

**CONFIDENTIAL**

Strategic Analysis Division-July 2018



## Financial Intelligence Centre Republic of Namibia

---

PO Box 2882  
Windhoek  
Namibia

Phone: + 264 61 283 5100  
Fax: + 264 61 283 5259  
[helpdesk@fic.na](mailto:helpdesk@fic.na)

# Monthly Statistical Report

**Divisions** : Financial Investigations and Analysis and Compliance and  
Monitoring

**Reporting Period** : 01 -31 August 2018

**Date Compiled** : 05 September 2018

## 1. Incoming Reports

<b>Reports</b>			
	<b>August 18</b>	<b>August 17</b>	<b>Total</b>
CBMCRs <sup>1</sup>	0	0	92
CTRs <sup>2</sup>	7 597	7 271	285 120
EFTs <sup>3</sup>	78 743	53 632	3 432 107
IFTs <sup>4</sup>	120 008	138 878	3 100 588
SARs <sup>5</sup>	19	14	542
STRs <sup>6</sup>	130	183	4 584

The period under review has seen an increase in the number of EFTs from 53 632 transactions to 78 743 transactions. This can be attributed to the fact that these platforms provide better convenience to users than conventional banking. Similarly, there is an increase in the number of CTRs, and SARs received. It is however noted that the FIC observed a reduction in the number of IFTs and STRs received, when compared to the same period last year.

<b>Requests for Information</b>			
	<b>August 18</b>	<b>August 17</b>	<b>Total</b>
IRD <sup>7</sup>	8	10	245
IRIs <sup>8</sup>	2	0	44

A total of 8 IRDs were received during August 2018, a decrease from 10 IRDs received during the same period last year. Further, there were only two IRIs received during the period under review. Thus far, a total of 289 requests have been received by the Centre since inception.

<sup>1</sup> CBMCR: Cross Border Movement of Cash Report

<sup>2</sup> CTR: Cash Transaction Report

<sup>3</sup> EFT: Electronic Funds Transfer

<sup>4</sup> IFT: International Funds Transfer

<sup>5</sup> SAR: Suspicious Activity Report

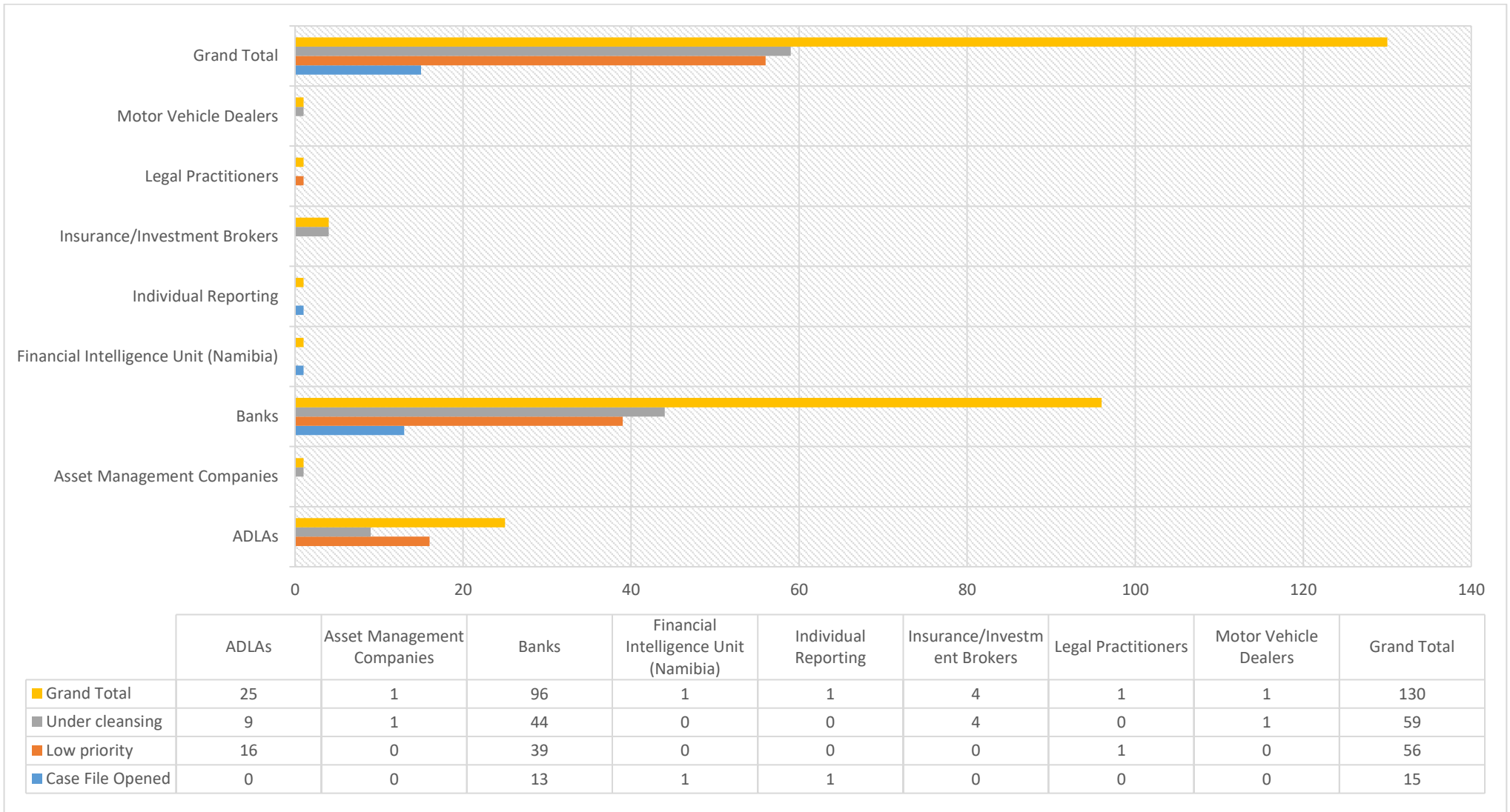
<sup>6</sup> STR: Suspicious Transaction Report

<sup>7</sup> IRD: Incoming Request-Domestic

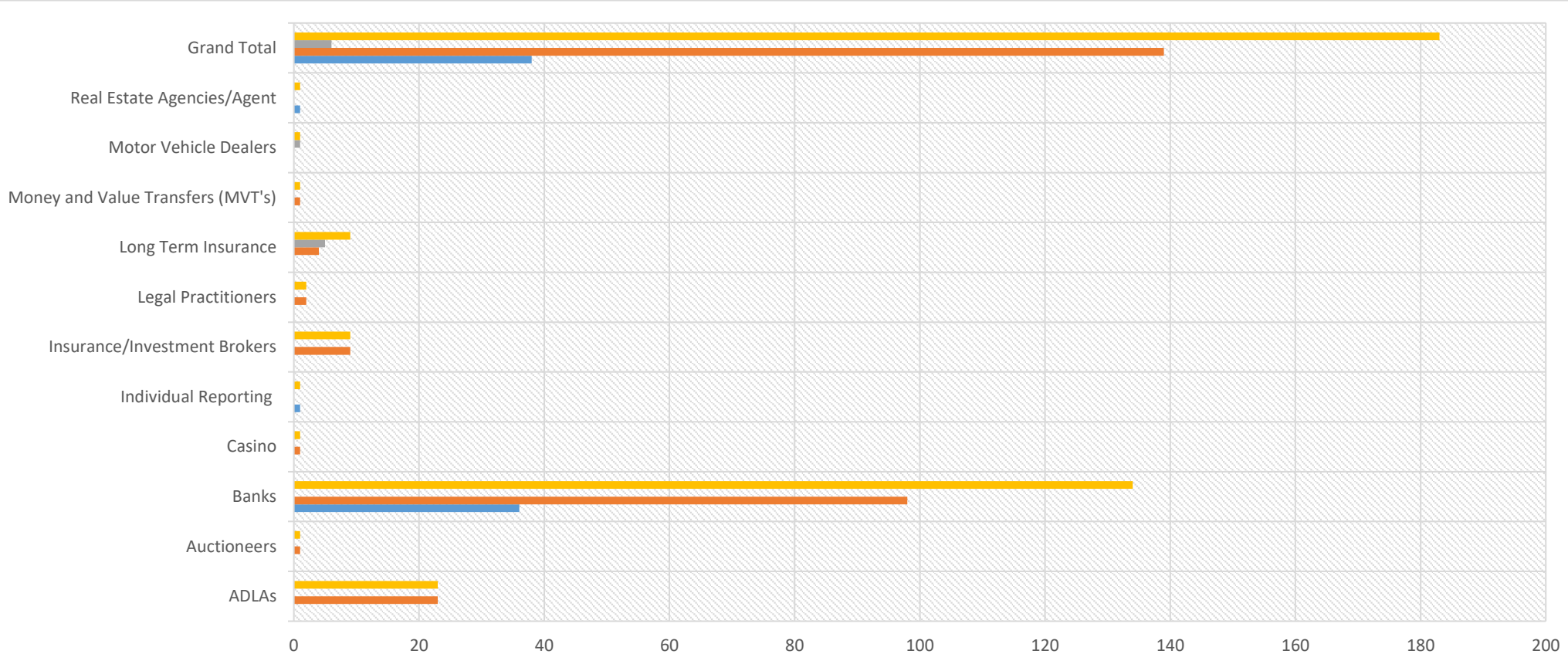
<sup>8</sup> IRI: Incoming Request-International

**2. STR received by Source Type**

**Graph 2.1: STRs received in August 2018 by Source Type**



**Graph 2.2: STRs received in August 2017 by Source Type**



	ADLAs	Auctioneers	Banks	Casino	Individual Reporting	Insurance/Investment Brokers	Legal Practitioners	Long Term Insurance	Money and Value Transfers (MVT's)	Motor Vehicle Dealers	Real Estate Agencies/Agent	Grand Total
■ Grand Total	23	1	134	1	1	9	2	9	1	1	1	183
■ STR Set-Aside	0	0	0	0	0	0	0	5	0	1	0	6
■ Low priority	23	1	98	1	0	9	2	4	1	0	0	139
■ Case File Opened	0	0	36	0	1	0	0	0	0	0	1	38

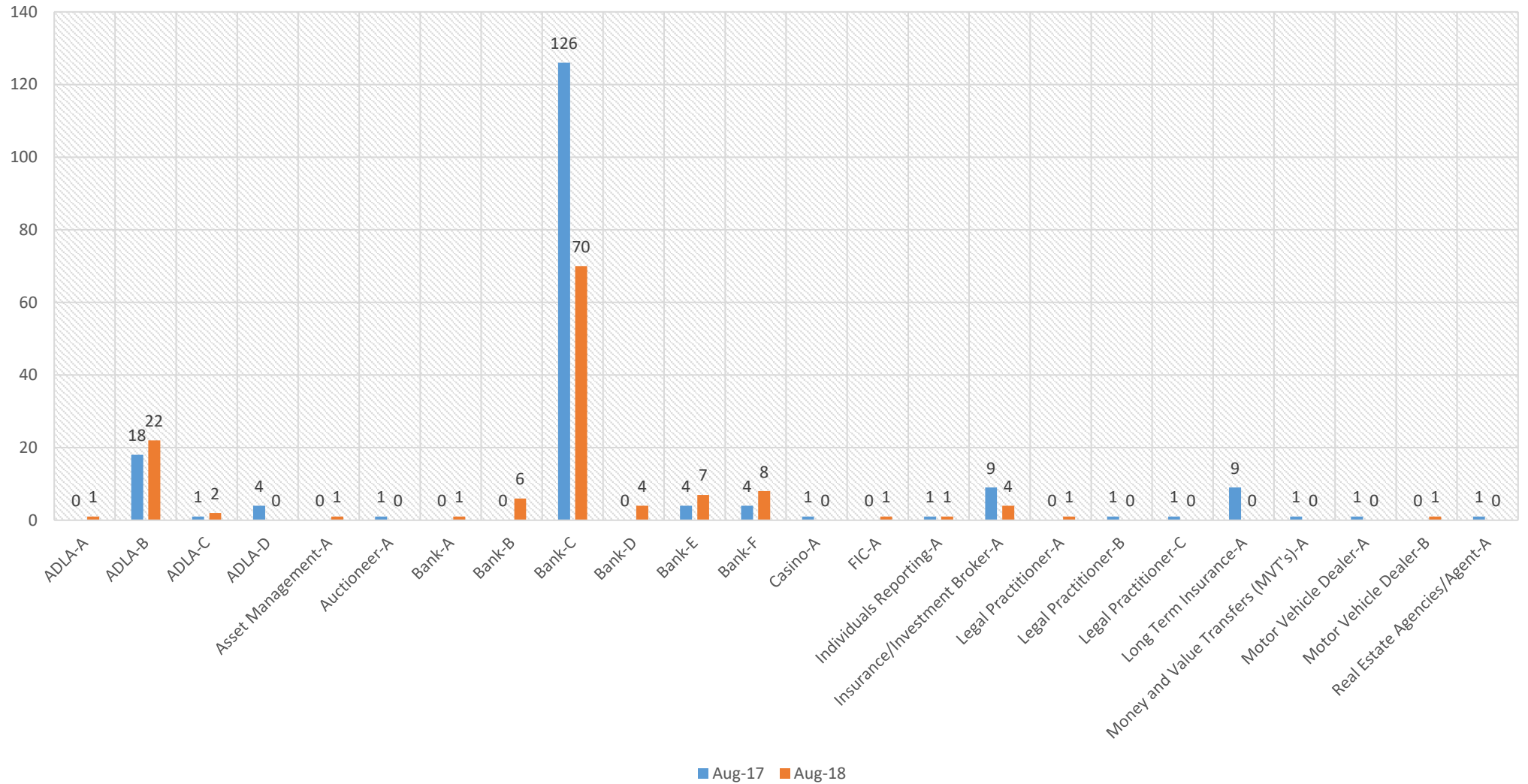
**CONFIDENTIAL**

Strategic Analysis Division-July 2018

The total number of STRs received decreased by 28.9% from 183 STRs recorded in August 2017 to 130 STRs recorded in August 2018.

Graph 2.1 further shows that out of all the STRs received during the period under review, only 11.5% of the STRs were escalated for further analysis whereas 43.1% were classified as low priority. Reports can be classified as low priority when the observed suspicion does not fall within law enforcement's priority areas of investigation or if the FIC finds poor articulation of the grounds of suspicion in STRs filed. A significant portion (45.4%) of these STRs are still under cleansing and work on them has not yet commenced. This delay is primarily caused by limited resources within the FIC. The Banks continue to file the most reports. In the period of August 2018 and August 2017, they filed 73.8% and 73.2 of all STRs respectively.

**Graph 2.3: STRs by Reporting Entities: August 2018 & August 2017**



Bank-C filed the majority of STRs, amounting to 53.8% of all STRs. This was followed by ADLA-B which filed 16.9% in the period under review. Similarly, during the same period last year, Bank-A filed the most STRs followed by ADLA-B, with the said institutions filing 68.9% and 9.8% respectively.

**3. Analysis**

Under Analysis	
August -18	
Cases	144
IRDs	56
IRIs	5

Set-Aside			
	August -18	August -17	Total
Cases	0	0	101
IRDs	0	0	4
IRIs	0	0	0
SARs	0	0	4
STRs	0	4	70

Low Priority			
	August -18	August -17	Total
Cases	0	0	308
IRDs	0	0	0
IRIs	0	0	0
SARs	2	7	320
STRs	43	63	2 714

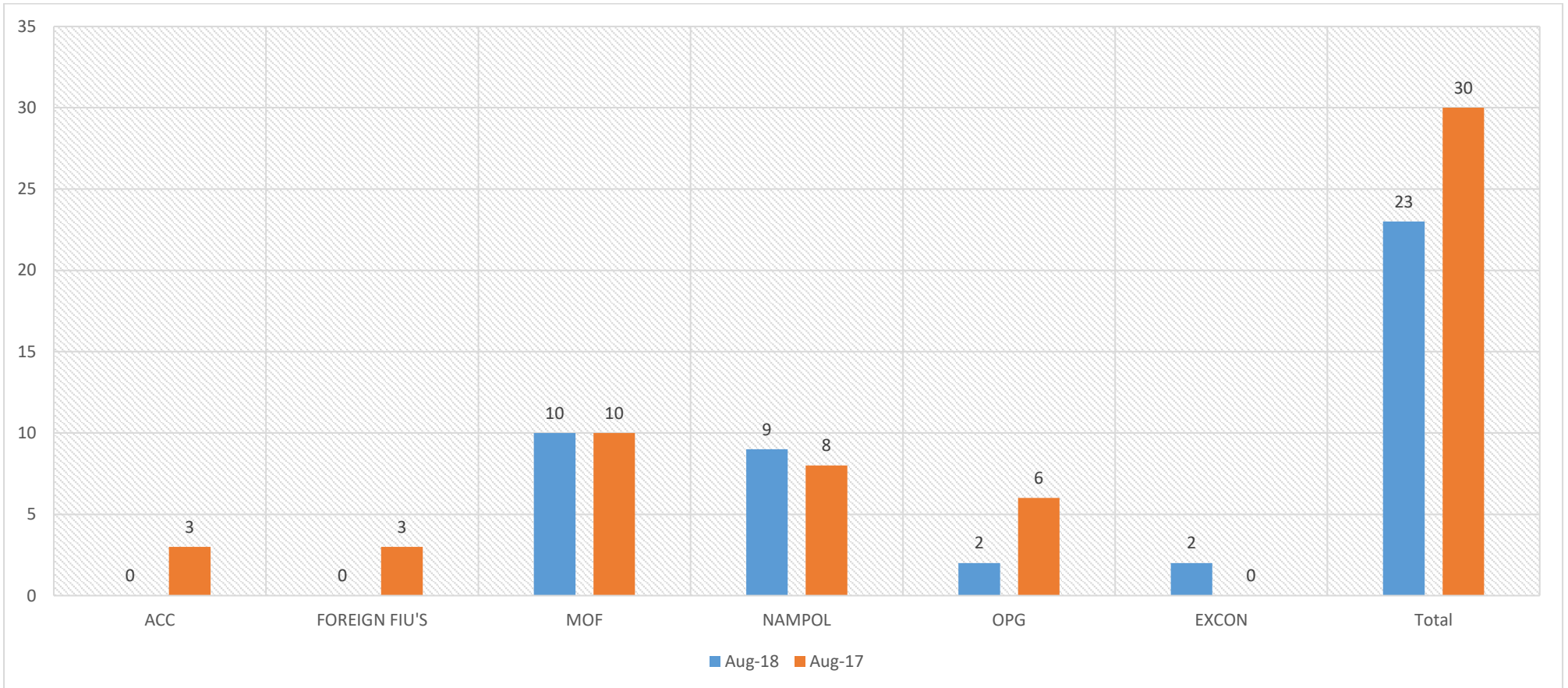
During the period under review, 144 Cases, 56 IRDs and 5 IRIs were under analysis. There were no Cases, IRDs, IRIs, SARs nor STRs set aside during the month of August 2018. The number of STRs classified as low priority amounted to 43, a decrease from the 63 classified as such during the same period in 2017. Further, SARs classified as low priority decreased from 7 to 2. The primary reason why these reports were classified as low priority in August 2018 is due to the negligible (or insignificant) amounts involved and poor articulation of the grounds of suspicions in STRs.

Since inception, the total number of SARs and STRs classified as low priority amounted to 320 and 2,714 respectively.

4.

Disclosures

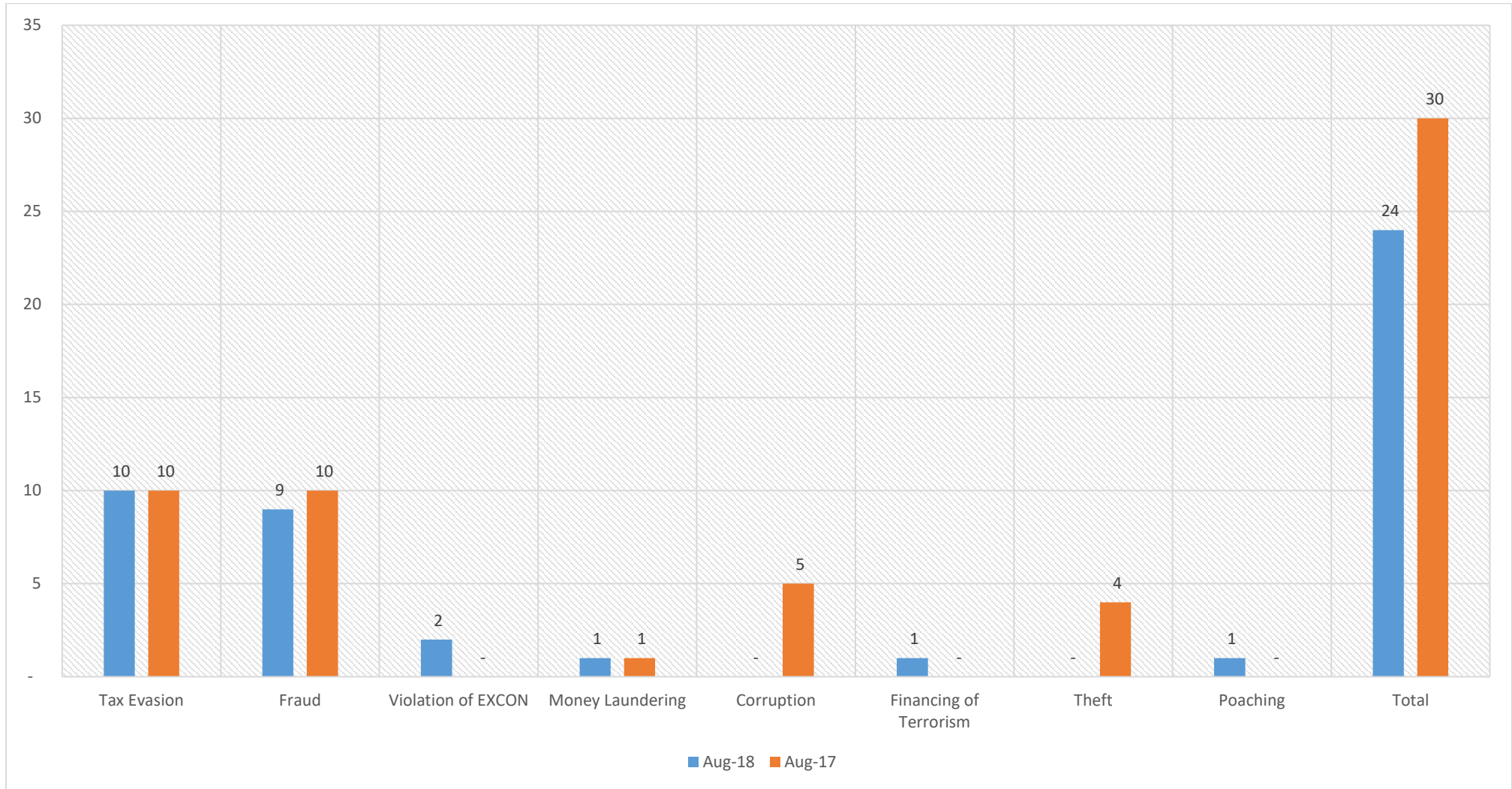
Graph 4.1: Total Disclosures: August 2018 and August 2017



The Centre disseminated a total of 23 and 30 disclosures during the month of August 2018 and August 2017 respectively. The Ministry of Finance-Receiver of Revenue Department continue to receive the highest number of disclosures (From FIC) during both periods under review, receiving a total of 10 reports. This points to potential tax evasion cases being the highest in cases under FIC review and analysis.

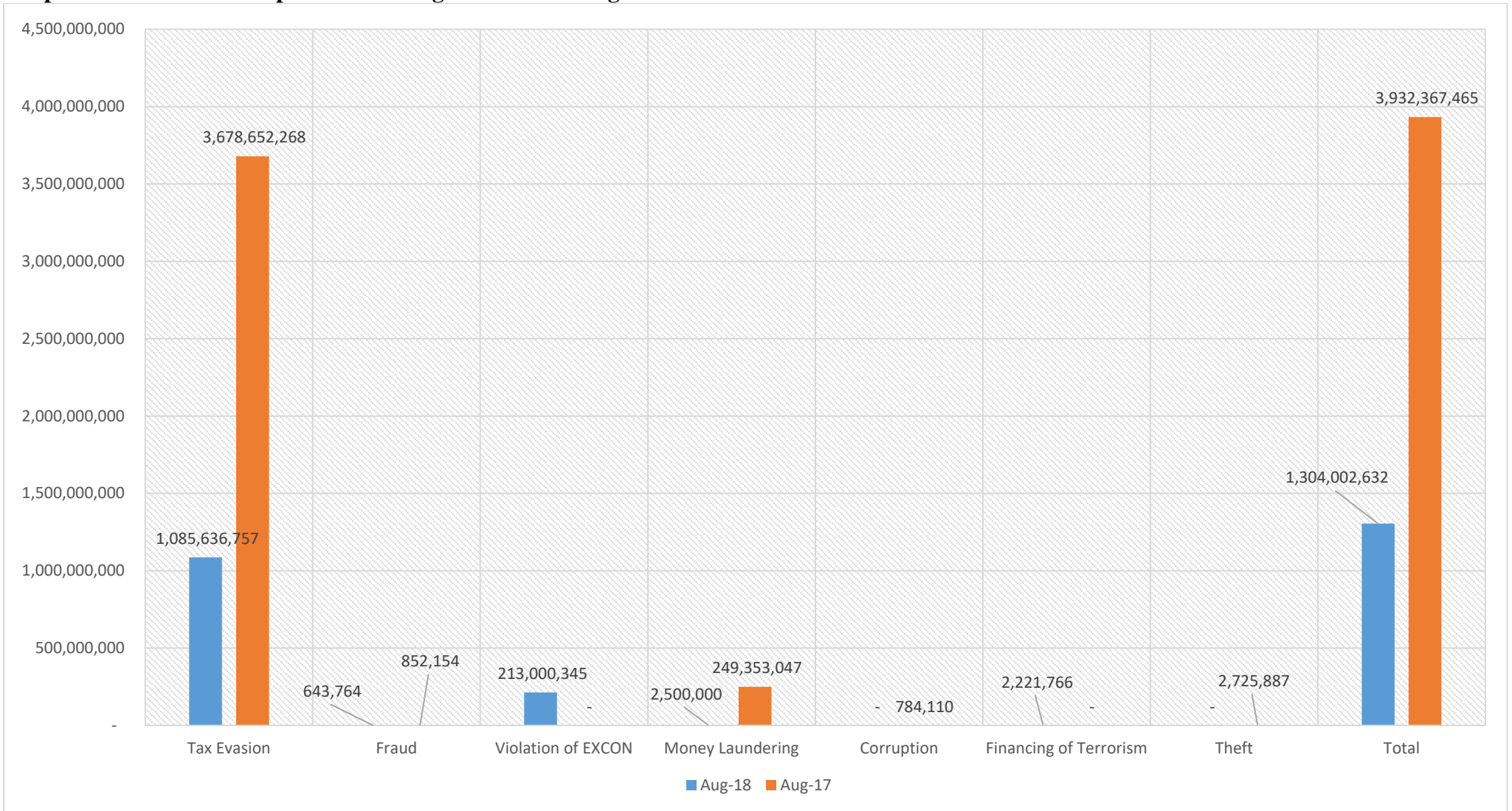


**Graph 4.2: Potential Offences: August 2018 and August 2017**



Tax Evasion featured as the leading potential offence with 10 potential offences recorded in both August 2018 and August 2017. Fraud cases also featured as the second leading potential offences during the period under review followed by corruption.

**Graph 3.3: Potential value per offence: August 2018 and August 2017**



**CONFIDENTIAL**

Strategic Analysis Division-July 2018

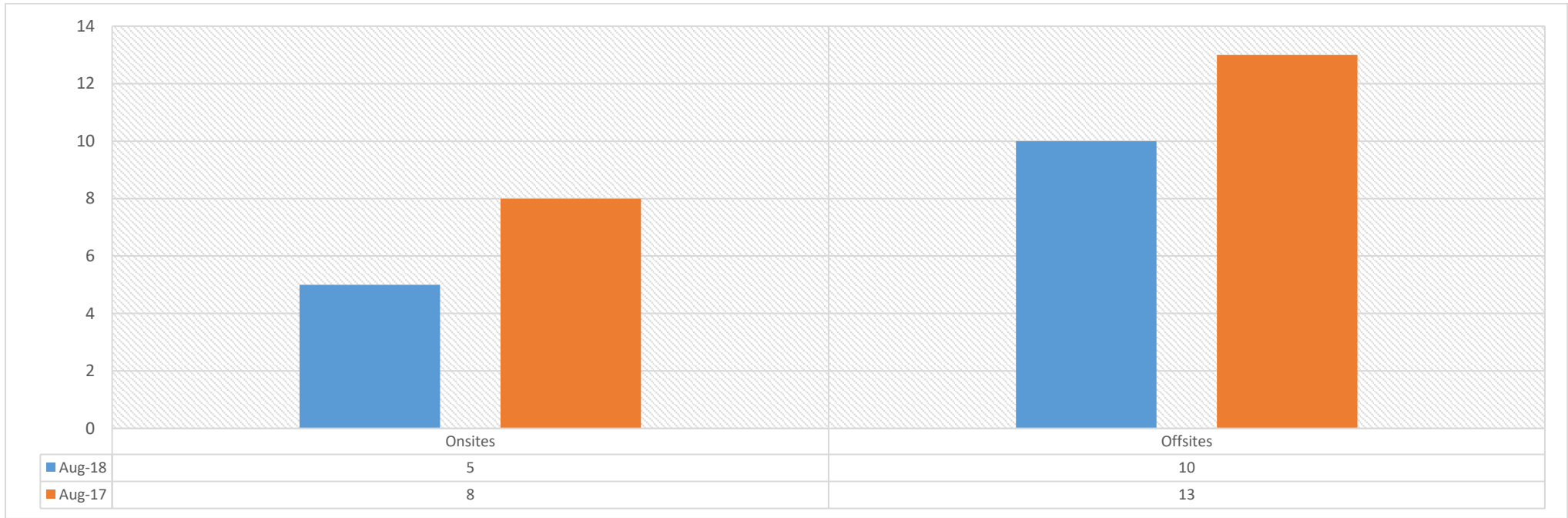
There is a significant decrease in the potential value per offense recorded during August 2018 when compared to August 2017, as such, the total figures stood at N\$ 3 932 367 465 and N\$ 1 304 002 632 respectively. The Tax Evasion value per potential offense recorded the highest amount of N\$ 1 085 636 757 followed by Violation of EXCON Rulings and Regulations amounting to N\$ 213 000 345 during the period under review.

<b>5. Referrals</b>						
<b>Compliance</b>		<b>Legal &amp; Enforcement</b>		<b>Monitoring Orders</b>		<b>Intervention Orders</b>
1		None		Issued : 1		Issued : 4
				No. of accounts : 1		Amount Involved : N\$ 4 040 722.25

Four intervention orders were issued of which one was to Bank-C and three to Bank-B. Investigations are currently ongoing with the Receiver of Revenue and the PG's office. Further, one monitoring order was issued to Bank-C and one referral issued to the Compliance Monitoring and Supervision Division.

**6. Compliance Inspections**

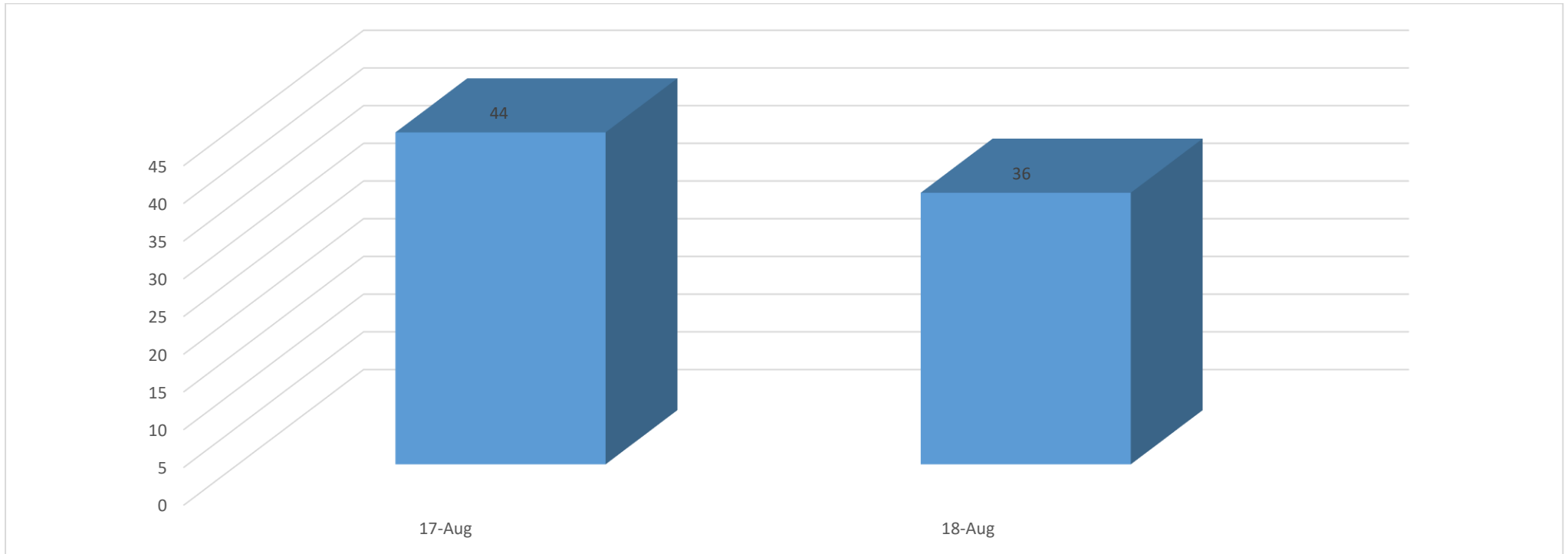
**Graph 6.1: Compliance assessments: August 2018 and August 2017**



During the period under review, the number of onsite assessments decreased to 5 compliance assessments from 8 onsite assessments recorded last year. Similarly, the number of Off-site assessments decreased to 10 compliance assessments during the period under review from 13 recorded last year. Reasons for the decrease include:

- a. the reduction in the number of staff members (2 staff resignations); and
- b. re-prioritisation of AOCs – the Compliance Monitoring and Supervision Division is undertaking Sectoral Risk Assessments, which has resulted in a reduction in the volume of assessments, thus enabling staff to concentrate on this time consuming exercise.

**Graph 6.2: Registrations: August 2018 and August 2017**



During the period under review, the volume of registration of Accountable Institutions and Reporting Institutions decreased to 36 from 44 registrations undertaken in August 2017.