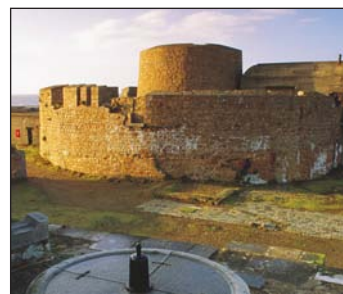
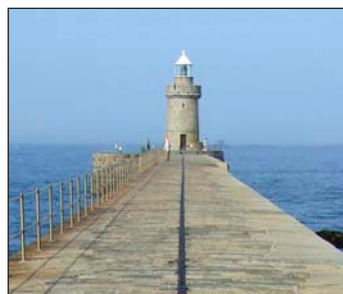


Financial Intelligence Service  
Bailiwick of Guernsey **Annual Report 2007**







## Contents

### Message from the Director

1. Introduction
2. Terrorism
3. Money Laundering Reports
4. International assistance
5. FIS activities
6. Training and feedback
7. Objectives

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## Message from the Director

I am delighted to introduce to you the Guernsey Financial Intelligence Service's Annual Report for 2007.

This, our 7th year of operation, has undoubtedly been most notable for developments within the Bailiwick's legislative and regulatory framework. The implementation of several additional financial crime laws and following significant consultation, the publication of the Guernsey Financial Services Commission Handbook for Financial Services Businesses on countering Financial Crime and Terrorist Financing, have introduced a number of additional investigative tools, along with a risk based approach to customer due diligence.

The regulatory developments have also seen the introduction of 'Relevant Businesses' and requirements placed upon them with regard to anti-money laundering measures. The full impact of these developments, both on the jurisdiction and the operation of the FIS, will be monitored and evaluated over the next 12 months.

Within the legislative developments, a number of areas have positively impacted on the operational work of the FIS, most notably the provisions contained within the Disclosure (Bailiwick of Guernsey) Law, 2007. This Law has enabled regulations to be introduced which prescribe the form and manner in which suspicion disclosure reports are to be made to the FIS and also provides a coercive power for the FIS to request additional information from disclosing institutions following such a report being made. It has also provided additional legal gateways for the sharing of intelligence, which will prove extremely beneficial in respect of the daily activities of the FIS.

Further amendments to the primary anti-money laundering laws have enacted additional powers that will further enhance the operational activity of the FIS and its partner law enforcement agencies. The introduction of Customer Information Orders and Account Monitoring Orders for all crimes are just two such additional tools. Proposed cash seizure and civil forfeiture legislation will also enable funds emanating from criminal conduct to be recovered, utilizing the civil standard of proof. The Bailiwick's Financial Crime Service Authority is currently reviewing the likely impact of this legislation in order to prepare for its efficient introduction, including assessing the responsibilities of law enforcement's financial crime teams and considering what changes might be put in place to allow for a likely increase in financial crime investigations.

In addition to legislative developments, in conjunction with the Customs and Excise, Immigration & Nationality Service, this year has seen the FIS embark on an exciting and ambitious IT development to devise an intelligence management system that will incorporate both Services' core business requirements, yet retaining operational independence and information protocols. For the FIS module, this will encompass all the internal workflows and analytical requirements and also incorporate the secure electronic submission of suspicion disclosure reports, with the primary aim of improving our analysis of financial intelligence.

The FIS places great importance on the role of the Egmont Group of FIUs and continues to be an active member with regular attendance at both the Plenary and working group meetings and fully endorses the purpose and spirit within which it operates. As a regular participant within the Training Working Group, the FIS has, despite being one of the smallest FIUs, continued to allocate resources to oversee the editorial process of the sanitised cases project.

Looking forward, 2008 promises to be a year of further change and challenge, both in terms of assessing and evaluating the impact of the enhanced regulatory and legislative framework as well as the implementation of a new financial intelligence database. In addition, the jurisdiction will be subject to a mutual evaluation by the International Monetary Fund against the Financial Action Task Force 40+9 recommendations. These issues alone pose significant challenges for the FIS and its team of dedicated staff, yet the main priorities will undoubtedly be to maintain the high standards of efficiency and quality intelligence provided by the Service.

To conclude, the FIS will continue through partnership working, investment in staff and a range of initiatives to play an intrinsic role within law enforcement's Financial Crime and Confiscation Strategy, with the aim to detect and deter those who seek to abuse the Bailiwick's financial services.

**Antonia Read**  
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. In 2007 alone, total deposits held with Guernsey banks at the year end reached a new high deposit level of £119.2 billion\*. This equated to the 4th consecutive quarterly rise and also represented a 29% increase in deposits over the year.

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.

\*Data sourced from [www.gfsc.gg](http://www.gfsc.gg).

### 1.2 Government Policy

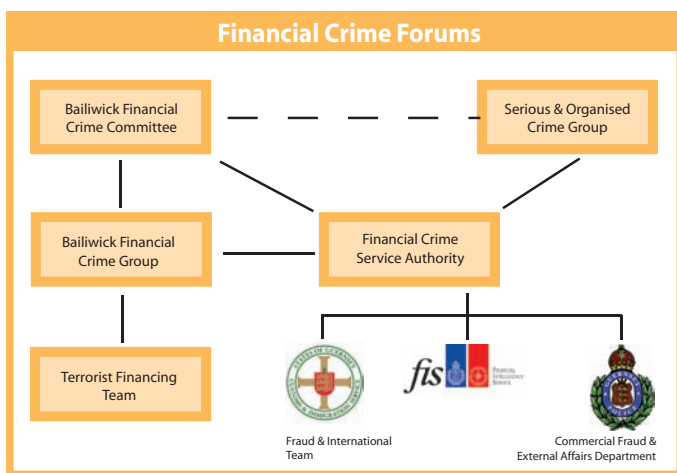
Each year Guernsey's government, The States of Deliberation, publishes a business plan in order to set out its strategic objectives and common corporate policies and to facilitate the most appropriate allocation and management of government resources to implement these policies. Following the establishment of the new machinery of government and the restructuring of company taxation, the need to constrain government expenditure and attain best value from public resources has never been higher on the political agenda.

The States of Guernsey Government Business Plan reflects the Home Department's Corporate Policy on Law and Order to reduce serious and organised crime, particularly money laundering and financial crime. This clearly 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 Strategy

Within the Bailiwick, a number of forums exist to ensure that relevant stakeholders within the AML/CFT regime meet regularly at both a strategic and tactical level. These forums encompass law enforcement, the financial services regulator, Law Officers of the Crown and representatives from the finance industry. The following chart outlines the various groups which encompass law enforcement representatives and how they are structured in order to ensure a cohesive and co-ordinated approach to financial crime issues.



In addition to the forums outlined above, the Joint Money Laundering Steering Group, which consists mainly of representatives from the various financial services and personnel from the Financial Services Commission, have met frequently during 2007 with a primary focus on producing the industry handbook. The FIS has been represented within this group and played an active role in the compilation of the Handbook for Financial Services Businesses on Countering Financial Crime and Terrorist Financing, with specific focus on the areas regarding the form and manner of reporting.

### 1.4 The Financial Intelligence Service

In April 2001, the Bailiwick of Guernsey formally launched the Financial Intelligence Service. Although equally staffed and funded by the Law Enforcement Agencies of the Guernsey Police and Customs and Excise, Immigration and Nationality Service (CEINS) it stands alone as far as is feasible from either of its parent organisations, whilst remaining within both Police and Customs responsibilities.

The FIS was established following the formal review of Law Enforcement’s approach to financial crime matters at the time and established the FIS strategic aims to be:

- ***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.***

Headed by a Director, whose position is independent of Police and CEINS, the FIS is staffed equally by each organisation. Following a resource review in 2002, approval was gained for an FIS complement of two Senior Intelligence Officers, four Intelligence Officers, a Financial Analyst, an Office Manager and an Administrative Assistant.

As in previous years, business objectives for the FIS in 2007 were agreed by the Financial Crime Service Authority, in order to provide a focus for operational activity in support of the Service’s overall mission statement. These included:

- ***to provide Guernsey Police and CEINS with quality financial intelligence relating to all crime, taking into consideration their strategic objectives;***
- ***to achieve a high level of compliance with relevant international standards expected of financial intelligence units;***
- ***to actively identify, promote and support the investigation of money laundering offences by local law enforcement teams;***
- ***to enhance the professional relationship between the financial services industry and the FIS;***
- ***to actively promote awareness of money laundering vulnerabilities within non financial services businesses;***

- ***to develop the knowledge and expertise of FIS staff in order to provide effective administration, analysis and investigation of financial intelligence relating to crime and terrorist financing.***

These objectives placed the overall aims of the Bailiwick Financial Crime Strategy into an operational context. In order to assess how the FIS performed against these objectives, several indicators were produced, which the team used to evaluate its performance, thus ensuring that the Service's activities supported the Bailiwick's financial crime strategy.

An assessment was made of the Service's performance against the objectives, the results of which indicated that significant progress had been made. These activities included:

- ***completion of a full review of all relevant international standards applying to FIUs, incorporating a self-evaluation of the FIS' compliance against those standards;***
- ***practical steps taken to promote and support the investigation of money laundering offences by local law enforcement teams and international partners;***
- ***support given to industry through feedback presentations covering legal and practical issues identified by the Service from the money laundering disclosures it receives; and***
- ***professional development training provided to staff during the year to ensure that the Service has the skills and expertise it needs to fulfil its obligations.***

The objectives and performance indicators were duly reviewed and adjusted to reflect progress made during the year, resulting in an updated set of objectives for the Service to take forward in support of its strategic and operational goals during 2008.

## 1.5 Financial Crime Review

The Law Enforcement Agencies of the Guernsey Police and CEINS have over the years developed a strong partnership in relation to law enforcement, with particular success in the arena of financial crime, where for many years the two Services have combined resources. Central to this, is the Financial Crime Service Authority which consists of senior managers from both Services and is designed to reflect the ethos of partnership working. In addition to overseeing the work of the FIS, through the Financial Crime Strategy, the Service Authority also co-ordinates the operational activities of Police and Customs with regard to financial crime.

During 2007, the heads of the Police Commercial Fraud and External Affairs Department and the Customs Service Fraud and International Team, became regular attendees at the Financial Crime Service Authority Meetings thereby improving inter-departmental communication at a tactical level.

2007 also saw the commencement of a Financial Crime Review by two members of the Financial Crime Service Authority, focusing on Law Enforcement's deployment of resources and effectiveness in the prevention and detection of all financial crime matters. As part of this review, the relevant teams have undertaken work activity analysis and stakeholders within the AML /CTF regime have also been canvassed for their views.

The findings and formal recommendations from the review are anticipated in early 2008.



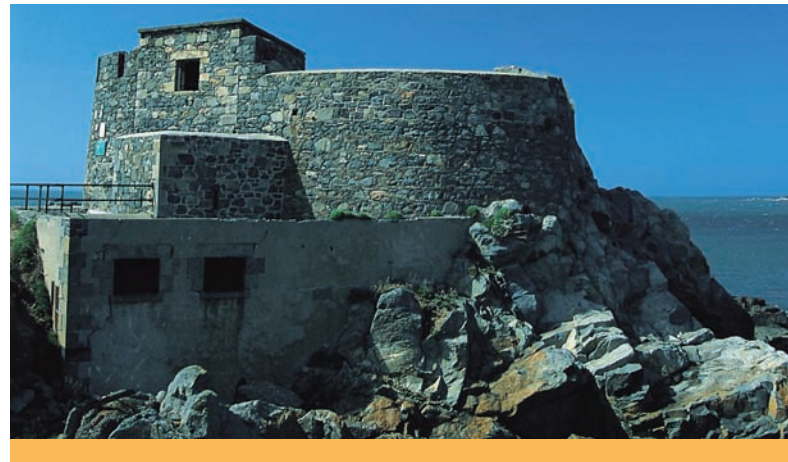
## 2 COUNTER TERRORISM ACTIVITIES

Disclosure reports to the FIS of terrorist financing suspicion have remained low during 2007 with a total of 3 reports being made. In addition, the FIS has assisted overseas agencies with a number of enquiries relating to the financing of terrorism as the following cases illustrate:

- ***an overseas anti-terrorism agency contacted the FIS for assistance with an investigation into a charity which appeared not to be fulfilling its stated charitable purposes. Local financial links were identified and following the sharing of additional intelligence a letter of request was received by the Guernsey authorities. A production order was subsequently granted and evidence forwarded to the other jurisdiction to support its investigation;***
- ***the FIS received a report of suspicion under local anti-terrorism laws regarding funds received from a high-risk jurisdiction via what was deemed to be an unusual route, leading to suspicion that the funds were related to terrorism. Intelligence was disseminated to the relevant jurisdiction and the case is being reviewed by anti-terrorist agencies;***
- ***a local financial institution identified through an automated media monitoring facility that one of its customers was alleged to have links to terrorist funding. The information was disclosed to the FIS and intelligence about the individual's financial relationship was disseminated to the relevant jurisdiction. The jurisdiction concerned is conducting further investigations.***

The Bailiwick, through the FIS, continues to monitor developments in terrorist financing both locally and in the wider, international context via the Terrorist Finance Team, which meets regularly to consider local reports, international developments and current threats or trends.

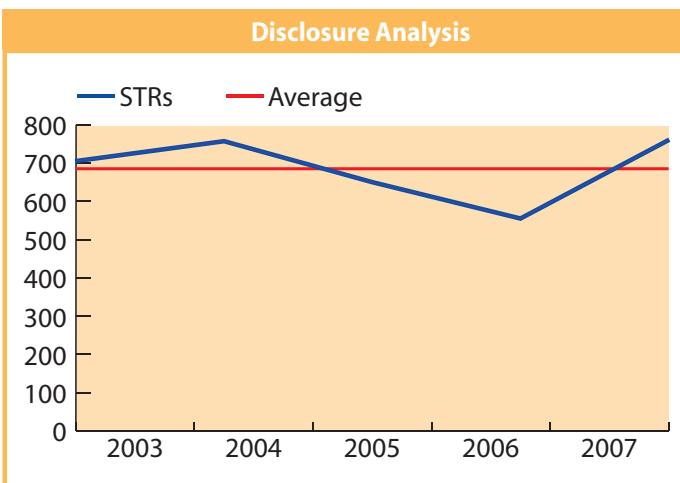
In addition, FIS representatives have continued to attend regional meetings in the UK with terrorist finance investigators which has proven useful in building on relationships already formed with the UK National Terrorist Finance Investigation Unit. It is anticipated that this forum will continue to meet regularly and will assist in developing relevant intelligence and disseminating it to the most appropriate teams.



### 3 MONEY LAUNDERING REPORTS

#### 3.1 Disclosure Analysis

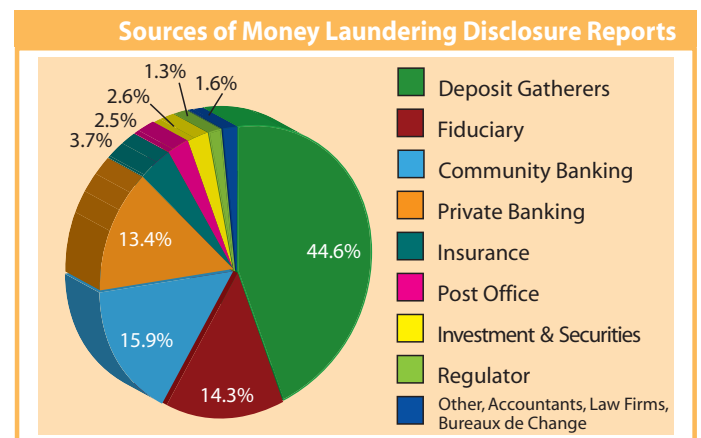
Statistics for the year 2007 do not represent a complete analysis of all disclosures made during the year, as a proportion are still being investigated and there is a natural overlap between the end of one year and the start of the next. They do, however, give a reliable illustration of trends and developments seen during the period.



During 2007, 760 disclosures were received, which is an increase on 2006, and can be accounted for in part by the UK authorities Offshore Disclosure Facility. Taking a view over the first six years of operation of the FIS, the figures remain balanced with explanations for each year's deviation which reflect international trends.

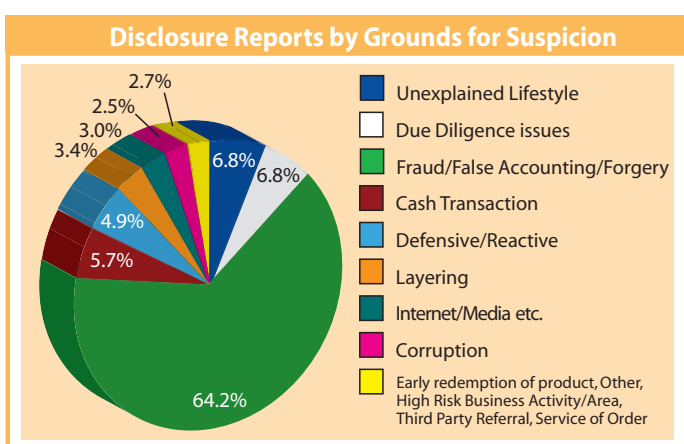
#### 3.2 Sources of Money Laundering Disclosure Reports

The following chart depicts the institution types from which money laundering disclosure reports are received. This has remained relatively consistent over the years, with the majority of reports emanating from the banking and fiduciary sectors, which would be expected given the nature of the businesses operating from within the Bailiwick.



It is interesting to note that during 2007, the FIS received its first reports from on-line gambling businesses, licensed through the Alderney Gambling Control Commission, denoted in the category 'Other'. These all related to possible fraudulent transaction attempts. Reports from lawyers and accountants remain low, but it is anticipated that following the introduction of regulations for 'Relevant Business' reports from these sectors may increase.

### 3.3 Disclosures by Grounds

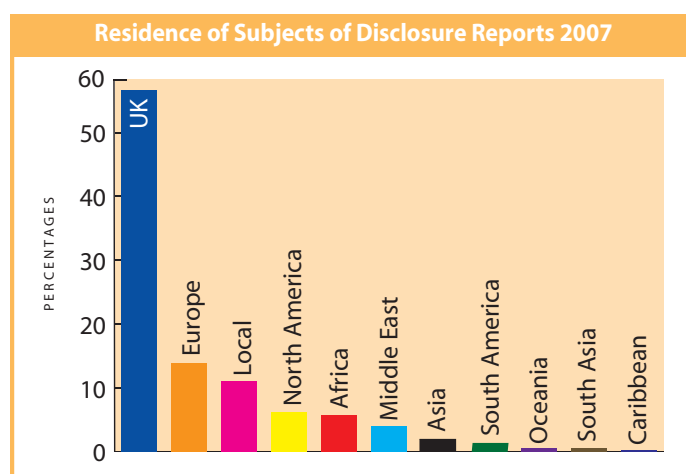


The grounds on which financial services businesses base their suspicions are carefully analysed to identify any emerging trends. Any notable changes in trends are considered as possible trigger points in directing anti money laundering prevention and education activities.

Analysis of the grounds for reports in 2007 when compared with previous years has revealed that the figures have remained relatively consistent.

One issue of note relates to those reports received regarding to cash transactions. Guernsey has a significant itinerant population who mainly work within the horticulture and catering industries and analysis of this category identified that the majority of these reports are connected to such workers repatriating their salaries to their homeland. In 2006, approximately 15% of reports received related to cash transactions of this nature, whilst in 2007 this has notably decreased to only 5.7% (16) reports. Analysis indicates that this has occurred as a result of a change of business practices by the disclosing institutions and improved understanding regarding their grounds for suspicion.

### 3.4 Jurisdiction in which Subject Resides



Trends relating to the countries or jurisdictions where subjects of reports reside are also of particular interest. The chart above gives an overview of such information for 2007. Subjects are classified by the jurisdiction of residence, or if the subject is a company or trust, its place of administration. In line with previous years, the majority of disclosures received have centred on residents of the UK, Europe and locals, which is expected given Guernsey's proximity to mainland Europe.

## 4 INTERNATIONAL ASSISTANCE

### 4.1 Requests for Assistance

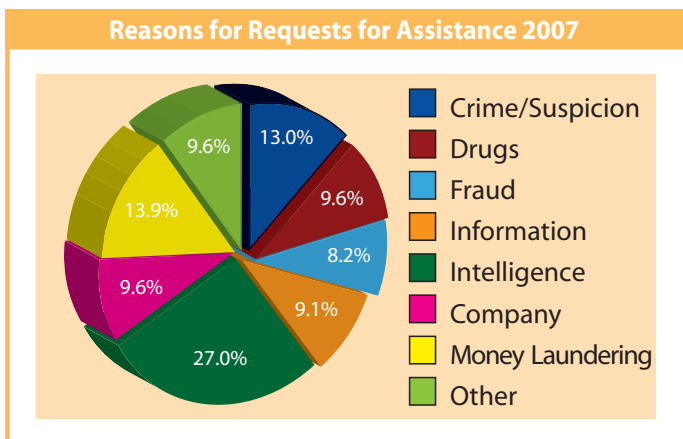
The FIS receives a wide range of requests for assistance each year from local law enforcement and overseas agencies and monitors the progression of the cases into the evidential arena.

As part of its commitment to international co-operation, the FIS is keen to assist other jurisdictions by sharing intelligence where this is required in support of a criminal investigation.

The nature of requests varies significantly from simple checks to establish any previous criminal intelligence, to more complex matters involving organised crime groups.

During 2007, 474 requests for assistance were received, an almost identical figure to that of 2006. Of these, 54% were received from outside the Bailiwick, which is consistent with the 2006 data.

The following chart details the variety of matters involved in intelligence requests received by the FIS:



### 4.2 International Organisations

During 2007, 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 during the early part of the year within the Transition Sub-committee.

The Training Working Group project to devise an on-going process to produce and publish sanitised cases for the benefit of FIUs and associated bodies continues to develop, with FIS personnel managing the editorial processes. Due to the increasing number of cases received, a Typologies Database was designed by a member of the FIS for inclusion on the Egmont Secure Web in order to assist FIUs in locating cases relevant to their needs. As a result of the further development of the Egmont Secure Web an incompatibility issue arose between the technologies used and consequently this database is now being operated solely within the FIS as part of the editorial process and can be interrogated on request.

The Egmont Operational Working Group has since embarked on a project to develop a trends and indicators database and consultation has led to the inclusion of the Training Working Groups requirements and the continued involvement of FIS personnel. In addition to this new work stream, with the assistance of colleagues in partner FIUs, efforts are continuing to translate sanitised cases in order to service a wider community.

Although not directly involved in asset recovery, the FIS also provides the Bailiwick point of contact for the CARIN Group and monitors the group's activities on behalf of the jurisdiction.

### 4.3 Memorandums of Understanding

The FIS does not routinely require a Memorandum of Understanding in order to exchange information; however the Service is aware that some organisations do need a MoU as a pre-requisite. Where such a requirement exists and there is an operational need, the FIS is able to enter into such agreements. At present the FIS is party to 13 MoUs with international partners.

During 2007, following the creation of the Serious & Organised Crime Agency in the UK and the absorption of the former NCIS FIU into the Agency's Proceeds of Crime Department, an MoU was signed between the two organisations. This agreement reflects the long-standing relationship between the jurisdiction's FIUs and is intended to form part of a larger agreement between SOCA and the Bailiwick's law enforcement agencies in due course.

## 5 FIS ACTIVITIES

It is difficult to quantify the value of FIS activities and the intelligence produced; by its nature, intelligence cannot be used directly in support of a prosecution and due to the suspicion based regime within the Bailiwick, disclosure reports may need significant development before they add notable value to a criminal investigation.

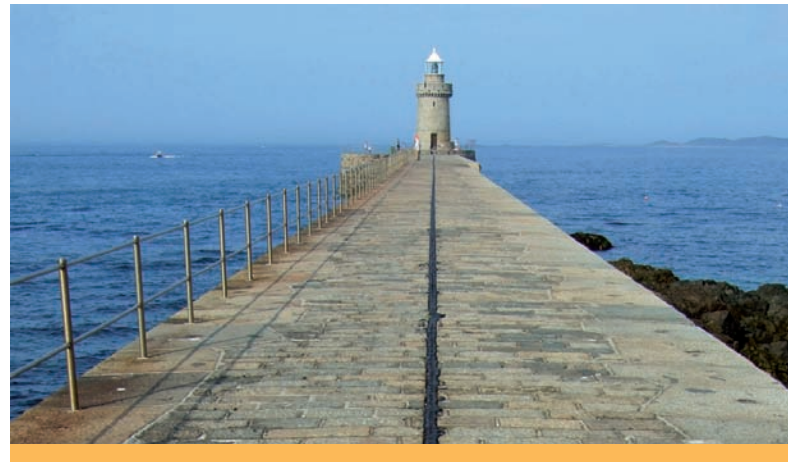
As an indication of the effectiveness and value of intelligence submitted by financial services businesses, approximately 7% of all formal Letters of Request and Production Orders served in Guernsey during 2007 were preceded by a disclosure report and the sharing of intelligence with the jurisdiction concerned. The actual significance of the intelligence forwarded cannot be fully evaluated, however this indicates that a proportion of reports received do contribute directly to actual investigations.

The FIS continues to regularly support local law enforcement agencies by the provision of financial intelligence on suspects already under investigation, or by pro-actively compiling intelligence reports for consideration of further investigation. During 2007, FIS Financial Investigators were also allocated as single points of contact in respect of local operations, thereby providing a dedicated resource and level of expertise to the investigations.

During 2007, the FIS has through a variety of initiatives attempted to promote closer inter-departmental working with the intelligence and evidential teams within the Police and Customs Services. Such initiatives have included meetings with departments to discuss liaison and the manner of intelligence exchange, legislative and procedural developments as well as case related discussions.

A significant proportion of the FIS' activities relates to the provision of international cooperation in support of criminal investigations within foreign jurisdictions, as in the following sample cases:

- ***In 2005 a local regulated fiduciary made a disclosure to the FIS about a person living in a foreign jurisdiction who had approached the Guernsey fiduciary for assistance in setting up a company structure in order to administer the proceeds of his business activities. During the application process the person paid funds into the fiduciary's client account in anticipation of the relationship being confirmed. However, the fiduciary established that the funds took the***



***form of large amounts of cash, paid in via various overseas bank branches. This resulted in the fiduciary declining the business and arrangements were made for the person to recover his funds, in cash, at the branches at which he had paid them in. Intelligence from the disclosure was sent to the foreign FIU.***

***During 2007 an investigation in a foreign jurisdiction into the suspected criminal activities of the subject revealed a large drug trafficking operation, with the subject using a legitimate trading business as a front for laundering cash from illegal drug sales. The foreign FIU identified the FIS intelligence link and assistance was provided to the investigators to obtain evidence of the Guernsey approach for business. This demonstrated the same money laundering typology as had been used elsewhere by the subject, as well as linking him to the movements of large quantities of cash. The subject has been jailed for over 20 years for drug-trafficking and money laundering.***

- ***A disclosure was received from a local financial institution concerning one of its clients as customer due diligence enquires had identified that the client was wanted for a multi-million GBP fraud in a foreign jurisdiction. The FIS disseminated intelligence about his financial affairs to the relevant investigating authority, which passed the information to their prosecution authority. As a consequence of the intelligence being disseminated production orders have been served and evidence returned to the prosecuting authority. The case is still pending.***



- ***The FIS received a request for assistance from a European jurisdiction for intelligence on an individual they were investigating for serious corruption and money laundering offences. The FIS carried out extensive financial enquires and was able to obtain substantial financial intelligence to assist the overseas jurisdiction with their investigation. The enquiries identified a large structure of companies with assets invested in separate jurisdictions - the beneficial owners were found to include relatives and close associates of the main subject. The intelligence was passed on by the foreign FIU to its prosecuting authority to support its application for production orders to be served in the island.***

- ***Following suspicions reported by separate local financial institutions regarding the same customer, enquiries revealed strong indications that the person was operating accounts in false names. Further investigation identified accounts in several other jurisdictions, with assets amounting to around GBP 5 million. The enquiries revealed a typology of providing false information to obtain low-level identification documentation outside the financial services sector, and then using these documents in support of applications to obtain financial products in false identities. The case is continuing with the assistance of other FIUs and police forces to establish what criminal offences might lie behind the suspicious activity reported.***

- ***A foreign jurisdiction investigating a GBP 7 million fraudulent holiday scheme involving bogus travel agents contacted the FIS for assistance, having found the name of a Guernsey bank on a document during property searches. The FIS conducted enquiries and obtained intelligence showing that several personal and business accounts linked to the main suspects were held at a private bank, with around GBP 2 million in the accounts. The intelligence was sent to the foreign FIU with permission to share it with the agency dealing with the case and the funds were subsequently restrained. Four of the main suspects have been convicted of fraud offences and have received prison sentences of up to 7 years.***

## 6 TRAINING & FEEDBACK

### 6.1 Industry Training

During 2007, the Bailiwick of Guernsey authorities agreed and adopted several new pieces of financial crime legislation as well as implementing new Financial Services Business Regulations. In addition, following consultation, on the 15th December the Guernsey Financial Services Commission, issued a new Handbook to industry which outlined a risk based approach to customer due diligence. As a consequence of these significant changes, a joint training event was held for financial institutions on a sector basis. Presentations were given by the Law Officers of the Crown, the Commission and the FIS. The latter focused on the form and manner of reporting; the operational activities of the FIS and the implications of the Disclosure (Bailiwick of Guernsey) Law, 2007 on current working practices.

Seminars were also conducted in Alderney and Sark, which fall under the legislative provisions and an additional session was held for the benefit of non-regulated financial services businesses with an approximate total attendance of 550 individuals.

In addition to these formal presentations the FIS continued to provide speakers at the request of a number of local forums including the Guernsey Training Agency and the International Commanders Course. A presentation was also made to members of the States of Deliberation by the Director, as part of a joint initiative to raise awareness of the law enforcement and regulatory issues within the jurisdiction.

### 6.2 Feedback Initiatives

During 2006, a feedback project was commenced which encompassed a review of all disclosures received in 2004 in order to provide case specific feedback to the reporting financial institutions. This took the form of written feedback with a brief description of any relevant developments since the report was made, such as whether or not the intelligence was disseminated to another agency or jurisdiction, any follow-up assistance requested and any specific outcomes resulting from the information the institution had provided. A total of 591 disclosure reports from 120 different financial services businesses were reviewed.

The benefit of this initiative was evaluated during 2007 and of the 66 responses the majority were extremely positive and included minor suggestions on how the process could be further improved, as well as updates on the cases. The FIS

concluded that in light of the positive response from industry and the investigative benefit in reviewing case files, the project would be repeated in respect of 2005 disclosures and similar feedback will be provided during early 2008.

A further initiative relates to the industry focus group, which was formed with representatives from the main financial services sectors in order to speak as a group with members of the FIS on an informal basis. This forum is intended to give money laundering reporting officers the opportunity to raise directly with the FIS any comments on relevant issues for discussion. The meetings have so far proved very productive, with the FIS being able to receive first hand the opinions and observations of the group on issues surrounding the making of reports and the implications of anti money laundering legislation and procedures. In light of the introduction of Relevant Businesses, membership of this group will be expanded to include appropriate representation.

### 6.2 FIS Training

In order to continue the development of specialist knowledge within the FIU's own staff, several tailored training sessions were held during the year, including specific training focused on open source research techniques and analytical products. In addition, FIS personnel attended several local courses, which focused on a number of financial vehicles such as RATS, Islamic Finance principles and terrorist financing issues.

An FIS manager also attended the UK National Intelligence Managers Course and FIS investigators continued to attend the Asset Recovery Agency series of courses culminating with all FIS investigation staff having attained Diplomas in Financial investigation.

Towards the latter part of the year the FIS hosted a presentation by colleagues from the US Federal Bureau of Investigation on international corruption case management. This closed session was directed at local Law Enforcement officers who were provided with an insight into the legal and commercial business factors involved in large corruption investigations. The presentation was extremely well received and proved to be very beneficial in terms of the practical problems encountered by investigators and the impact of such cases.



## 7 OBJECTIVES

### 7.1 IT Developments

Following a review of its current IT provisions and, with the endorsement of the Financial Crime Service Authority and States of Guernsey Home Department, it was agreed to commence development of a financial intelligence database in conjunction with the planned replacement of the CEINs intelligence database. This project not only benefits from economies of scale in terms of shared development but will also improve intelligence exchange between the organisations and other key stakeholders. Following completion of a tender selection process, a preferred supplier was identified and a contract was duly signed. Development and implementation of the FIS module of the system which will incorporate on-line submission will commence in early 2008. A user group comprising representative Money Laundering Reporting Officers from the various financial sectors has been formed to assist with the design and detailed specification.

### 7.2 Legislation

Several pieces of financial crime legislation are currently being progressed, which will address a number of issues within the current AML and CFT provisions and provide additional gateways for intelligence exchange. Proposals regarding cash seizure and a civil forfeiture regime are also being progressed, which will undoubtedly provide the jurisdiction with additional methods of tackling the proceeds of criminal conduct, where a criminal confiscation cannot be achieved or has previously been attempted.



## **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:**

GMT.

### **Financial Intelligence:**

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

### **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)

Website: [www.guernseyfis.org](http://www.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.

## 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, contact:-

### **Customs and Excise, Immigration and Nationality 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 CEINS 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 CEINS 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 contact:-

### **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.

## Legal Inquiries:

If you have a question relating to the legislation concerning mutual assistance matters in the Bailiwick 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](mailto: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 contact:-

### **Fiduciary and Intelligence Services 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: [kdown@gfsc.gg](mailto:kdown@gfsc.gg) Website: [www.gfsc.gg](http://www.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.



