



Transaction Monitoring: Reporting Perspective

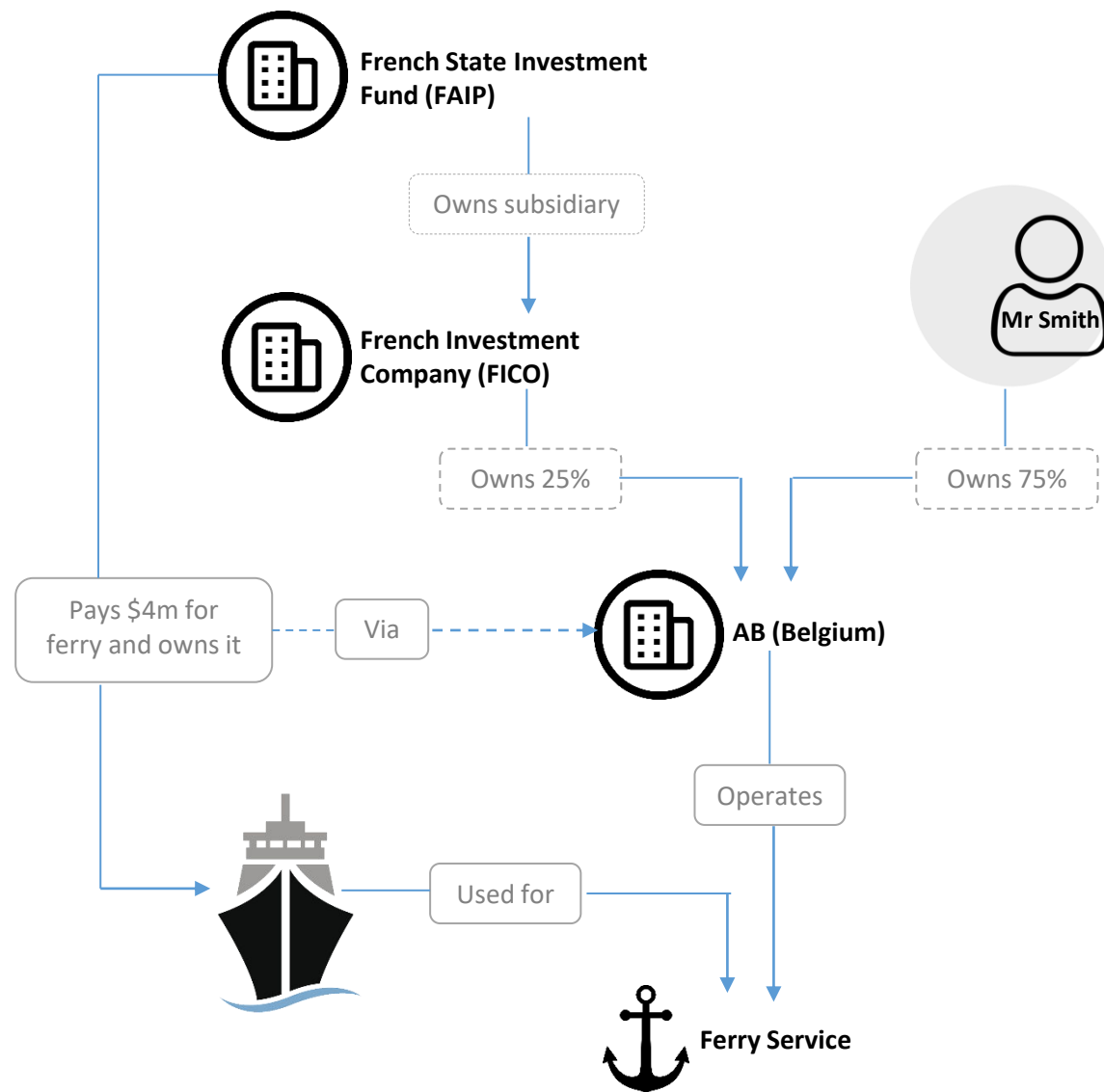
Chantiane Said

Intelligence Analysis



Reports: Scenario 1

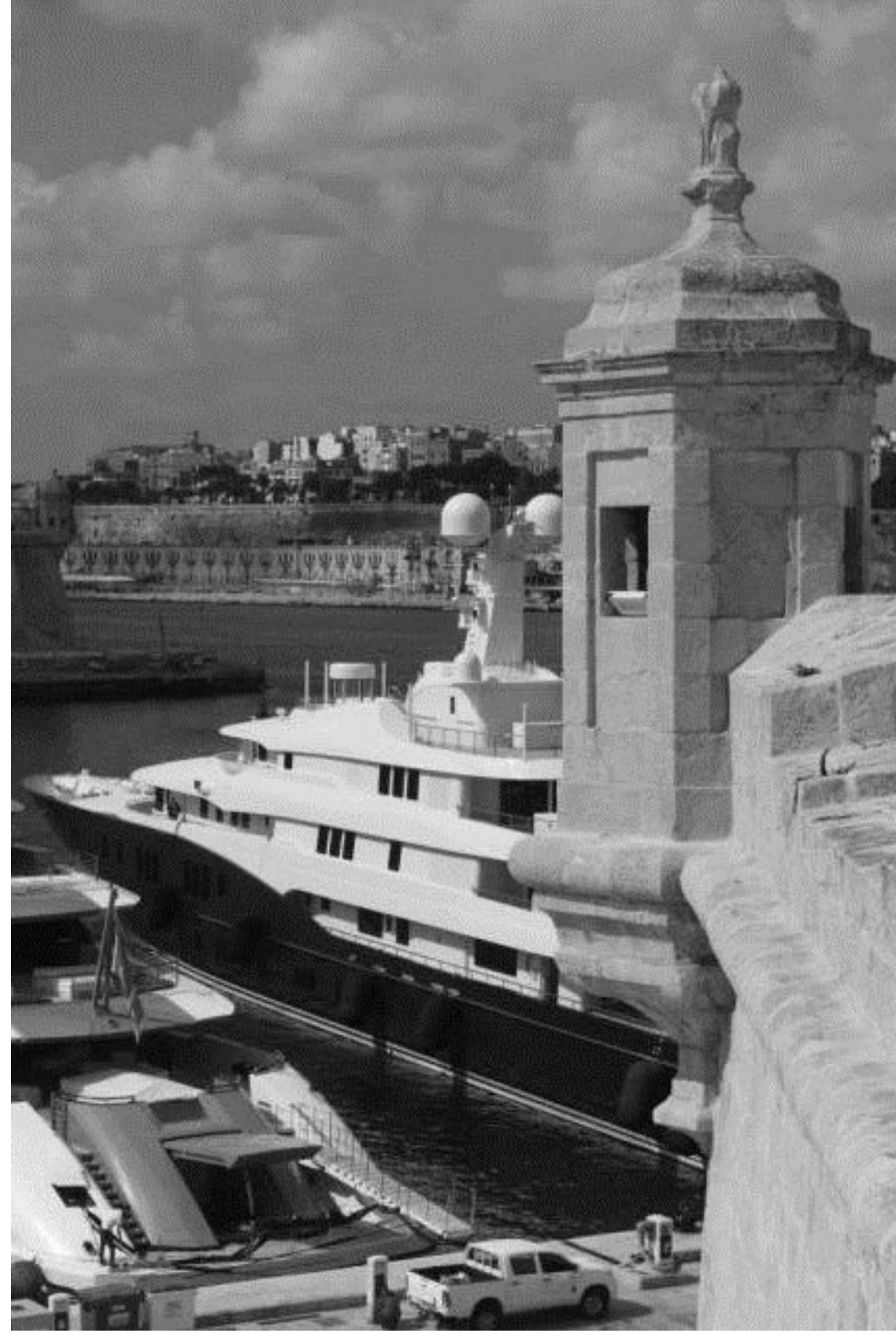
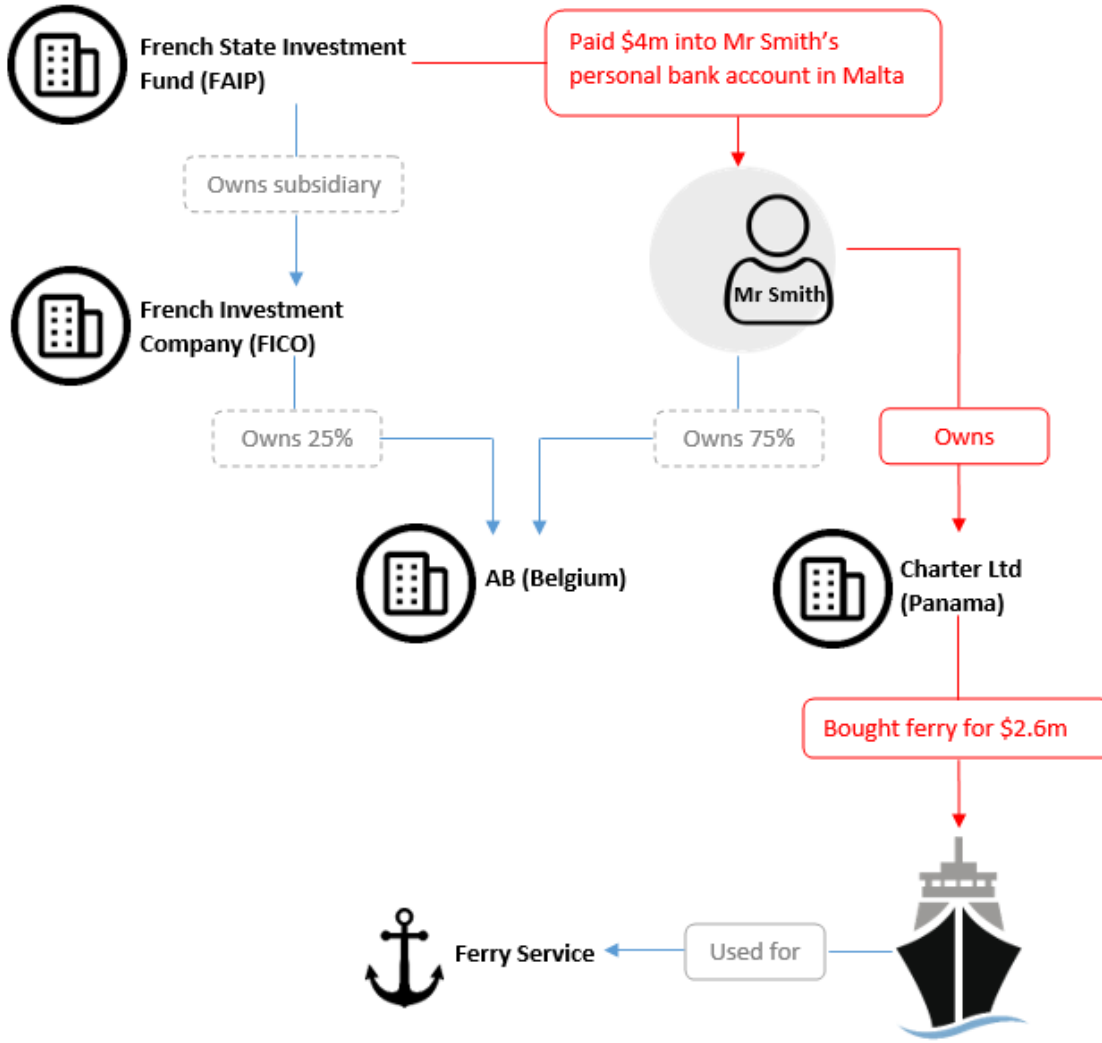
How the Joint Venture Was Supposed to Work





Reports: Scenario 1

What Actually Happened





Reports: Scenario 1

Main Reporting Purpose

✓ Adverse Media

- ✗ However, the ML structuring of funds reported in OSINT is visible in local accounts.
- ✗ The SPs transaction monitoring system failed to raise the alert.
- ✗ Leading to Late Reporting



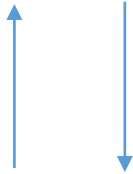


Reports: Scenario 2



Abela FZE (UAE)

*Involved in transportation,
freight & storage*



Camilleri Holdings Ltd (MT)

€3m – Payable in instalments

*Payment represents part settlement from
sale of shares in Cassar Airlines Ltd
(Cyprus) by Camilleri Holdings Ltd to
Abela FZE*





The circumstances of the case portray:

- ✓ Prompt dissemination
- ✓ Highlights a good and operative transaction monitoring systems

