## **Don W Randall MBE**

#### MID ATLANTIC MONEY LAUNDERINGCONFERENCE Washington, 27 – 29 JULY 2010

### THEMES

- 1. ORGANISED CRIME
- 2. INTERNATIONAL MONEY LAUNDERING
- 3. AWARENESS AND COMBATING (1 & 2)
- 4. PUBLIC/PRIVATE SECTOR CO-OPERATION AND PARTNERSHIP
- 5. LEGISLATIVE REQUIREMENTS AND ENGAGEMENTS

- CURRENT UK ESTIMATE ORGANISED CRIME = £40 BILLION
- DRUGS
- PEOPLE TRAFFICKING
- ECONOMIC CRIME
- TRADITIONAL ORGANISED CRIME
- POLITICALLY EXPOSED PERSONS

### HISTORY

- 1. 1983 USA 1986 UK
- 2. Various legislative upgrades and organisational development
- 3. Are we any better at investigating/seizing assets ?
- 4. Have the money laundering methodologies changed ?
- 5. Why are we not as successful in seizure and prosecution ?

- Organised crime is growing
- Monetary reward is growing
- Money laundering is growing
- Arrests are down
- Seizures are down
- Major prosecutions are down

N.B No significant UK money laundering prosecutions.

#### **METHODOLOGIES**

- 1. Is today any different to 20 30 years ago?
- 2. Same person different suit Technology
- 3. Casino Bureau de Change Trade Based
- 4. Hawala Banking Informal money transfer
- 5. Smurfing
- 6. Cash based trade
- 7. Mortgage related Identity focus, Not fund focused

### WHY ARE WE NOT BETTER

- 1. Fear of regulation \_ conformity as opposed to sharing "significant".
- 2. Reduced resources and expertise.
- 3. Lacks priority non personal protracted investigations and prosecution.
- 4. True extent Cyber myth
- 5. International co-operation restricted by regulations and confidentiality.
- 6. Statistical goals versus real goals

## **ALTERNATIVE APPROACHES**

- 1. Where does the institutional responsibility lie ?
- 2. Is that person/s sufficiently aware, practiced and engaged.
- 3. Law enforcement and engagement
- 4. Formal reporting
- 5. Centralised collating
- 6. Sufficient analysis

# PARTNERSHIPS

- Who with
- How
- When
- What
- Formal / Informal
- Public / Private
- Public / Public
- Private / Private

## **EXAMPLES**

- 1. Project Griffin
- Purpose
- Methodology
- Success
- 2. Sister Banks
- 3. Key is international and transferable