



Annual Report

Financial Intelligence Unit

2009

The National Criminal Police
National Criminal Intelligence Service

Financial Intelligence Unit

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Finanspolisen – the Financial Intelligence Unit

1.1 Finanspolisen - the Financial Intelligence Unit (FIU); A definition

The European Union Council Decision 2000/642/JHA of 17 October 2000 defines the form of co-operation between financial intelligence units (FIUs) regarding exchange of information.

The Member States have set up FIUs to collect and analyse information received under the provisions of Directive 91/308/EEC of 10 June 1991 with the aim of establishing links between suspicious financial transactions and underlying criminal activity in order to prevent and combat money laundering.

Article 1 of Council Decision 2000/642/JHA states that Member States shall ensure that FIUs, set up or designated to receive disclosures of financial information for the purpose of combating money laundering shall cooperate to assemble, analyse and investigate relevant information within the FIU on any fact which might be an indication of money laundering in accordance with their national powers.

Article 2 states that
for the purposes of this Decision, FIUs shall be a single unit for each Member State and shall correspond to the following definition:

“A central, national unit which, in order to combat money laundering, is responsible for receiving (and to the extent permitted, requesting), analysing, and disseminating to the competent authorities, disclosures of financial information which concern suspected proceeds of crime or are required by national legislation or regulation.”



2 Summary of the Year 2009

2009 has seen a development of the FIUs statistical function, a refinement of the analysis of information contained in the money laundering register, the introduction of a system for transferring information electronically from Tullverket (Swedish Customs) and the electronic reporting system has taken shape. These developments will enhance the effectiveness of operations. However, further development is necessary to maintain this effectiveness.

The main incentive for criminals is the proceeds they may derive from crime and this is especially true for serious organised crime. It is desirable to criminals that crime proceeds are given a seemingly legal background so that they may be invested or consumed without direct links to the underlying criminal activity. More or less advanced money laundering attains the seemingly legal background. Otherwise, the connection between apparently wealthy and successful persons and their criminal activities becomes far too obvious. Money is laundered by integrating and marketing the crime proceeds into the financial system or with the assistance of companies using the services the financial system offers. Money laundering is facilitated even more if the criminals have connections at and influence or control over companies within the financial system. To prevent and combat money laundering, the legislation has been strengthened and the number of supervisory bodies increased.

The so-called third money laundering directive, Directive 2005/60/EC, was implemented to strengthen the Swedish legislation. Furthermore, the administrative boards of the counties of Göteborg, Malmö and Stockholm have been appointed as supervisory bodies for those companies which are liable to report suspected money laundering in accordance with the Swedish (Prevention) Act 2009:62 on Money Laundering and Terrorist Financing but not supervised by the Swedish Financial Supervisory Authority. To combat money laundering and terrorist financing a coordination unit has been set up within the Swedish Financial Supervisory Authority.

- *Number of reports* – In 2009, the FIU received 9,137 reports regarding suspected money laundering or terrorist financing.
- *Reporting tendency* – only 1 % of the companies covered by the review and reporting obligations stipulated in the Act on Money Laundering have sent in reports in 2009. Around 15 000 companies are covered by the stipulations of the Swedish Act on Money Laundering.



- Quality – there is a pronounced variation in quality between the reports. To obtain a higher reporting quality the reporting bodies must receive more feedback from the FIU and participate in the seminars arranged by the supervising bodies and authorities in cooperation with the FIU. This report is part of the feedback to the reporting bodies.
- *Organised crime* – There are clear indications that money originating from serious organised crime is being laundered by financial institutions or by companies using the services provided by the financial system.

All companies and authorities liable to report must shoulder their responsibility in helping to prevent serious organised crime from succeeding in laundering crime proceeds. The legislative demand for greater client knowledge introduced in 2009 has improved the possibilities for the reporting bodies to detect anomalies.

Arne Andersson
Head of the Criminal Intelligence and Investigation Division

Thomas Palmberg
Head of the Swedish Financial Intelligence Unit



3 Problems and Trends

3.1 Money laundering

Problems

- Money laundering is not a crime in its own right in Sweden, which renders our crime fighting measures inefficient.
- The reporting bodies use a number of different forms when reporting and this sometimes causes problems for the FIU. Sometimes the reports are hand-written and difficult to decipher. In other instances it may be difficult to understand what type of transaction that is being reported. Sometimes important information is lacking for instance regarding the amounts, the origin of the money and detailed descriptions of why a transaction is suspicious. Some reporting bodies send in reports although there is nothing suspicious to report.
- The reports and statements of accounts are mainly sent by mail (on paper) or in the shape of image files (.jpeg, .tif, .pdf) which renders the processing and analysis of the information difficult and inefficient. The FIU would therefore prefer if all statements of accounts were sent in Excel-format.
- Concurrently with the increasing interest in “following the money” within all law enforcing authorities, the demand for assistance from the FIU has also increased. Unfortunately, the FIU did not have sufficient resources in 2009 and consequently had to turn down requests for assistance from RUC (Regional Intelligence Center), EBM (Economic Crimes Bureau) and different action groups even in prioritised cases.
- Many of the reporting bodies have requested more detailed feedback regarding their reports. However, legislative stipulations restrict the FIUs possibilities of divulging the requested information.
- Many reporting bodies have expressed their wishes of being able to meet with the FIU to obtain more information and support to better fulfil their obligations in accordance with the Act on money laundering. However, the FIU has not had the resources necessary to comply with all such requests. Regretfully, we have had to prioritise our operative activities.
- The reporting tendency in many sectors still leaves much to wish for. In 2010 the coordination unit and the sector-specific supervising bodies will elaborate strategies for the dissemination of information to and the training of professionals to increase both their knowledge of the existing legislation and their tendency to report anomalies.



Reporting is still geographically restricted mainly to the three metropolitan areas. This might lead to problems for the newly established RUCs since it will become more difficult for the FIU to assist them.

Trends

- the number of reports regarding suspected money laundering decreased in 2009 compared with 2008. However the number of bodies reporting suspect money laundering transactions in 2009 increased.
- Criminals control firms through the whole chain of their operations, which is clearly seen in the building sector. This enables them to keep all their transactions illegal.
- In 2009, several cases where forged employers' certificates were presented in connection with loan applications were observed.
- This year, several banks noticed that the perpetrators' opening of accounts using forged identity documents preceded many cases of fraud directed at their clients.
- This year, the FIU focused on training estate agents, lawyers and auditors. The efforts resulted in an increase of reports from these occupational categories.
- Relatively few cash deposits are reported, a circumstance that the FIU would like to highlight. To prevent crime proceeds from becoming part of the financial system all persons carrying on a profession must be observant of any cash deposits made.
- There has been a decrease in the number of reports concerning cashier's cheques. This year one institution/company has taken the decision to no longer accept transferred cashier's cheques, a decision, which undoubtedly will lead to a change of method, as the conversion of crime proceeds is concerned.
- The reporting of money laundering is still geographically restricted to the three metropolitan areas.

3.2 Terrorist financing

- 2009 has been characterised by a considerable influx of money laundering reports with possible links to the financing of terrorism. It may be noted that for certain types of money remittance agencies, non-profit associations and informal financial networks cash transactions are still important.



- In this context, certain regions/countries are of active interest to the FIU.
- The cooperation between different authorities has also improved and become more efficient this year.
- Terrorist financing is the very basis for all terrorist activities.
- The access to financial means is directly linked to the number of terrorist attacks i.e. more money, more attacks.
- An effective means of preventing terrorist attacks is to stem the flow of financial means to terrorist organisations or certain terrorist cells.
- As regards the taliban activities in Afghanistan there are indications that these activities are funded mainly through donations coming in from foreign countries.
- In 2009, the cash transactions undertaken by and within certain groups with links to non-profit associations and money remittance agencies have been more closely observed.
- It has been confirmed that the financial systems are still used to channel funds for the financing of terrorism in certain regions.

4 Money laundering – Procedures and methods

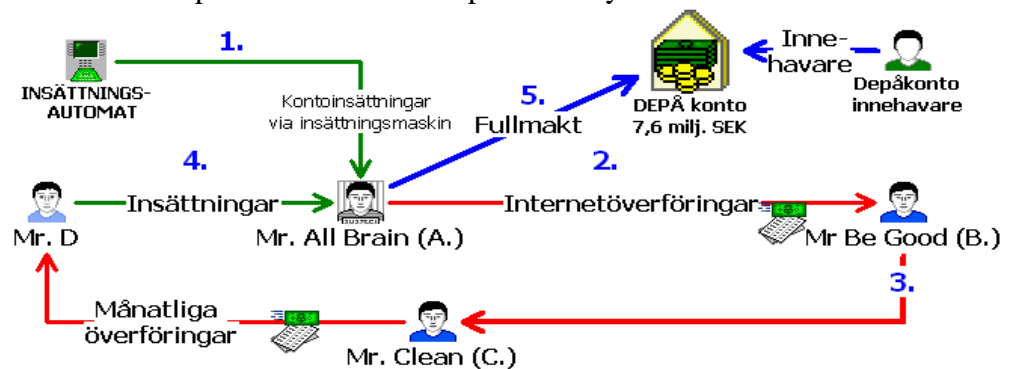
4.1 General

It is reasonable to believe that the increased attempts of criminals to access so-called “cash businesses” indicate ongoing money laundering. This type of business facilitates the passing of illegal money into legal activities. Front companies are created and although it is suspected that the staff is paid without actually working, income statements are reported, tax deductions made and social security contributions paid. The front company makes it possible to report a “legal income” to the authorities.

More often than not, front men are used to prevent the detection of the actual ownership. It has also become more common for several persons to join together and invest money in these types of companies. Part of the purchase money is physically carried out and delivered to the seller outside of Sweden.

4.2 Results of a money laundering investigation

The FIU investigated a strange series of transactions where large amounts were deposited into the bank account of individual A through the means of cash deposit systems (machines). Once Mr. A. had received the money (see illustration below) they were transferred to Mr. B, who in his turn transferred it to Mr. C, who transferred it to Mr. D. The circle closed as Mr. D made deposits in the account of Mr. A. who transferred the money to a deposit account which was not his own. Mr. A. was authorised to handle this account on behalf of the actual holder, since the actual holder did not reside in Sweden. The balance of the account was up to 7.6 million SEK periodically.



During this FIU investigation, another police unit had been informed that Mr. A might be planning on starting to trade in narcotics. Once the results of the FIU investigation were released to that police unit a criminal investigation was instituted, centred mainly on Mr. A. Five months later, Mr. A. and Mr. D. were sentenced to imprisonment for narcotic drug offence.

5 Asset recovery investigations

5.1 Asset recovery, general conditions

On 01.07.2008, the rules governing extended confiscation came into force. The rules make it possible to confiscate suspected crime proceeds (proceeds and assets), if it is clearly more probable than not that these were generated by criminal activities. It is not necessary to link the crime proceeds to a specific crime. This regulation is applicable when:

- 1). A person is sentenced for committing a crime punishable by imprisonment for six years or more and if the crime was intended to yield a profit.
- 2). A person is sentenced for criminal activities pursued in more or less organised form or if the criminal activities are antisocial or in other ways harmful. Chapter 36, Section 1b, second paragraph, of the



Swedish Penal Code lists the covered offences, i.a. trafficking in humans, narcotic drug offences (of a normal degree), procuring, doping offences, gross usury, gross unlawful dealing in counterfeit currency, money laundering and gross illicit gambling.

The National Criminal Police shall be able to use this possibility of forfeiting the proceeds of crime and the assets resulting from serious organised crime within the framework of its preliminary investigations.

The FIU has therefore, within the terms of reference for preliminary investigations led by the National Criminal Police, tasked some of its personnel to trace presumed crime proceeds and to suggest and initiate measures based on a prosecutor's decision regarding these presumed crime proceeds (existing assets or unrealised gain) with links to certain suspects.

The rules governing extended confiscation makes it possible to confiscate the assets of an offender, in totality or in part, if it can be proven that it is clearly more probable than not that these were generated by criminal activities. The rules regarding extended confiscation are to be applied to crimes that are typically linked to serious organised crime.

The new possibilities to confiscate assets supplement the measures previously available to the Police to recover assets from criminals.

To recover the assets of criminals suspected of having committed offences falling under the rules of extended confiscation, a thorough survey and inquiry regarding their financial situation and actual assets is necessary.

The National Criminal Police has decided to call this procedure an Asset Recovery Investigation. The National Criminal Police is convinced that to combat organised crime efficiently it is necessary to focus on the financial assets of the criminals. By striking at their crime based assets it is possible to reduce the gain and earning capacity of organised crime as such.

The prosecutor's decision to recover assets is based on a financial investigation. The information contained in the asset recovery investigations can be used by other authorities e.g. the Swedish Tax Agency, the Swedish Enforcement Authority and the Swedish Economic Crimes Bureau.

5.1.1 Asset recovery investigations



In 2009, the National Criminal Police initiated 20 asset recovery investigations. Of these investigations, 14 were concluded by the end of 2009 and 6 were still ongoing.

All in all, these asset recovery investigations led to the confiscation or impounding of in total 12 million SEK by order of an ordinary court or after a decision by a county administrative court. This sum can be broken down follows: 5.4 million SEK stem from asset recovery investigations made by the National Criminal Police; 6.4 million SEK from regular police investigations (with Stockholm as the main region) and 0.2 million SEK from cases linked to serious organised crime (case ongoing at the time of publication of this report).

5.1.2 Results of an asset recovery investigation

In January 2009, the police cracked down on a number of persons suspected of illegally importing and marketing narcotic drugs in Sweden.

During a search of premises 150 kg of cannabis and 500 000 SEK in cash were found and seized. Three individuals (A, B and C) were apprehended and later on detained for aggravated narcotic drugs crime. The detained individuals either own businesses or act as managers.

These three individuals had only declared very limited incomes for the past years, ranging from 12 000 to 140 000 SEK/year.

The investigation revealed that individual B. had bought narcotic drugs by the kilo from A. for a six-month-period prior to the arrest.

These purchases had been financed through the illicit sale of shares in a company run by B amounting to 500 000 SEK.

The investigation also revealed that B. had not only purchased narcotic drugs but also invested 300 000 in a business. He was also intending to buy a business for 2.4 million SEK. 1 million had already been paid before the arrest took place.

The three individuals were sentenced to long-term imprisonment for aggravated narcotic drug crimes. Furthermore, B. and one of his business partners had their assessment raised with 2.7 million SEK due to the sale of shares, the money used and intended for the purchase of a business and other undeclared taxable incomes.

6 Extended legislation and reinforced supervision



6.1 **Implementation of the third directive on money laundering**

The last directive on money laundering (2005/60/EG) has been implemented for the purpose of countering the detrimental effects that black money may have on the stability of the financial sector and the threat against the inner market it constitutes. The directive also focuses on terrorism financing which is shaking our society to its very foundations. The proposed measures in the directive complement the penal solutions and may in a preventive way be effective to the financial system.

The directive is more comprehensive than the two former ones and for this reason the previous Act on Money Laundering ((1993:768) was rescinded and replaced by the new Act on Money Laundering (2009:62) that entered into force on 15 March 2009.

New professional categories that have been included:

- registered auditing firms and business that involves professional bookkeeping services or auditing services
- business that includes the creation of legal entities
- sale of newly founded limited companies
- procurement of Swedish or foreign legal entities
- providing a registered office or a postal address and thereto attached services to a legal entity or a trust or a similar legal formation
- legal or natural persons that carry on commercial trade or auction sale where cash payment is made to an amount of at least 15.000 Euro as regards all the goods.

The new legislation is based upon a risk assessment of the concerned companies in their connections with customers. In the second chapter of the Act, the sometimes far-reaching measures that the concerned companies have to take in order to establish the identity of a client are regulated. If the client's identity cannot be established, no client relation shall be initiated.

The review resources are used when necessary and therefore the companies included must have adequate routines and knowledge to be able to assess whether a situation poses a risk of money laundering or terrorism financing.

6.2 **Co-ordination body for the supervision of measures against money laundering and terrorism financing**



Since 1 June 2009 a special unit, Co-ordination against Money Laundering, exists at the Financial Supervisory Authority with co-ordination responsibility for the supervision of the Money Laundering and Terrorism Financing Act (2009:62). This unit administers and directs the work of the Co-ordination body, which consists of representatives for the following supervisory authorities: the Board of Supervision of Estate Agents, the Financial Supervisory Authority, the National Gaming Board, the Supervisory Board of Public Accountants, and the county administrative boards in the counties of Stockholm, Västra Götaland and Skåne. Furthermore, the Swedish Bar Association participates on a voluntary basis. As does the Swedish Companies Registration Office, which has participated as an additional representative on account of the department's responsibility for the newly set up register of operators under the supervision of county administrative boards. The operational supervisory responsibility for the parties that are included by the regulation lies with concerned supervisory authority.

The tasks of the unit Co-ordination against Money Laundering include an overall co-ordination responsibility for the operations of the supervisory authorities as regards methods and rules as well as evaluation and follow-up of the supervision that has been carried out. The unit shall also provide support to the supervisory authorities in issues concerning training, promote effective co-operation between supervisory authorities and the FIU concerning the obligation of the operators to report and the obligations of the supervisory authorities to inform. Another task is to initiate proposals for changes in the legislation, way of working and priorities for the purpose of creating a more effective supervision within this sphere.

7 Organisational development

7.1 Web-based reporting

The last two months of 2009 involved important changes to the administrative proceedings of the FIU. Reporting via fax was replaced by web-based reporting and this made it easier for the administrative staff to register and handle the large inflow of money laundering reports etc. In 2010, all reports shall be made on the Web form. During the year a further development of the web form has been started. This means that for the reporting entities that so wish, it will be possible to make the report in a so called xml-format that will automatically load the form.

The positive side effect is a reduced consumption of paper. It also means that cases, once they end up in the archives, no longer take up as much space.



7.2 Statistics

When web reporting was introduced, replacing reporting via fax, the possibility of obtaining statistical data regarding around 30 previously identified questions via VUP¹/Business Objects was introduced. Due to initial problems the first statistics information for the year 2009 was not entirely reliable. These problems have been taken care of and in the year 2010 it will be possible to use the statistics system as a satisfactory tool.

7.3 Analysis

This statistical system makes it possible for the FIU to carry out different kinds of analyses.

This system makes it possible to promptly obtain and compare a large number of parameters providing information that is important to the operational as well as the strategic work against money laundering and terrorism financing. (This year, two projects have been launched for the purpose of strategically examining the work and the amount of information handled by the FIU).

7.4 Electronic transfer of information about customs declarations

In 2009, efforts have been made to establish a secure connection between the Customs Service and the FIU. The secure connection will be used for the transfer of information about customs declarations concerning currency across the border to and from third countries.

According to existing legislation all persons that go to or from a third country carrying more than 10.000 € must fill in a specific form. According to the same legislation, the information contained in the form is sent to the FIU for analysis.

At the end of 2009 this secure connection had not yet been opened. As to the Police everything was ready but the Customs Service still had some work to do before this connection could be fully serviceable.

8 Statistics with analysing notes

8.1 The number of national and international cases where the FIU have given assistance in 2009

¹ VUP, Police Data System for Follow-up



On a national level, the FIU has assisted other entities on 242 occasions. In most cases, it is regional intelligence centres (RUC) which require assistance but the FIU also assists the Police Authorities and the National Criminal Police.

There were 272 international requests for assistance. 160 of these requests for assistance came via the Egmont Group and its international money laundering co-operation.

On a national level	242
On an international level	272

Table 8.1.

8.1.1 Number of cases of assistance per county

The FIU has assisted the police authorities in Sweden in 242 cases. Many cases are connected to the Regional Intelligence Centres. The three metropolitan areas represent 84% of the cases of assistance, of which Stockholm represents 59%.

Dalarna	4
Gävleborg	2
Halland	4
Jönköping	1
Kalmar	2
Kronoberg	1
Norrbottn	2
Skåne	26
Stockholm	147
Södermanland	3
Uppsala	2
Värmland	1
Västerbotten	1
Västernorrland	2
Västra Götaland	29
Örebro	9
Östergötland	6

Table 8.1.1.

8.1.2 Number of cases of assistance per country

As appears from table 8.1, 272 international cases were processed. Below is a list of the countries most frequently requesting assistance?

The Netherlands	34
-----------------	----



Denmark	23
Germany	22
Estonia	15
The UK	12
Spain	11
Norway	10
Belgium	10
Finland	10
Switzerland	9
The USA	9

Table 8.1.2.

8.2 Number of intelligence leads disseminated by the FIU in 2009

A total of 1180 intelligence leads were elaborated by the FIU during the year. This is an increase compared with 2008 when 685 were made (1045 in 2007). The information of one such intelligence lead can be based on one or several money laundering reports from one or several reporting entities. In most cases there is no 1 to 1 ratio. This makes it difficult to draw any conclusions as regards the efficiency of the reporting.

On a national level	1032
On an international level	148

Table 8.2.

8.3 Geographical distribution of received money laundering reports per county

From table 8.3 it appears that a little more than 84% of the received money laundering reports come from the Göteborg, Malmö and Stockholm regions. The figures (Stockholm 56%, Göteborg 9%, Skåne 21%) are approximately the same as last year with the exception of Skåne where there has been a decrease to 12,8%. The number of reports is about 750.

Certainly most business transactions that fall under the Money laundering Act take place in the big cities in the country, but still the question is whether such a large share of these takes place in the three regions that dominate the statistics.

County	%
--------	---



Other	3,9
Blekinge	0,2
Dalarna	0,6
Gotland	0,1
Gävleborg	0,6
Halland	0,9
Jämtland	0,2
Jönköping	0,9
Kalmar	0,3
Kronoberg	0,7
Norrbottn	0,5
Skåne	12,8
Stockholm	60,8
Södermanland	1,2
Uppsala	1,4
Värmland	0,7
Västerbotten	0,2
Västernorrland	0,5
Västmanland	0,9
Västra Götaland	10,5
Örebro	0,8
Östergötland	1,4

Table 8.3.

8.4 Direction of reported suspected money remittance transactions

In 2008, the largest number of reported remittance transactions were directed to Nigeria and Ghana. Iran was not among the most frequent countries last year.

8.4.1 From Sweden

Nigeria
Ghana
Iran
China
The UK
Thailand
Turkey
The Philippines

Table 8.4.1.

Remittance transactions from Estonia, Italy and Great Britain were the most frequent ones also in 2008. The United Arab Emirates was the country that was added as frequently reported.



8.4.2 To Sweden

Estonia
Italy
The United Arab Emirates
The UK
The USA
Turkey
China
Congo

Table 8.4.2.

8.5 Reported Figures in 2009

The reported figures for 2009 amount to 6.065.102.712 SEK from all reporting entities, which can be compared with 9.852.075.307 SEK in 2008 and 4.013.959.827 SEK in 2007. The decrease of the amount is somewhat larger (38%) than the decrease of the number of reports (31%). This discrepancy can be explained by a reduction nearly by half in the number of bank reports and by the fact that no extreme transactions were reported in contrast to 2008.

8.6 Type of transaction in connection with reporting of suspected money laundering in 2009

The most frequent transactions stated in the reports:

Currency Exchange	24,8 %
Transfer	21,1 %
Withdrawal	20,3 %
Money transfer agencies	16,8 %
Deposition	10,4 %

Table 8.6.

These types of transactions represent about 93% of all reports. In most of the cases currency exchange is the type of transaction that has been the cause of suspected money laundering.

Money transfer between different financial institutes within the country or to another country, in this connection mostly large withdrawals of cash, is the second most usual way of transaction that gives cause to suspected of money laundering.



The most widespread transaction method associated with money laundering is deposition, mostly cash, corresponding to somewhat more than 10% of the reports.

8.7 Number of money laundering reports received by the FIU in 2009

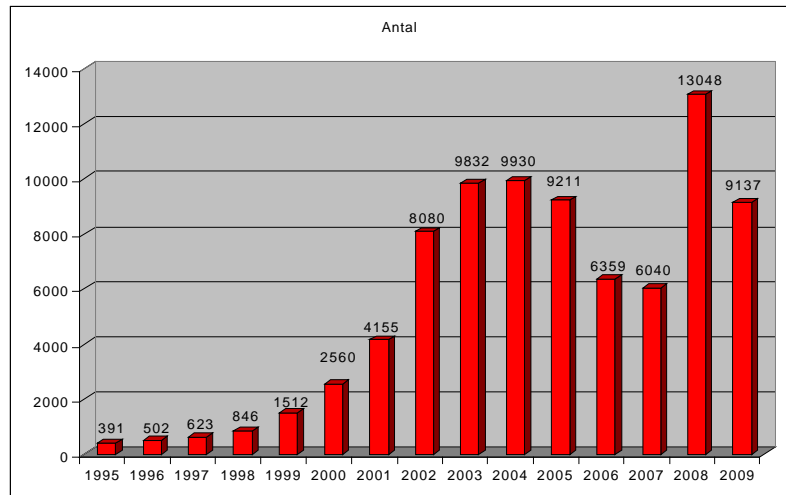


Table 8.7.

In 2009, 9 137 money laundering reports were received by the FIU. This is a clear decrease compared with 2008 but on a level with the previously highest reporting levels in the years 2002 – 2005. In 2008 some companies changed their reporting routines. This produced an accumulated result and the number of bank reports amounted to 7232, which can be compared with 765 reports from banks in 2004 (of a total of 9930 money laundering reports) and 1310 reports from banks in 2007.

This year’s reporting level is considerably higher than for the years 2006 (6353) and 2007 (6040). It is likely that this trend, indicating a stable reporting increase will continue.

8.7.1 Transaction Reports per Sector in 2009 (2008)

Sectors reporting money laundering in 2009, in accordance with Act 2009:762 relating to measures against money laundering and financing of terrorism.	Number of money laundering reports /sector	Number of legal and natural persons reporting	Number of legal and natural persons obliged to report
Lawyers	3 (2)	3 (2)	148
Banking & Finance	3275 (7232) ²	56 (57)	118 (126)
Money remittance services	1749 (1452)	17 (7)	42

² In 2008, one limited banking company changed its review routines and subsequently delivered money laundering reports for an accumulated period



Car dealers (vehicle trade)	10	(17)	6	(7)	1000
Casinos	322	(145)	1		1
Real estate agents	8	(0)	8	(0)	6100
Investment funds	5	(1)	5	(1)	117
Insurance business	7	(1)	6	(1)	1046
Trade in antiques and art	1	(0)	1	(0)	150
Trade in precious stones and metal	1	(0)	1	(0)	1000
Trade in waste materials	0	(0)	0	(0)	86
Credit market companies	51	(0)	7	(0)	97
Pension trusts	0	(4)	0	(2)	79
Auditors	8	(2)	5	(2)	4117
Tax advisors	0	(0)	0	(0)	159
Currency exchange companies	3680	(4177)	14	(13)	43
Companies/Institutions issuing electronic money	1	(0)	1	(0)	3
Companies/Institutions trading in securities	1	(5)	1	(2)	156
Other sectors, not liable to report	15	(7)	11	(3)	15
Total	9 137	(13048)	140	(97)	14 462

Table 8.7.1.

As previously mentioned the number of reports has decreased with almost 30% compared with 2008, something that had been anticipated in last year's report. The reporting is on a level with the reporting in 2004 (9930) that up to now has the second highest number of money laundering reports in one year. During 2010 and the next few years the reporting is expected to increase.

140 companies obliged to report according to the Money Laundering Act delivered money laundering reports. This represents almost 1% of the number of companies obliged to report. This level is of course low but it is still a substantial improvement compared with 2008 (97 reported companies). It constitutes an increase of 45%. In 2007, 52 companies sent reports.

Occupational categories that have increased their reporting are e.g. casinos, real estate agents, money remittance services, auditors, investment funds and credit market companies. One of these sectors had before this delivered only one report during the years with obligation to report.

However, the currency exchange companies have decreased their reporting (3680) with 10 % compared with 2008 (4177). The vehicle trade too decreased its reporting from 17 reports in 2008 to 10 reports in 2009.

9 Trends in the money laundering reporting in 2009

The number of money laundering reports decreased in 2009 compared with 2008, partially the result of a change in the reporting routines at



some reporting entities, but still it constituted a significant increase compared with 2006 and 2007. This trend is expected to continue.

14 462 companies are covered by the review and reporting obligation in the Money Laundering Act. 140³ companies of those have reported suspected money laundering to the FIU in 2009. This means that only 1% of the companies are sending reports. 97 companies sent reports in 2008 and 52 in 2007. Expressed in percent this is a significant increase, but from a rather low level.

The risk of being used for money laundering purposes differs between sectors. Within high-risk sectors the tendency to report varies a lot between companies situated in the same area. Some report frequently whereas others do not report at all.

One of the reasons for the combination of an increased number of reporting companies but a decreased number of reports could be recently introduced supervisory system for the companies obliged to report⁴.

Knowledge about the Act on money laundering and the meaning of its obligations has probably not reached all companies that fall under its regulation. None of the companies classified and obliged to report⁵ in accordance with the 2009 Act have sent any money laundering reports.

A continuous flow of information from the supervisory authorities, in collaboration with the FIU, and better feedback from the FIU to the companies obliged to report, should improve both the sense of confidence between the parties and the possibilities of preventing money laundering. Information directed at the representatives of the sectors that were included in the Money Laundering Act in 2009 is particularly important in order to bring their attention to different types of money laundering indications.

10 Organisation chart

³ Note table 8.7.1. page 23

⁴ See chapter 6, Extended legislation and reinforced supervision, p. 12.

⁵ Registered auditing firms, professionally offered bookkeeping or auditing services, creation of legal entities, sale of newly founded limited companies, procurement of Swedish or foreign legal entities, providing a registered office or a postal address and thereto attached services to a legal entity or a trust or a similar legal formation as well as legal or natural persons that carry on trade or auction sale where cash payment to an amount of at least 15.000 € as regards all goods.



The FIU is a section within the National Criminal Police and the Criminal Intelligence and Investigation Division. The FIU has five main fields of operation:

1. Money laundering
2. Terrorist financing
3. ARO – Asset Recovery Office
4. National contact point (NCO) for counterfeit cash and credit cards, cheques and other means of payment
5. Environmental crime

The FIU has a staff of 27, divided as described in the organisation chart below

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