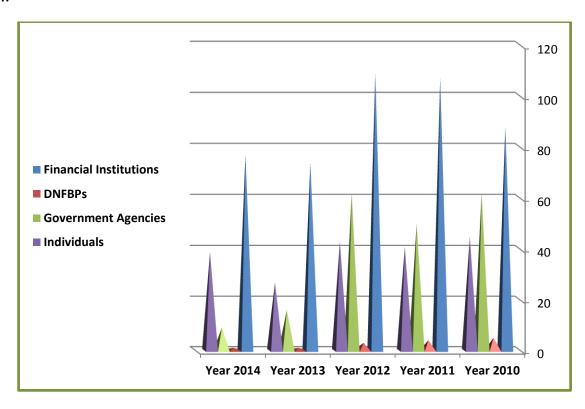
Forth: "Number of Feedbacks in 2014":

| Type of Operation | Number of Feedbacks |
|---------------------|---------------------|
| Terrorism Financing | 87 |

Fifth: "Comparison Between the Number of Reports issued by Reporting Entity from 2010 to 2014":

| Reporting Entity | Year 2010 | Year 2011 | Year 2012 | Year 2013 | Year 2014 |
|------------------------|-----------|-----------|-----------|-----------|-----------|
| Financial Institutions | 88 | 107 | 109 | 74 | 77 |
| DNFBPs | 5 | 4 | 3 | 1 | 1 |
| Government Agencies | 62 | 50 | 62 | 16 | 9 |
| Individuals | 45 | 41 | 43 | 27 | 39 |
| Total | 200 | 202 | 217 | 118 | 126 |

The following chart shows a comparison between the number of reports issued by the reporting entity from 2010 to 2014:

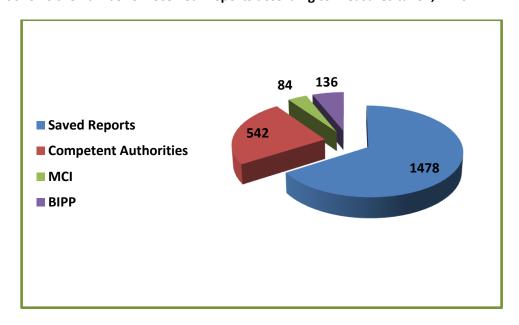


c: General Statistics:

First: "Total Number of received Reports according to measures taken, in 2014"

| Type of Reports | Number of Referred Reports | Percentage |
|-----------------------|----------------------------|------------|
| Saved Reports | 1478 | %66.0 |
| Competent Authorities | 542 | %24.2 |
| MCI | 84 | %3.8 |
| BIPP | 136 | %6.1 |
| Total | 2240 | %100 |

The following chart shows the number of received Reports according to measures taken, in 2014



"Number of Judicial Rulings issued in ML and Number of Defendants in 2014"

983 Judicial Rulings (8 in money laundering and 975 in financing of terrorism) , based on reports from SAFIU, were referred by competent investigative authorities to courts in all over the Kingdom. The judicial rulings included imprisonment, fines, confiscations, and (Ta'ziri) punitive rulings.

| Type of Operation | Number of Referred Reports |
|--|----------------------------|
| Judicial Rulings in Money Laundering | 8 |
| Judicial Rulings in Financing of Terrorism | 975 |

Chapter 3 Applications and Cases

Case Study of an FIU report from a financial Institution

First: "Reporting Process"

SAFIU received a report from a local financial institution about a large number of deposits made by expatriates working in the Kingdom to an account held by a non-financial institution owned by a Saudi citizen. The transactions (withdrawals and foreign remittances) on the account do not reflect the size and type of activity for such non-financial institution according to account opening documents.

Second: "Information Collection and Analysis Procedures"

When SAFIU received the report, it began processing the issue according to a specific mechanism; Information was gathered, analyzed and studied and then compared with the received information from the reporting agency, and as a result of analyses and study, a number of indicators and leads which enhanced the suspicion of the suspect 's financial activities and the possibility of conducting money laundering.

In the light of the above mentioned, SAFIU prepared a case file, containing the SAR and the technical report, and sent the file to Bureau of Investigation and Public Prosecution (BIPP) to verify the regulatory of the financial transactions which were not compatible with the size and activity of the non-financial institution.

Third: "Investigation procedures"

the Bureau of Investigation and Public Prosecution (BIPP), after questioning the institution's owner , accused him of money laundering and for failure to provide sufficient evidence to prove the legality of the resources of funds and for his confession to lease his bank account for a number of expatriate workers and taking a commission (approximately 0.5%) The mediator (non-Saudi)was the most prominent depositor. The case was referred to the Public Court requesting sentence in accordance with Anti-Money Laundering Law.

Fourth: "The Trial"

After several court hearings, the institution's owner and the mediator couldn't prove the legality of their financial transactions and the source of funds incoming /outgoing the account. The defendants acknowledged all what had been stated in the lawsuit presented by the prosecutor. Therefore, it has been proved to the judge that the first defendant (the owner) was involved in committing a crime of money laundering, and was sentenced to five years in jail and confiscation of the funds in the account of his non-financial institution. The second defendant (the mediator) was sentenced to a year in jail and a removal from the country after the completion of his sentence according to Anti-Money Laundering Law.

Chapter 4 Future Activities

SAFIU's Future Activities

First: "On a Local Level"

SAFIU intends during the upcoming period to complete and deliver the following:

- 1. Hold training sessions for compliance personnel from relevant authorities of effective reporting on suspicious financial transactions related to money laundering or financing of terrorism.
- 2. Continue to hold specialized training courses in the field of search and investigation of suspicious financial operations related to money laundering and financing of terrorism.
- 3. Continue to hold workshops on money laundering and financing of terrorism.
- 4. Begin the experimental and actual receiving of reports (SARs) electronically from supervisory and regulatory agencies.
- 5. Sign agreements of electronic links with relevant authorities in a phased manner.

Second: "On an International Level"

SAFIU is seeking to enhance international cooperation in information exchange by signing a number of Memorandums of Understanding, and conducting visitations with its counterparts in order to take advantage of their practical and scientific expertise in money laundering and financing of terrorism.

SAFIU also intends to hold a number of training courses and workshops related to money laundering and financing of terrorism, as well as participating in international conferences and periodical meetings.