

Jersey Financial Intelligence Unit (Jersey FIU) Suspicious Activity Reports: Industry Feedback Q4 2022





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INTRODUCTION AND AIM

The Jersey FIU serves as the central agency for the receipt of Suspicious Activity Reports (SARs) filed pursuant to obligations in the Proceeds of Crime (Jersey) Law 1999 (POCJL) and the Terrorism (Jersey) Law 2002 (TJL).

The global Anti Money Laundering (AML)/Countering Financing of Terrorism (CFT) strategy places Financial Institutions (FIs) and Designated NonFinancial Business and Professions (DNFBPs) as fundamental stakeholders in the fight against Money Laundering (ML)/Terrorist Financing (TF); this is based on the fact that FIs and DNFBPs:- will be aware of and involved in financial transactions taking place in the market; having the freedom to operate comes with the responsibility to cooperate; and they are best positioned to know their customers, monitor transactions and detect suspicious behaviour/activity. The reporting of suspicious activity is rightly one of the cornerstones of the AML/CFT framework and is reflected as such in Recommendations 20 (FIs: Reporting suspicious behaviour) and 23 (DNFBPs: Other Measures) of the FATF standards.

The aim of this quarterly report, and others which will follow, is to provide feedback to submitters of SARs on recorded data received by the Jersey FIU. The information contained in SARs is vitally important as it allows the Jersey FIU to better understand suspected criminal activity, ML/TF typologies, emerging threats, risks, and trends. SAR information will be used not only to structure the work of the Jersey FIU and ensure it is effective in the way it uses financial intelligence, but also feeds into wider work carried out by other local competent authorities tasked with financial crime strategy development/ implementation.

Submitters of SARs to the Jersey FIU will be aware of changes made to the SAR Template which came into effect on 1st February 2022. These changes allow for more detailed analysis of information contained in a SAR by the Jersey FIU and provides for better feedback of SAR data to industry. This Q4 2022 report contains feedback which is as a direct result of those changes in areas such as consent requests, business declined information, and disclosure of criminal activity.

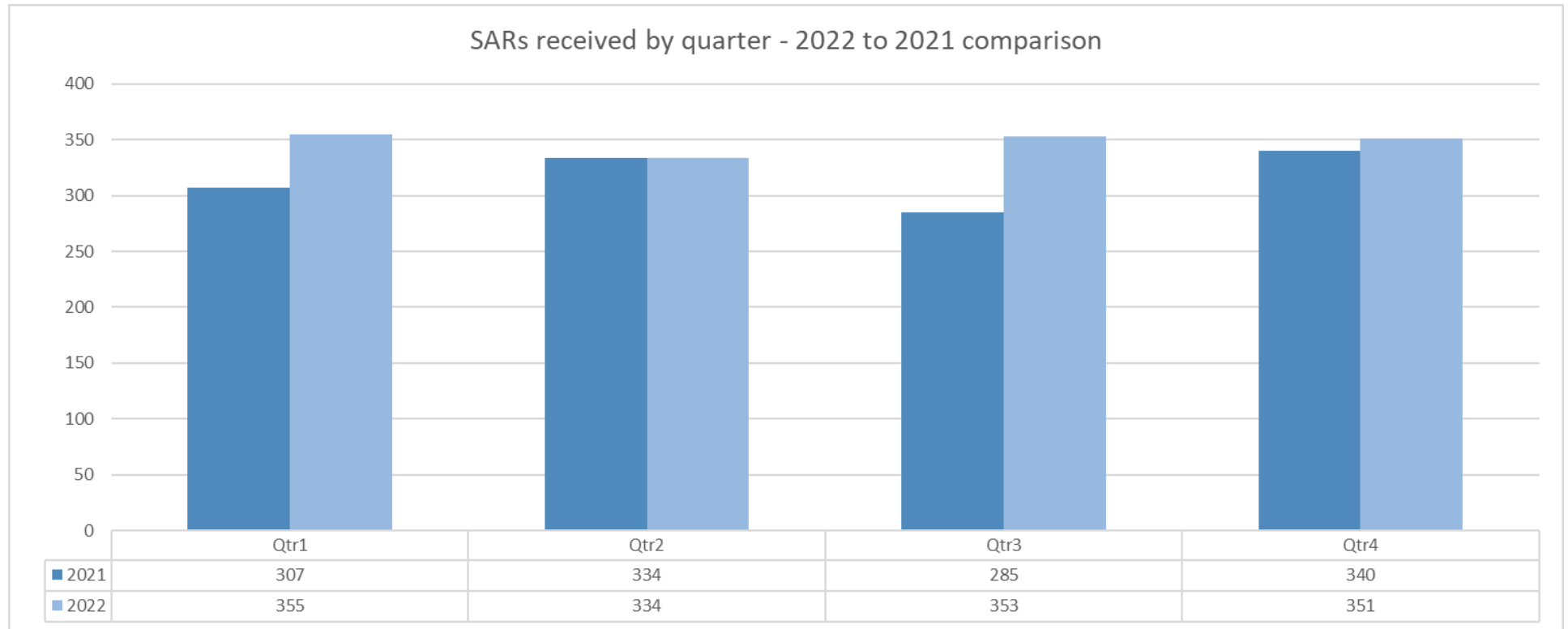
Louise Clayson, Interim Head of Jersey FIU January 2023



SUSPICIOUS ACTIVITY REPORTS - OVERVIEW

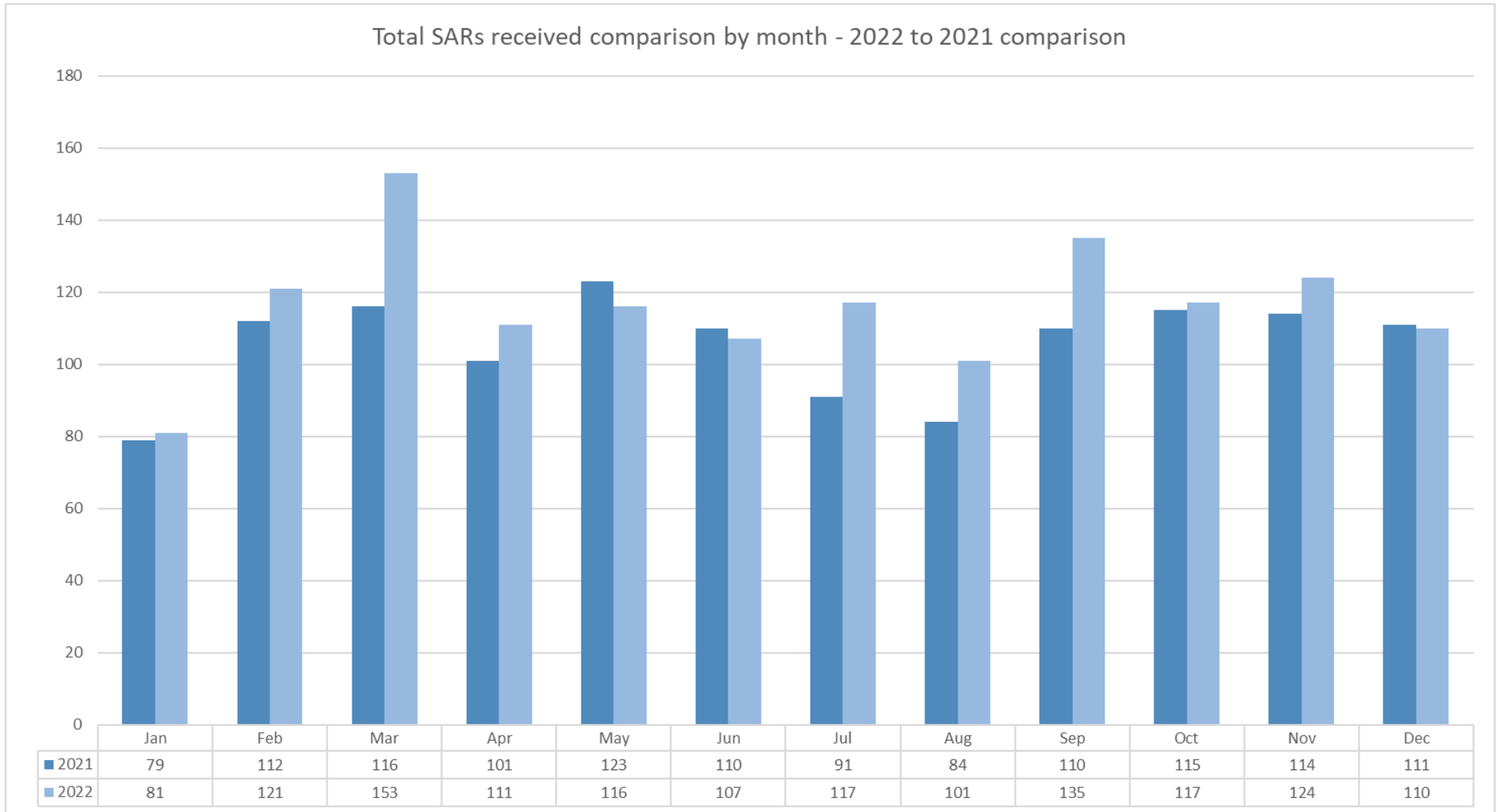
SAR Totals by Quarter

351 SARs were received by the Jersey FIU in Q4 2022. This is a 3% increase compared to the same period in 2021. Q4 2022 in comparison to Q3 2022 has decreased by 1%.





SAR Totals by Month

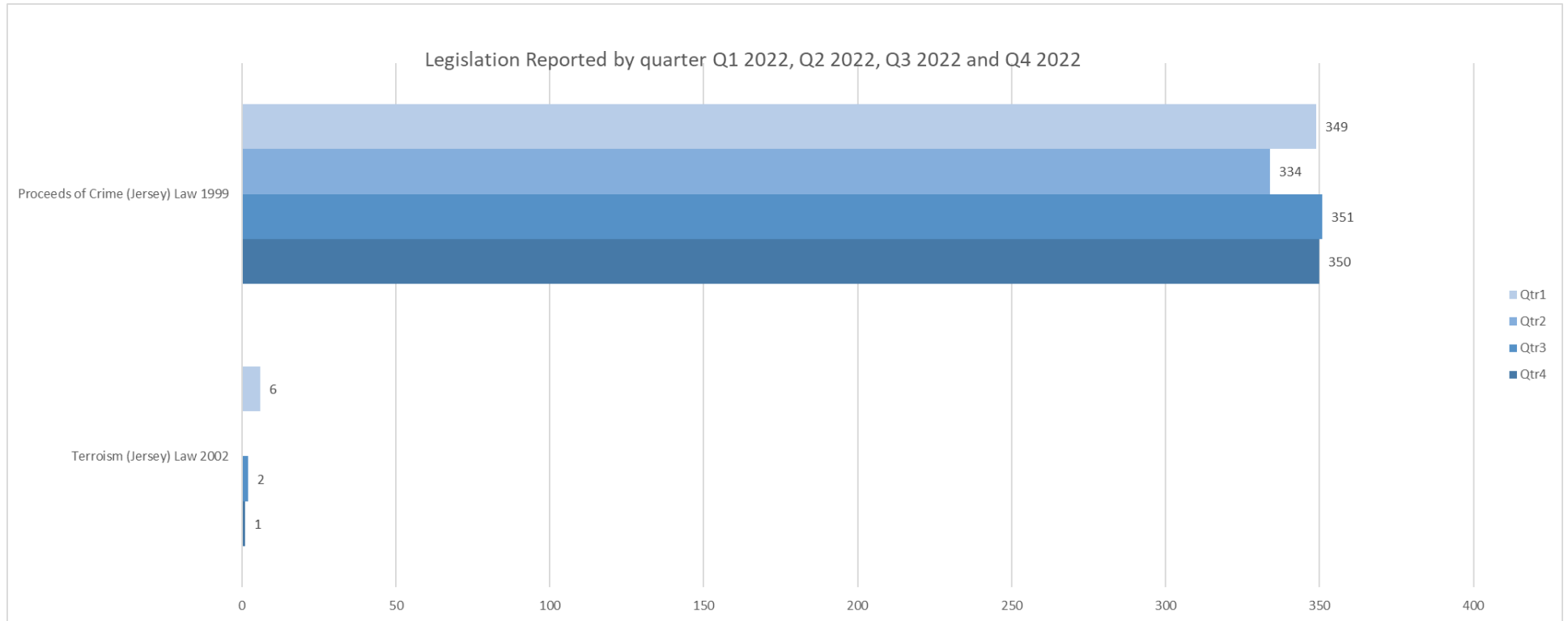


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SARs by Legislation by Quarter

In Q4 2022 350 SARs were submitted under the POCJL, with 1 under the TJL.





SARs - Business Declined by Quarter

The new SAR template now requires the submitter to state if the SAR submission relates to business that was declined. This could be for a variety of reasons and includes situations where due diligence carried out as part of any onboarding process triggered a reporting obligation under the POCJL or TJJL legislation. Business declined was chosen 10% in Q4 2022 compared to 7.6% of all SARs submitted in Q3 2022.

It is important that submitters of declined business SAR's only select 'declined business' if you have decided not to take the client on. If you are still in the process of making the decision to on board the client but still wish to submit a report, choose "No". (Please see further guidance in the SAR user manual).

| Business Declined | Feb 22 - Mar 22 | % | Q2 22 | % | Q3 22 | % | Q4 22 | % |
|-------------------|-----------------|---------------|------------|---------------|------------|---------------|------------|---------------|
| No | 235 | 85.8% | 303 | 90.7% | 326 | 92.4% | 316 | 90.0% |
| Yes | 39 | 14.2% | 31 | 9.3% | 27 | 7.6% | 35 | 10.0% |
| Total | 274 | 100.0% | 334 | 100.0% | 353 | 100.0% | 351 | 100.0% |

Where SARs relate to business declined the Grounds for Disclosure were recorded by the submitters as follows (this is a multiple-choice selection):

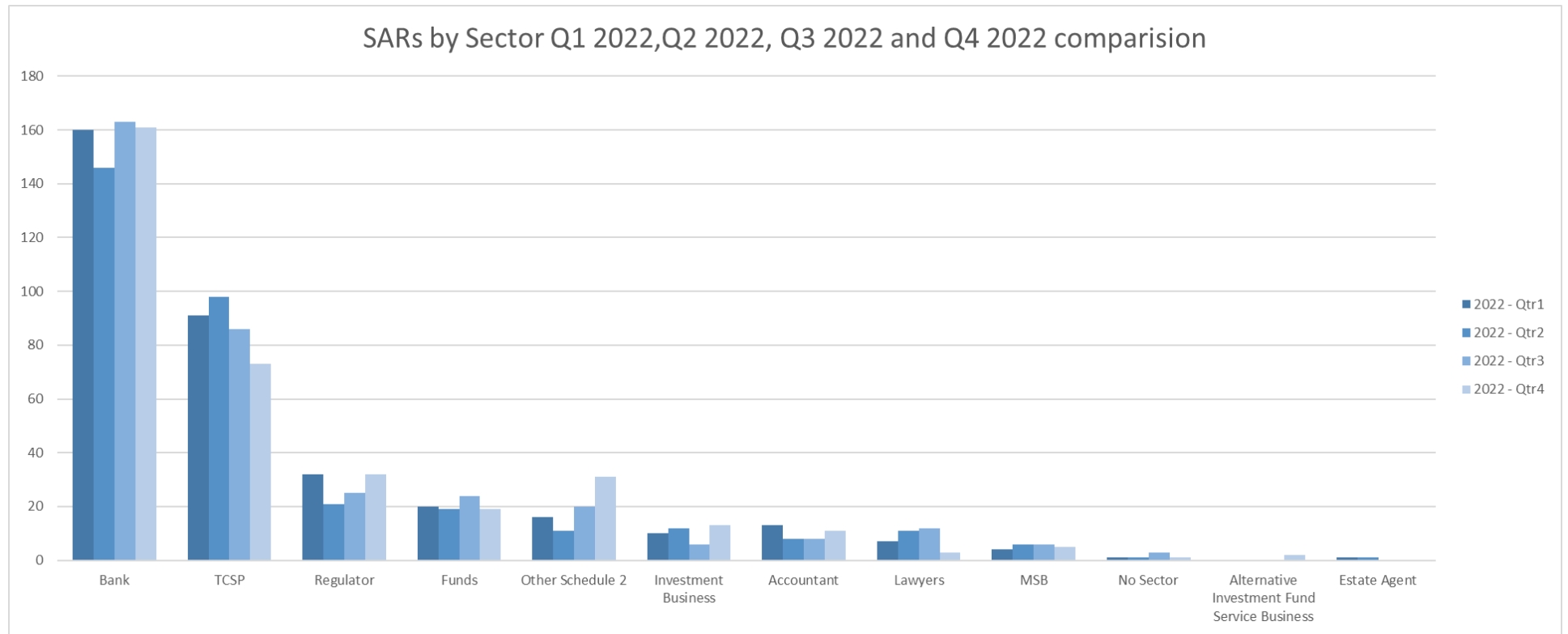
| Grounds for Disclosure | Feb-22 - Mar 22 | Q2 22 | Q3 22 | Q4 22 | Total |
|--|-----------------|-----------|-----------|-----------|------------|
| Due Diligence | 18 | 8 | 6 | 13 | 45 |
| Internet Research/Media | 16 | 8 | 5 | 5 | 34 |
| Fraud / False Accounting | 6 | 10 | 7 | 5 | 28 |
| High Risk Jurisdictions | 3 | 2 | 5 | 6 | 16 |
| Tax/TIEA | 3 | 6 | 4 | 2 | 15 |
| Sanction identified | 1 | 2 | 0 | 7 | 10 |
| Evidence of Forged Documentation | 5 | 3 | 0 | 0 | 8 |
| Cash Transactions | 1 | 2 | 1 | 3 | 7 |
| Group Information | 1 | 1 | 3 | 1 | 6 |
| Production Order/Law Enforcement Enquire/POC Notice/Liaison Notice | 2 | 3 | 0 | 0 | 5 |
| Unexplained Lifestyle | 1 | 1 | 1 | 1 | 4 |
| Unusual Forex Transactions | 2 | 1 | 1 | 0 | 4 |
| Account Activity Not in Keeping with KYC | 1 | 2 | 1 | 0 | 4 |
| Vulnerable Person | 0 | 1 | 1 | 1 | 3 |
| Highly Transactional | 0 | 2 | 0 | 0 | 2 |
| Grand Total | 60 | 52 | 35 | 44 | 191 |



REPORTING SECTOR FEEDBACK

SARs by Reporting Sector by Quarter

The Banking Sector was again the largest reporting sector equating to 45.9% of all SARs submitted in Q4 2022 (46.2% in Q3 2022) followed by the Trust and Corporate Service Provider (TCSP) sector (Q4 2022 – 20.8%) and then the Regulator (Q4 2022 – 9.1%).



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Combatting Financial Crime: **Together**



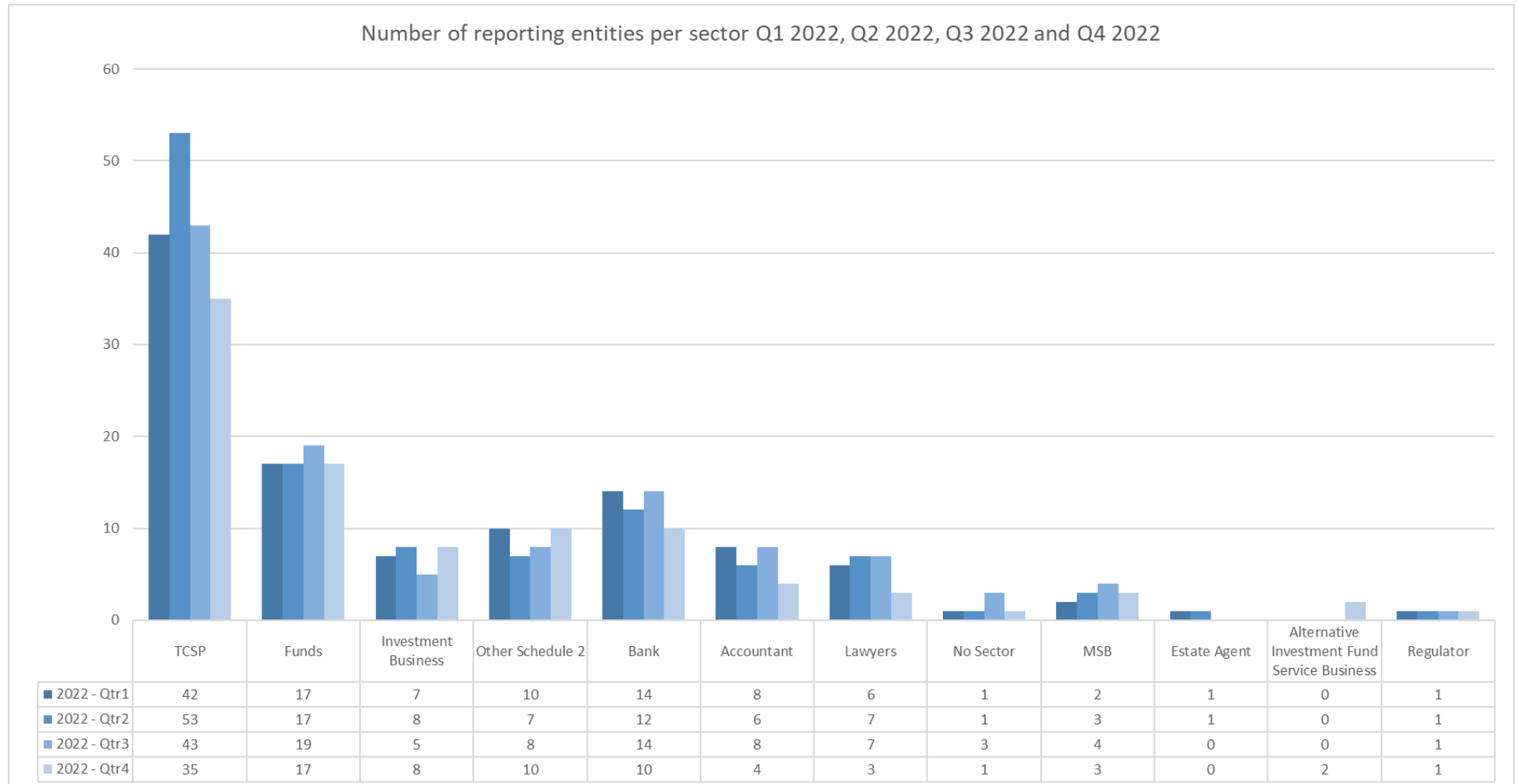
| Sector | Q1 22 | Q1% | Q2 22 | Q2% | Q3 | Q3% | Q4 | Q4% |
|---|------------|---------------|------------|---------------|------------|---------------|------------|---------------|
| Bank | 160 | 45.1% | 146 | 43.7% | 163 | 46.2% | 161 | 45.9% |
| TCSP | 91 | 25.6% | 98 | 29.3% | 86 | 24.3% | 73 | 20.8% |
| Regulator | 32 | 9.0% | 21 | 6.3% | 25 | 7.1% | 32 | 9.1% |
| Funds | 20 | 5.6% | 19 | 5.7% | 24 | 6.8% | 19 | 5.4% |
| Other Schedule 2 | 16 | 4.5% | 11 | 3.3% | 20 | 5.7% | 31 | 8.8% |
| Investment Business | 10 | 2.8% | 12 | 3.6% | 6 | 1.7% | 13 | 3.7% |
| Accountant | 13 | 3.7% | 8 | 2.4% | 8 | 2.3% | 11 | 3.1% |
| Lawyers | 7 | 2.0% | 11 | 3.3% | 12 | 3.4% | 3 | 0.9% |
| MSB | 4 | 1.1% | 6 | 1.8% | 6 | 1.7% | 5 | 1.4% |
| No Sector | 1 | 0.3% | 1 | 0.3% | 3 | 0.8% | 1 | 0.3% |
| Alternative Investment Fund Service Business | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 2 | 0.6% |
| Estate Agent | 1 | 0.3% | 1 | 0.3% | 0 | 0.0% | 0 | 0.0% |
| Total | 355 | 100.0% | 334 | 100.0% | 353 | 100.0% | 351 | 100.0% |

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Number of Entities Reporting Per Sector by Quarter

The below graph shows how many entities have reported per identified sector, for example in Q4 2022 35 different entities submitted a report from the TCSP sector. 'No sector' refers to a submission from a non-financial service business.





CONSENT REQUESTS

Consent requests by quarter

The new SAR template allows the Jersey FIU to record consent requests in more detail - broken down into Act, Transact and Exit requests; prior to 1 February 2022 this separate detail was not recorded in SAR submissions. In Q4 in 2022 the Jersey FIU received 442 consent requests in comparison to 335 in Q3 2022. As can be seen below of the 442 requests for consent for an Act, Transact or Exit in Q4 2022 the Jersey FIU has provided consent on 309 occasions (70%) and withheld consent on just 87 occasions (20%).

| Quarter 1 | Transact | % | Act | % | Exit | % | Total | % |
|----------------------|-----------|-------------|-----------|-------------|-----------|-------------|------------|-------------|
| Yes | 71 | 77% | 32 | 54% | 40 | 58% | 143 | 65% |
| No | 6 | 6% | 3 | 5% | 9 | 13% | 18 | 8% |
| Not a consent matter | 1 | 1% | 11 | 18% | 6 | 9% | 18 | 8% |
| Withdrawn | 15 | 16% | 14 | 23% | 14 | 20% | 43 | 19% |
| Total | 93 | 100% | 60 | 100% | 69 | 100% | 222 | 100% |
| Submitter Error | 0 | | 6 | | 3 | | 9 | |

| Quarter 2 | Transact | % | Act | % | Exit | % | Total | % |
|----------------------|------------|-------------|-----------|-------------|-----------|-------------|------------|-------------|
| Yes | 94 | 67% | 31 | 50% | 23 | 32% | 148 | 54% |
| No | 11 | 8% | 3 | 5% | 20 | 29% | 34 | 13% |
| Not a consent matter | 19 | 14% | 15 | 24% | 14 | 20% | 48 | 18% |
| Withdrawn | 16 | 11% | 13 | 21% | 13 | 19% | 42 | 15% |
| Total | 140 | 100% | 62 | 100% | 70 | 100% | 272 | 100% |
| Submitter Error | 2 | | 6 | | 3 | | 11 | |

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| Quarter 3 | Transact | % | Act | % | Exit | % | Total | % |
|----------------------|------------|-------------|-----------|-------------|-----------|-------------|------------|-------------|
| Yes | 157 | 74% | 30 | 49% | 32 | 54% | 219 | 66% |
| No | 20 | 9% | 15 | 24% | 20 | 33% | 55 | 16% |
| Not a consent matter | 16 | 8% | 12 | 19% | 3 | 5% | 31 | 9% |
| Withdrawn | 20 | 9% | 5 | 8% | 5 | 8% | 30 | 9% |
| Total | 213 | 100% | 62 | 100% | 60 | 100% | 335 | 100% |
| Submitter Error | 6 | | 4 | | 1 | | 11 | |

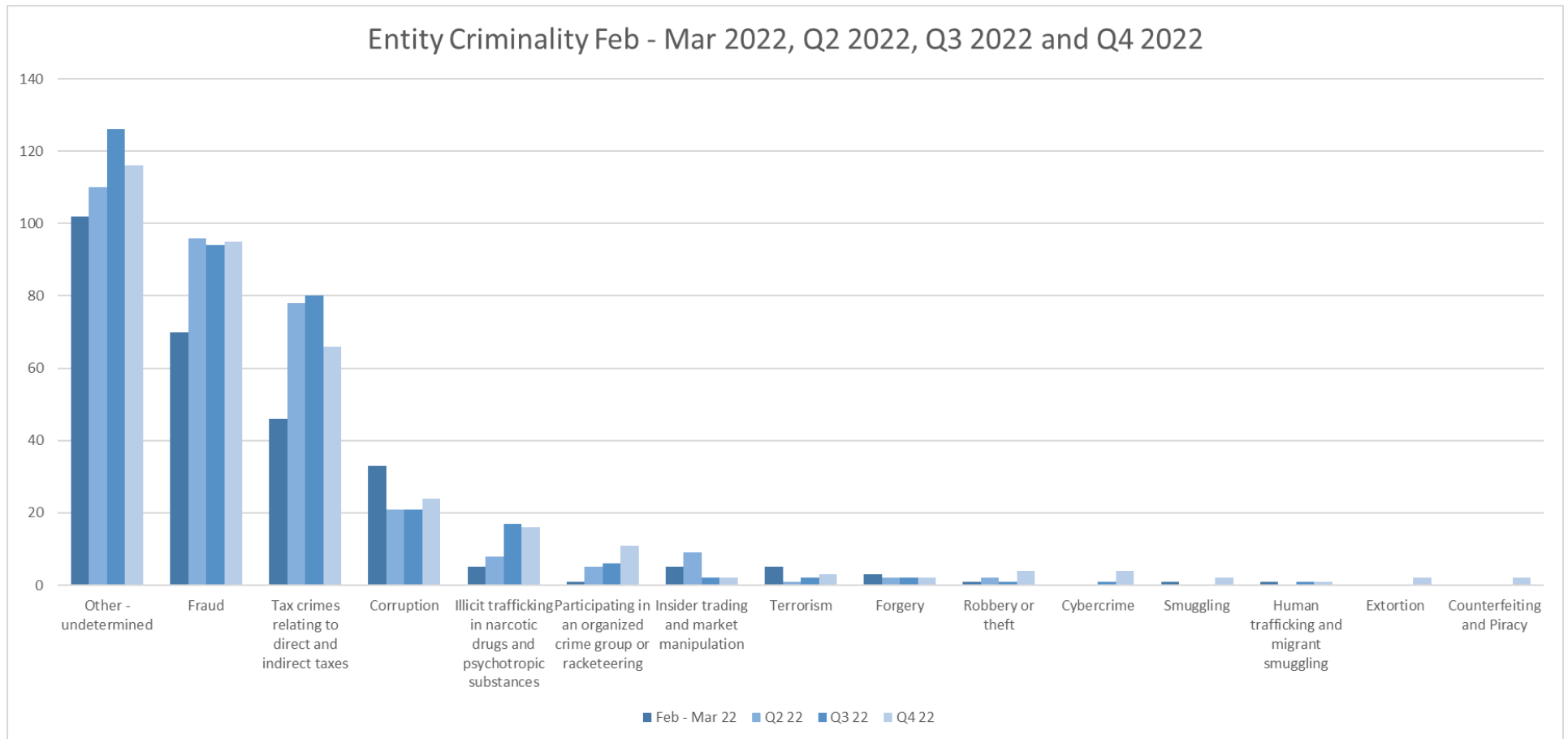
| Quarter 4 | Transact | % | Act | % | Exit | % | Total | % |
|----------------------|------------|-------------|-----------|-------------|------------|-------------|------------|-------------|
| Yes | 223 | 81% | 36 | 56% | 52 | 50% | 311 | 71% |
| No | 39 | 14% | 13 | 20% | 38 | 37% | 90 | 20% |
| Not a consent matter | 7 | 3% | 12 | 19% | 14 | 13% | 33 | 7% |
| Withdrawn | 5 | 2% | 3 | 5% | 0 | 0% | 8 | 2% |
| Total | 274 | 100% | 64 | 100% | 104 | 100% | 442 | 100% |
| Submitter Error | 0 | | 1 | | 0 | | 1 | |

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CRIMINALITY ACTIVITY FEEDBACK

Entity criminality selection by quarter



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| Criminality | Feb - Mar 22 | % | Q2 22 | % | Q3 22 | % | Q4 22 | % |
|---|--------------|---------------|------------|---------------|------------|---------------|------------|---------------|
| Other - undetermined | 102 | 37.2% | 110 | 32.9% | 126 | 35.6% | 116 | 32.9% |
| Fraud | 70 | 25.5% | 96 | 28.7% | 94 | 26.6% | 95 | 27.1% |
| Tax crimes relating to direct and indirect taxes | 46 | 16.8% | 78 | 23.4% | 80 | 22.7% | 66 | 18.8% |
| Corruption | 33 | 12.0% | 21 | 6.3% | 21 | 5.9% | 24 | 6.8% |
| Illicit trafficking in narcotic drugs and psychotropic substances | 5 | 1.8% | 8 | 2.4% | 17 | 4.8% | 16 | 4.6% |
| Participating in an organized crime group or racketeering | 1 | 0.4% | 5 | 1.5% | 6 | 1.7% | 11 | 3.1% |
| Insider trading and market manipulation | 5 | 1.8% | 9 | 2.7% | 2 | 0.6% | 2 | 0.6% |
| Terrorism | 5 | 1.8% | 1 | 0.3% | 2 | 0.6% | 3 | 0.9% |
| Forgery | 3 | 1.1% | 2 | 0.6% | 2 | 0.6% | 2 | 0.6% |
| Robbery or theft | 1 | 0.4% | 2 | 0.6% | 1 | 0.3% | 4 | 1.1% |
| Cybercrime | 0 | 0.0% | 0 | 0.0% | 1 | 0.3% | 4 | 1.1% |
| Smuggling | 1 | 0.4% | 0 | 0.0% | 0 | 0.0% | 2 | 0.6% |
| Human trafficking and migrant smuggling | 1 | 0.4% | 0 | 0.0% | 1 | 0.3% | 1 | 0.3% |
| Extortion | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 2 | 0.6% |
| Counterfeiting and Piracy | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 2 | 0.6% |
| Sexual exploitation | 0 | 0.0% | 1 | 0.3% | 0 | 0.0% | 1 | 0.3% |
| Counterfeiting and pirating products | 0 | 0.0% | 1 | 0.3% | 0 | 0.0% | 0 | 0.0% |
| Illicit arms trafficking | 1 | 0.4% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | 274 | 100.0% | 334 | 100.0% | 353 | 100.0% | 351 | 100.0% |

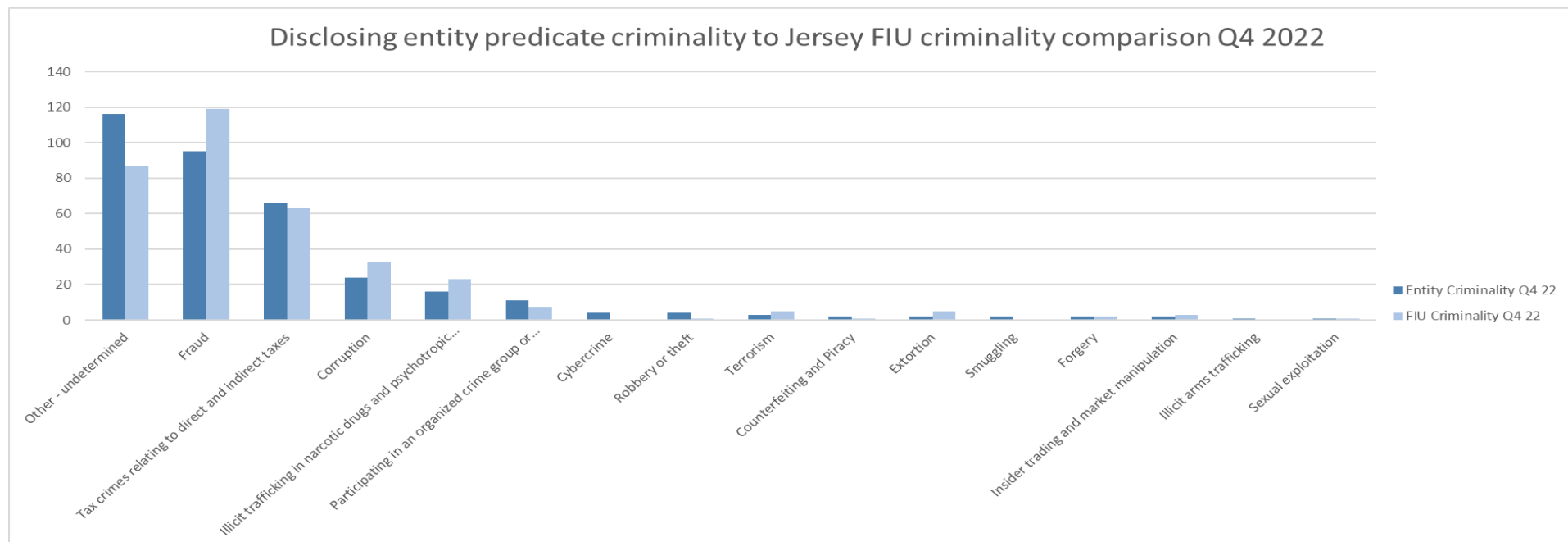
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Disclosing entity predicate criminality comparison to Jersey FIU chosen criminality

The new SAR template released on 1st February 2022 requires a submitter to choose a single predicate criminality they suspect; this is a change to the previous SAR template whereby numerous criminality suspected could be chosen.

Upon receipt of a SAR, the Jersey FIU undertakes a formal grading process which allows for prioritisation and allocation to financial intelligence officers within the unit, who may have specialist areas of responsibility for example, terrorist financing, human trafficking, bribery and corruption. As part of the grading process, the grading officer will review the SAR for the chosen predicate criminality suspected against the narrative provided in the SAR by the submitter. As can be seen from the below charts there has been limited occasions where, in the Jersey FIU’s view, the predicate offence selected in the SAR did not always match the predicate criminality identified in the narrative in the SAR. The Jersey FIU provides this feedback for information and comparative purposes only and understands predicate criminality is a subjective assessment made by the submitter of the SAR.



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| | Entity Criminality Q4 22 | Entity Criminality Q4 22 % | FIU Criminality Q4 22 | Entity Criminality Q4 22 % |
|---|-----------------------------|-------------------------------|--------------------------|-------------------------------|
| Other - undetermined | 116 | 32.9% | 87 | 24.7% |
| Fraud | 95 | 27.1% | 119 | 33.9% |
| Tax crimes relating to direct and indirect taxes | 66 | 18.8% | 63 | 17.9% |
| Corruption | 24 | 6.8% | 33 | 9.4% |
| Illicit trafficking in narcotic drugs and psychotropic substances | 16 | 4.6% | 23 | 6.6% |
| Participating in an organized crime group or racketeering | 11 | 3.1% | 7 | 2.0% |
| Cybercrime | 4 | 1.1% | 0 | 0.0% |
| Robbery or theft | 4 | 1.1% | 1 | 0.3% |
| Terrorism | 3 | 0.9% | 5 | 1.4% |
| Counterfeiting and Piracy | 2 | 0.6% | 1 | 0.3% |
| Extortion | 2 | 0.6% | 5 | 1.4% |
| Smuggling | 2 | 0.6% | 0 | 0.0% |
| Forgery | 2 | 0.6% | 2 | 0.6% |
| Insider trading and market manipulation | 2 | 0.6% | 3 | 0.9% |
| Human trafficking and migrant smuggling | 1 | 0.3% | 0 | 0.0% |
| Sexual exploitation | 1 | 0.3% | 1 | 0.3% |
| Murder | 0 | 0.0% | 1 | 0.3% |
| Total | 351 | 100% | 351 | 100.0% |

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Other – Undetermined (understanding)

As can be noted from the graph on page 14 'Other – Undetermined' was the highest predicate criminality chosen by SAR submitters in Quarter 4 (32.9%). Where 'Other – Undetermined' was chosen, the supporting grounds for disclosure were also selected (the submitter can choose multiple reasons).

| | Feb - Mar 22 | Feb - Mar 22 % | Q2 2022 | Q2 2022 % | Q3 2022 | Q3 2022 % | Q4 2022 | Q4 2022 % |
|--|--------------|----------------|------------|---------------|------------|---------------|------------|---------------|
| Account Activity Not in Keeping with KYC | 27 | 18.0% | 28 | 16.1% | 38 | 19.7% | 34 | 20.3% |
| Internet Research/Media | 15 | 9.9% | 21 | 12.1% | 23 | 11.9% | 15 | 8.9% |
| Due Diligence | 26 | 17.3% | 13 | 7.5% | 16 | 8.2% | 19 | 11.3% |
| Cash Transactions | 16 | 10.7% | 23 | 13.3% | 19 | 9.8% | 15 | 8.9% |
| Production Order/Law Enforcement Enquire/POC Notice/Liaison Notice | 13 | 8.7% | 18 | 10.4% | 24 | 12.4% | 16 | 9.5% |
| Group Information | 15 | 10.0% | 10 | 5.8% | 25 | 12.9% | 17 | 10.1% |
| Sanction identified | 15 | 10.0% | 17 | 9.8% | 12 | 6.2% | 14 | 8.3% |
| High Risk Jurisdictions | 9 | 6.0% | 10 | 5.8% | 16 | 8.2% | 14 | 8.3% |
| Highly Transactional | 4 | 2.7% | 11 | 6.4% | 12 | 6.2% | 7 | 4.2% |
| Fraud / False Accounting | 4 | 2.7% | 2 | 1.2% | 1 | 0.5% | 9 | 5.4% |
| Unexplained Lifestyle | 0 | 0.0% | 6 | 3.5% | 3 | 1.5% | 2 | 1.2% |
| Vulnerable Person | 1 | 0.7% | 3 | 1.7% | 1 | 0.5% | 4 | 2.4% |
| Tax/TIEA | 1 | 0.7% | 5 | 2.9% | 1 | 0.5% | 2 | 1.2% |
| Unusual Forex Transactions | 2 | 1.3% | 4 | 2.3% | 2 | 1.0% | 0 | 0.0% |
| Gambling | 2 | 1.3% | 2 | 1.2% | 1 | 0.5% | 0 | 0.0% |
| Total | 150 | 100.0% | 173 | 100.0% | 194 | 100.0% | 168 | 100.0% |



Predicate criminality by Sector

The below chart shows the primary predicate criminality chosen by the submitter broken down into sectors for Q4 2022.

| | Bank | % | TSP | % | Regulator | % | Other | % | Funds | % | Investment | % | Accountant | % | MSB | % | Lawyers | % | Alternative | % | No Sector | % |
|---|------------|-------------|-----------|-------------|-----------|-------------|-----------|-------------|-----------|-------------|------------|-------------|------------|-------------|----------|-------------|----------|-------------|-------------|-------------|-----------|-------------|
| Other - undetermined | 61 | 37% | 22 | 31% | 5 | 15% | 7 | 23% | 4 | 20% | 6 | 47% | 3 | 28% | 4 | 80% | 2 | 67% | 2 | 100% | 0 | 0% |
| Fraud | 59 | 36% | 12 | 17% | 8 | 25% | 3 | 10% | 6 | 32% | 2 | 15% | 4 | 36% | 1 | 20% | 0 | 0% | 0 | 0% | 0 | 0% |
| Tax crimes relating to direct and indirect taxes | 18 | 11% | 24 | 33% | 13 | 41% | 1 | 3% | 6 | 32% | 3 | 23% | 1 | 9% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Corruption | 7 | 4% | 6 | 8% | 5 | 16% | 0 | 0% | 1 | 5% | 2 | 15% | 2 | 18% | 0 | 0% | 0 | 0% | 0 | 0% | 1 | 100% |
| Illicit trafficking in narcotic drugs and psychotropic substances | 8 | 5% | 0 | 0% | 0 | 0% | 8 | 26% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Participating in an organized crime group or racketeering | 2 | 1% | 1 | 1% | 0 | 0% | 8 | 26% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Cybercrime | 0 | 0% | 2 | 3% | 0 | 0% | 0 | 0% | 2 | 11% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Robbery or theft | 0 | 0% | 2 | 3% | 0 | 0% | 1 | 3% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 1 | 33% | 0 | 0% | 0 | 0% |
| Terrorism | 1 | 1% | 1 | 1% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 1 | 9% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Counterfeiting and Piracy | 1 | 1% | 1 | 1% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Forgery | 1 | 1% | 1 | 1% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Extortion | 1 | 1% | 1 | 1% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Smuggling | 0 | 0% | 0 | 0% | 0 | 0% | 2 | 6% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Insider trading and market manipulation | 1 | 1% | 0 | 0% | 1 | 3% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Sexual exploitation | 1 | 1% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Human trafficking and migrant smuggling | 0 | 0% | 0 | 0% | 0 | 0% | 1 | 3% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% | 0 | 0% |
| Total | 161 | 100% | 73 | 100% | 32 | 100% | 31 | 100% | 19 | 100% | 13 | 100% | 11 | 100% | 5 | 100% | 3 | 100% | 2 | 100% | 1 | 100% |

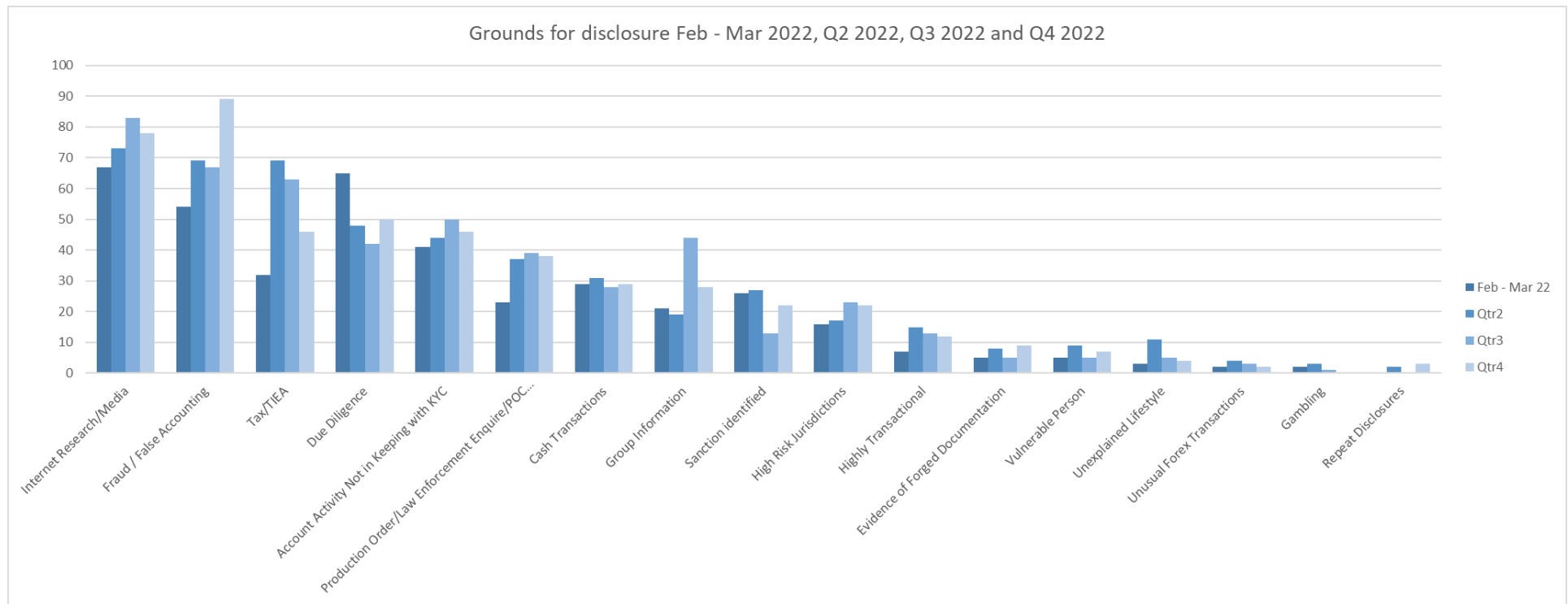


GROUNDS FOR DISCLOSURE

Grounds for Disclosure by Quarter

The below charts show the comparison of grounds for disclosure chosen by submitters of all SARs between February and March 2022, Q2 2022, Q3 2022 and Q4 2022. Grounds for disclosure is a multiple-choice selection field and therefore will not match the total SARs submitted between the same periods.

In Q4 2022 Fraud / False Accounting increased to become the highest grounds for disclosure by percentage.



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| Grounds for Disclosure | Feb - Mar 22 | Feb - Mar 22 % | Q2 2022 | Q2 2022% | Q3 2022 | Q3 2022 % | Q4 2022 | Q4 2022 % |
|--|--------------|----------------|------------|---------------|------------|---------------|------------|---------------|
| Internet Research/Media | 67 | 16.7% | 73 | 15.0% | 83 | 17.2% | 78 | 16.1% |
| Fraud / False Accounting | 54 | 13.6% | 69 | 14.1% | 67 | 13.8% | 89 | 18.4% |
| Tax/TIEA | 32 | 8.0% | 69 | 14.2% | 63 | 13.0% | 46 | 9.5% |
| Due Diligence | 65 | 16.3% | 48 | 9.9% | 42 | 8.7% | 50 | 10.3% |
| Account Activity Not in Keeping with KYC | 41 | 10.3% | 44 | 9.1% | 50 | 10.3% | 46 | 9.5% |
| Production Order/Law Enforcement Enquire/POC Notice/Liaison Notice | 23 | 5.8% | 37 | 7.6% | 39 | 8.1% | 38 | 7.8% |
| Cash Transactions | 29 | 7.3% | 31 | 6.4% | 28 | 5.8% | 29 | 6.0% |
| Group Information | 21 | 5.3% | 19 | 3.9% | 44 | 9.1% | 28 | 5.8% |
| Sanction identified | 26 | 6.5% | 27 | 5.6% | 13 | 2.7% | 22 | 4.5% |
| High Risk Jurisdictions | 16 | 4.0% | 17 | 3.5% | 23 | 4.8% | 22 | 4.5% |
| Highly Transactional | 7 | 1.8% | 15 | 3.1% | 13 | 2.7% | 12 | 2.5% |
| Evidence of Forged Documentation | 5 | 1.3% | 8 | 1.6% | 5 | 1.0% | 9 | 1.9% |
| Vulnerable Person | 5 | 1.3% | 9 | 1.9% | 5 | 1.0% | 7 | 1.4% |
| Unexplained Lifestyle | 3 | 0.8% | 11 | 2.3% | 5 | 1.0% | 4 | 0.8% |
| Unusual Forex Transactions | 2 | 0.5% | 4 | 0.8% | 3 | 0.6% | 2 | 0.4% |
| Gambling | 2 | 0.5% | 3 | 0.6% | 1 | 0.2% | 0 | 0.0% |
| Repeat Disclosures | 0 | 0.0% | 2 | 0.4% | 0 | 0.0% | 3 | 0.6% |
| Grand Total | 398 | 100.0% | 486 | 100.0% | 484 | 100.0% | 485 | 100.0% |

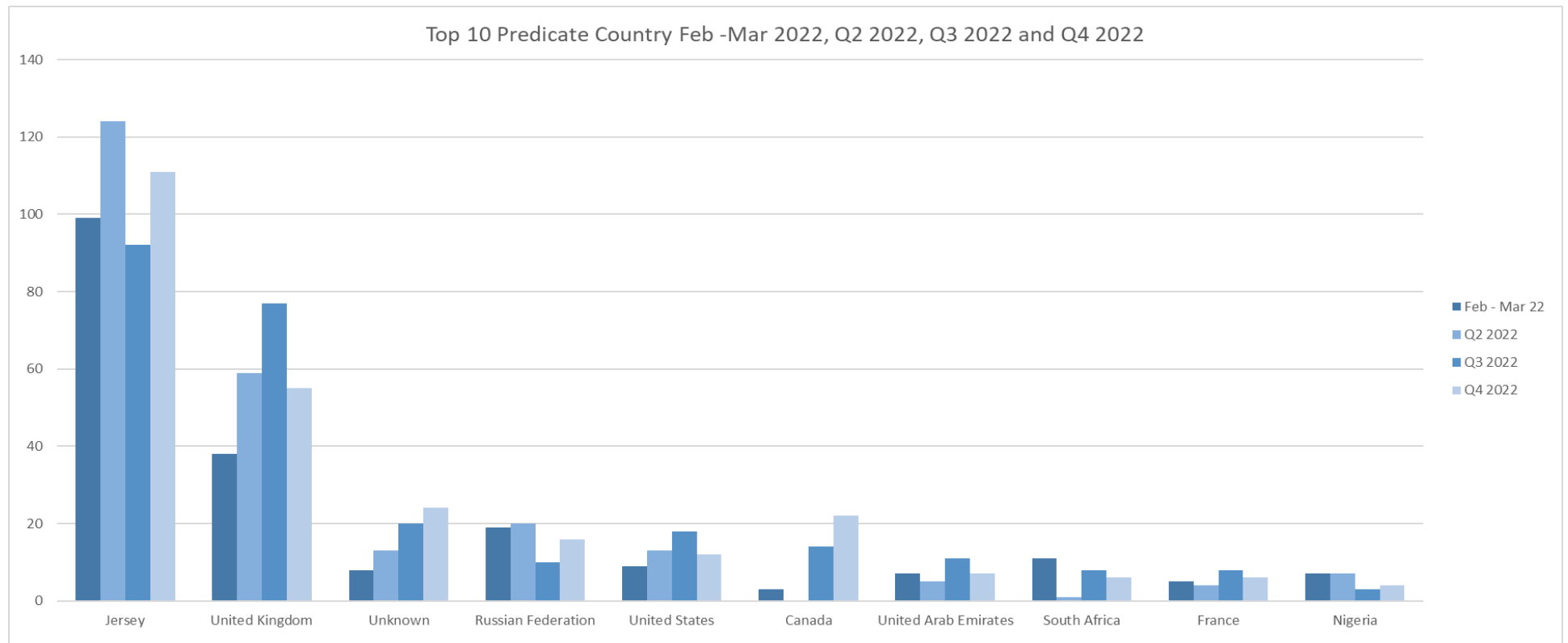
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TOP 10 COUNTRIES OF PREDICATE CRIMINALITY

Top 10 Countries of predicate criminality by Quarter

The new SAR template requires the submitter to disclose the country where the suspected predicate criminality occurred. SAR data indicates there is a high percentage that the predicate offending occurred in Jersey. An initial review indicates a potential misunderstanding of the term “country of predicate crime”. The FIU reminds the submitter to read the guidance published in the Q2 statistical report.



Jersey Financial Intelligence Unit

Combatting Financial Crime: **Together**



| | Feb - Mar 22 | Feb - Mar 22 % | Q2 2022 | Q2 2022% | Q3 2022 | Q3 2022% | Q4 2022 | Q4 2022 % |
|----------------------|--------------|----------------|------------|---------------|------------|---------------|------------|---------------|
| Jersey | 99 | 48.1% | 124 | 50.5% | 92 | 35.2% | 111 | 42.1% |
| United Kingdom | 38 | 18.4% | 59 | 24.0% | 77 | 29.5% | 55 | 20.9% |
| Unknown | 8 | 3.9% | 13 | 5.3% | 20 | 7.7% | 24 | 9.1% |
| Russian Federation | 19 | 9.2% | 20 | 8.1% | 10 | 3.8% | 16 | 6.1% |
| United States | 9 | 4.4% | 13 | 5.3% | 18 | 6.9% | 12 | 4.6% |
| Canada | 3 | 1.5% | 0 | 0.0% | 14 | 5.4% | 22 | 8.4% |
| United Arab Emirates | 7 | 3.4% | 5 | 2.0% | 11 | 4.2% | 7 | 2.7% |
| South Africa | 11 | 5.3% | 1 | 0.4% | 8 | 3.1% | 6 | 2.3% |
| France | 5 | 2.4% | 4 | 1.6% | 8 | 3.1% | 6 | 2.3% |
| Nigeria | 7 | 3.4% | 7 | 2.8% | 3 | 1.1% | 4 | 1.5% |
| Total | 206 | 100.0% | 246 | 100.0% | 261 | 100.0% | 263 | 100.0% |

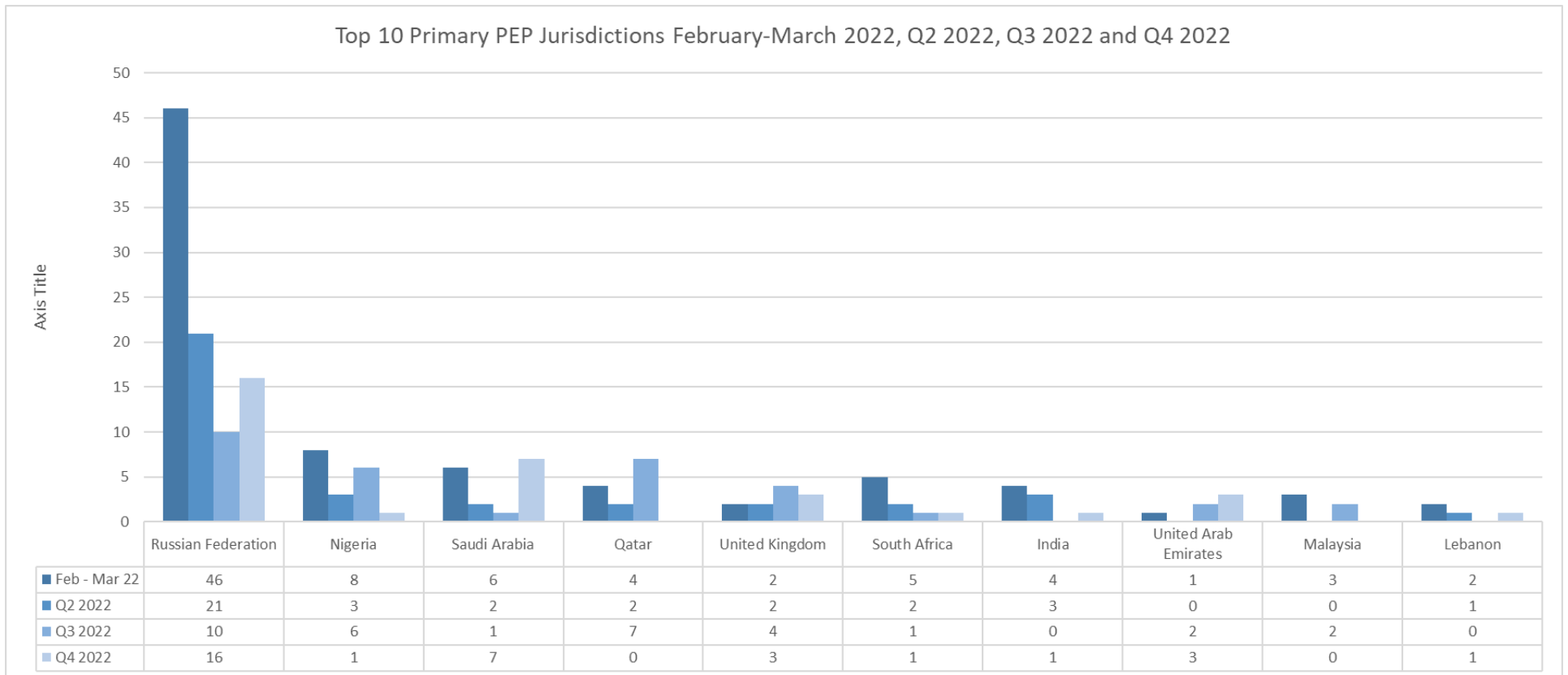
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POLITICALLY EXPOSED PERSONS (PEPS)

Top 10 PEP Nationalities by Quarter

The below graph shows the nationality of individual PEPs disclosed in SARs between 1st February 2022 and 31st March 2022, Q2 2022, Q3 2022 and Q4 2022. Duplicate data resulting from multiple SARs from different entities on the same PEP has been removed.





Top 10 Primary PEP Jurisdictions by Quarter

The below graph shows the top 10 primary jurisdictions a PEP is associated with as disclosed in SARs between 1st February 2022 and 31st March 2022, Q2 2022, Q3 2022 and Q4 2022. For example a PEP may have a nationality of Russian but has a primary associated jurisdiction of the United Kingdom. Duplicate data resulting from multiple SARs from different entities on the same PEP has been removed.

