

# **Annual Report 2012**



**Anti Money Laundering  
& Counter Terrorist Financing Unit**



**His Majesty King Abdullah II Ibn Al Hussein**



**His Royal Highness Prince Al-Hussein Ibn Abdullah II, Crown Majesty**

# Table of Contents

<b>NATIONAL ANTI MONEY LAUNDERING AND COUNTER TERRORIST FINANCING COMMITTEE.....</b>	<b>5</b>
NATIONAL COMMITTEE MEMBER .....	9
<b>ANTI MONEY LAUNDERING AND COUNTER TERRORIST FINANCING UNIT.....</b>	<b>7</b>
STATEMENT BY THE CHIEF OF THE UNIT .....	8
VISION, MISSION & STRATEGIC OBJECTIVES .....	9
THE UNIT IN FIVE YEARS .....	10
<b>NOTIFICATIONS OF TRANSACTIONS SUSPECTED TO BE RELATED TO MONEY LAUNDERING OR TERRORIST FINANCING.....</b>	<b>19</b>
STATISTICS .....	20
TYPOLOGIES .....	29
<b>LEGISLATION.....</b>	<b>33</b>
ANTI MONEY LAUNDERING AND COUNTER TERRORIST FINANCING LEGISLATION.....	34



Ministry of Justice



MINISTRY OF FINANCE



ANTI MONEY LAUNDERING  
& COUNTER TERRORIST FINANCING UNIT



Ministry of Social Development  
The Hashemite Kingdom of Jordan



**Chairman**

Governor of the Central Bank of Jordan

H. E. Dr. Ziad Fareez

**Vice Chair**

Deputy Governor of the Central Bank of Jordan

H. E. Dr. Maher "Sheikh Hasan"

**Member**

Secretary General of the Ministry of Justice

H. E. Judge Mr. Mohammad Mbaydeen

**Member**

Secretary General of the Ministry of Interior

H. E. Mr. Sameh Majali

**Member**

Secretary General of the Ministry of Finance

H. E. Dr. Omar Al Zoubi

**Member**

Secretary General of the Ministry of Social Development/Acting

H.E Mr. Omar Hamzeh

**Member**

Director General of the Insurance Commission

H. E. Mrs. Rana Tahboub

**Member**

Companies Controller

H. E. Mr. Burhan Akroush

**Member**

Commissioner from the Jordan Securities Commission

H. E. Mr. Mansour Hadadin

**Member**

Chief of the Unit

Mrs. Dana Junbulat



**Anti Money Laundering  
& Counter Terrorist Financing Unit**

**F**ive years passed on the inception of the Anti Money Laundering and Counter Terrorist Financing Unit's journey in the Kingdom of which I personally witnessed nearly four years. Now and while I am looking at the past years, I can see clearly the endless efforts done by the Unit during the past years and the fruitful cooperation with all the national entities concerned with combating money laundering and terrorist financing for the advancement of the anti money laundering and counter terrorist financing regime in the Kingdom. All such efforts reflected the Kingdom's seriousness and keenness in setting the necessary frameworks to prevent the misuse of the financial and non-financial institutions in illicit transactions, in addition to building an effective anti money laundering and counter terrorist financing regime.



What has been persistently done and achieved by the Unit during the past five years contributed in the Unit's advancement into wider spaces. Such achievements provided the Unit with more persistence to keep up with the latest international developments in the fight of money laundering and terrorist financing crimes and here comes the Financial Action Task Force (FATF) with new obligations through amending the international standards to include the Risk Based Approach (RBA) and the Weapons of Mass Destructions Proliferation which requires a more concerted and synergized efforts from all of us towards the preparation for the next stage.

By the end of our five years, we have established a high status of cooperation with all of the counterpart units through the Kingdom joining Egmont Group to be the ninth Arab country to join such Group. For that reason, we obtained an international recognition that admits the effectiveness of the Anti Money Laundering and Counter Terrorist Financing Unit in the Kingdom in the framework of participating in the international efforts in the fight against money laundering and terrorist financing crimes. In addition, we reinforced the Unit's autonomy by moving to a new premises equipped with the latest developed technological equipments and security devices for guaranteeing the safety and protection of the Unit's information consistent with the best practices and international standards of the Financial Information Units (FIUs) and in a strategic location in an area where spatial locations of the entities subject to the provisions of the Anti Money Laundering and Counter Terrorist Financing Law concentrated therein.

By the start of our sixth year and for considering us one of the governmental institutions in the Kingdom, we are continuing our career and becoming more firm and convinced that we will not accept less than uniqueness, excellence and taking the initiative in the achievement to reinforce the Kingdom's known constants and bright side regionally and internationally and we all are one hand behind or Hashemite leadership and its enlightened vision and great ambition from where we get our determination.

May Allah save Jordan our dear and impervious and save his regime, security and stability and reinforce our King, His Majesty King Abdullah Bin al Hussein, the protector and the leader of the path of goodness and success.

**Chief of the Unit**  
**Dana T. Junbulat**



## **V**ision

An Efficient Unit to combat money laundering and terrorist financing, and a distinguished performance at the regional and international levels.

## **M**ission

Ensuring the protection of the financial systems and the community from the risk of money laundering and terrorist financing through providing the required information promptly with high precision in coordination with the related competent authorities.

## **S**trategic Objectives

1. Developing and implementing the national legislation related to combating money laundering and terrorist financing.
2. Reinforcing the mechanisms of disseminating information between the Unit and the related competent authorities, and maintaining the confidentiality of such information.
3. Developing and documenting the executive procedures necessary to coordinate with the financial and non-financial entities subject to the provisions of the Law.
4. Building the institutional and administrative capacity of the Unit and the relevant competent authorities.

# The Anti Money Laundering and Counter Terrorist Financing Unit in Five Years

Five years are the lifetime of the Anti Money Laundering and Counter Terrorist Financing Unit in the Kingdom, whereby the Unit passed through several difficulties and achieved great achievements, referred to as tremendous efforts, to become the Unit's experience in the Kingdom as one of the unique experience not only on the regional level but also on the international level, during such short period of time.

The beginning was represented by the Kingdom membership in the Middle East and North Africa Financial Action Task force (MENAFATF) since its foundation in 2004 and chairmanship of the 5<sup>th</sup> and 6<sup>th</sup> MENAFATF plenary meetings by His



Excellency the Governor of the Central Bank of Jordan in 2007. Thus, the Kingdom establishes by such deeds its serious steps in the anti money laundering and counter terrorist financing framework through its commitment in adopting and implementing the International Standards issued by the Financial Action Task Force (FATF) in this regard. That was evidenced by the promulgation of the Anti Money Laundering Law in the beginning of the second half of the year of 2007 to formulate the responsible body for drawing the general policy in Jordan for combating and preventing money laundering which is represented



by the National Committee chaired by the Governor of the Central Bank of Jordan and the Deputy Governor of the Central Bank of Jordan and the National Committee includes in its membership the Secretary General of many ministries (Ministry of Justice, Ministry of Interior, Ministry of Finance and the Ministry of Social Developments and Affairs), in addition to the membership of the Companies Controller, a commissioner of the Securities Commissions Commissioners board, the General Director of the Insurance Commission and the Chief of the Anti money Laundering Unit to include most of the entities that their roles must be consistent to achieve the highest levels of collaboration and cooperation in the fight against such crime. Furthermore, the Anti Money Laundering National Committee Work Regulation No. (44) for the year 2008 addressed its mechanism of work in terms of its meetings, quorum for conducting such meetings and the decisions taken by the National Committee thereof.

Moreover, the Anti Money Laundering Law No. (46) for the year 2007 established for

the real core for combating money laundering crime which is the Anti Money Laundering Unit to be an independent unit responsible for receiving notifications on suspicious transactions from entities subject to the provisions of the Law, requesting information therewith and conducting necessary financial and

technical analysis of the received information and taking the necessary procedures in this regard. Furthermore, the Anti Money Laundering Unit Regulation No. (40) for the year 2009 addressed in more details the competences and duties of the Unit and the Chief of the Unit, in addition to the organization of its financial affairs and human resources.

In addition, the Anti Money Laundering Law No. (46) for the year 2007 assumed organizing the Declaration of the Cross-border Moveable Money system which represents a basic guarantee for not allowing any person to transfer money originated from illegal activities. In this regard, the Unit coordinated with the Customs Department for the purposes of activating the Declaration of the Cross-border Moveable Money system, preparing the forms of declaration and the necessary awareness guidance billboards and distributing such on all the cross borders which obliged the arrival traveler to the Kingdom to declare on the

The image shows a 'Cross Border Declaration Form' for arriving passengers. The form is titled 'Arriving Passengers - Cross Border Declaration Form'. It contains several sections:
 

- Personal Information:** Fields for First Name, Father's Name, Grandfather's Name, Family Name, Sex (Male/Female), Nationality, and Date of Birth.
- Travel Information:** Fields for Mode of transport (Air/Sea/Other), Origin (Country/City), and Number of Family Members traveling with you.
- Declaration Table:** A table with columns for 'Country and/or Origin of Imported Merchandise and/or Goods', 'Quantity', and 'Amount and/or Value'. It includes a checkbox for 'I am carrying the amount on behalf of someone else?'.
- Purpose of Bringing in the Goods:** Radio button options for 'Personal Use', 'Business', 'Medical Treatment', and 'Other (Specify)'. There is also a checkbox for 'I am bringing in the amount as a gift'.
- Signature and Seal:** Fields for the traveler's name and a space for a signature and seal.

funds he possess if the value exceeds (15000) Jordanian Dinar or its equivalent in foreign currencies and that was illustrated by virtue of the Declaration on the Cross-border Moveable Money Declaration Instructions which are issued pursuant

to the Law. The instructions emphasized on the authority of the Customs Department in questioning the courier on the source of the funds he/she possess and the purpose of using such funds, including the Customs Department verification of the funds in case of forgery and requesting the purchasing receipt of precious stones and metals to prove its ownership.

Following the Kingdom's mutual evaluation for assessment for the effectiveness of the anti money laundering and counter terrorist financing regime through identifying the extent of its compliance with the International Standards issued by the Financial Action Task Force (FATF) and the outcomes of such evaluation which included the action plan which all the relevant entities in the Kingdom are obliged to follow to address the deficiencies outlined in the mutual evaluation report. The Unit drew in the end of 2009, in cooperation with all the relevant national entities, the features of the path that should be followed to address the aspects of such deficiencies, whereby the mentioned entities took several appropriate legislative and administrative procedures in order to address such deficiencies and that also what was required from the Kingdom to provide, through the past two years, periodic Follow-up reports for the Middle East and North Africa Financial Action Task Force (MENAFATF) which were required to show the corrective actions taken to address the deficiencies in accordance with the mutual evaluation report until reaching the application of removal process from the regular Follow-up process into biennial updates every two years. The Kingdom resumed again to collide with bigger challenge represented

by the Financial action Task force (FATF) adoption of new procedures. Such procedures determine the anti money laundering and counter terrorist financing regime of countries which need to be reviewed because of the existence of strategic deficiencies in its regimes and deficiencies which need to be addressed in accordance with the Forty Recommendations of Money Laundering and the Special Nine Recommendations of Terrorist Financing by the monitoring of the FATF International Cooperation Review Group (ICRG), whereby the Kingdom was from the countries included in this review.

Hence, it was necessary for the Unit and all the relevant entities to collaborate their efforts and enhance their procedures to surpass all the challenges one after another. The most of the procedures in this regard was represented by amending the Anti Money Laundering Law, whereby the definition and criminalization of terrorist financing, expanding the extent of predicate offences that their proceeds are considered money laundering, reinforcing the financial and administrative independency of the Unit, providing the Unit with the authority to receive notifications suspected to be related to terrorist financing, expanding the extent of the entities subject to the provisions of the Law with emphasizing on their obligations legally and providing the General Prosecutors and the judges more competences related to tracing and confiscating the money and setting dissuasive sanctions commensurate with the risk of each of money laundering and terrorist financing crime. Accordingly, amending each of the National Committee

Committee Work Regulation and the Anti Money Laundering Unit Regulation.

Also, the Unit, in cooperation with all the regulatory and supervisory authorities on financial institutions which are the Central Bank of Jordan, Securities Commission, Insurance Commission, Ministry of Industry and Trade and the Telecommunication Regulatory Commission and the regulatory and supervisory authorities on the designated non financial businesses and professions (DNFBPs) that are the Ministry of Interior, the Ministry of Finance/ Lands and Survey Departments, have worked on amending and preparing legislation and controls necessary for entities which are subject to their supervision which are banks, money exchange companies, securities activities, insurance activities, financial activities, financial leasing companies, entities providing postal services, trading with jewelries and precious metals and stones and trading with real estates, in addition to issuing the guidelines of methods and trends of money laundering and terrorist financing transactions and the SAR forms on such transactions.

Based on the Unit consideration for the importance of the existence of an explicit and determined procedures for the financial and non -

**Security Council Resolution  
No. 1267 (1999) and Other  
Relevant Resolutions**

financial institutions with regard to persons and entities listed on the black lists in accordance with the international resolutions issued regarding counter terrorism and rationing such, the Instructions of the Execution of the obligations

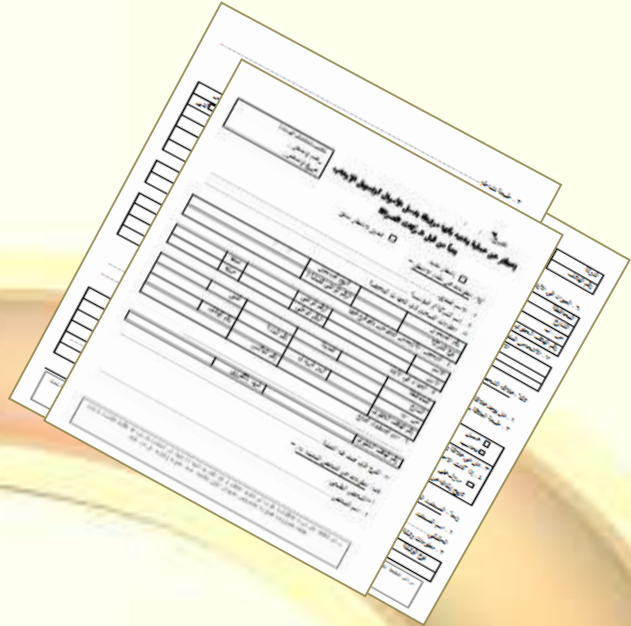
**Security Council Resolution No. 1373 (2001) and Other Relevant Resolutions**

mentioned in the United Nations Security Council Resolution No. (1267) for the year 1999 regarding Al Qaida and Taliban and the related persons and entities thereof, in addition to the Instructions of the United Nations Resolution No. (1373) for the year 2001 regarding counter terrorism were issued to be the pioneer instructions on the regional level.

The Unit and all the relevant national entities have spared no efforts in confronting such challenge and took several proactive and effective procedures to face such challenge and because of taking the appropriate legislative and administrative procedures by the Kingdom to address all the strategic deficiencies which have been raised in the (ICRG) process including the provision of the Hashemite Kingdom of Jordan government of a political commitment to assure its determination to proceed with taking the corrective actions regarding its anti money laundering and counter terrorist financing regime in accordance with the international standards in this regard. The Financial Action Task force (FATF) decided to exclude the Hashemite Kingdom of Jordan from the targeted review process. Based on such decision, the Kingdom

had recorded a milestone and an idol in devoting endless efforts to confront what faces its path of challenges.

It is worth mentioning that in the framework of carrying out the Unit main objective by which it was established for, the Unit started to receive notifications on transactions suspected to be related to money laundering since its commencement of its work in July 17<sup>th</sup>, 2007. The



Unit received until the end of 2007 (35) SAR that increased by an average annually to reach for around (190) SAR and with various reporting entities since the years of the Unit work and that refers to the awareness increasing of the reporting officers concerned with anti money laundering at the different entities as a result of the meetings that were held by the Unit with such entities, in addition to the amendments of the Law that subjected by virtue thereof new entities to its provisions, criminalizing terrorist financing and providing the Unit with the competence to study such SARs along with the money laundering SARs.

On the other hand, the largest percentage of the SARs received by the Unit was from the banks operating in the Kingdom followed by the other competent regulatory and supervisory authorities then comes the money exchange companies and last is the rest of the entities subject to the provisions of the Law.

Furthermore, as a result of financial and legal intelligence and analysis conducted by the Unit for the SARs, documents, banking statements and additional information requested by the Unit whether from national entities or counterpart units to determine the relationship between persons, verifying their legal activities, tracing the movement of their funds and the funds resources, the Unit referred a number of cases to the prosecution whether for a suspicion in money laundering or other crimes such as forgery and fraud. For that reason, (3) convictions were issued in money laundering and other convictions in other crimes. In execution of the provisions of different articles of the Law, the Unit referred a number of cases to a number of other competent authorities through which the Unit discovered through such SARs that the suspects infringed the provisions of the laws that fall under the competence of such authorities.

The outcomes of one of the studies conducted by the Unit was by studying a number of suspects and comparing such number of suspects with the number of the SARs received by the Unit was that the inequality of the two numbers in terms of the number of persons, because money laundering and terrorist financing are a transnational, associated and organized crimes in most cases.

On the level of the Unit's cooperation with counterpart units, the number of the exchange of information requests, whether the requests issued or received by the Unit, during the past five years, reached for a total of (152) request and the number of counterpart units that the Unit have cooperated with through the five past years reached for (32) country distributed on four continents.

The approach that the Kingdom is known to follow is keeping updated with the international and regional developments and all new with regard to combating crime. The Kingdom always and ever aspired to be party to the international conventions which organize its relationship with other countries in this regard. Thus, the Kingdom ratified several conventions related to combating money laundering, terrorist financing and other crimes such as the United Nations Convention Against Illicit Trafficking in Narcotic Drugs and Psychotropic Substances (Vienna Convention), United Nations Convention Against Transnational Organized Crime (Palermo Convention) and the International Convention for the Suppression of the Financing of Terrorism, in addition to, the Arab Convention on Combating Money Laundering and Terrorist Financing, the Arab Convention Against Transnational Organized Crime and the Arab Convention for Combating the Cyber Crimes.

Since the Unit's establishment, it has given the international cooperation with the counterpart units in other countries the utmost importance for the purposes of enhancing its competences through tracing the money and obtaining



information to support its suspicion that can be achieved through signing Memoranda of Understanding with a number of Arab and foreign counterpart units such as United Arab of Emirates, Turkey, National Palestinian Authority, United Kingdom, South Africa, Cyprus, Algeria, Syria, Ukraine, Poland, Bahrain, Iraq, Saudi Arabia, Russia, Yemen and Morocco.

Furthermore, the Unit became a member in the Financial Information Units Forum of the Middle East and North Africa Financial action Task Force (MENAFATF) which aims at exchanging expertise through presenting the best practices by the Financial Information Units (FIUs).



On the national level, since the establishment of the Unit, the Unit has established robust rules for cooperation with the regulatory and supervisory

authorities and the law enforcement agencies. The Unit signed Memorandum of Understanding with the Central Bank of Jordan, Securities Commission, Insurance Commission and the Public Security Directorate and for achieving the rapid sorts and the most effective actions in the process of responding with all regulatory and supervisory authorities and other competent authorities. The Unit and such authorities agreed to appoint liaison officers for outreaching with the Unit and following up with the response of any request related to such authorities work. Therefore, the Unit conducted periodic meetings with several representatives of such authorities to address any difficulties that might be faced in the framework of what it takes of procedures to combat money laundering and terrorist financing crimes. In addition, the Unit set mechanisms that enable it to use information in the databases of the national authorities such as the Civil Status and Passports Department and the Lands and survey Department.



In raising awareness, the Unit, through its keenness to raise awareness of the entities obliged to report on transactions suspected to be related to money laundering or terrorist financing, has prepared and distributed brochures for the purpose of identifying such entities with their obligations

in exerting customer due diligence (CDD), in addition to giving identification on the Unit's objectives and its role in the field of anti money laundering and counter terrorist financing.



In the framework of reinforcing the cooperation and strengthening the professional relationship between the Unit and the entities subject to the provisions of the Law, the Unit conducted bilateral meetings with the reporting officers in the entities subject to the provisions of the Law from banks, money exchange companies, financial brokerage companies, insurance companies, financial leasing companies and financial activities companies mentioned in the Law, in addition to the gold and jewelries traders and the real estate's offices owners by the attendance of the representatives of the regulatory and supervisory authorities, according to each one's competence, from the Central Bank of Jordan, Securities Commission, Insurance Commission, Ministry of Industry and Trade, Companies Control Department and Lands and Survey Department. Such meetings for the whole financial sector and the designated non – financial business and professions (DNFBPs) institutions emphasized on the necessity of complying with the provisions of the Anti Money Laundering and Counter Terrorist Financing Law in force in general and complying with the procedures of exerting due diligence and notifying the Unit on

transactions suspected to be related to money laundering or terrorist financing in particular.



Also, the Unit completed all the procedures related to establishing the Unit electronic web-site in Arabic and English and launching the new electronic web-site as a facilitation for all the regulatory and supervisory authorities, other competent authorities and the entities subject to the provisions of the Law to get back to the legislation related to anti money laundering and counter terrorist financing, international conventions and international standards in this regard, in addition to keeping up all the entities with the latest updates related to money laundering and terrorist financing.

Moreover, the Unit contributed in conducting several training courses and lectures to reach (13) training courses. Such training courses and lectures included all the entities concerned with combating money laundering and terrorist financing including the financial and non-financial institutions subject to the provisions of the Law which aimed at reinforcing the professional relationship of such entities with the Unit which was reflected positively on the quality of SARs submitted to the Unit also the quality of their responses to the Unit's requests.



Training / 2012			
Date	Subject	Organizing Entity	Location
8-8/12	Intq - Mutual Evaluation	U/S Embassy - Iraq	Jordan
11/12	Compliance & Due Diligence	SADDE "Legal Publishing" & "Legal/Finan"	Jordan
19-21/12	Workshop entitled "Asset Recovery"	Anti Corruption Commission	Jordan
12/12	Bank Legal Liability in Reference to UTRs	Banko Association	Jordan
25-28/12	Financial Analysis Training Course	UNODC	Jordan

Based on the Anti Money Laundering and Counter Terrorist Financing Unit belief that its success in assuming its objectives comes through creating and reinforcing the efficient technical knowledge for its human resources, the Unit delegated many of its staff to participate in conferences and training courses relevant to its work which have reached a number of (61) training course at the end of 2012 within a comprehensive system to be identified with the latest updates in anti money laundering and counter terrorist financing matters and to preview the experiences of a number of countries in the framework of combating money laundering and terrorist financing, in addition to the Unit's participation in the Working Groups of the Middle East and North Africa Financial Action Task Force (MENAFATF) and the Training Working Group of Egmont Group.



The Unit's work through the past five years has become fruitful by joining the Egmont Group in July 2012 to be the ninth Arab country that joins this Group. Such achievement is considered as an international recognition that the Kingdom has an effective Anti Money Laundering and Counter Terrorist Financing Unit in the framework of participating in the international efforts to combat money laundering and terrorist financing. Also, joining Egmont Group is considered a huge opportunity to enhance the exchange of information on money laundering and terrorist financing with the counterpart units and participating in the Egmont Working Groups in the legal, outreach, information technology, training and analysis fields which enrich the technical knowledge of the Unit and give it opportunities to share its opinions with the counterpart units.



Moving to the organizational side of the Unit's internal affairs, the Unit has followed a distinguished approach that is consistent with the best international standards in this regard and which came as a result of reinforcing its independence and maintaining its security and information protection that it deals with, in addition to the instructions that organize its internal works,



the Unit issued instructions for establishing and managing passwords of the records access to its computerized systems, networks and basic and personal computer devices used by the Unit. In addition, the employees authorized to use the metal cabinets and cupboards of notifications on transactions suspected to be related to money laundering or terrorist financing were identified and the mechanism of maintaining the keys of the cabinets and cupboards of such SARs were identified too. The Database Information on Transactions Suspected to be Related to Money Laundering or Terrorist Financing Instructions addressed the conditions and guarantees of maintaining information security. Such instructions determined the persons from the Unit who are authorized to manage and use the data base.

The Unit has ended the year of 2012 by moving into its new premises and that was what reinforced its work independence and provided more reinforced procedures to guarantee the Unit's safety and protection of information in line with



the best practices and international standards for the Financial Information Unit (FIUs). The building was prepared based on the best security and protection standards and equipped with the latest technological equipments and developed security devices, whereby the building occupies a strategic location an area where the spatial locations of the entities subject to the provisions of the Anti money Laundering and Counter Terrorist Financing Law are concentrated therein.

During the past five years, the Unit's path was harsh. The Unit confronted a lot of difficulties and challenges to achieve the best of what a Financial Information Unit can obtain in such a very short period of time. The factors of the Unit success is represented by careful planning and explicit approach in the functioning of the Unit by the support given by the National Committee and the synergies of the national entities to achieve the vision, mission and strategic objectives set by the Unit placed in its sight in order to play a role, that is less to be described, an effective and distinguished role in combating money laundering and terrorist financing crimes.

What the Unit has been through during the past years formulated a foundation pillar and a starting point in its preparations towards the next stage of work in the framework of responding to the amendments on the International Standards issued

by the Financial Action Task Force (FATF) that the Unit has started to prepare early for such amendments for taking any procedures on the legislative or executive level such amendments require in the framework of what had been known about the Unit in insisting on achieving more of uniqueness in its work.

# **Notifications of Transactions Suspected to be Related to Money Laundering or Terrorist Financing**



**Number of SARs Received by the Unit from Entities Obligated to Report 2007 – 2011**

Year	Number of SARs	Banks	Money Exchange Companies	Financial Companies	Securities Activities Companies
2007	24	23		1	
2008	187	183	4		
2009	131	121	8	1	1
2010	185	177	6		2
2011	239	214	24		1
<b>Total</b>	<b>766</b>	<b>718</b>	<b>42</b>	<b>2</b>	<b>4</b>

**Number of Notifications Received by the Unit from Regulatory and Supervisory Authorities and Other Competent Authorities 2007 – 2011**

Year	Number of Notifications	Central Bank of Jordan	Securities Commission	General Customs Department	Public Security Directorate	Anti Corruption Commission
2007	11	10	1			
2008	3	3				
2009	8	6	1	1		
2010	9		1	5	3	
2011	3		1			2
<b>Total</b>	<b>34</b>	<b>19</b>	<b>4</b>	<b>6</b>	<b>3</b>	<b>2</b>

## Requests of Information Received by the Unit from Counterpart Units 2007 – 2011

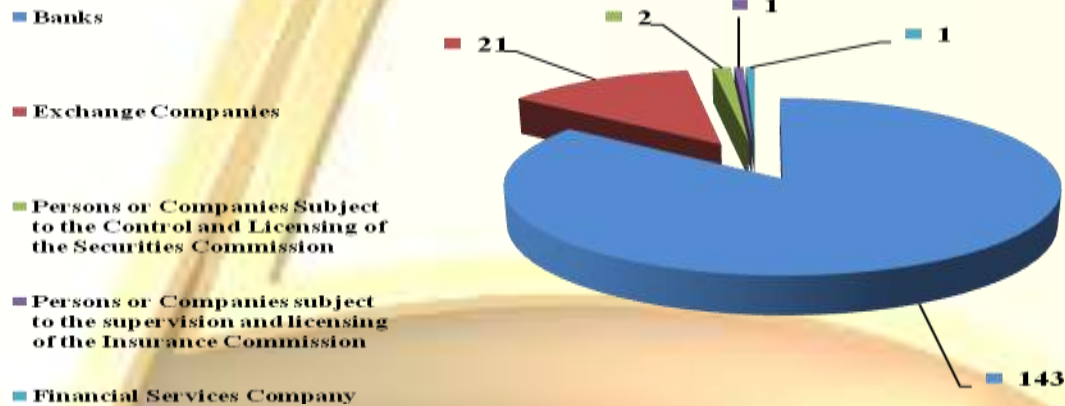
<b>Year</b>	<b>Country</b>	<b>Number</b>	<b>Gross</b>
<b>2007</b>	-	0	<b>0</b>
<b>2008</b>	Syria	2	<b>2</b>
<b>2009</b>	Iraq	1	<b>8</b>
	Lebanon	2	
	Bulgaria	1	
	Syria	2	
	Armenia	1	
	Saudi Arabia	1	
<b>2010</b>	United States of America	1	<b>21</b>
	Egypt	1	
	Saudi Arabia	3	
	Bulgaria	1	
	Algeria	1	
	Oman	1	
	Iraq	5	
	Qatar	1	
	Syria	6	
	Palestine	1	
<b>2011</b>	Lebanon	2	<b>16</b>
	Syria	3	
	Saudi Arabia	2	
	Oman	1	
	United Arab of Emirates	1	
	Iraq	4	
	Serbia	1	
	Palestine	2	
<b>Total</b>			<b>47</b>

## Requests of Information Issued by the Unit to Counterpart Units 2007 – 2011

Year	Country	Number	Gross
2007	-	0	0
2008	United states of America	2	3
	United Arab of Emirates	1	
2009	Saudi Arabia	2	7
	United Arab of Emirates	4	
	Lebanon	1	
2010	Iraq	1	18
	Palestine	2	
	Sudan	1	
	Egypt	1	
	Cyprus	2	
	Saudi Arabia	4	
	Lebanon	3	
	Qatar	1	
	Estonia	1	
	Kenya	1	
	Turkey	1	
2011	Syria	3	41
	Iraq	9	
	Saudi Arabia	5	
	British Virgin Islands	1	
	Cayman Islands	1	
	United Kingdom	3	
	Egypt	3	
	United Arab of Emirates	4	
	Oman	2	
	Lebanon	1	
	Denmark	1	
	South Africa	2	
	Qatar	1	
	Italy	1	
	Palestine	2	
Ukraine	1		
Turkey	1		
<b>Total</b>			<b>69</b>

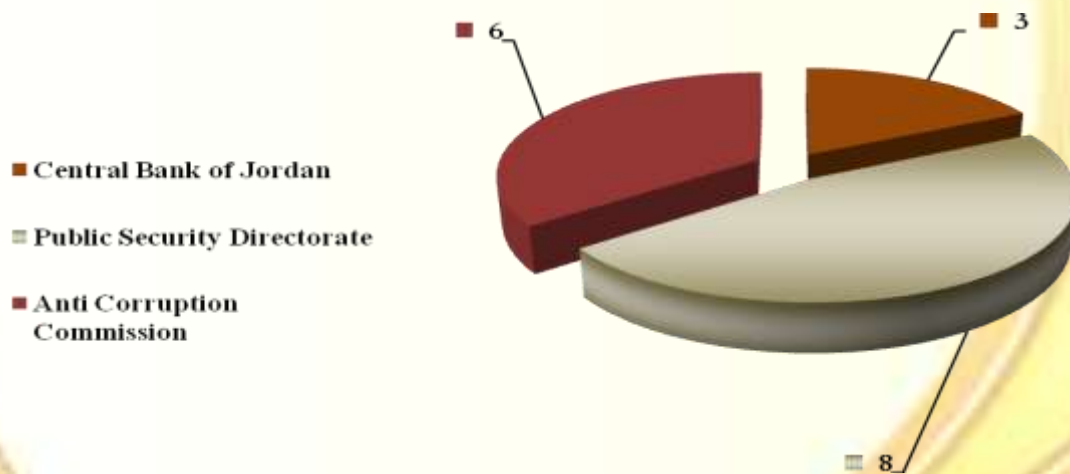
## SARs Received by the Unit from the Entities Obligated to Report for 2012

Entity	Number of SARs
Banks	143
Money exchange Companies	21
Persons or Companies subject to the supervision and licensing of the Securities Commission	2
Persons or Companies subject to the supervision and licensing of the Insurance Commission	1
Financial Services Company	1
<b>Total</b>	<b>168</b>



## Number of Notifications Received by the Unit from Regulatory and Supervisory Authorities and Other Competent Authorities 2012

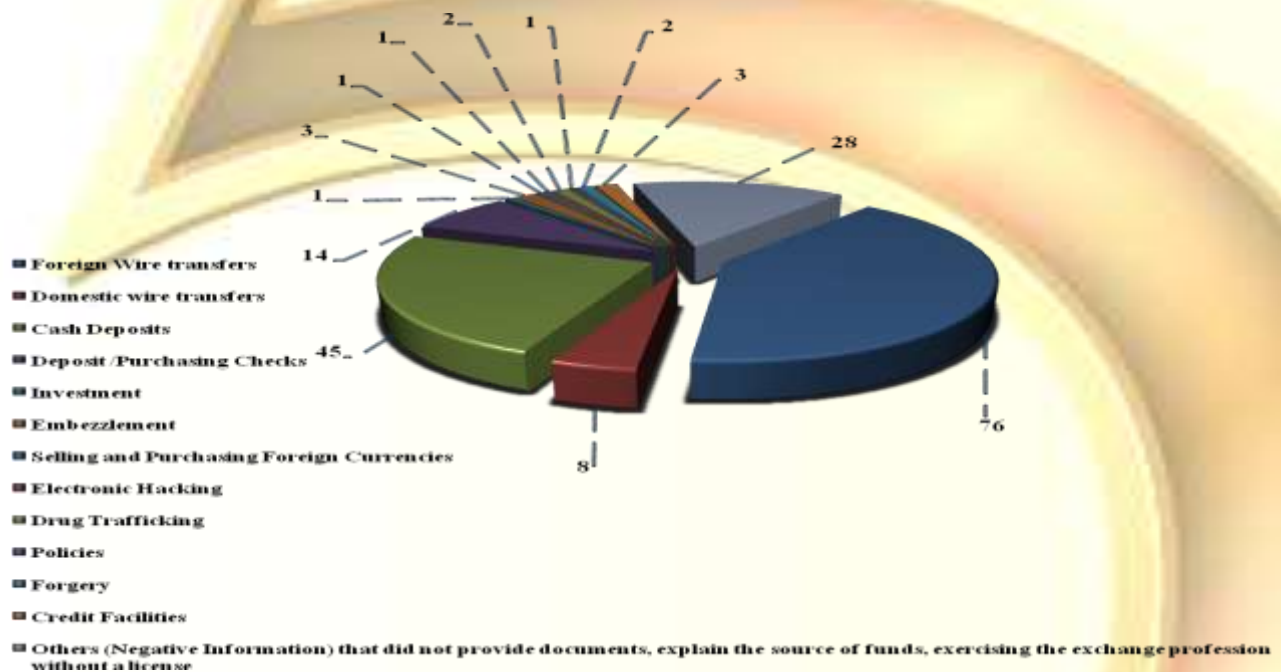
Entity	Number of SARs
Central Bank of Jordan	3
Public Security Directorate	8
Anti Corruption Commission	6
<b>Total</b>	<b>17</b>





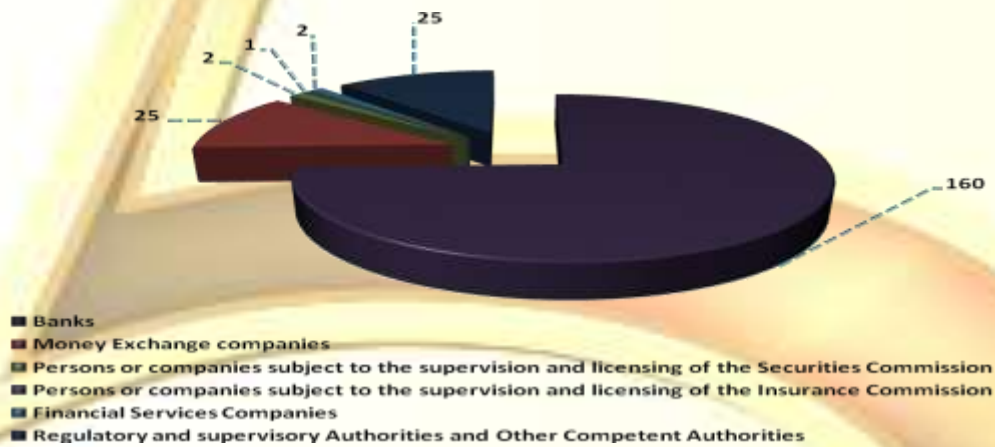
### Number of SARs Received by the Unit Based on the Type of Transaction 2012

Type of Transactions	Number of SARs
Foreign Wire transfers	76
Domestic wire transfers	8
Cash Deposits	45
Deposit /Purchasing Checks	14
Investment	1
Embezzlement	3
Selling and Purchasing Foreign Currencies	1
Electronic Hacking	1
Drug Trafficking	2
Policies	1
Forgery	2
Credit Facilities	3
Others (Negative Information) that did not provide documents, explain the source of funds, exercising the exchange profession without a license	28
<b>Total</b>	<b>185</b>



### Number of SARs Received by the Unit Based on the Number of Suspects for 2012

Entity	Number of Suspects
Banks	160
Money Exchange companies	25
Persons or companies subject to the supervision and licensing of the Securities Commission	2
Persons or companies subject to the supervision and licensing of the Insurance Commission	1
Financial Services Companies	2
Regulatory and supervisory Authorities and Other Competent Authorities	25
<b>Total</b>	<b>215</b>



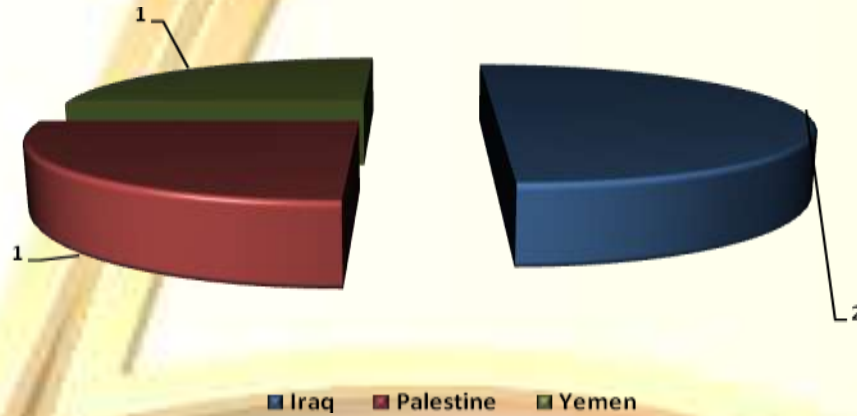
### Requests of Information Exchange Issued by the Unit to Counterpart Units 2012

Entity	Number of Requests
Bahrain	2
Iraq	6
Lebanon	1
Cyprus	2
United Kingdom	1
United Arab of emirates	2
United states of America	1
Palestine	1
Yemen	2
<b>Total</b>	<b>18</b>



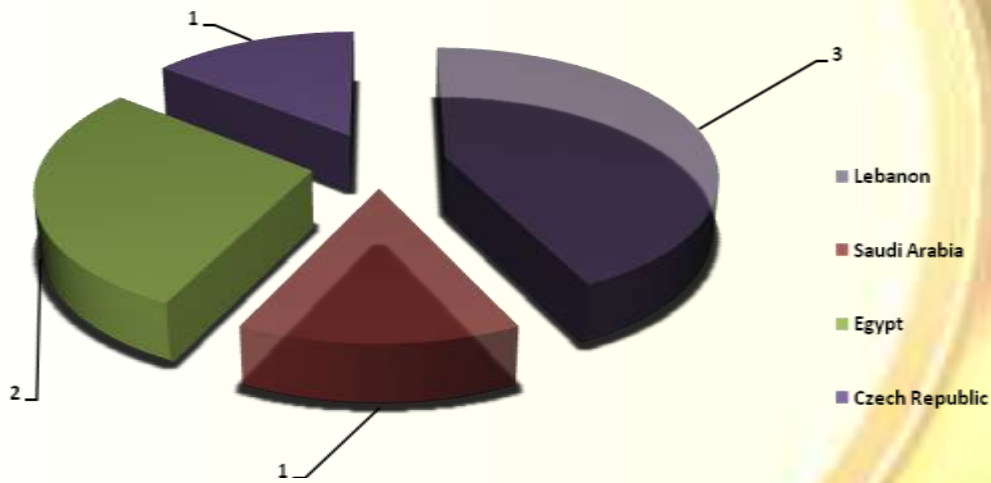
**Requests of Information Exchange Received by the Unit from Counterpart Units for 2012**

Entity	Number of Requests
Iraq	2
Palestine	1
Yemen	1
<b>Total</b>	<b>4</b>



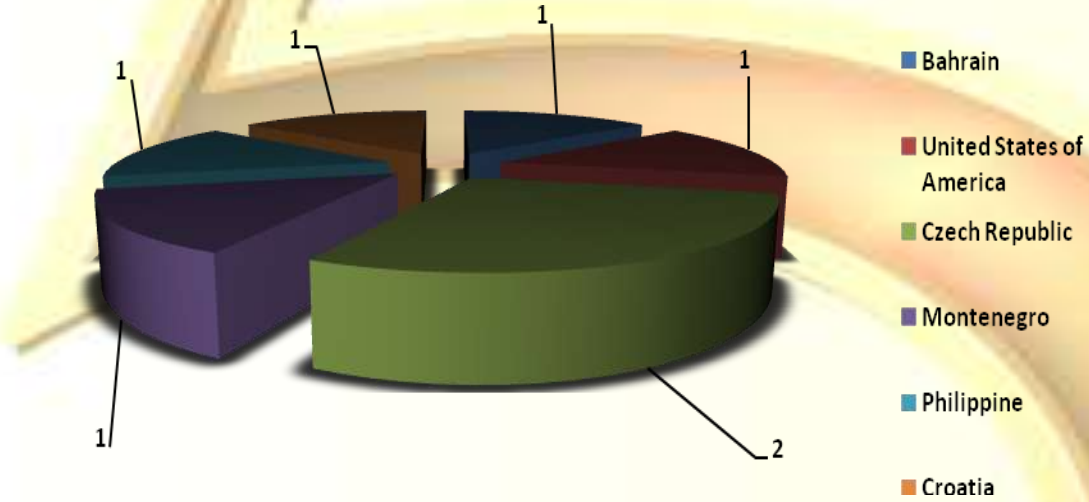
**Requests of Information Exchange Issued by the Unit to Counterpart Units Egmont Group Members for 2012**

Entity	Number of Requests
Lebanon	3
Saudi Arabia	1
Egypt	2
Czech Republic	1
<b>Total</b>	<b>7</b>



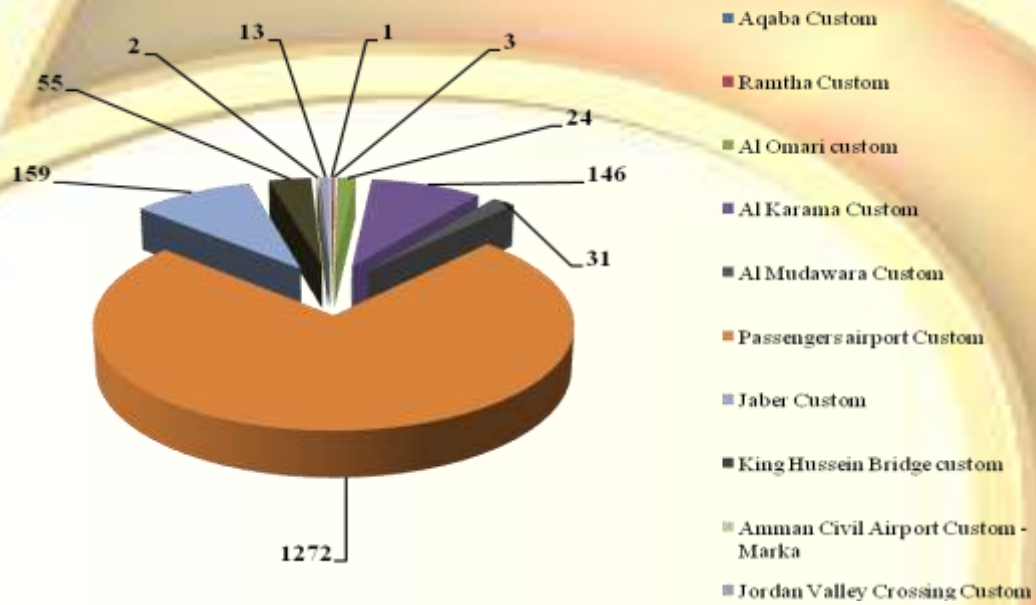
**Number of Requests of Information Exchange Received by the Unit from Counterpart Units Egmont Group Members for 2012**

<b>Entity</b>	<b>Number of Requests</b>
Bahrain	1
United States of America	1
Czech Republic	2
Montenegro	1
Philippine	1
Croatia	1
<b>Total</b>	<b>7</b>



### Statistics on the Cross-border Moveable Money Declarations Filled in for 2012

Custom Center	Number of declarations	Total of Declarations in Jordanian Dinars
Aqaba Custom	1	45000
Ramtha Custom	3	103950
Al Omari custom	24	747520
Al Karama Custom	146	371028933
Al Mudawara Custom	31	1362638
Passengers airport Custom	1272	1699248956
Jaber Custom	159	21148170
King Hussein Bridge custom	55	6992317
Amman Civil Airport Custom - Marka	2	63212
Jordan Valley Crossing Custom	13	1091893
<b>Total</b>	<b>1706</b>	<b>2101832592</b>



\*كما وردت من دائرة الجمارك العامة

## Practical Cases:-

Four practical cases that the Unit conducted in its regard a financial and legal intelligence and analysis after receiving SARs from entities obliged to report legally or notifications received from regulatory and supervisory authorities for the fact that a suspicion of such transactions to be related to money laundering and that are referred to the competent judicial authorities are presented as follows:-

### **First Case:-**

The Unit received an SAR from one of the banks operating in the Kingdom with regard to one of its customers involved in fraud transactions in one of the countries. Several ongoing wire transfers were conducted through the internet from his bank account in one of the banks operating in that country to his bank account existed in a bank operating in the Kingdom.

After the Unit conducted the intelligence and analysis on the suspect, an existence of arrest warrant issued by the Interpol on the mentioned suspect was revealed as a result of committing fraud in the country that he issued the wire transfers from, in addition to revealing the existence of an international circular in favor of that suspect by virtue of an international red bulletin for the fact that the suspect is wanted to one of the countries authorities which he was issuing the wire

transfers through for committing a dishonesty offence.

Furthermore, the suspect was issuing wire transfers through the internet from his bank account at one of the banks in the other country to his wife bank account and a company's account that is owned by his wife in the bank that reported such suspicion in the Kingdom. Accordingly, he conducted a huge internal wire transfers between his bank accounts, the bank account of his company and his wife's company bank account at the bank existed in the Kingdom then it turned out that he also conducted cash deposit transactions in his bank account conducted by himself and another persons from various locations in the Kingdom at the bank which has reported him and at another bank operating in the Kingdom. Adding to all what have been mentioned, receiving ongoing wire transfers to the suspect from one of the companies existed in one of the countries which are inconsistent with in their nature of activity with the activity of the suspect.

After the Unit cooperation with the counterpart unit of that country in which the suspect was issuing wire transfers through the internet thereof, the Unit revealed that the suspect was working in that country and that he is wanted to one of the relevant authorities.

Therefore, the Unit took the decision to refer the case to the Prosecutor General who referred the case to the competent court for committing money laundering crime and the case is still under consideration at the mentioned court.

### **Second Case:-**

The Unit received a notification from one of the regulatory and supervisory authorities with regard to receiving two ongoing wire transfers from one of the banks operating abroad into the suspect bank account in one of the banks operating in the Kingdom, then receiving a swift message from a bank abroad to the domestic bank which received the two wire transfers. Such swift message shows that both wire transfers are generated from a fraud transaction.

After the Unit has conducted intelligence and analysis on the suspect, the Unit revealed that the suspect is a partner in an investment company and an owner of a factory operating in the Kingdom. Furthermore, the Unit revealed that the suspect does not own any assets at the Kingdom and the two ongoing wire transfers were inconsistent with the usual activity of the suspect bank account at the domestic bank that received both wire transfers and at all the banks operating in the Kingdom.

During conducting the analysis, the Unit revealed that the suspect has a joint bank account in one of the other banks operating in the Kingdom with his wife's brother. While conducting intelligence on his wife, the Unit revealed the existence of previous circulars for the wife arresting warrant and travel ban. such circulars were discontinued.

Therefore, the Unit took the decision to refer the case to the Prosecutor General who referred the case to the competent court for committing money laundering crime in favor of the wife who was convicted by imprisonment, a fine and a confiscation of the funds generated from committing money laundering (A decision subject to appeal).

### **Third Case:-**

The Unit received a SAR from one of the banks operating in the Kingdom on a customer bank account activity and transactions conducted by him through a bank account inconsistent with his nature of activity as a doctor in one of the countries in terms of the volume of the cash deposits.

After conducting the intelligence and analysis by the Unit on the suspect, the Unit revealed that the mentioned suspect conducted several cash deposits with huge amounts in a domestic bank who reported him, and then he obtained two loans from the same bank against high insurance. Moreover, the Unit revealed that the suspect purchased several

real estates and paid the costs by several checks. In addition, he rented some of these real estates and he has two taxi cars that are used by other persons against fees.

The Unit also revealed that the suspect is married to a woman who owns a medical complex in one of the countries and that the suspect occupies as administrative director in that complex. In addition, it was revealed that he presented to a domestic bank a marriage contract that shows that he is married to another woman and another official document which shows that this woman is a partner in one of the companies existed in the country he works in. The official data bases revealed that the suspect divorced that woman.

Moreover, the suspect has established several companies; two of them have the same purpose, and were created within a month period between establishing the first company and the second one. The suspect has provided, in the context of proving the source of his income, a bank statement of one of the two companies he owns issued by another bank and within the period that precedes the date of establishing that company.

After requesting information by the Unit from the official authorities, the Unit revealed that another company was existed which holds the same commercial name of that company that the suspect established. The partners in that company which holds the same name cancelled the commercial name of that

company at the same date of establishing that company by the suspect, then it was revealed that they are the same partners in the company that had been established by the suspect. The suspect obtained another loan from another third bank.

The Unit requested information from the counterpart unit of the country in which the suspect was working at as an administrative director of a medical complex owned by his wife. Accordingly, the response of the counterpart unit revealed that the mentioned wife has submitted a complaint against the suspect in that country for threatening and fraud accusation and that the suspect embezzled a huge amount of money from the medical complex and transferred a huge part of it and left the country. The Unit revealed that purchasing transactions of real estates and cars and the establishment of the companies were conducted after the date of his leaving that country. The cash deposits transactions at the domestic bank who reported him were conducted during a day or two before transferring transactions that have been conducted by him from that country.

Therefore, the Unit took the decision to refer the case to the Prosecutor General who referred the case to the competent court for committing money laundering offence and the case is still under consideration at the competent court.



#### **Fourth Case:-**

The Unit received a notification from one of the regulatory and supervisory authorities which reported that during its inspection on one of the entities subject to its supervision and regulation and studying one of the customer bank account, it revealed that this customer owns several opened bank accounts and that most of the activities conducted on such accounts were cash deposits with huge amounts that were inconsistent with the customer nature of activity. In addition, his transactions were concentrated by a cash deposits without using any other banking products.

After conducting intelligence and analysis by the Unit on that suspect, the Unit revealed that the suspect deposited cash amounts on the basis of several payments to several bank accounts for several years reached for millions of dinars. Such cash deposits conducted by persons who work at the same entity in which the suspect used to work in. In addition, it was revealed that there were deposit accounts for the suspect in foreign currencies. The suspect conducted internal transfers between such deposit accounts for combining the deposited amounts for the purposes of obtaining the best interest rate. Moreover, the suspect was transferring his salary to the deposit accounts without the existence of any activities which indicate his personal expenses. In addition to what was

mentioned, an ongoing wire transfers were received by the suspect accounts from investment companies operating abroad where the suspect has previously invested several securities in such companies and through the same entity subjects to the provisions of the Law. Furthermore, the suspect deposited checks with huge amounts in his bank accounts that were inconsistent with his nature of activity.

Therefore, the Unit took the decision to refer the case to the Prosecutor General who referred the case to the competent court for committing money laundering offence, in addition to committing other offences where the court convicted him by imprisonment, fine and confiscation of money generated from committing such offences (a decision subject to appeal).

**Legislation**



**egislation**

<b>Law</b>	Law No.(46) For 2007 Anti Money Laundering and Counter Terrorist Financing Law and Amendments thereto
<b>Regulations</b>	Regulation No. (44) for the year 2008 Regulation of the National Anti Money Laundering and Counter Terrorist Financing Committee and amendments thereto
	Regulation No. (40) for the year 2009 Regulation of the Anti Money Laundering and Counter Terrorist Financing Unit and Amendments related thereto
<b>Instructions and Guidelines</b>	Anti Money Laundering and Counter Terrorist Financing Instructions No. 51/2010 of Banks and the Guidelines related thereto
	Anti Money Laundering and Counter Terrorist Financing Regulation related to Money Exchange Companies No. (2/2010) and Guidelines thereto
	Instructions on Anti Money Laundering and Counter Terrorist Financing in Securities Activities and Guidelines related thereto
	Anti Money Laundering and Counter Terrorist Financing Instructions of Insurance Activities No. 6/2010 and Amendments thereto and Guidelines related thereto
	Anti Money Laundering and Counter Terrorist Financing Instructions Pertaining to Goldsmithing and Sale of Jewelry, Precious Metals and Gems 'Shops for the year 2010 and Amendments thereto and Guidelines related thereto
	Anti Money Laundering and Counter Terrorist Financing Instructions Pertaining to Licensed Real Estates and its Developments for the year 2010 and Guidelines related thereto
	Anti Money Laundering and Counter Terrorist Financing Instructions Pertaining to Companies which exercise the Activity of Financial Leasing for the year 2011 and Guidelines related thereto
	Instructions No. (3) for the year 2011 Anti Money Laundering and Counter Terrorist Financing Instructions for Entities Exercising any of the Financial Activities and Guidelines related thereto
<b>Instructions for Implementing the Relevant Security Council Resolutions</b>	Instructions No. (1) for the Year 2010 Instructions for Implementing the Obligations Provided in Security Council Resolution No. 1267 (1999) and Other Relevant Resolutions and amendments thereto
	Instructions No. (2) for the Year 2010 Instructions for Implementing the Obligations Provided in Security Council Resolution No. 1373 (2001) and Other Relevant Resolutions and amendments thereto
<b>Other Instructions</b>	Controls and Basis Related to Reporting Transactions Suspected to be Related to Anti Money Laundering and Counter Terrorist Financing Instructions for the year 2011
	Instructions of Notifying the Entities Obligated to Report of Receiving the SAR by the Unit No. (1) for the year 2011
	Instructions on Forms and Mediums Relating to Notifications on the Transactions Suspected to be Related to Money Laundering or Terrorist Financing No. (2) for the year 2011
	Instructions of the Cross-border Moveable Money Declaration No. (4) for the year 2011
	Instructions No. (1) for the year 2012 the Means that Insure Providing the Regulatory Authorities and Other Competent Authorities with any Data or Information available within the Unit's Database
<b>Internal Instructions</b>	Internal Instructions No. (1) for the year 2011 Internal Organization for the Anti Money Laundering and Counter Terrorist Financing Unit Instructions
	Internal Instructions No. (6) for the year 2011 the Use of the Metal Cabinets and Cupboards of Notifications Instructions
	Internal Instructions No. (7) for the year 2011 the Database of Information on Transactions Suspected to be Related to Money Laundering or Terrorist Financing, Conditions and Guarantees of Maintaining Confidentiality thereto
	Personal Commitment Form for Compliance With the Charter of Professional Conduct Related to Information Security and Protection

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