



Anti Money Laundering
& Counter Terrorist Financing Unit



Annual Report 2015



His Majesty King Abdullah II Ibn Al Hussein



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

Chapter One: National Anti Money Laundering and Counter Terrorist Financing Committee



National Committee Tasks and Authorities

The National Anti Money Laundering and Counter Terrorist Financing Committee was formed pursuant to the provisions of Article (5) of Law No. (46) for the year 2007, the Anti Money Laundering and Counter Terrorist Financing Law and the amendments thereto, chaired by the Governor of the Central Bank of Jordan and the membership of the following: -

1. Deputy Governor of the Central Bank of Jordan - Vice Chairman
2. Secretary General of the Ministry of Justice
3. Secretary General of the Ministry of Interior
4. Secretary General of the Ministry of Finance
5. Secretary General of the Ministry of Social Development
6. Director General of the Insurance Commission¹
7. General Controller of the Companies
8. A Commissioner of the Securities Commission Board
9. Chief of the Unit

The National Anti Money Laundering and Counter Terrorist Financing Committee undertakes to perform any tasks and authorities related to anti money laundering and counter terrorist financing, including the following: -

1. Developing the general policy for anti money laundering and counter terrorist financing and setting the plans necessary for its implementation.
2. Following-up with the competent authorities for the purposes of fulfilling the obligations under the relevant and enforceable international resolutions.
3. Participating in international forums relevant to the general policy of anti money laundering and counter terrorist financing.
4. Studying the annual reports submitted by the Unit concerning anti-money laundering and counter terrorist financing activities.
5. Approving and adopting the annual budget of the Unit proposed by the Chief of the Unit.
6. Studying the necessary draft legislation for implementing the provisions of this law as prepared by the Unit, and submitting such to the Council of Ministers to complete the necessary procedures.
7. Studying the instructions and guidelines to be issued by the regulatory and supervisory authorities pursuant to the provisions of this law

Regulation No. (44) for the year 2008 and the amendments thereto, Regulation of the National Committee's function was issued which determined the National Committee meetings, the necessary quorum of the Committee's meetings, decisions taken, its recommendations, the committee's modus operandi and other related provisions.

¹ In accordance with the Prime Minister letter no. 83/11/1/19878 dated 8/6/2014

National Committee Members

Chairman

Governor of the Central Bank of Jordan
H. E. Dr. Ziad Fariz

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. Ahmad Jamaliah

Member

Secretary General of the Ministry of Interior
H. E. Mr. Samir Mbaydeen

Member

Secretary General of the Ministry of Finance
H. E. Dr. Ezzedine Kanakrieh

Member

Secretary General of the Ministry of Social Development
H.E Mr. Omar Hamzeh

Member

Secretary General of the Ministry of Industry, Trade and Supply¹
H. E. Mr. Yousef AlShamali

Member

Companies Controller²
H. E. Dr. Omar Zoubi

Member

Commissioner from the Jordan Securities Commission
H. E. Mr. Mansour Hadadin

Member

Chief of the Unit
H.E. Mrs. Dana Junbulat

¹ as of June 2015 instead of H. E. Ms. Maha Ali

² as of December 2015 instead of H. E. Mr. Burhan Akroush

Chapter Two: The Anti Money Laundering and Counter Terrorist Financing Unit



ANTI MONEY LAUNDERING
& COUNTER TERRORIST FINANCING UNIT

Vision

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

Mission

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.

Strategic 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.

Reinforcing Cooperation

The Unit keen on communicating with the national and international agencies concerned with combating money laundering and terrorist financing for the sake of activating and reinforcing the Anti money Laundering and Counter Terrorist Financing regime in the Hashemite Kingdom of Jordan, the Unit conducted several coordinating meetings with the national and international agencies concerned with combating money laundering and terrorist financing and these agencies are: -

Ministry of Foreign Affairs and Expatriates/ Ministry of Justice/ The Central Bank of Jordan/ the Judicial council/ Judicial Military Directorate/ Public Security Directorate/Anti-Corruption Commission/U.S Embassy in Amman/ International Monetary fund (IMF)/ Internal Affairs Attaché' at the Spanish Embassy in Amman/the counterpart unit of Japan/ European Union/ Council of Europe/Representatives from the French Embassy in Amman/ Representatives from the Australian Embassy in Amman/ Representatives from the Danish Embassy in Amman and a delegation from Denmark/ a number of banks operating in Jordan.

Training

The Unit always seeks to keep up with the latest international developments in the field of anti money laundering and counter terrorist financing and implementing the FATF International Standards which addresses the international obligations to ensure the availability of an effective framework for combating money laundering and terrorist financing and addressing the new risks in this regard , the Unit participated in several workshops, conferences and regional and international meetings which we highlight the most important as follows:-

On the National Level

A workshop for Training the banking and insurance companies sector on AML/CFT and another two workshops on the Financial Intelligence Unit (FIU) Role in AML/CTF and the strategic analysis, source of information and practical cases on TF organized in collaboration with the (World Bank).



On the Regional and International Level

Meetings:

1. The Egmont Group Working Groups meetings and the Intersessional Meetings of the HoFIUs and Observers in the EG/ Berlin, Germany during the period from January 27th, 30th, 2015.
2. The 21st Middle East and North Africa Financial Action Task Force (MENAFATF) plenary meeting held in Muscat/ Oman.

The First update report of the Hashemite Kingdom of Jordan was discussed by the plenary meeting within the framework of the Follow up for the mutual evaluation processes conducted by the MENAFATF to look at the latest developments and measures taken by the Kingdom in the framework of enhancing the AML/CTF regime which included the new corrective measures taken after Jordan was removed from regular follow-up process to the biennial update including the new corrective measures taken by the Kingdom in light of the issuance of the revised FATF International standards for combating Money laundering and terrorist financing and proliferation and the methodology of assessing the technical compliance with the FATF recommendations and the effectiveness of the AML/CTF systems issued by the FATF which obtained the appraisal of the member countries of the MENAFATF for the continuity of the Kingdom's efforts in the field of combating money laundering and terrorist financing.

The mentioned report shows the corrective measures that were undertaken by Jordan during the last two years, including:-

1. Legislative and organizational developments.
 2. The amendments to the instructions issued by the supervision authorities.
 3. The amendments on the implementation of the UNSCRs.
 4. The international and national cooperation.
3. The 22nd Middle East and North Africa Financial Action Task Force (MENAFATF) plenary meeting held in Bahrain during the period from October 24th-26th, 2016 with the chairmanship of Oman.

Workshops:

The Anti Money Laundering and Counter Terrorist Financing Unit participated in the following workshops:-

1. The national workshop on the "Implementation of UNSCRs related to Counter Terrorist Financing and Freezing Assets", the Special Session of the Arab Forum on Asset Recovery (AFAR IV).
2. The Basic Components of an Effective Anti-Terrorism Measures in the framework of the Criminal Justice.
3. The MENAFATF "Sixth Assessors Training Course", in the light of preparing for the 2nd round of mutual evaluation for the MENA Countries, and the MENA Region Countries Money Laundering and Terrorist Financing Risks.
4. Typologies and Capacity building Workshop.

Participation in the Counter Terrorist Financing International Initiatives

The Anti Money Laundering and Counter Terrorist Financing Unit participated this year in several international initiatives and working groups formed by counter terrorist financing international organizations especially those related to the terrorist organization "Da'esh" which aimed at disrupt moving money and combating the financing of the mentioned terrorist organization in all its forms as follows:-

1. Egmont Working Group Project on Foreign Terrorist Fighters Meeting.
2. The 2nd Meeting of the Counter ISIL Finance Group (CIFG) held in Saudi Arabia.
3. The 3rd Meeting of the Counter ISIL Finance Group (CIFG) held in Washington D.C., USA.



Lectures, Training, Workshops and Meetings Nationally

Date	Subject	Organizing Entity	Place
11-12/2	Workshop on "Targeted Financial Sanctions on Iran"	Ministry of Foreign Affairs in cooperation with International Institute for Strategic Studies	Amman – Jordan
22/3	Workshop on "Anti Money Laundering and Terrorist" for banks and Insurance Companies	World Bank and the Anti Money Laundering and Counter Terrorist Financing Unit	Amman – Jordan
23-24/3	Workshop on the "Role of the Financial Intelligence Unit in the Field of Anti Money Laundering and Counter Terrorist Financing"	World Bank and the Anti Money Laundering and Counter Terrorist Financing Unit	Amman – Jordan
9/6	A Training on "Anti Money Laundering and Counter Terrorist Financing Law, the Preventive Measures in the Field of Anti Money Laundering and Counter Terrorist Financing and Indicators for Suspicion"	Preventive Security Training Centre	Amman – Jordan
3-5/8	National Workshop on the "Basic Components of an Effective Anti – Terrorism Measures in the framework of the Criminal Justice"	United Nations Office for Drugs and Crime (UNODC)	Amman – Jordan
16/8	A Seminar on Transnational Anti Money Laundering	Preventive Security Training Centre	Amman – Jordan
28-30/9	Workshop on International Cooperation for MENA Region Countries	U.S. Ministry of Justice in cooperation with the U.S. Embassy in UAE	Amman – Jordan
6/10	Workshop on "Anti Money Laundering and Counter Terrorist Financing Law, the role of the Anti Money Laundering and Counter Terrorist Financing Unit competences"	Criminal Investigation Training Centre	Amman – Jordan
1-6/11	A Workshop on "Strategic Analysis, Source of Information, and Practical Cases on Terrorist Financing"	International Monetary Funds (IMF)	Amman – Jordan
18/11	A Training on "Anti Money Laundering and Counter Terrorist Financing Law, the Preventive Measures in the Field of Anti Money Laundering and Counter Terrorist Financing and Indicators for Suspicion"	Criminal Investigation Training Centre	Amman – Jordan
22-23/11	A Workshop Titled "Financing the Electoral Campaigns"	Rasheed Coalition for Integrity and Transparency, in cooperation with the Independent Election Commission and in partnership with the Transparency International and the European Union	Amman – Jordan

15/12	The Ceremony of Launching Two Policy Papers on the "National Integrity System Project"	Rasheed Coalition for Integrity and Transparency	Amman - Jordan
20-21/12	A Workshop on "Terrorists Financial Assets Freezing and Listing"	Counter-Terrorism Implementation Task Force (CTITF)	Amman - Jordan

Lectures, Training, Workshops and Meetings Regionally and Internationally

Date	Subject	Organizing Entity	Place
5-9/1	The Visit of the National Working Group for Reviewing Kingdom of Bahrain Compliance with Implementing the United Nations Convention Against Corruption (UNCAC)	The United Nations Office of Combating Drugs and Crime (UNODC) organized by the General administration of Anti-Corruption, Economic and Electronic and Security at the Ministry of Interior of Bahrain	Manama-Bahrain
27-30/1	Egmont Working Groups and the Intersessional Meetings of HoFIUs and Observers	Egmont Group	Berlin-Germany
10-12/2	National Workshop Titled "Implementation of Security Council Resolutions related to the Financing of Terrorism and Freezing Assets"	United Nations Office for Drugs and Crime (UNODC)	Algeria
9-10/4	Program on "Towards a Strengthened Democratic Governance in the Southern Mediterranean"/ South Program 2	Council of Europe	Strasbourg/France
26-30/4	21 st Plenary Meeting of the Middle East and North Africa Financial Action Task Force (MENAFATF)	The Middle East and North Africa Financial Action Task Force (MENAFATF)	Oman
4-5/5	Meeting of Egmont Working Group on Foreign Terrorist Fighters (Egmont ISIL Project)	The Counterpart Unit of USA (FinCEN)	Washington D.C./ USA
7/5	The 2 nd Meeting of the Counter ISIL Finance Group (CIFG)	Saudi Arabia Ministry of Interior	Jeddah/Saudi Arabia

Lectures, Training, Workshops and Meetings Regionally and Internationally

Date	Subject	Organizing Entity	Place
18-20/5	The Special Session of the Arab Forum on Asset Recovery (AFAR IV)	Organized under Germany's (G7) Presidency in cooperation and collaboration with the German Foundation for International Legal Cooperation (IRZ), the German Federal Ministry of Justice and consumer Protection, the German Federal Foreign Office and the Stolen Asset Recovery Initiative (StAR) of the World Bank	Tunisia
6-7/10	3 rd Meeting of the Counter ISIL Finance Group (CIFG)	U.S. Treasury	Washington D.C./ USA
4-8/10	The "Sixth Assessors Training Course"	The Anti-Money Laundering and Suspicious Cases Unit (AMLSCU) - United Arab Emirates in collaboration with the Middle East and North Africa Financial Action Task Force (MENAFATF)	Abu Dhabi-United Arab Emirates
18-22/10	Training Course on "Money Laundering and Terrorist Financing Risks in the MENA Countries Region"	The International Monetary Fund- Middle East for Economic and Finance	Kuwait - Kuwait
26-28/10	Training Course on "Train the Trainer on Strategic Analysis"	Egmont Group and the Counterpart Unit of Morocco	Rabat - Morocco

Lectures, Training, Workshops and Meetings Regionally and Internationally

Date	Subject	Organizing Entity	Place
15-16/11	Training on "International Cooperation in the Field of Financial Investigations, Money Laundering and Assets Recovery"	United Nations Office for Drugs and Crime (UNODC)	Egypt
22-26/11	22 nd Plenary Meeting of the Middle East and North Africa Financial Action Task Force (MENAFATF)	The Middle East and North Africa Financial Action Task Force (MENAFATF)	Manama-Bahrain
14-16/12	A Joint Typologies and Capacity Building Workshop of MENAFATF	The Middle East and North Africa Financial Action Task Force (MENAFATF)	Sudan

Signing a Memorandum of Understanding with Bangladesh

The Anti Money Laundering and Counter Terrorist Financing Unit signed a Memorandum of Understanding with the counterpart unit of Bangladesh on August 18th, 2015.

Signing a Memorandum of Understanding with the counterpart unit of Japan

On September, 15th, 2015, the Anti Money Laundering and Counter Terrorist Financing Unit signed a Statement of Cooperation in Amman with Japan Financial Intelligence Centre of the National Public Safety Commission (Counterpart Unit of Japan) in Amman for the purpose of setting a framework of cooperation between both countries in exchanging financial information related to money

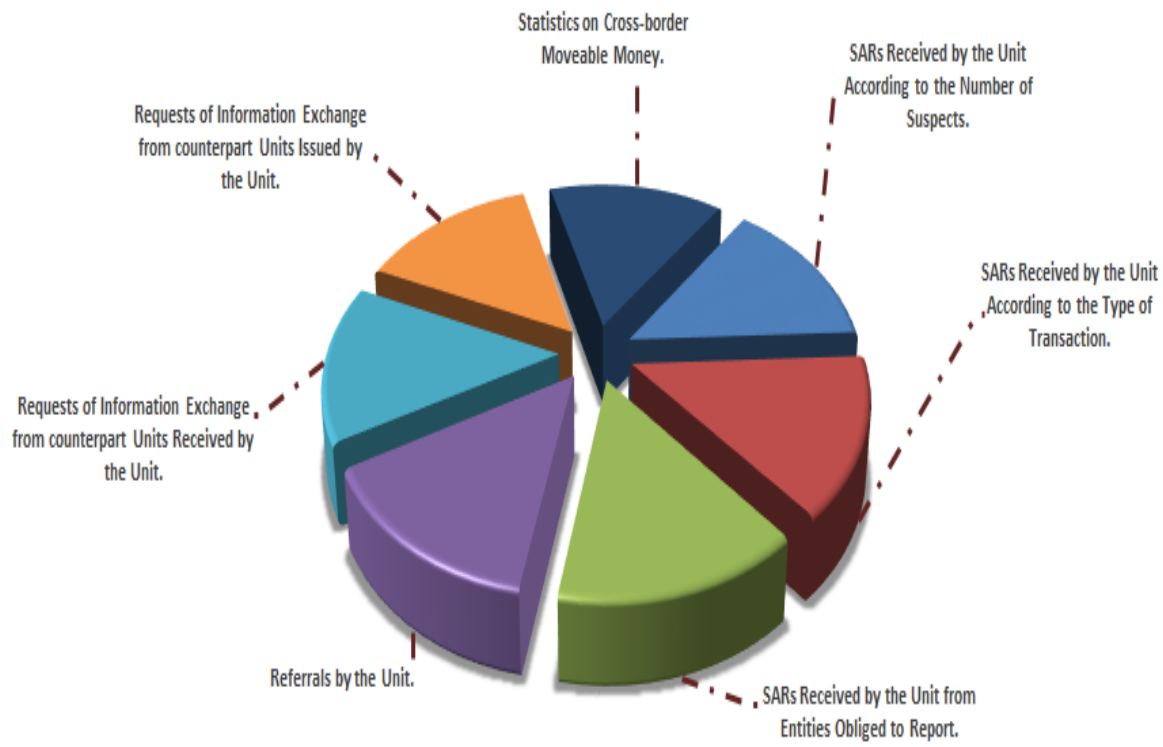


laundering and terrorist financing with the attendance of a high level Japanese delegation from Japan Financial Intelligence Centre, the Second Secretary at the Embassy of Japan in Amman-Jordan and a representative from the Ministry of Foreign and Expatriate Affairs. Mrs. Dana Junbulat/ Chief of the Anti Money Laundering and Counter Terrorist Financing Unit signed the mentioned (SOC) on behalf of the Jordan, whereby Mr. Yosuke Ito represented Mr. Takashi KINOSHITA/ Director General of Japan Financial Intelligence Centre in signing the mentioned (SOC) on behalf of the Japan.

Therefore, the number of MOUs signed between the Unit and the Arab and Foreign counterpart units is totaled (21) MOUs⁴.

⁴ UAE, Turkey, Palestine, South Africa, Cyprus, Algeria, Syria, Ukraine, Poland, Bahrain, Iraq, KSA, Russia, Morocco, Yemen, UK, Belgium, Indonesia, Sudan, Bangladesh, Japan.

Chapter Three: Suspicious Activity Reports (SARs) and Notifications of Transactions Suspected to be Related to Money Laundering or Terrorist Financing



SARs Received by the Unit from the Entities Obligated to Report for 2015

Entity	Number of SARs
Banks	253
Money Exchange Companies	61
Financial Services Companies	5
Total	319

SARs Received by the Unit According to the Number of Suspects for 2015

Entity	Number of Suspects
Banks	321
Money Exchange Companies	74
Financial Services Companies	4
Total	399

SARs Received by the Unit According to the Type of Suspects for 2015

Entity	Natural Person	Legal Person
Banks	285	36
Money Exchange Companies	72	2
Financial Services Companies	4	0
Total	361	38

**Notifications Received by the Unit from Regulatory and Supervisory
Authorities and Other Competent Authorities for 2015**

Entity	Number of SARs
Securities Commission	1
Anti Corruption Commission	1
Public Security Directorate	12
General Customs Department	14
Total	28

**Notifications Received by the Unit According to the Number of Suspects for
2015**

Entity	Number of Suspects
Securities Commission	3
Anti Corruption Commission	1
Public Security Directorate	34
General Customs Department	15
Total	53

Notifications Received by the Unit According to the Type of Suspects for 2015

Entity	Natural Person	Legal Person
Securities Commission	2	1
Anti Corruption Commission	1	0
Public Security Directorate	33	1
General Customs Department	14	1
Total	50	3

SARs and Notifications Received by the Unit According to the Type of Transaction for 2015

Type of Transaction	Number of SARs and Notifications
Foreign Wire transfers	95
Domestic Wire transfers	20
Foreign and Domestic Wire transfers	18
Cash Deposits/Withdrawals	129
Deposit /Purchasing Checks	20
Credit Facilities	3
Negative Information	15
Fraud	10
Dealings Related to Investment	2
Banking, International and Financial Transactions	6
Foreign Tax Fraud	1
Customs Smuggling	1
Cases of non-Customs Declaration	13
Forgery	3
Others	11
Total	347

National Cooperation Requests Received by the Unit for 2015

Entity	Number of Requests
Public Security Directorate	42
Central Bank of Jordan	17
Anti Corruption Commission	4
Ministry of Foreign Affairs and Expatriates	1
Total	64

**National Cooperation Requests Received by the Unit According to the
Number of Suspects for 2015**

Entity	Number of Suspects
Public Security Directorate	105
Central Bank of Jordan	30
Anti Corruption Commission	29
Ministry of Foreign Affairs and Expatriates	1
Total	165

**National Cooperation Requests Received by the Unit According to the Type of
Suspects for 2015**

Entity	Natural Person	Legal Person
Public Security Directorate	81	24
Central Bank of Jordan	27	3
Anti Corruption Commission	29	0
Ministry of Foreign Affairs and Expatriates	0	1
Total	137	28

**Requests of Information Exchange Issued by the Unit to Counterpart Units
(Egmont Group Members and Non- members) for 2015 According to the
Country**

Country	Number of Requests
Kingdom of Saudi Arabia	2
Palestine	1
Iraq	1
Lebanon	1
Egypt	1
United Arab of Emirates	1
Dominica	1
United States of America	2
Switzerland	1
Total	11

**Requests of Information Issued by the Unit to Counterpart Units (Egmont
Group Members and Non- members) for 2015 According to the Number of
Suspects**

Country	Number of Suspects
Kingdom of Saudi Arabia	5
Palestine	2
Iraq	1
Lebanon	2
Egypt	1
United Arab of Emirates	1
Dominica	1
United States of America	2
Switzerland	1
Total	16

**Requests of Information Received by the Unit from Counterpart Units
(Egmont Group Members and Non- members) for 2015 According to the
Country**

Country	Number of Requests
United States of America	12
Palestine	7
Iraq	3
Saudi Arabia	5
Lebanon	2
Bahrain	8
New Zealand	2
Russia	1
Latvia	1
France	1
Hungary	2
United Kingdom	3
Philippines	1
Guatemala	2
Romania	1
Oman	1
Belgium	1
Moldova	1
Algeria	2
Cayman Island	1
Netherlands	1
Lithuania	1
Czech Republic	1
Ireland	1
Switzerland	1
Taiwan	1
Cyprus	1
Yemen	1
Turkey	4
United Arab Emirates	1
Jersey	1
Total	71

**Requests of Information Exchange Received by the Unit from Counterpart
Units (Egmont Group Members and Non- members) for 2015 According to the
Number of Suspects**

Country	Number of Suspects
United States of America	24
Palestine	10
Iraq	4
Saudi Arabia	8
Lebanon	2
Bahrain	14
New Zealand	2
Russia	3
Latvia	1
France	4
Hungary	3
United Kingdom	12
Philippines	9
Guatemala	75
Romania	1
Oman	1
Belgium	2
Moldova	2
Algeria	3
Cayman Island	5
Netherlands	1
Lithuania	1
Czech Republic	1
Ireland	2
Switzerland	6
Taiwan	45
Cyprus	8
Yemen	10
Turkey	70
United Arab Emirates	1
Jersey	2
Total	332

Cross-border Moveable Money Declarations Statistics

Statistic on the Cross-border Moveable Money Declarations Filled in for 2015

Custom Center	Number of Declarations	Total of Declarations in Jordanian Dinar
Aqaba Customs	8	601,428
Al Omari Custom Center	29	1,369,053
Al Karama Custom Center	132	64,071,939
Al Mudawara Custom Center	28	857,238
Passengers airport Custom	939	556,113,451
King Hussein Bridge Custom	549	8,288,646,119
Amman Civil Airport Custom - Marka	2	375,770
Jordan Valley Crossing Custom	11	732,851
Total	1698	8,912,767,849

Cross-border Moveable Money Declaration for 2015

Year	Number of Declarations	Total of Declared Amounts/ Dinar	Cases Referred to the Customs General Prosecutor		
			Number of Non-Declaration Cases	Value of Non-declared Amounts/ Dinar	Total of Imposed Fines/ Dinar
2015	(1,698) Declaration	(8,912,767,849) Dinar	(37)	(9,364,150) Dinar	(28,846) Dinar

The Year of 2015 witnessed a remarkable increase in the volume of the SARs and notifications received by the Unit from various reporting entities and regulatory and supervisory entities in comparison with the year of 2014, whereby the increase percentage reached (88.5) %, which can be justified by several reasons including the following: -

- 1- The surrounding conditions to Jordan and threats by the terrorist organizations.
- 2- The adoption of several entities subject to the provisions of the AML/CTF Law of control systems and monitoring mechanism of financial transactions conducted to achieve compliance with the legislation in force in the Kingdom including those related to combating money laundering or terrorist financing transactions, which added to the speed and efficiency of detecting transactions suspected to be related to ML or TF.
- 3- Issuing a new instructions related to forms and means of reporting on transactions suspected to be related to ML or TF by the Anti Money Laundering and Counter Terrorist Financing Unit to address all the weaknesses identified through a thorough study of Suspicious Activity Reports (SARs) previously received by the Unit, which resulted in the reinforcement and enhancement of reporting mechanism on such transactions and the nature of information provided to the Unit.
- 4- Activating the on-site and off-site supervision; thus, increasing sanctions imposed by the regulatory and supervisory authorities on entities subject to the provisions of the AML/CTF Law in force with regard to non-compliance with the AML/CTF Law and instructions issued by virtue thereof.
- 5- The emergence of a fraud scheme known as "Taa'zeem" that was witnessed by Jordan in 2015.
- 6- Increasing the compliance measures applied by some of the international wire transfer companies in monitoring the wire transfer transactions in countries or high risk countries.
- 7- Granting the Unit the power of receiving the referrals from the Customs Department related to cross-border moveable money in case of non-declaration or t false declaration or the suspicious of transaction related to ML or TF.

The First Practical Case:

A Suspicious Transaction Report (SAR) was received by the FIU from Bank (X) with regard to suspect Mr. (A) who came to the bank and request from the Bank director renting him a safe deposit box. It turns out to the bank's director that the purpose of the requested box is to put the amount of money in the mentioned box, which raised suspicions to the bank director and refused to meet his request. Then, suspect (A) requested to open a mutual account/ Term Deposit and the signatories are Mr. (A), Mr. (B) and Mr. (C). After opening the mentioned account, the accountant (D) at the company (F) deposited in the account an amount of (475,000) JD in cash and when the bank director requested providing him with the documents which show the source of funds, the accountant (D) provided the bank with documents represented the transactions of withdrawals in cash from the account of company (F) during different periods at bank (Y) with a total amount of (334,142) Dinars, in addition to an amount of (150,000) JD which represents receipts of money from company (S). After (5) days, suspect (A) deposited an amount of (187,523) JD in the mutual account from the savings of the company.

The Unit's Intelligence and Financial Analysis Procedures:

- It turned out that suspect Mr. (A), Mr. (B) and Mr.(C) are the chairman and members of the board of directors of company (K) and each of the suspect Mr. (A) and Mr. (B) are chairman of directors board in each of company (F) and company (S) who also the authorized signatory of these companies.
- There is a seizure on the funds of company (K) and several subsidiaries including company (F) and company (S) upon request by one of the law enforcement agencies and excluding company (K)'s board of directors, directors and board of directors from the prohibition of disposing the companies' assets in order to conduct its business.
- The copies of the funds receipt issued by company (S) which were submitted to the Bank (C) as documents to prove the deposited source of the funds indicated that such receipts are payments from a reconciliation agreement that are paid from a client at company (S).
- There is an endorsement by the accountant of company (F) on the copies of the cash bonds from company (F) at Bank (R) which were submitted to bank (X) as a proof of the deposited source of funds which indicates that the mentioned

accountant received such amounts from Mr. (B) and that the funds were deposited in the company's safe.

- At the request of information from Bank (Y), company (F) account statement and the copies of the attached checks revealed that the checks were deposited in the account the purpose of such checks mostly were payments of rents. In studying the bank statement of company (F), it revealed that after depositing the values of checks in the company's accounts, a withdrawal in cash transaction for each of the amounts of checks were conducted and that the total amount of the cash withdrawals is similar to the deposited total amount in the mutual account.

Results of Case Analysis:

The actions conducted by the suspects after withdrawing funds from company (F) and taking over the financial dues of company (K) as attempt to hide the amount of funds in the metallic safe then depositing such funds in the mutual account which was opened at Bank (X) are considered of actions of Money Laundering crime which violate the Anti Money Laundering and Counter Terrorist Financing Law.

Therefore, the Anti Money Laundering and Counter Terrorist Financing Unit referred the case to the competent general prosecutor for the suspicion of money laundering crime who issued a seizure order on all the accounts of the suspects, then the competent general prosecutor referred the case to the competent court.

The Second Practical Case:

On 31/8/2015, a Suspicious Transaction Report (SAR) was received by the FIU from Bank (C) on suspect (A); holds a Jordanian nationality, the details are as follows: -

- Suspect (A) works at bank (C) since 6/9/2012 as a consultant. On 22/8/2015, suspect (A) went to country (X) for a work mission. He was supposed to stay in country (X) till 28/8/2015 to come back upon his completion of his work.
- On 25/8/2015, suspect (A) claimed that his uncle died and he must go back to Jordan; therefore, he left country (X) after he paid all his hotel expenses, noting that such expenses were covered by bank (C). After that, the contact with him was lost till 27/8/2015.
- On 27/8/2015, suspect (A)'s cousin (B) came to bank (C) and submitted suspect (A)'s resignation justifying this for personal issues; such resignation raised up suspicion to the bank.

- Bank (C) reviewed suspect (A)'s bank account and revealed that he withdrew an amount of approximately (3000) JOD during (3) days from his bank account through his ATM card; by reviewing his conducted transactions, **there were transactions for booking flights through travelling agencies of (2) tickets;** one of these tickets was for country (Y) which was revealed through his payment of an amount of (60) USD for a hotel in country (Y). It was revealed that there were withdrawal transactions amounted of (736) JOD conducted in one of the cities of country (T) adjacent to a conflict zone, a subsequent movement in border city to country (T), conducted through country (T)'s banks.

The Unit's Intelligence and Financial Analysis Procedures:

- There was no existence of any individual institutions in the name of suspect (A), in addition, it was revealed that suspect (A) was not a partner or owned any company.
- There was no any suspicious activity report filed on suspect (A).
- It was revealed that suspect (A) is married and has a daughter of two years old.
- There was no existence of any negative information regarding suspect (A) in the commercial databases.
- There was no existence of any properties in the name of suspect (A).
- There was no existence of any criminal records or requests of suspect (A), in addition, it was revealed that the last movement of suspect (A) departure and arrival records was departing to country (X) on 22/8/2015.
- It was revealed that suspect (A) previously sold and waived (3) vehicles; the last vehicle was sold on 6/9/2016, after his travelling to country (X) which indicates that suspect (A) sold the vehicle under a proxy and it is unclear the fate of the sales price and whether the price was transferred to suspect (A) or not, knowing that suspect (A) does not currently have any vehicles.

Results of Case Analysis

- ✓ Suspect (A) was in country (X) for the purposes of work mission for the bank and instead of coming back to the Kingdom the suspect (A) moved to country (Y) and then to country (T) during a very short period of time, whereby country (T) is considered one of the countries adjacent to countries of conflict zones where there exists ISIL and the suspect (A) might joined ISIL there.
- ✓ Suspect (A) resigned unexpectedly and deported his wife to where her relatives reside before he leaves to country (X).
- ✓ Suspect (A) was self-financed to move to country (Y) and then moved to country (T) and from then he conducted withdrawal transactions through ATM

card from country (Y) then to country (T). During the period from 25-28/8/2015, suspect (A) withdrew an amount of (3000) JOD from his bank account through his ATM card from country (Y) and from two cities in country (T) which is adjacent to the Syrian borders where ISIL exists.

- ✓ The main resources of suspect (A) funds represented by his salaries for the fact that he works at bank (C) as a consultant, in addition to selling his car and conceded his car on 6/9/2015 i.e. after the date of his travel to country (Y) which means the necessity to determine the destination of such funds.

At the conclusion, the FIU referred the case to the competent general prosecutor for a TF suspicious case.

Chapter Four: The Unit Financial Statements



Chapter Five: Legislation



Law	Law No.(46) For the year 2007 Anti Money Laundering and Counter Terrorist Financing Law
Regulations	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
Instructions and Guidelines	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 for the year 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 2014 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
	Instructions No. (1) for the year 2012 the Anti Money Laundering and Counter Terrorist Financing Instructions of Entities Providing Postal Services and Guidelines related thereto
Instructions for Implementing the Relevant Security Council Resolutions	Instructions No. (1) for the Year 2014 Instructions for Implementing the Obligations Provided in Security Council Resolution No. 1267 (1999) and No. 1989 (2011) and Other Relevant Resolutions and Amendments thereto and Guidance Related thereto
	Instructions No. (2) for the Year 2014 Instructions for Implementing the Obligations Provided in Security Council Resolution No. 1988 (2011) and Other Relevant Resolutions and Amendments thereto and Guidance Related 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
Other Instructions	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
	Instructions No. (1) for the year 2015 Instructions of Forms and Means of Reporting on Transactions Suspected to be related to Money Laundering or Terrorist Financing and the unified financial analysis form

Internal Instructions	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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