



Financial Intelligence Service

Bailiwick of Guernsey

Annual Report 2005

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## Message from the Director

I am delighted to commend to you the 4th Annual Report of the Guernsey Financial Intelligence Service (FIS).

During 2005, the FIS continued to play a key role within the Bailiwick's Law Enforcement Financial Crime Strategy, which encompasses the operational activity of the Commercial Fraud Departments of Police and Customs, as well as incorporating the Law Officers of the Crown and the Regulator at both strategic and tactical levels, thereby ensuring the most effective use of the Bailiwick's resources.

On reflection, the last 12 months have proven to be a period of consolidation for the FIS, predominantly due to personnel changes within the department. In spite of this, the Service has endeavoured to maintain a high level of professionalism and continued to build on its positive record of achievements, both locally and within an international arena, as the content of this report will evidence.

Within the report, we have endeavoured to provide an overview of the range of activities that the FIS has been involved with, in addition to statistical data and analysis. With reference to this latter element, although beneficial in terms of providing general indicators, issues in respect of micro-analysis need to be borne in mind.

During 2005, the FIS continued to play an active role within the Egmont Group of FIUs and is currently co-ordinating the typologies project within the Training Working Group, which will provide a training resource for member FIUs and related bodies. The FIS is also participating in the Transition Sub-Group, which is evaluating the changes required for the Group to become a more formal and self funding organisation.

Locally, the FIS has continued to work in partnership with the Guernsey Training Agency, the Guernsey Financial Services Commission, Police and Customs Services to provide training opportunities for staff within the financial services sectors, with a view to raising their awareness in respect of money laundering and the financing of terrorism.

Within the context of training initiatives, during August 2005 the FIS hosted a seminar on identification fraud with speakers from the Metropolitan Police Service and US Federal Bureau of Investigation. This seminar, which was attended by representatives of the finance industry, judiciary and law enforcement raised awareness of the level and impact of identification fraud, with particular relevance to the finance industry's due diligence requirements.

During 2005, the strategic aims of the FIS have remained clearly focused on the provision of quality criminal intelligence with regard to all crime, with a particular emphasis on money laundering, countering the financing of terrorism and the provision of full international co-operation to competent overseas authorities. This said, during the latter part of the year the FIS conducted an internal review of its mission statement and strategic aims and objectives, the results of which will form the basis of the 2006 Business Plan and provide an enhanced focus for all of the Service's activities.

Looking forward, it is anticipated that 2006 will see further developments within the working practices of the FIS, firstly in light of on-going IT developments and secondly as a consequence of the introduction of a more focused Business Plan. A number of legislative developments on the horizon will also impact on the Service and the manner in which it operates. Aside of these challenges, the main priority will continue to be the provision of quality criminal intelligence.

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None of the achievements of the past year, or indeed our future goals, would be possible without the dedication, enthusiasm and commitment of the FIS team and the unstinting support from our various stakeholders, to whom I am most appreciative. It is within this context that I look forward to the challenges ahead and continuing with our primary aim to detect and deter those who seek to abuse the Bailiwick's financial services.

Antonia Bligh  
Director



## 1. INTRODUCTION

### 1.1 The Bailiwick of Guernsey

The Bailiwick of Guernsey comprises the principal islands of Guernsey, Alderney, Sark, and Herm. The islands form part of the British Isles, but politically they are not part of the United Kingdom - the Crown has devolved most matters of government to the Bailiwick, apart from such areas as defence and foreign affairs. The system of government that exists in the islands has resulted in a comparatively stable economic environment, and this in turn has encouraged the development of the financial services industry.

The remarkable growth of the finance sector in the Bailiwick has raised the profile of the islands on the global finance scene. Matching this increase has been the resolve of the Bailiwick's government to combat the potential for money laundering that such expansion brings. Financial services regulators and law enforcement agencies have sought to develop strategies and policies that will be effective in preventing and detecting money laundering in the islands, through legislative and procedural measures.

### 1.2 Government Policy

Each year Guernsey's government, The States of Deliberation, publishes a policy and resource plan in order to set out strategic objectives and common corporate policies, and to facilitate the most appropriate allocation and management of government resources to implement these policies.

The States of Guernsey Policy & Resource Planning Report 2005 demonstrates the priority that the Bailiwick government places on its international responsibilities to prevent money laundering and to counter the financing of terrorism. Further information and a full copy of the report can be found at [www.gov.gg](http://www.gov.gg).

### 1.3 Financial Crime Review

The Police and Customs Services in the Bailiwick have developed a strong partnership in relation to law enforcement, and one particular focus is on combating financial crime. For several years the two services had combined resources in the detection of crime related financial activity by forming a joint unit, responsible for intelligence and investigation.

In 1999 two senior officers from the Police and Customs Services conducted a comprehensive financial crime review. The review made a number of recommendations that sought to improve and enhance law enforcement's financial crime strategy. It was concluded that the effective management and development of intelligence was crucial in the fight against financial crime. To achieve this objective it was necessary for Police and Customs & Immigration to further consolidate their previous strategies through the creation of a central unit that would be given the sole responsibility for gathering, evaluating and disseminating all financial intelligence in the Bailiwick.

### 1.4 The Financial Intelligence Service

In April 2001, the Bailiwick of Guernsey formally launched the Financial Intelligence Service (FIS), which stands alone as far as is feasible from either of its parent organisations, while remaining within both Police and Customs responsibilities.

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The Financial Crime Review established the strategic aims of the FIS, which are;

- the provision of quality intelligence with regard to all financial crime, with a special emphasis on combating money laundering and countering the financing of terrorism,
- the provision of full international co-operation, within the law, to competent and relevant overseas authorities, and
- the provision of services to enhance the co-ordination and the development of criminal intelligence to combat financial crime.

The FIS mission statement is to

- provide leadership and excellence with regard to criminal intelligence to combat financial crime, with a special emphasis on money laundering and the countering of terrorist financing, both internationally and locally.

Headed by a Director, whose position is independent of Police and Customs, the FIS is staffed equally by each parent organisation. Following a resource review in 2002 approval was given to increase the FIS complement to two Senior Intelligence Officers, four Intelligence Officers, a Financial Analyst, an Office Manager and an Administrative Assistant. At the end of 2005 there were two Intelligence Officer positions vacant.

## **1.5 The FIS Service Authority**

The Director is responsible to a Service Authority, constituted equally from senior operational Police and Customs Officers who are directly responsible to their respective Chief Officers. The membership of the Service Authority is designed to reflect the policy of partnership and joint working between Guernsey Police and Customs. An additional role of the Service Authority is to co-ordinate the operational aims of Police and Customs with regard to financial crime and in particular the efforts of the Police Commercial Fraud and External Affairs Department and the Customs Fraud and International Team.

## **1.6 Bailiwick Financial Crime Committee**

Another recommendation of the Financial Crime Review was that a Bailiwick Financial Crime Committee be established as the chief forum for discussing and developing strategies to enhance the prevention and detection of financial crime. The committee comprises Her Majesty's Procureur (HM Attorney General), the Chief Officers of Police and Customs & Immigration, the Director General of the Guernsey Financial Services Commission (GFSC) and key members of their executives. The committee sets policy and where necessary recommends changes to existing or proposed legislation.

## **1.7 Financial Crime Group**

The responsibility for implementing the Financial Crime Committee's strategies and initiatives falls to the Financial Crime Group, which is made up of operational representatives of the Attorney General's Office, Police, Customs & Immigration, the GFSC and the FIS, and is chaired by a member of the FIS Service Authority. This group gives the participating agencies a structured forum for liaison and co-operation at an operational level, and the aims of the group are to develop practical steps to bring about the efficient implementation of Bailiwick financial crime policies.

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## 1.8 Crown Dependency Anti Money Laundering Group

In addition to the groups mentioned above, the co-chairs of the FIS Service Authority and the FIS Director are also members of the Crown Dependency Anti Money Laundering Group. This group comprises the Attorney Generals, Director Generals and key senior staff from the financial services regulatory bodies, and senior representatives of Police, Customs and FIUs from the Crown Dependencies of Guernsey, Jersey and the Isle of Man.

The purpose of this group is to provide a forum for the members to discuss and develop joint strategies and policies within the islands to enhance the capability to prevent and detect financial crime of all types, and the laundering of the proceeds of crime. The group formally convenes at least once a year.

## 1.9 Joint Money Laundering Steering Group

The FIS, together with the GFSC and representatives from financial services sector professional associations in the Bailiwick, is also a member of the Joint Money Laundering Steering Group. This group is chaired by the Director General of the GFSC, and primarily focuses on issues relating to the Guidance Notes on the Prevention of Money Laundering and Countering the Financing of Terrorism issued by the GFSC to financial services businesses.

## 1.10 Serious and Organised Crime Group

During 2005, the Serious and Organised Crime Group was formed to enable the Chief Officers of Police and Customs and Immigration Service and their respective heads of operations to meet at a strategic level with HM Procureur. This forum, which aims to meet 4 times a year, endeavours to address issues such as legislative developments to ensure a co-ordinated and cohesive law enforcement approach is adopted. The FIS Director acts as secretary to the group.

## 2. TERRORISM

The FIS continues to give high priority to countering the financing of terrorism. Money laundering disclosures highlighting suspicion of links to terrorism are immediately brought to the attention of officers specially trained in terrorist finance investigation. Intelligence is then disseminated to appropriate agencies in an effort to quickly assess the value of the received information in the light of what is already known about the subject or activity reported. Close relations have been built with The National Terrorist Financial Investigation Unit (NTFIU) of the Metropolitan Police Service and the Terrorist Finance Team at the National Criminal Intelligence Service (NCIS) in the UK, in order to promote co-operation and to aid the meaningful development of terrorism-linked intelligence received by the FIS.

In order to ensure that information available to various agencies in the Bailiwick is developed as effectively as possible, the Bailiwick's Terrorist Financial Team (TFT) continued to meet periodically during the year to consider current information and discuss strategies. This group, chaired by the FIS and made up of representatives from Police, Customs & Immigration, the GFSC and the Attorney General's Office, also reviews information regarding Politically Exposed Persons who are suspected to have financial links to the Bailiwick. Reports of individuals whose links to the islands may be seen as a threat to the high reputation of the local financial services sector are immediately brought to the attention of the Attorney General and the GFSC. These may then be further considered at TFT meetings, where any joint strategies can be agreed.

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Over the last year there have been 8 disclosures of information made to the FIS under the Terrorism and Crime (Bailiwick of Guernsey) Law, 2002, which is a decrease from 12 reports the previous year. Many of the reports were shared with the Terrorist Finance Team at NCIS and some were disseminated to US agencies. The grounds for making these reports tended to centre on suspicion that a customer was a person stated in the media to be linked to terrorism, but in most cases it was found that there was insufficient information available to evidence that the customer was the same person.

### 3. MONEY LAUNDERING REPORTS

In accordance with its mission statement and stated aims and objectives the majority of the FIS's time and resources is spent on evaluating and disseminating intelligence linked to potential money laundering and terrorist financing. Most intelligence received by the FIS is in the form of money laundering disclosure reports submitted by financial services businesses in the Bailiwick.

#### 3.1 Disclosure Analysis

Statistics for the year 2005 do not represent a complete analysis of all disclosures made during the year, as a proportion are still being investigated and there is natural overlap between the end of one year and the start of the next. They do, however, give a reliable illustration of the trends and developments seen during the year.

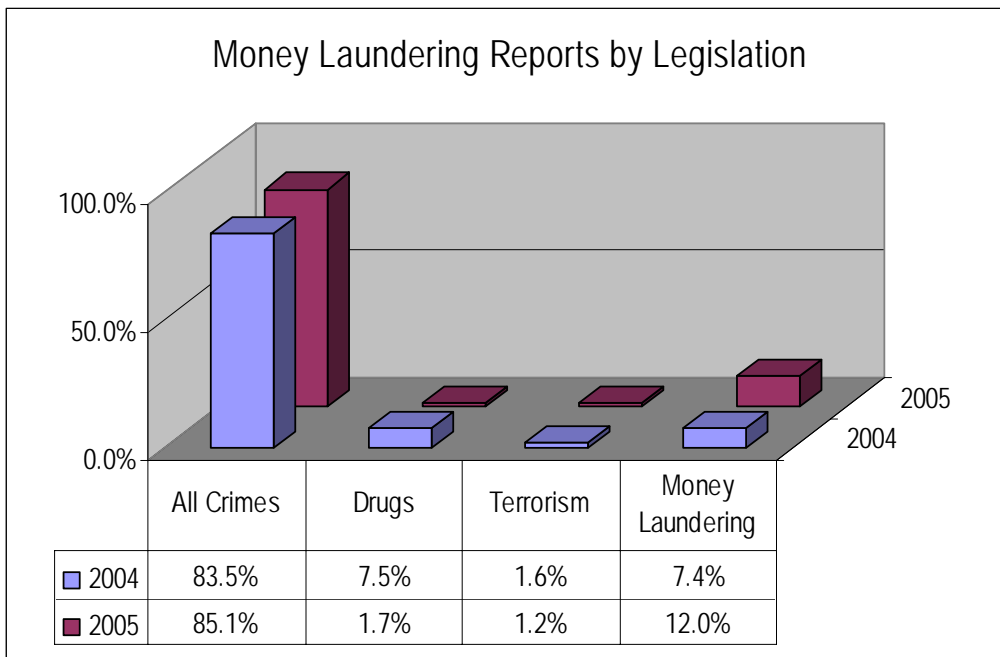
During 2005 the FIS received 650 money laundering disclosure reports, which represented a decrease of 14% compared with 2004. There was a steady increase in STRs between 1996 and 2002, which represented retrospective reviews being carried out on clients and the increased vigilance following 9/11, combined with increased awareness within industry of their reporting requirements. Over the last 4 years the numbers of reports appear to be stabilising and any future fluctuations would be expected as a result of changes to legislation, regulation or composition of the finance industry in Guernsey.





### 3.2 Disclosures by legislation

Where a disclosing institution suspects that activity is linked to terrorism or drug-related funds, it is required by the relevant terrorism and drugs laws to report the suspicion. Where the circumstances do not point particularly to terrorism or drug trafficking, the disclosure should be made under the Criminal Justice (Proceeds of Crime)(Bailiwick of Guernsey) Law, 1999 as amended. Additionally, reports are made under the Money Laundering (Disclosure of Information) Guernsey, Alderney and Sark Laws. Any person, corporate or individual, who makes such a disclosure, is protected by these laws from any liability relating to a breach of confidentiality arising from information that they disclose to the FIS.

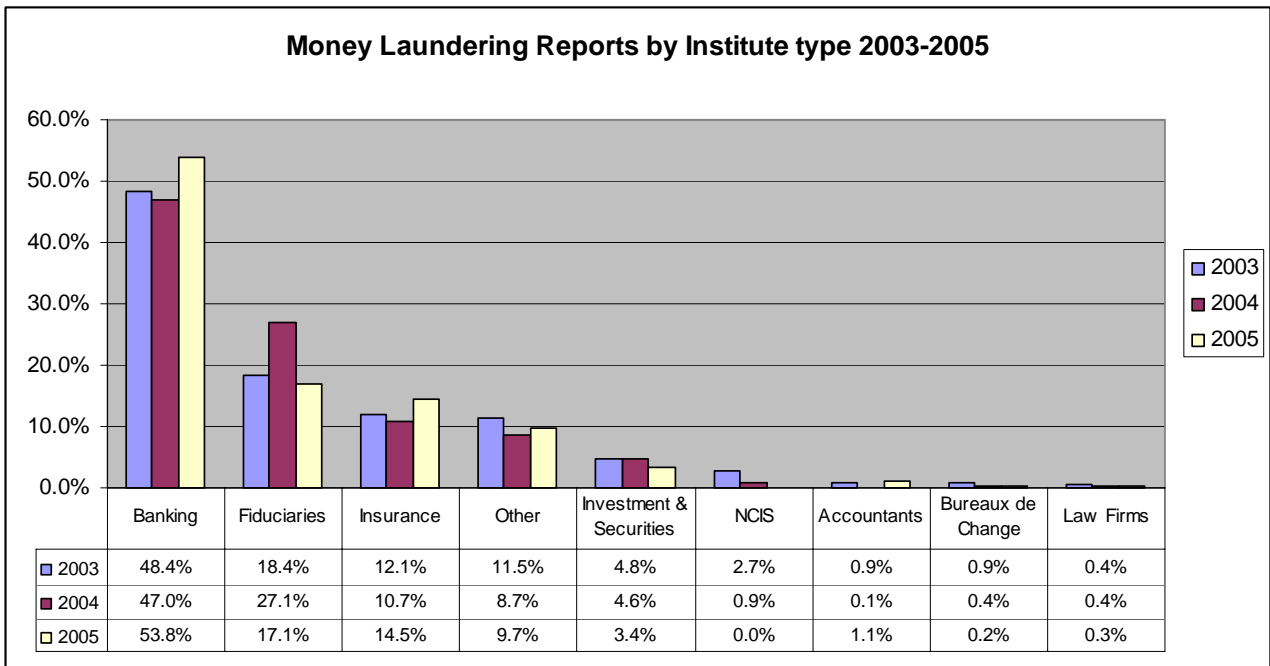


Of the 650 disclosures received in 2005, 85.1% were made under the Proceeds of Crime Law. This is consistent with trends in previous years. It is often difficult for institutions to infer the illegal nature of transactions, and it is therefore appropriate that disclosures should, in these circumstances, be made under the Proceeds of Crime Law.

Disclosures are also required by virtue of the various EU and UN Sanctions that are extended to the Bailiwick through UK Statutory Instrument. There were no disclosures received in 2005 under these statutes. For further information relating to the reporting requirements brought about by these and other sanctions please refer to the Foreign and Commonwealth Office and Guernsey Financial Services Commission websites at [www.fco.gov.uk](http://www.fco.gov.uk) and [www.gfsc.gg](http://www.gfsc.gg).

### 3.3 Sources of Money Laundering Reports

The following chart depicts the institution types from which money laundering disclosure reports are received:



Traditionally, the majority of reports have been consistently made by the banking sector and this continued in 2005, with the majority of disclosures being made by banks and building societies. Although the percentage of reports indicates an increase of 6.8%, in real terms the actual number of reports received from this sector during 2005 decreased slightly.

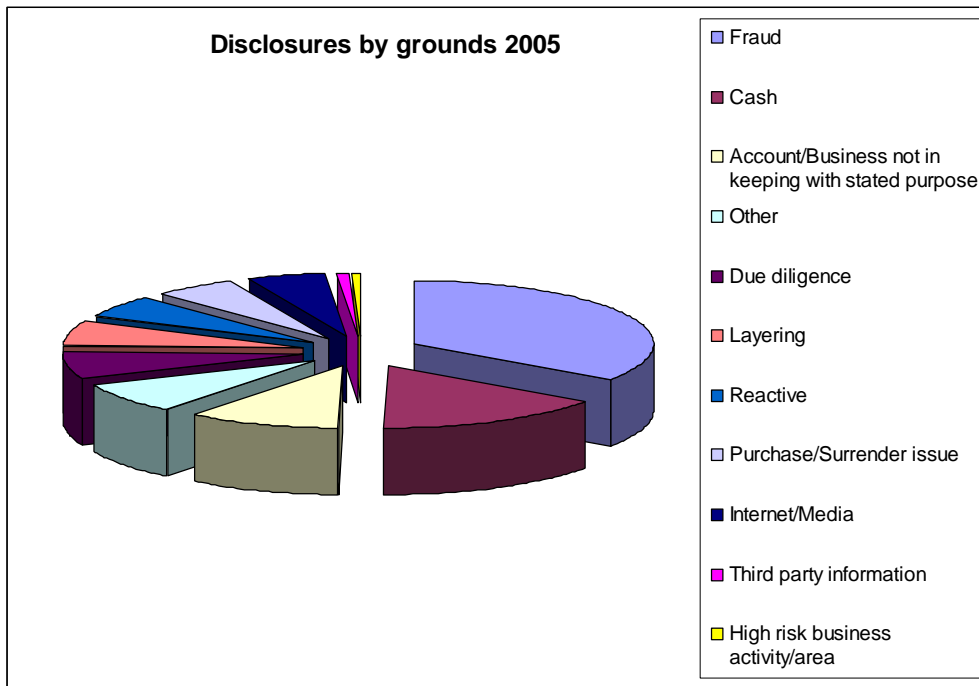
There have been minor fluctuations in the numbers of reports received from other sectors, which do not give rise to any trend indicators.

### 3.4 Disclosures by Grounds

The grounds on which institutions base their suspicions are carefully analysed, as these can be a significant indication of money laundering trends. Changes can also highlight areas where the Bailiwick may be targeted by money launderers, and give an indication to staff of where to be particularly vigilant.

Some grounds, such as "Account not in keeping with stated purpose" and "Internet/Media" also demonstrate the effectiveness of institutions' internal monitoring systems and improvements in the general practices employed by financial services businesses to ensure that they know their clients.

The number of STRs received relating to cash transactions is mainly attributable to the itinerant working population, many of whom send a percentage of their salary back to their home country via cash means.

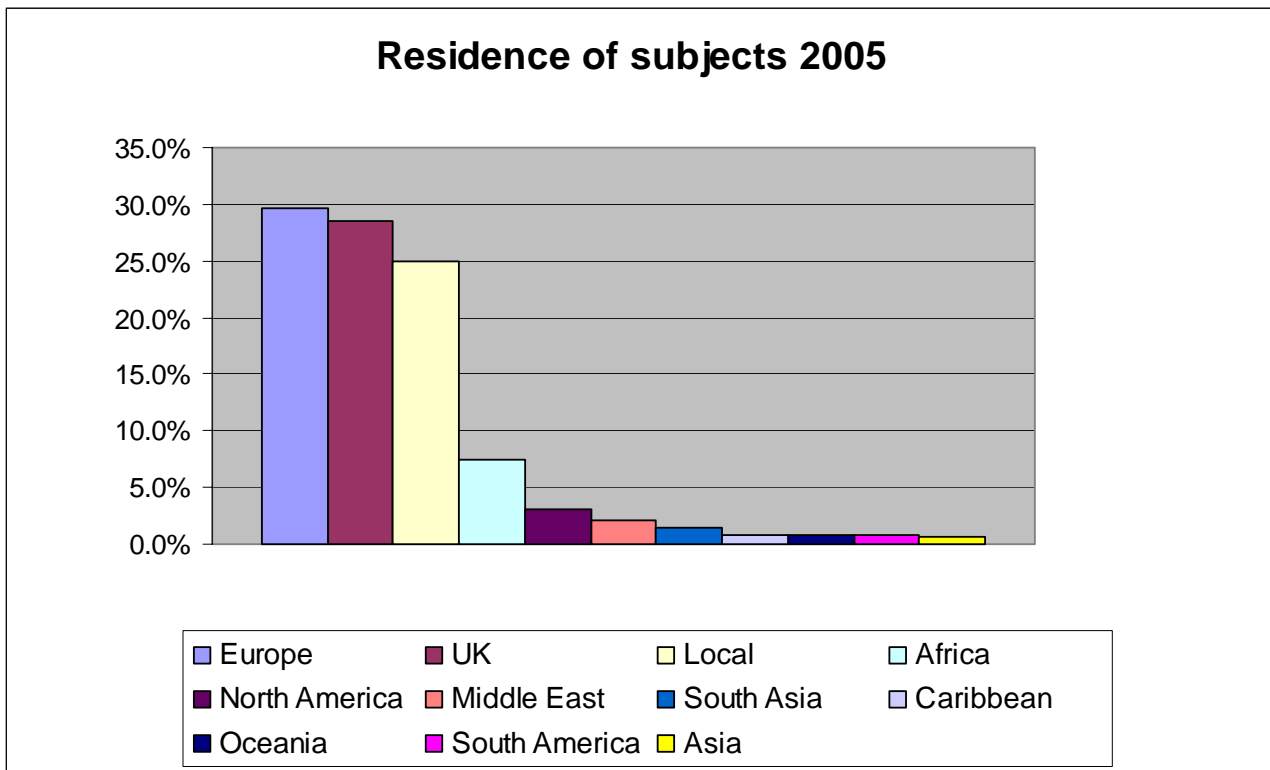


There has been comment in international circles about the problem of “defensive” reporting, where disclosures are submitted without sufficient suspicion being evident, supposedly to negate any allegation of having failed to make a report required by law. Figures are not maintained by the FIS for this type of reporting as it has not been seen as a significant problem within this jurisdiction and it is unusual to see a report made without proper justification. Previous statistics released by the FIS mentioned “defensive” reports, but these referred to reports made following contact from law enforcement, such as after the service of a production order. This category is now described as “reactive” reporting, to differentiate it from the current use of the term “defensive.”

### 3.5 Jurisdiction in which subject resides

Trends relating to the countries or jurisdictions where account holders reside are of particular value. The following chart shows a general overview of where the majority of the subjects of money laundering disclosure reports live. Subjects are classified by either the jurisdiction in which the individual resides, or, if the subject is a company, its place of administration.

Although nearly all reports received by the FIS are disclosures submitted by local financial institutions, in excess of 75% of all disclosures relate to individuals or companies outside the Bailiwick, consequently, the FIS deals extensively with overseas agencies. The regional breakdown is similar to previous years (the UK has been shown separately to Europe due to the high volume of reports relating to UK residents and entities, and its particular relationship with the Bailiwick).



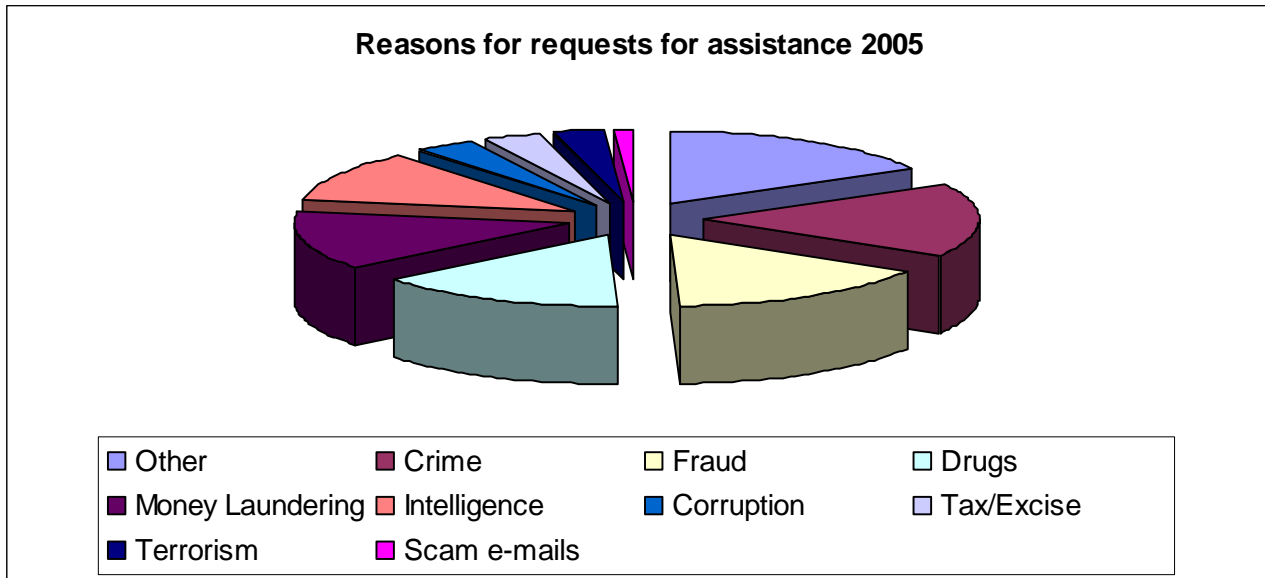
## 4. INTERNATIONAL ASSISTANCE

### 4.1 Routine requests for assistance

The FIS receives a wide range of requests for assistance each year from a number of different jurisdictions. The substance of such requests varies greatly from seeking to establish if law enforcement agencies hold any criminal intelligence on an individual, to more serious investigations involving organised crime groups.

During the year, 190 requests for assistance were received. Of these, 85 were from outside the Bailiwick, which is consistent with previous years.

The FIS is committed to the policy of co-operation promoted by the Bailiwick Authorities, and is keen to assist other jurisdictions by sharing intelligence where this is required in support of a criminal investigation. Seven of the requests made last year related to corruption investigations, including payments made to senior political figures in other jurisdictions, thirty two enquiries related to general crime and thirty were of a general fraud nature. The remainder involved money laundering, drug trafficking and other such serious crimes. The following chart details the variety of matters involved;



## 4.2 The Egmont Group

During 2005, the Financial Intelligence Service has continued to play an active role within the Egmont Group of Financial Intelligence Units, with representation on the Training Working Group and the recently formed Transition Sub-Committee.

Following the success of the 1999 publication of '100 Egmont Sanitised Cases' the Training Working Group has initiated a project to devise an on-going process to produce and publish sanitised cases for the benefit of FIUs and associated bodies. Within this project, the FIS is playing an intrinsic role in overseeing the editorial processes to ensure quality cases are produced and appropriately distributed.

In addition, following recommendations from the Heads of FIU Meeting in Washington during June 2005, the FIS is also participating in the Transition Sub-Committee, which has been tasked with formalising the Egmont Group in light of its ever increasing membership.

The inaugural session of the Transition Sub-Committee was convened in Sofia during October 2005 and sub-groups formed to look at the three key issues, namely, a charter document, funding options and the introduction of a permanent secretariat. An ambitious schedule for completion of the work has been agreed, with the aim of placing recommendations before the Heads of FIU at the 2006 Plenary session in Cyprus.

## 4.3 Memoranda of Understanding

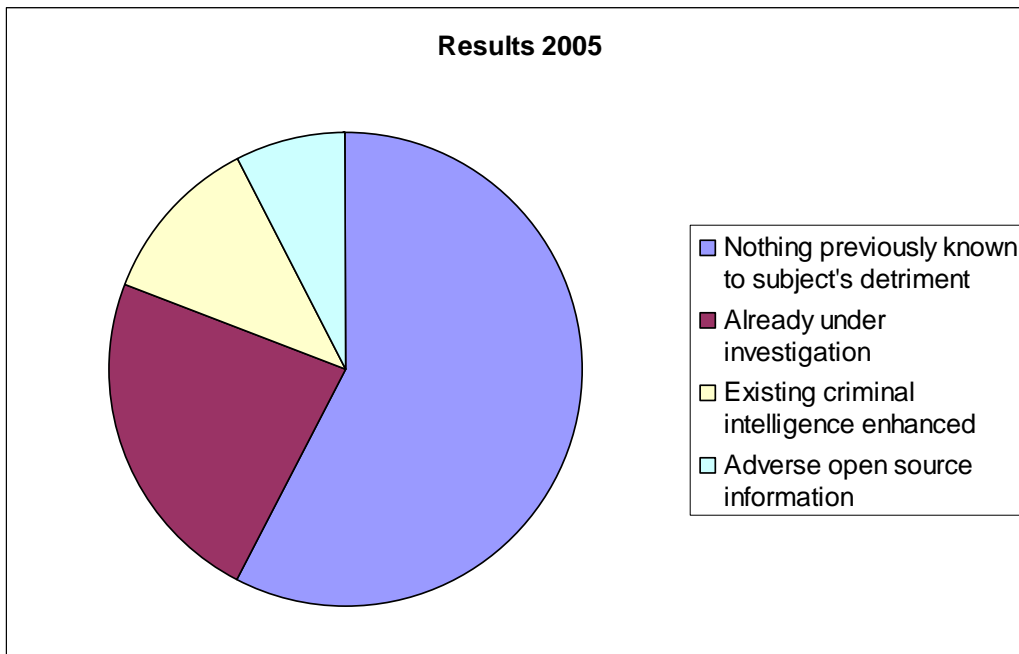
The Bailiwick of Guernsey is able to assist other jurisdictions without the prior need of a formal Memorandum of Understanding. It is recognised, however, that in some cases the laws enacted in other countries require their FIU to have a signed memorandum before they can share intelligence with their counterparts. Where it is considered appropriate, the FIS will seek to agree the terms of such memoranda in order to ease the flow of information between co-operating jurisdictions, whether or not this is required by the other country's domestic legislation. The FIS bases such agreements on the Egmont model MOU, with some additional provisions to reflect local circumstances.

In April 2005 a Memorandum of Understanding was signed with the General Inspector of Financial Information, the Polish FIU. This is an administrative financial intelligence unit based within the Polish Ministry of Finance, which is only able to share intelligence with other countries on the basis of an MOU. Following an

investigation involving Polish nationals the FIS carried out checks with the GIFF but was unable to receive the results until the MOU was signed. The gateway is now established for all future enquiries.

## 5. RESULTS

Of the disclosures investigated to date, 58% of individuals named as the main subject were previously unknown to Law Enforcement and consequently may be the first indication of a person's involvement in criminality. The remainder contained information that would either enhance intelligence already held on a subject, or lead to the provision of evidence in support of the prosecution of a suspected criminal. The percentage of positive or direct links to suspected criminality is therefore high and confirms the quality of financial disclosures.



It is difficult to quantify the value of FIS activities and the intelligence produced; by its very nature intelligence cannot be used to directly support a prosecution, and as it is based on suspicion it may need significant development before it can be used to support a criminal investigation. Financial intelligence normally takes the form of isolated pieces of information that may or may not lead to proof of crime, and which can sometimes be held for long periods before they become significant to a criminal investigation. Added to this is the fact that most of the intelligence seen by the FIS is subsequently disseminated to other jurisdictions, and has to take its place among the various priorities of other financial intelligence units.

An indication of the effectiveness and value of intelligence submitted by financial services businesses is that around 13% of all production orders served in Guernsey last year were preceded by a suspicion report submitted to the FIS and the sharing of intelligence with the jurisdiction concerned. The actual significance of the information passed cannot be fully assessed, but this figure indicates that a healthy proportion of reports received from the finance industry contribute directly to investigations.

## 6. OPERATIONS

The FIS gives frequent support to local law enforcement agencies by providing financial intelligence on suspects already under investigation, or by pro-actively compiling intelligence reports to be further investigated. Part of the FIS mandate is also to provide full international co-operation in the fight against crime, and in line with this objective the FIS has been involved in some significant investigations with other jurisdictions. For example;

- a request was received from a European jurisdiction investigating an investment manager suspected of large scale fraud amounting to around GBP 10 million. It was believed that the person had placed some funds in Guernsey, but the nature or location of the funds was unknown. The FIS conducted local enquiries revealing that he held a local account containing USD 80,000. This was subsequently restrained under Guernsey legislation, undertaken by officers of the Guernsey Police Fraud and External Affairs Department, and the case is continuing;
- a national police agency investigating a suspected drug trafficker, who it was believed was laundering the proceeds of drug crime through the purchase, redevelopment and sale of property, contacted the FIS for assistance. The suspect was connected with a financial institution in Guernsey, and enquiries showed that his account had seen funds paid through and onwards to two institutions in another jurisdiction. This intelligence was passed back to the police investigators, and later obtained as evidence under local production orders served by the Police Fraud and External Affairs Department. The investigation resulted in the arrest and charge of six offenders who are currently awaiting trial for drug trafficking and money laundering;
- during a police investigation into extortion and money laundering in a neighbouring jurisdiction, the FIS was asked to trace a payment made to a company account in Guernsey. The payment was suspected to have been from a victim of the extortion, and FIS enquiries confirmed the details of the payment, including the onward destination of the funds. The investigators applied for production orders, which were subsequently obtained by the Police Fraud and External Affairs Department and documentary evidence was supplied. The case is still progressing.

## **7. TRAINING & FEEDBACK**

The Financial Intelligence Service has been active during the course of 2005 in providing support to the financial services sector through joint training initiatives with the GFSC, the Guernsey Training Agency, and the Fraud Departments of Police and Customs.

Regular feedback presentations were made by FIS staff to money laundering reporting officers, administration staff new to the finance industry, and members of particular professional associations. These sessions covered the work and role of the FIS and highlighted important issues relevant to each sector of the industry. They were used as an opportunity to feed back to the delegates information showing trends in reporting and the main grounds of suspicion seen during the previous year. Case studies were also described, with examples of particular issues raised by those investigations.

Specialist training continued to be provided for the staff of the FIS, with two more members of the team successfully completing initial financial investigator training, and a tailored course was provided locally for the whole team, covering technical issues relevant to Bailiwick legislation and procedures.

In addition a seminar was arranged for law enforcement and representatives from the financial services industry covering the FBI approach to countering terrorist funding in the post 9/11 climate, and the practical experiences of the UK Metropolitan Police in combating identity fraud. This was a very successful event

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attended by over 120 delegates, which resulted in positive feedback on the practical value of such presentations. The FIS continues to consider ways of supporting local initiatives aimed at combating money laundering and the financing of terrorism.

## **8. OBJECTIVES**

### **8.1 IT strategy**

Over the course of 2005 members of the team continued to assist in the development of a new IT system that would improve FIS administration, investigation and analytical capability, as well as electronic submission of disclosures by industry.

The task proved to be extremely challenging and has entailed more development work than was originally envisaged. It is hoped that work will be completed during 2006 and that a fully functional system will meet the future needs of the unit.

### **8.2 Specialist assistance**

Following the engagement at the end of 2004 of a firm of forensic accountants the FIS has referred a number of more complex cases to them for consideration during the course of the past year. The specialists were able to add value to these investigations by giving their expert independent opinion on the nature of the information held by the FIS.

### **8.3 Media Monitoring**

During 2005, the FIS has continued to make full use of the service provided by LexisNexis UK, a company that provides financial institutions with an application for performing enhanced due diligence in order to mitigate money laundering risk. The LexisNexis KYC application enables a user to quickly check high risk entities against global databases of news, company filings, sanctions and PEP lists to assist proof of identity and to reveal associated interests. Additional functionality targets derogatory news on the entity that has appeared in an archive stretching back 30 years and covering many thousands of sources.

The FIS has found that reports gathered from LexisNexis have added value to investigations and kept investigators abreast of media reports relevant to cases of on-going interest. For further information on LexisNexis' services please contact the Financial Analyst at the FIS office.

### **8.4 Implementation of FIS Business Plan**

As a result of being fully operational for almost 5 years, the mission statement and strategic objectives of the FIS have been reviewed in order to ensure they meet current challenges. The environment in which money laundering and terrorist funding investigators operate is constantly evolving, so it is prudent that agencies regularly examine their overall aims and objectives and the methods adopted to achieve them. Members of the team have been involved in evaluating the effectiveness of the current objectives and considering ways to further develop the unit to better achieve the desired results of preventing and detecting crime. These changes will be incorporated in the 2006 Business Plan.





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## Bailiwick of Guernsey

### Financial crime intelligence and investigation teams

#### Initial contact points for overseas authorities

Within the Bailiwick of Guernsey are a number of agencies involved in mutual assistance matters relating to criminal investigations.

The following information will enable you to make contact with the most appropriate department to provide you with assistance.

#### **Time Zone:**

The Bailiwick of Guernsey is in the same time zone as the United Kingdom.

#### **Financial Intelligence:**

If your enquiry is one relating to intelligence only, concerning the financial aspects of an investigation, you should contact the

Financial Intelligence Service  
Hospital Lane  
St. Peter Port  
Guernsey  
Channel Islands  
GY1 2QN

Tel: + 44 (0)1481 714081  
Fax: + 44 (0)1481 710466  
E-mail: [director@guernseyfis.org](mailto:director@guernseyfis.org)

The FIS office is open between 9.00 am and 5.00 pm Monday to Friday with the exception of Public Holidays. In the event of an emergency please telephone +44 (0)1481 725111 and ask for the Duty Police Inspector who will, if necessary, make contact with one of the FIS Officers outside of normal working hours.

It is also possible for other EGMONT FIUs to contact the FIS using the EGMONT secure channels of communication.

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## **International Drug Trafficking and Customs Fraud, including International Sanctions:**

If your enquiry relates to international drug trafficking offences involving importation, exportation or cross border money laundering offences, smuggling of contraband, fraud against your country's Customs and Immigration related legislation, the laundering of the proceeds of such crimes or infringements relating to International Sanctions, you should contact the

Customs and Immigration Service  
Investigation Division  
Fraud and International Team  
White Rock  
St. Peter Port  
Guernsey  
Channel Islands  
GY1 3WJ  
Tel: +44 (0)1481 230603  
Fax: +44 (0)1481 715901

The Customs and Immigration Fraud and International Branch office is open from 8.30 am to 5.00 pm Monday to Friday with the exception of Public Holidays. If you require urgent assistance outside of normal office hours then please telephone the Guernsey Customs and Immigration Investigation Department on +44 (0)1481 741400 and one of the Duty Officers will, if necessary, make contact with one of the officers of the Fraud and International Team.

## **General Fraud and Drug Trafficking:**

If your enquiry relates to other types of fraud, drug trafficking offences being investigated by police or the laundering of the proceeds of crime you should contact the

Guernsey Police Commercial Fraud and External Affairs Department  
Police Headquarters  
Hospital Lane  
St. Peter Port  
Guernsey  
Channel Islands  
GY1 2QN

Tel: +44 (0)1481 719449  
Fax: +44 (0)1481 719443  
E-mail: [gpolfraud@guernsey.net](mailto:gpolfraud@guernsey.net)

The Guernsey Police Commercial Fraud and External Affairs Department office is open between 9.00 am and 5.00 pm Monday to Friday with the exception of Public Holidays. If you require assistance outside of normal office hours please telephone +44 (0)1481 725111 and ask for the Duty Inspector. He will give whatever assistance he can and if required contact one of the officers of the Commercial Fraud Department outside of normal office hours.

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### Legal Inquiries:

If you have a question relating to the legislation concerning mutual assistance matters in the Bailiwick you should contact

The Criminal Team  
The Chambers of the Law Officers of the Crown  
St. James' Chambers  
St. Peter Port  
Guernsey  
Channel Islands  
GY1 2PA

Tel: +44 (0) 1481 723355  
Fax: +44 (0)1481 725439  
E-mail: law@gov.gg

The Chambers of the Law Officers of the Crown are open between 9.00 am and 5.00 pm Monday to Friday with the exception of Public Holidays.

### Inquiries regarding regulatory matters:

If you require regulatory information you should contact the

Fiduciary Services and Enforcement Division  
Guernsey Financial Services Commission  
La Plaiderie Chambers  
La Plaiderie  
St. Peter Port  
Guernsey  
Channel Islands  
GY1 1WG

Tel: +44 (0)1481 712706  
Fax: +44 (0)1481 726952  
E-mail: kborn@gfsc.gg

The Guernsey Financial Services Commission is open between 9.00 am and 5.00 pm Monday to Friday with the exception of Public Holidays.

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