



REPUBLIC OF SLOVENIA  
MINISTRY OF FINANCE  
**OFFICE FOR MONEY LAUNDERING  
PREVENTION**

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**DATA FROM THE REPORT ON ACTIVITIES OF THE  
OFFICE FOR MONEY LAUNDERING PREVENTION OF  
THE REPUBLIC OF SLOVENIA FOR THE YEAR 2016**

## 1. PREAMBLE

The Act on the Prevention of Money Laundering and Terrorist Financing (Official Gazette of the Republic of Slovenia No. 60/07, 19/10, 77/ 11, 108/12 and 19/14 - hereinafter: APMMLFT) in its Article 72 and the Act on Prevention of Money Laundering and Terrorist Financing (Official Gazette of the Republic of Slovenia No. 68/16, hereinafter: APMMLFT-1) in its Article 119 stipulate that the Office for Money Laundering Prevention (hereinafter: OMLP) shall submit to the Government of the Republic of Slovenia a report on its activities at least once annually.

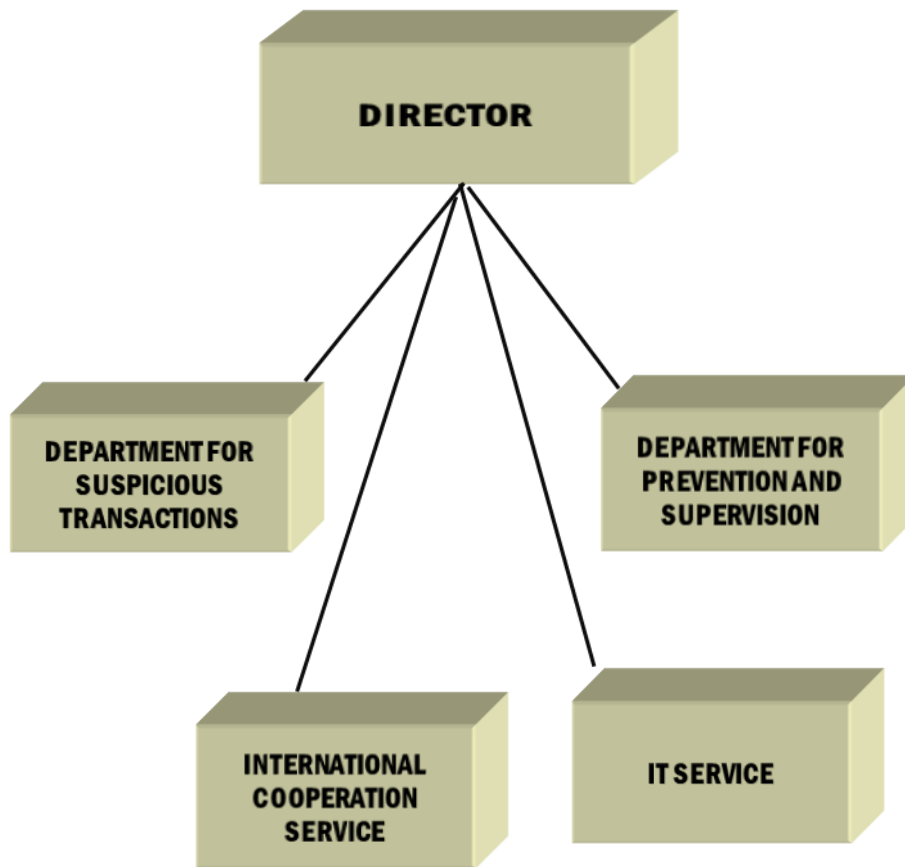
**The report on the activities of the OMLP for the year 2016 has already been the twenty-first report to the Government and refers to the period from 1 January 2016 until 31 December 2016. The stated period has been shown separately regarding statistical and other numerical data; to allow for year-by-year comparison also certain data from previous years has been stated in the report and its attachments.**

### 1.1 Organizational chart of the OMLP

By the implementation of the preventive acts on the prevention of money laundering and terrorist financing and the establishment of the office for money laundering prevention 20 years ago, the system of detection of money laundering has intended a special role also to the obliged entities (financial and non-financial institutions) and afore mentioned office as well. The international expression for those offices is “Financial Intelligence Unit – FIU”, meaning that one of its duties is also sending financial and other intelligence to the competent authorities. This duty has been stipulated by the definition of the Financial Action Task Force (FATF), according to which the office for money laundering prevention is the “**central national unit for receiving, and analysing suspicious transaction reports and other information relevant to money laundering, associated predicate offences and terrorist financing and for disseminating results of its analysis to the competent authorities**”.

The FIUs can be administrative, police, judicial/court and hybrid types, the majority of them are administrative. Almost half of the FIUs from EU Member States are administrative FIUs. Slovenia has also decided for the administrative type of the FIU, which does not have police competences, but has a special role at detection and prevention of money laundering and terrorist financing. The advantage of such FIUs is also the possibility to develop trust and cooperation of the FIU with financial institutions, especially banks. Namely, the OMLP is the administrative office within the Ministry of Finance and acts as a clearing house between the financial institutions and law enforcement authorities. Within its competences, OMLP analyses suspicious transactions sent by the obliged entities and if it establishes the reasons for the suspicion of money laundering, terrorist financing or other criminal offences, it forwards gathered data as notification or information to the competent authorities (Police, State Prosecutor Office) for further investigation. With regard to the notifications of OMLP it is necessary to point out, that these are intelligence data containing sensitive financial data, and not criminal reports in the sense of the Criminal Procedure Act.

The organizational chart of the OMLP is as follows:



Beside the management, the OMLP consists from 4 organizational units, namely:

- Department for suspicious transactions
- Department for Prevention and Supervision
- International Cooperation Service
- IT Service.

## **2. ACTIVITIES OF OMLP IN THE FIELD OF SUSPICIOUS TRANSACTIONS**

The OMLP received from organizations, which are obliged entities according to the Article 4 of the APMLTF (hereinafter: organizations) until 19 November 2016 data on all transactions exceeding the certain threshold, namely:

- data on all cash transactions exceeding 30.000 EUR (hereinafter: cash transactions)
- since 18 October 2011, data on all transfers exceeding 30.000 EUR , which were on the basis of the customer`s demand performed to the countries or accounts of natural persons and legal persons with their residence or headquarters in the states with a higher risk of money laundering and terrorist financing; the list of those countries is published at the website of the OMLP (hereinafter: transfers exceeding 30.000 EUR)
- data on transfers of cash exceeding 10.000 EUR when crossing the Slovenian part of the EU border, according to the Regulation of the European Parliament and Council on Cash Movements entering or leaving EU (hereinafter: cash transfers).

Since 19 November, 2016, when the APMLFT-1 came into force, the Office received the following data on all transactions exceeding the certain threshold, namely:

- data on all cash transactions, exceeding 15.000 EUR (hereinafter: cash transactions)
- data on all transfers exceeding 30.000 EUR, which were on the basis of the customer`s demand performed to the countries or accounts of natural persons and legal persons with their residence or headquarters in the states with a higher risk of money laundering and terrorist financing; the list of those countries is published at the website of the OMLP.

As in 2016, the Office received the cash transactions exceeding 30.000 EUR and 15.000 EUR, the analysis of cash transactions and transfers in the Chapters 2.1 and 2.2. will refer only to transactions, exceeding 30.000 EUR.

## **2.1 Cash transactions exceeding 30.000 EUR**

In 2016, the OMLP received the reports on cash transactions exceeding 30.000 EUR from 40 different organizations. **13.822 cash transactions** in the total value of **862.564.344 EUR**, but in 2015 there were 11.993 cash transactions with the value of 853.095.310 EUR. The comparison between the years 2015 and 2016 has shown, that the **number of reported cash transactions has increased for 15% in 2016, mostly because of transactions reported by casinos. The total amount of reported cash transactions remained almost the same. It has been established, that the decreasing trend of number and total amount of reported cash transactions since 2008, has stopped.**

The detailed review of the number of cash transactions can be found in the Table 1.

**Table 1: Number and share of cash transactions exceeding 30.000 EUR in the period 2015-2016 by reporters**

<i>Organizations</i>	<i>2015</i>		<i>2016</i>		<i>INDEX</i> <i>2015/2016</i>
	<i>Number</i>	<i>Share</i>	<i>Number</i>	<i>Share</i>	
<i>Banks</i>	10.365	86,43%	10.014	72,45%	0,97
<i>Post Office</i>	457	3,81%	388	8,79%	0,85
<i>Gaming houses</i>	882	7,35%	1.869	0,10%	2,12
<i>Savings banks</i>	1.006	8,39%	1.215	2,33%	1,21
<i>Gaming Saloons</i>	275	2,29%	322	13,52%	1,17
<i>Savings and Credit houses</i>	6	0,05%	14	2,81%	2,33
<i>Exchange offices</i>	2	0,02%	0	72,45%	0,97
<b>TOTAL CASH TRANSACTIONS</b>	<b>11.993</b>	<b>100,0%</b>	<b>13.822</b>	<b>100,00%</b>	<b>1,15</b>

As could be seen from the Table 1, the majority of cash transactions were reported to OMLP from banking sector, the average amount of transaction was 62.405 EUR, which was less than in 2015, when the average amount of cash transaction was 65.658 EUR.

## **2.2 Transfers exceeding 30.000 EUR to the countries with the higher ML/FT risk**

Since 18 October 2011, the organizations shall according to the Article 38 of the APMLFT or

Article 68 of APMLFT-1 in three days at the latest, report to the OMLP the data on every transfer exceeding 30.000 EUR (since 19 November 2016 15.000 EUR), which was on the basis of demand of the client performed to the account of natural and legal persons with permanent or temporary residence or headquarters in the countries with the higher risk for money laundering or terrorist financing or to the accounts in those countries (hereinafter: transfers). The list of the countries with the higher risk for money laundering or terrorist financing (hereinafter: list of the countries) changed two times in 2016. The last list published at the website of the OMLP contained 57 countries.

Due to the change of threshold on 19 November 2016, when the banks are obliged to report transfers, the precise annual comparison can not be made. From gathered information could be seen, that in 2016 the banks sent data on 2.688 transactions exceeding 30.000 EUR as well as 15.000 EUR. Due to small difference in the number of reported transactions, we have prepared the analysis of all reported transactions with the estimation, it has had no particular influence to annual comparison.

In the period from 1 January 2016 until 31 December 2016, the organizations reported to the OMLP altogether **2.861 transfers in the total value of 751.467.321 EUR**. 2.440 transfers (over 90% of all transfers) in the total value of 702.462.962 EUR were transfers for domestic legal persons (93% of the total value of all transfers), 319 transfers (11% of all transfers) in the total value of 37.673.238 EUR were performed on behalf of foreign legal persons and 102 transfers (3% of all transfers) on behalf of natural persons. Recipients of those transfers were mostly foreign companies, as to their accounts 2.768 or 96% of all transfers in the total value of 740.378.829 EUR were performed (which was 98,2% of the total value of all transfers). 91 transfers (3% of all transfers) were performed to the benefit of natural persons and 2 transfers (0,07% of all transfers) to domestic legal persons to the accounts in the countries from the list. In comparison with the year 2015, there was a significant decrease in the number of transfers (approximately 50%) and the total amount of performed transfers (for 17%), but the structure of transfers stayed similar with regard to the type of the person for which the transfers is performed, and type of the receiver.

### **2.3 Transfers of cash exceeding 30.000 EUR via EU borders**

As stipulated by the Article 73 of the APMLFT and Article 120 of APMLFT-1, the customs authorities are obliged to report to OMLP (within three days at latest), the data on any declared import or export of cash amounting to or exceeding 10.000 EUR when entering or leaving EU. **In 2016, there were 101 reported transfers of cash at the Slovenian part of the EU border, which was 25% less than in 2015.** In 2016, there was no established non-reported transfers of cash via EU borders.

Among 101 reported transfers, there were **57 transfers to EU and 44 of transfers from EU. 23 transfers were performed on behalf of foreign legal persons and 78 transfers on behalf of natural persons. The total value of transfers to EU for foreign legal persons was 32.600 EUR, as the total value of transfers from EU (via Slovene border) was 395.190 EUR and 423.234 USD. The total value of transfers to EU on behalf of natural persons was 1.518.960 EUR and 100.000 USD and transfers from EU 841.026 EUR and 355.756 USD.**

By entering of Croatia to EU, the number of transfers decreased rapidly, as the reporting obligation of cash has been valid only at airport border crossings and harbours.

### **3. ACTIVITIES OF OMLP IN THE FIELD OF SUSPICIOUS TRANSACTIONS**

The OMLP receives from organizations, which are obliged entities according to Article 4 of the APMLTF (organizations from the Paragraph 1, Article 4 of the APMLFT, lawyers, law firms and notaries from Paragraph 2, Article 4 of the APMLFT) data on suspicious transactions regardless the amount and data on persons, whereby the reasons for the suspicion on money laundering and terrorist financing activity are raised.

On the basis of Article 60 of the APMLTF, the OMLP can also start its analysis in certain cases on the basis of the initiatives of the state and supervisory authorities stated in those articles and on the basis of the discovered facts of the Central Securities Clearing Corporation and Stock Exchange as stipulated by Article 74 of the APMLFT and supervisory authorities from Article 89 of the APMLFT. On the basis of the Articles 64 and 65 of APMLFT, the OMLP also receives certain data from its foreign counterparts and checks the following databases: on cash transactions; transfers of cash via EU borders; transfers related to the countries with inadequate AML/CFT measures, which is also a basis to start gathering data on suspicious transactions, assets and persons.

Paragraph 2 of Article 53 of the APMLFT stipulates that OMLP receives, collects, analyses and forwards data, information and documentation obtained on the basis of the APMLFT, and authorizes the OMLP in its Articles 61 and 62 to inform competent authorities if it considers that in connection with a transaction or person there are grounds to suspect money laundering, terrorist financing or other criminal offences, stated in the Article 62.

By the adoption of new APMLFT-1, the afore mentioned provisions have not changed significantly, therefore OMLP can according to Article 89 of the APMLFT-1 start its analysis on the basis of the following:

- reports on suspicious and cash transactions received from obliged entities stipulated in the Article 4 of APMLFT-1;
- initiatives of certain state and supervisory authorities from Article 99 of APMLFT-1
- reported facts of supervisory authorities stipulated in Article 139 of APMLFT-1.
  
- certain data received from foreign counterparts ,
- database of cross-border transfers of cash via EU borders and
- database of transfers related to countries with higher ML/FT risk, .

APMLFT-1 in the Paragraph 2, Article 87 stipulated, that the OMLP receives, collects, forwards and analyses data and information on the basis of APMLFT-1, and in its Articles 101 and 102 authorizes OMLP, that when it considers the transactions raised reasons for ML/FT suspicion or other officially prosecutable offenses with prescribed sentences, it can inform competent authorities thereof.

### **3.1 Cases with the raised reasons of suspicion for money laundering or terrorist financing**

According to the provisions of the APMLFT and APMLFT-1, the OMLP received 449 reports on suspicious transactions or suspicious activities in 2016. Among them 5 reports a suspicion of committing the criminal offence of terrorist financing has been raised according to Article 109 of the Criminal Code. On the basis of all those reports, the OMLP opened 449 cases and performed activities on the basis of the relevant APMLFT and APMLFT-1.

Those data has been divided in this report (for the period 2010 – 2016) according to the:

- reporters
- number and dynamics of opened and concluded cases
- cases, forwarded to the Criminal Police Directorate of the Ministry of Interior due to the reasons for the suspicion for money laundering
- cases, forwarded to the Criminal Police Directorate of the Ministry of Interior due to the reasons for the suspicion for financing of terrorism
- cases, forwarded to the Criminal Police Directorate of the Ministry of Interior and other competent authorities due to the reasons for the suspicion of committing other criminal offences
- temporary postponement of transactions
- the value of temporarily seized dirty money and assets
- typology of suspicious transactions.

#### **3.1.1 Reporters**

Detailed data on reporters of suspicious transactions and persons, on the basis of which the OMLP opened and investigated particular cases in 2016, can be seen from the Table 2 (together with comparative data for the period from 2010 until 2015). The table contains only reporters, explicitly determined by the APMLTF and APMLFT-1, as the OMLP could start the investigation of the certain case and use its authorizations only on the basis of the provisions of Article 53.

*Table 2: Number and share of cases by reporters in the period from 2010 - 2016*

REPORTERS	2010	2011	2012	2013	2014	2015	2016
<b>1. SUSPICIOUS TRANSACTIONS ACCORDING TO THE ARTICLE 38 OF APMLTF</b>	<b>176</b>	<b>262</b>	<b>502</b>	<b>542</b>	<b>423</b>	<b>464</b>	<b>392</b>
	<b>75,54%</b>	<b>79,51%</b>	<b>89,09%</b>	<b>90,17%</b>	<b>87,29%</b>	<b>88,48%</b>	<b>87,30%</b>
<b>Banks</b>	<b>164</b>	<b>238</b>	<b>461</b>	<b>504</b>	<b>372</b>	<b>422</b>	<b>361</b>
Savings banks	5	7	16	12	25	19	22
Post Office	1	4	9	2	4	6	2
Brokerage companies and management companies of investment funds	1	1	1	9	4	2	1
Leasing	1	1	4	3	4	1	-
Auditors and accountants	1	-	-	2	1	-	-

Casinos	-	-	-	-	2	2	2
Organizers of the games of chance	-	1	-	2	2	1	-
Dealers with precious stones	2	8	7	5	2	5	2
Real Estate Agencies	1	-	-	-	1	-	1
Insurance companies	-	-	-	-	1	3	-
Other obliged entities	-	-	-	2	1	-	-
Notaries	1	-	2	1	4	-	1
Lawyers	1	2	2	-	-	3	-
<b>2. INITIATIVES OF STATE AUTHORITIES</b>	<b>24</b>	<b>28</b>	<b>36</b>	<b>30</b>	<b>39</b>	<b>35</b>	<b>32</b>
	<b>10,30%</b>	<b>8,56%</b>	<b>6,44%</b>	<b>5,00%</b>	<b>8,13%</b>	<b>6,72%</b>	<b>7,12%</b>
Ministry of Interior, Criminal Police Directorate	18	17	24	16	25	28	18
State Prosecutor`s Office	2	2	7	9	8	5	7
Court	-	3	-	1	2	-	1
Ministry of Finance, Customs Administration (Financial Administration)	1	1	2	2	-	-	-
Commission for the Prevention of Corruption	3	3	3	1	2	-	-
Slovenian Intelligence and Security Agency	-	2	-	1	2	2	6
<b>3.REPORTING OF THE FACTS OF SUPERVISORY AUTHORITIES</b>	<b>6</b>	<b>4</b>	<b>6</b>	<b>3</b>	<b>0</b>	<b>2</b>	<b>3</b>
	<b>2,58%</b>	<b>1,22%</b>	<b>1,07%</b>	<b>0,50%</b>	<b>0,00%</b>	<b>0,38%</b>	<b>0,67%</b>
Ministry of Finance, Tax Office (Financial Administration)	2	1	3	2	-	-	2
Securities Market Agency	-	-	-	-	-	-	1
Market Inspectorate	1	2	1	-	-	1	-
Bank of Slovenia	3	1	1	1	-	1	-
Court of Audit	-	-	1	-	-	-	-
<b>5. EXCLUDED BY THE OMLP FROM DATABASES</b>	<b>4</b>	<b>17</b>	<b>3</b>	<b>-</b>	<b>2</b>	<b>-</b>	<b>2</b>
	<b>1,72%</b>	<b>5,20%</b>	<b>0,54%</b>	<b>0,00%</b>	<b>0,42%</b>	<b>0,00%</b>	<b>0,45%</b>
<b>6. FOREIGN FIUs</b>	<b>21</b>	<b>16</b>	<b>12</b>	<b>25</b>	<b>16</b>	<b>20</b>	<b>20</b>
	<b>9,01%</b>	<b>4,89%</b>	<b>2,15%</b>	<b>4,17%</b>	<b>3,33%</b>	<b>3,84%</b>	<b>4,45%</b>
<b>TOTAL</b>	<b>233</b>	<b>327</b>	<b>559</b>	<b>600</b>	<b>480</b>	<b>521</b>	<b>449</b>

### 3.1.2 Number and dynamics of opened and concluded cases

In the Table 3 you can find the number of opened and concluded cases in the period from 2010 until 2016, which were analysed by the OMLP due to the reasons for the suspicion on committing the criminal offences of money laundering and terrorist financing.



*Table 3: Opened and concluded cases for the period from 2010 until 2016*

<i>YEAR</i>	<i>Opened</i>	<i>Notification</i>	<i>Information</i>	<i>AA in OMLP</i>	<i>Concluded TOTAL</i>	<i>Number of all sent written information Notification/Information</i>
<b>2010</b>	233	55	43	109	207	43/34
<b>2011</b>	327	99	58	99	256	84/48
<b>2012</b>	559	175	73	130	378	132/64
<b>2013</b>	600	170	109	156	435	135/83
<b>2014</b>	480	190	124	207	521	157/111
<b>2015</b>	521	259	107	206	572	190/95
<b>2016</b>	449	245	150	136	531	185/128

From the Table 3 can be seen, that **in 2016 the OMLP opened 449 new cases on the basis of the reports and in the same period concluded 531 cases.**

**In 2016, 531 cases were concluded as follows:**

- **245 cases** were as 184 written notifications on suspicious transactions forwarded to the Criminal Police Directorate (in some cases also to the State Prosecutor`s Office), as the reasons for the suspicion of committing the criminal offences of **money laundering** or **terrorist financing** were raised (55,56% of all cases, concluded in 2016)
- **150 cases** were concluded with 128 written information, due to the raised reasons for committing the **other criminal offences**, stipulated by Article 62 of APMLFT or Article 102 of APMLFT-1 (33,4% of all cases concluded in 2016). The cases were therefore forwarded to the competent authorities (Police, Financial Administration of the Republic of Slovenia).
- **136 cases** were **concluded and kept in the OMLP** as no reasons for the suspicion of committing the criminal offence of money laundering or other criminal offence from Article 62 of APMLFT or Article 102 of APMLFT-1 were detected (30,28% of all cases, concluded in 2016).

**3.1.3 Cases, forwarded to the Criminal Police Directorate of the Ministry of Interior and/or State Prosecutor`s Office due to the suspicion of money laundering according to the Article 245 of the Penal Code**

Among concluded cases, the OMLP forwarded to the Criminal Police Directorate of the Ministry of Interior and/or State Prosecutor`s Office, those cases which were suspected to be connected with the criminal offence of money laundering, together with documentation on the basis of Article 61 of the APMLFT or Article 101 of APMLFT-1.

*In 2016, during its analysis the OMLP discovered by 236 cases the reasons for the suspicion of committing the criminal offence of money laundering, which it sent (in 176 written notifications) to the Criminal Police Directorate of the Ministry of Interior and/or State Prosecutor Office. The number of cases is higher than the number of written notifications, because some of the written notifications included several connected cases. Beside the afore mentioned notifications, the OMLP forwarded to the Criminal Police*

*Directorate of the Ministry of Interior and/or to the State Prosecutor's Office in 2016 also 33 completions of already sent notifications on suspicious transactions, concluded in the previous years.*

The amount of money for which (in the afore mentioned notifications on suspicious transactions) there existed reasons for the suspicion of committing the criminal offence of money laundering, increased for 58% in 2016 (in comparison with the year 2015), namely **391.619.408 EUR**. We should point out, that this amount is just the total amount of performed transactions, which raised reasons for the suspicion of money laundering, and not necessarily the amount of the money actually laundered.

Within its competences for detection of reasons for the suspicion of ML, the OMLP cannot definitively establish which predicate criminal offence was committed, but it can estimate on the basis of gathered data, which predicate criminal offences have most probably been committed. In 2016, in 23 written notifications, the OMP did not state the predicate criminal offence, but at remaining written notifications the OMLP estimated (on the basis of the circumstances) which predicate criminal offence has most probably been committed. Detected predicate criminal offences, from which most probably the dirty money originated in 2016 were: in 22 cases criminal offence of fraud according to the Article 211 of the Criminal Code; in 18 cases the abuse of position or trust at performing economic activities according to the Article 240 of the Criminal Code; in 7 cases the tax evasion according to the Article 249 of the Criminal Code. In some cases the following predicate criminal offences have been detected as well: theft according to the Article 204 of the Criminal Code; attack on IT system according to the Article 221 of the Criminal Code; unjustified production and trade with illegal substances according to the Article 186 of Criminal Code; damage to creditors according to the Article 228 of Criminal Code; trade with human beings according to the Article 113 of Criminal Code and smuggling according to the Article 250 of Criminal Code. The OMLP mentioned in its written notifications in 94 cases, that the funds most probably originated from predicate criminal offences committed abroad – in 86 cases from criminal offences committed in Italy.

#### **3.1.4 Cases, forwarded to the Criminal Police Directorate and/or State Prosecutor's Office due to the suspicion of committing the criminal offence of financing of terrorism according to Article 109 of the Criminal Code**

As already mentioned, the OMLP received in the year 2016 also 14 reports, where the transactions raised suspicions of committing the criminal offence of financing of terrorism according to Article 109 of the Criminal Code. Almost half of these reports were received from Police and Slovenian Intelligence and Security Agency, three reports were received from foreign counterparts and five from reporters.

In 2016, the OMLP informed the competent authorities in 9 cases on suspicions of committing the criminal offence of money laundering according to the Article 109 of the Criminal Code. In this information, we have investigated 2 domestic natural persons, 17 foreign natural persons and 5 domestic legal persons.

At the same time, the OMLP also (in the field of the prevention of financing of terrorism) performed regular monthly reviews of our databases (databases of cash transactions, suspicious transactions, transfers of cash from/to EU) with regard to the persons and

organizations from EU list (Consolidated List of Persons, Groups, Entities subject to EU Financial Sanctions), against whom certain financial sanctions have been applied on the basis of the EU Directives and UN Resolutions. With the introduction of the new system of reporting the suspicious and cash transactions, and transactions with countries with higher ML/FT risk, such checks have been performed on daily basis. The reviews in 2016 showed, that no person from that list performed any financial transaction in Slovenia or was connected with financial transactions in our country.**3.1.5 Temporary postponement of transactions**

On the basis of Article 57 of APMLFT or Article 96 of APMLFT-1, the OMLP may issue a written order for temporary postponement of transactions for a maximum of 72 hours, if it considers there are reasonable grounds to suspect ML/FT. In 2016, the OMLP issued such orders in 10 cases, when it postponed transactions in the total amount of 1.745.084 EUR and 6.266 USD at the debt of 22 bank accounts held by 13 domestic natural persons and 4 domestic legal persons. In majority of those cases, the State Prosecutor Office proposed (before the expiry of the temporary postponement of transaction) the temporary prohibition of disposing with all the funds at the accounts. On the basis of this proposal, the courts issued the decrees for provisional securing of the assets at the accounts.

### **3.1.6 Value of the provisionally secured assets in the ML cases**

In 2016, the courts provisionally secured assets in the total amount up to 2.614.528 EUR and 5.939 USD in ML cases on the basis of the proposals of State Prosecutor's Offices. Part of these amount refers to movable or fixed assets, which value could differ from those mentioned in decrees for provisional securing of the assets. The provisional securing referred to 6 domestic natural persons and 1 foreign natural persons and 2 domestic legal persons, investigated by the State Prosecutor Offices in 6 cases. In comparison with the year 2015 it has been established that the number of issued orders for temporary securing with regard to the number of cases, persons (against which the orders were issued) and total amount have decreased for approximately 50%.

**The value of the provisionally secured assets on 31. 12. 2016 was of 38.553.622 EUR.**

### **3.1.7 Typology of suspicious transactions**

On the basis of the performed analysis of 185 notifications on suspicious transactions with raised reasons of committing the criminal offence of money laundering, which were sent to the competent authorities (Criminal Police Directorate of the Ministry of Interior/State Prosecutor Office), it has been established that the typology of those suspicious transactions has almost stayed the same as in the previous year. Namely, the classic ML techniques have still been used, typical for first ML phase "placement" and second one "layering", but in some cases, all three ML phases were used (including the third one "integration").

We can talk on certain typology of money laundering when we detect the sample or series of similar procedures (methods) of concealment of the illegal source of the money or other assets, which include different mechanisms, techniques and instruments:

**- mechanism of money laundering represents the environment or the system, where the money laundering activities have been entirely/partially performed:** financial institutions (banks, saving houses, brokerage houses, leasing houses), notaries, lawyers, natural persons, legal persons or companies (domestic companies, "straw" companies, off-shore companies),

money transfer systems (Western Union, MoneyGram); traders with precious metal; casinos and gaming saloons etc.

- **money laundering technique is the method of performing money laundering**, represented by the following categories: cash withdrawals, cash deposits, wire transfers (electronic transfers of money between the accounts), use of alternative systems for the transfers of funds, transfer of cash via state border, exchange of currencies, “smurfing” of the amounts, concealment via third persons;
- **instrument of money laundering is the holder of the value, used for the money laundering activities** and is mostly represented by the following categories: cash, cheques, securities, real assets, vehicles, boats, companies.

With regard to the understanding of the typologies presented above and connected basic elements, we should point out that in a particular case several instruments, mechanisms and money laundering techniques could appear. The sum of particular established money laundering techniques, which is represented by particular typologies and cases, does not represent the total number of the cases, as in the particular case, several money laundering techniques could be detected. In 2016, we established the following most frequent used **mechanisms of money laundering** with regard to the particular basic elements of money laundering techniques (mechanisms, techniques, instruments):

- **Financial institutions** (banks and savings houses): we discovered that in 172 (out of 183 cases) the financial (banking) system was used. In the remaining cases, we detected also particular alternative systems for transfers of funds (MoneyGram and Western Union) and trade with precious metal (investment gold). Among the services of the financial (banking institutions) or financial system, mostly the accounts of the companies and natural persons at banks were abused, as in at least 97 cases the foreign accounts were used. This means that the foreign natural and legal persons used accounts in Slovenia or that Slovenian natural and legal persons used foreign bank accounts;
- **Natural persons** were used in 142 cases. The method of use was different: “self-laundering”, when the natural person commits the predicate criminal offence and criminal offence of money laundering as well; use of natural persons as authorized persons and use of natural persons as “third persons”, via whom the money laundering was performed.
- **Legal persons** were used in 116 cases, at least in 41 cases, the “straw” companies were used and in at least 17 cases off-shore companies appeared as well.

The most frequent money laundering **techniques** in 2016 (detected in more than one case) have been as follows:

- transfers of funds between the accounts (detected in approximately 79% cases)
- withdrawals of cash from the accounts (detected in approximately 68% of cases)
- transfer of funds between the countries (detected in approximately 74% of cases)
- cash deposits (detected in approximately 16% of cases)
- concealment via third persons (detected in approximately 4% of cases)
- transfers of funds via state borders (detected in approximately 11 of cases)
- smurfing and avoidance of identification (detected in approximately 8% of cases)
- use of compliance officers for the execution of transactions (detected in approximately 9% of cases)
- use of funds for economic activities (detected in approximately 9% of cases)
- cash withdrawals at ATMs abroad

- use of money transfer systems (MoneyGram, Western Union) (detected in approximately 3% of cases)
- use of fictive contracts (detected in approximately 7% of cases)
- investments to gold (detected in approximately 2% of cases)
- investments to real assets (detected in approximately 3% of cases)
- investments to securities (detected in approximately 2% of cases)
- false show of purpose of transactions (detected in approximately 5% cases)
- exchange of currencies (detected in approximately 3% of cases).

#### **4. COOPERATION WITH OTHER STATE AUTHORITIES AT DETECTION, INVESTIGATION AND PROSECUTION OF MONEY LAUNDERING**

In this period, at detection and prevention of the criminal offence of money laundering, the OMLP especially cooperated with the Criminal Police Directorate of the Ministry of Interior (Police), Special Group of Prosecutors for the Fight Against Organized Crime at Supreme State Prosecutor`s Office, Bank of Slovenia, Securities Market Agency, Financial Administration of the Republic of Slovenia and Slovenian Intelligence and Security Agency. OMLP also closely cooperated in concrete cases with criminalists from several police directorates and other state prosecutor`s offices. Cooperation with the afore mentioned state authorities has been taken at the level of principals and operative level between the authorized representatives of authorities.

In 2016, the OMLP issued 7 consents for cooperation in specialized investigative groups, which have been all (except one) established as financial investigative group on the basis of Act on confiscation of property of illegal origin. At the end of 2016, OMLP took an active role in 34 specialized groups (25 of them have been established on the basis of the Act on confiscation of property of illegal origin). The cooperation with the Police was good, which could also be confirmed by the fact, that in **2016 the Police filed 42 criminal reports due to the grounded suspicion of committing the criminal offence of money laundering.**

The State Prosecutor Office independently (without the previous criminal report of the Police for money laundering) **initiated the procedure in another 13 cases, therefore the new criminal reports were filed and the proceedings were initiated in 55 cases in 2016, where in preliminary criminal proceedings or criminal proceedings the suspicions of the criminal offence of money laundering have been investigated.**

In 2016, OMLP sent 105 information to the Financial Administration due to the suspicions of committing the criminal offence of tax evasion, which was more than in 2015, when OMLP sent 69 such information. The cooperation with Financial Administration has been successful, as it used the majority of the OMLPs information at its tax supervisions.

##### **4.1 Criminal offences and performing of Article 75 of APMLTF or Article 121 of APMLFT-1**

Article 75 of the APMLTF (or Article 121 of APMLFT-1) determines, that due to centralization and analysis of all data related to money laundering, courts, State Prosecutor`s Offices and other state authorities are obliged to forward to the OMLP data on the offences as provided by the APMLTF and criminal offences on money laundering. On the basis of this

article, the state authorities are obliged to forward data to the OMLP in each case and annually inform the OMLP on their findings referring to the received notifications and information. On the other hand, the State Prosecutor`s Offices and the courts should send to the OMLP twice annually (in July and January) the data on persons and procedures against whom the criminal or administrative proceedings have been raised.

**In 2016, the Police and State Prosecutor`s Office filed criminal reports or started criminal proceedings in 55 cases (within their competences) against 129 natural and 9 legal persons, referring to the suspicions of committing the criminal offence of money laundering. In the period 1995-2016, the preliminary criminal proceedings or criminal proceedings were started in 510 cases due to the grounded suspicions of committing the criminal offence of money laundering.**

#### **4.2 Statistical data of Police on criminal offences of money laundering**

On the basis of data on filed criminal reports, that has to be sent to OMLP by the Police, can be seen, that the number of criminal reports for the criminal offence of money laundering in 2016 increased in comparison with the year 2015, namely from 39 to 42 criminal reports.

**In the period 2010-2016, the Police altogether filed 325 criminal reports due to the grounded suspicion of committing the criminal offence of money laundering, which was more than 50% of all introduced procedures (510) with regard to money laundering since 1995 onwards (as incriminated in the Slovenian legislation).**

**In 2016, the Police filed altogether 42 criminal reports due to the grounded suspicions of committing the criminal offence of money laundering – 31 of them based on the OMLPs notifications.**

#### **4.3 Statistical data on pre-criminal and criminal proceedings for the criminal offence of money laundering**

From the data received for the year 2016 from the State Prosecutor`s Offices and Courts could be seen, that with regard to those **510 cases against 1026 natural and 133 legal persons**, the preliminary criminal procedures and criminal procedures were at the following stages on 31 December 2016:

*Table 4: Stage of procedures of cases connected with the criminal offence of money laundering on 31 December, 2016*

	<b>STAGE OF PROCEDURE</b>	<b>No. of cases</b>	<b>Domestic natural persons</b>	<b>Foreign natural persons</b>	<b>Domestic legal persons</b>	<b>Foreign legal persons</b>
<b>1</b>	SP*: decision has not been made yet	112	178	52	28	3
<b>2</b>	SP: criminal charge rejected	74	116	26	31	4
<b>3</b>	SP: prosecution has been delayed	1	1	-	-	-
<b>4</b>	SP: demand for investigation	31	85	12	10	6
<b>5</b>	IJ*: investigation has been introduced	56	124	8	18	1
<b>6</b>	COURT: indictment	74	129	13	11	3
<b>7</b>	COURTS: Convictions	69	103	9	5	1
<b>8</b>	COURT: Acquittals (final)	22	29	8	4	1

<b>9</b>	SP: Withdrawal from prosecution	28	68	7	3	-
<b>10</b>	COURT: Stop of the criminal procedures	20	26	6	1	-
<b>11</b>	COURT: Withdrawal of prosecution abroad	6	-	8	1	-
<b>12</b>	"Pre-qualification" of criminal offence (concealment)	5	11	-	-	-
<b>13</b>	Union of procedures	12	7	-	2	-
	<b>TOTAL:</b>	<b>510</b>	<b>877</b>	<b>149</b>	<b>114</b>	<b>19</b>

\* SP means State Prosecutor Office

\*\* IJ means Investigative Judge

From the Table 4 can be seen, that on 31 December 2016, **236 (of 510) cases** connected with the criminal offence of money laundering, **became final** as follows:

- **In 74 cases, State Prosecutor`s Office rejected the criminal report**
- **In 22 cases, the final acquittals were pronounced**
- **69 cases ended with the final conviction**
- In 48 cases, State Prosecutor`s Offices withdrew of prosecution or the court stopped the criminal prosecution
- 6 cases were forwarded abroad for further procedures
- 5 cases ended with prequalification to other criminal offence
- In 12 cases, the courts and state prosecutor offices decided to unite the preliminary criminal procedures and criminal procedures.

In other 112 cases, the State Prosecutor`s Office has not decided on the criminal prosecution and in 1 case it postponed the prosecution, but **in 161 cases**, the State Prosecutor`s Office began with the pre-criminal and criminal proceedings at court, which were on 31 December 2016 at the following stages:

- In 31 cases, demand for investigation
- In 56 cases, the investigation has been introduced
- In 74 cases, the indictment has been filed.

In Table 5, you will find the number of all cases on the last day of the particular year, where the criminal proceedings due to the criminal offence of money laundering have started. It could be seen that in the last 6 years the procedures in approximately 59 new cases connected with the criminal offence of money laundering have been introduced.

**Table 5: Comparison of the number of cases connected with committing the criminal offence of money laundering with regard to the stages of procedures on the last day of the particular year (2010 – 2015)**

Stage of Procedure	2010	2011	2012	2013	2014	2015	2016*
SP: decision has not been made	59	75	64	80	104	94	112
SP: criminal report rejected	15	17	50	56	55	65	74
SP: prosecution has been delayed	-	-	1	1	1	1	1
SP: demand for investigation	15	30	21	27	20	27	31
IJ: investigation has been introduced	23	25	37	53	60	53	56
COURT: indictment	17	27	39	50	56	74	74
COURT: conviction	3	5	9	26	45	57	69

COURT: judgment (not final)	1	2	0	0	0	0	0
COURT: final acquittal	10	10	13	15	16	19	22
COURT: final judgment - concealment	-	-	3	3	3	3	3
SP: withdrawal of prosecution, limitation etc.	11	15	24	29	20	25	28
COURT: stop of the criminal procedure	-	-	-	-	13	17	20
COURT: forwarding of criminal files abroad	4	4	4	5	6	6	6
Pre-qualification” of criminal offence (concealment)	-	-	-	-	2	2	2
Union of procedures	-	-	-	3	6	12	12
<b>TOTAL</b>	<b>158</b>	<b>210</b>	<b>265</b>	<b>348</b>	<b>407</b>	<b>455</b>	<b>510</b>

\*Data in column for the year 2016 is the sum, so if you want to have the data just for the year 2016, you have to deduct the data for 2015 from the data for 2016.

From the Table 5 could be seen, that the number of cases, where the State Prosecutor Office decides on the prosecution has slightly increased. The number of rejected cases increased rapidly only in 2012, which was the consequence of the legislation referring to the incrimination of tax evasion in higher amount (which exceeded 50.000 EUR of concealed taxes), which also influenced to the number of the rejections of prosecutions. The majority of rejected criminal reports referred to the reports filed before 2013, as their number in the period 2013-2016 was just 18.

Until the end of 2016, the courts pronounced 69 judgments in 69 cases due to committing the criminal offence of money laundering. In 161 cases, the state prosecutors offices decided for prosecution and they have been in stages of demand for investigation, investigation or indictment. The number of cases, concluded in any other way, did not increase significantly.

**In the last four years we have been noticed the constant number of cases related to committing the criminal offence of money laundering, which ended with the final conviction. The rapid increase of final judgments could also be confirmed by the data, that the courts pronounced 60 judgments in the last four years, as in the period 1995-2012 this number was only 9.**

## 5. PREVENTION AND SUPERVISION

In 2016, the activities of the OMLP in the field of prevention and supervision were as follows:

- preparation of the new APMLFT-1, which will replace the existing APMLFT, and its adoption
- preparation of by-laws issued on the basis of APMLFT-1;
- preparation of opinions and views with regard to the implementation of the APMLTF and bylaws, issued on its basis;
- participation in the bodies of Council of Europe and European Union, which deal with the prevention and detection of money laundering and terrorist financing,
- supervision on the implementation of the provisions of the APMLTF by organizations stated in Article 4 of the APMLTF;
- participation in the professional training of staff of the obliged entities, state authorities, organizations with public authorizations, cooperation in the training of the foreign counterparts and bodies
- ongoing editing of the website of the OMLP in accordance with the Act on the Access to the Information of Public Character.



## **5.1 Preparation of new APMMLFT**

In 2016, the OMLP continued with the preparation of new APMMLFT-1, which replaced the existing APMMLFT due to new rules adopted by FATF and EU in the field of the prevention of ML/FT.

Namely, in February 2012 the revised FATF recommendations came into force, which have to be taken into consideration by the countries at performing their measures of detection and prevention of money laundering, financing of terrorism and as new – proliferation. Previous 40 recommendations for money laundering and 9 specific recommendations for terrorist financing have been merged to 40 standards. Recommendation No. 1 (R1) has been one of the most important recommendations, as it demands from the states to perform (beside the sectorial risk analysis) also the national risk analysis for money laundering and terrorist financing. As FATF expanded the recommendations, the EU has prepared the new fourth . AML/CTF Directive 2015/849 EU, which supposed to be implemented to the national legislation until 26 June 2017. Due to the terrorist threats, the European Commission published in February 2016 the Action plan to fight against financing of terrorism, on which basis the countries were encouraged for the earlier implementation of this Directive – until the end of 2016. Therefore the existing APMMLFT was be replaced with the completely new law, which is also very important due to the 5<sup>th</sup> Round Evaluation of Slovenia by the MONEYVAL, which took place in 2016.

Another reason for the adoption of the new law is also the action plan for execution of MONEYVALs recommendations, which was adopted by the Government of the Republic of Slovenia on 13 January 2011 by decision No. 46000-2/2010/3, determining the competent authorities to perform adequate measures.

Other reasons for the preparation of the law were certain deficiencies, which influence to efficiency of the system as a whole and should be removed by new legislative provisions.

On 20 October 2016, the Parliament of the Republic of Slovenia adopted APMMLFT-1 at its 23 session, it came into force on 19 November 2016.

The main novelties of APMMLFT-1 are as follows:

- expansion of the number of obliged entities (all organizers of games of chance, Bank Assets Management Company, Slovenian Sovereign Holding);
- determination of exemptions referring to the financial activities;
- the introduction of the approach, based on risk analysis at national and supra-national level, level of obliged entities and in the field of supervisors` activities;
- determination and checking of the identity of the client without his personal attendance with the use of video-electronic identification;
- amendment of the definition of beneficial owner;
- establishment of the Register of beneficial owners;
- obligation of business subject to report data on their beneficial owners to the Register of beneficial owners;
- expansion of the term of politically exposed persons (including also domestic PEPs);
- decrease of threshold from 30.000 EUR to 15.000 EUR, when the obliged entities should report to OMLP data on cash transactions;
- obligation of lawyers, law companies and notaries to report cash transactions to OMLP;
- introduction of the definition of suspicious transactions;

- prolongation of the temporary postponement of transaction from 72 hours to 3 working days;
- inspection powers of OMLP;
- introduction of the reporting system on violations;
- introduction of the obligation to disclose the information on supervisory measures imposed and violators` identity;
- adoption of the criminal provisions for violations of non-implementation of the law according to the Directive 2015/849/EU.

## **5.2 Written opinions and views referring to the implementation of APMLFT and APMLFT-1**

In 2016, the OMLP gave 55 written opinions/points of view with regard to the explanation of APMLFT and APMLFT-1, namely 5 opinions to the requests of the supervisory authorities according to the APMLFT and APMLFT-1; 1 opinion to the request of foreign FIU; 2 opinions to the request of the state authorities; 10 opinions to the requests of the banks; 7 opinions to the requests of lawyers; 30 opinions to the requests of other obliged entities and natural persons.

The OMLP gave opinions/points of view with regard to the following questions:

- customer due diligence by opening of the accounts or establishment of the permanent business relationship
- identification of the beneficial owner
- prohibition to disclose data
- CDD via third person
- politically exposed persons
- limitations of cash transactions
- occasional transaction
- update and keeping of data
- performing of other duties according to the APMLFT and APMLFT-1.

The majority of the OMLP`s written opinions has been published on the website of the OMLP to be available to all organizations and other obliged entities.

## **5.3. Activities within the international bodies**

The activities of the OMLP were in 2016 in a large extent connected with the MONEYVAL Committee at the Council of Europe and Committee for the Prevention of Money Laundering and Terrorist Financing at European Commission.

### ***5.3.1 Council of Europe***

In 2016, there were three Plenary Meetings of MONEYVAL in Strasbourg, participated also by the representatives of OMLP, their contents can more precisely be seen below:

#### **50th Plenary Meeting MONEYVAL (April 11 – 15, 2016))**

At this meeting, the 5<sup>th</sup> Round Evaluation Report of Serbia was discussed and adopted. Beside this, progress reports of Czech Republic, Montenegro, Lithuania, Croatia, Moldova,

Slovakia, Romania, Macedonia and Poland were discussed and adopted as well. The new Rules of Procedure for 5<sup>th</sup> Round Evaluation were presented, mainly procedures in case of insufficient effectiveness of some countries at prevention of ML/FT and therefore low ratings received within evaluation.

#### 51<sup>st</sup> Plenary Meeting MONEYVAL (September 26-29, 2016)

At this plenary, the 5<sup>th</sup> Round Evaluation report of Hungary was discussed and adopted. Beside this, the progress reports of Montenegro, Czech Republic, Estonia, Liechtenstein, Moldova, Latvia and Bulgaria were discussed and adopted as well. The representative of FATF presented changes of FATF recommendation N. 8 (R8), on which basis all NPOs have been exposed to FT, therefore appropriate measures should be implemented to the abuse of NPOs.

#### 52<sup>nd</sup> Plenary Meeting MONEYVAL (December 5-9, 2016)

At this plenary, the 5<sup>th</sup> Round Evaluation Report of Isle of Man was discussed and adopted. The progress reports of Czech Republic, Montenegro, Israel, Croatia, Lithuania, Moldova, Slovakia, Azerbaijan, Poland, Macedonia and Armenia were discussed and adopted as well. Due to insufficient progress, some of the afore mentioned countries will have to report on their further activities at the first MONEYVAL meeting in 2017, namely between 29 May 2017 and 2 June 2017.

At all plenary meetings, the international organizations (FATF, IMF, World Bank, EGDMONT, European Commission etc.) informed the participants on their activities from the field of the prevention of ML/FT and the MONEYVAL Secretariat presented the draft schedule of meetings for the year 2016.

In the year 2016, the 5<sup>th</sup> Round Evaluation Procedure of MONEYVAL began in Slovenia as well, namely the country received two huge questionnaires referring to the technical compliance and effectiveness, to which the competent authorities and bodies prepared replies together with additional documentation. In the period November 7 – 18, 2016, the evaluators visited Slovenia and met with more than 150 representatives from approximately 60 different state authorities, supervisory institutions and private sector, to convince themselves “on-site” on the effectiveness of the system of prevention of money laundering and terrorist financing of Slovenia. On the basis of gathered information and documentation, the evaluators prepared the draft of the report, to which additional data and explanation were provided. The 5<sup>th</sup> Round Evaluation Report of Slovenia will be discussed at the first MONEYVAL Plenary in 2017, namely from 29 May 2017 and 2 June 2017.

### **5.3.2 European Union**

#### Experts Group on Money Laundering and Terrorist Financing - EGMLTF

The European Commission published on 2 February 2016, the Action plan on strengthening of the fight against FT, with regard to the increased terrorist activities in EU and according to the adopted conclusions of ECOFIN meetings. On this basis, it prepared the proposal of Directive on changes of Directive 2015/849/EUR on prevention of use of financial system for ML/FT, which changes and amends two Directives, namely Directive 2015/849 and Directive 2009/101/EC on harmonization of safeguards of interests of partners and third persons, demanded by the EU member states from economic subjects. The purpose of

changes of Directive 2009/101/EC was to increase the transparency of beneficial owners of legal persons due to avoidance of taxes (“Panama papers”) and money laundering. The main changes of directive refers to the introduction of the in-depth customer review from third countries with high risk; increased competences of FIUs from EU; establishment of centralized national registers of bank and payment accounts; controlling of FT risks connected with virtual currencies and anonymous prepayment instruments (prepayment cards).

#### EU-FIU Platform

In 2016, there were four EU-FIU platform meetings organized in Brussels – two of them were attended by the representative of OMLP. The first meeting was held on 12 May 2016 and the second between December 15-16, 2016. The main topics of FIU platform meetings in 2016 were: the improvement of international cooperation; aggregation of two IT systems for exchange of information FIU.NET and SIENA, cross border reporting of suspicious transactions and fight against FT. The second meeting was also attended by the representatives of FIUs from Middle East and South East Asia with the purpose to discuss on the future global EU programme on prevention of ML/FT.

#### **5.4 Participation at professional training**

Point 6 of Paragraph 1 of Article 43 of the APMLFT and the “Rules on Performing Internal Control, Authorized Person, Safekeeping and Protection of Data and Keeping of Records of Organizations, Lawyers, Law firms and Notaries” (Official Gazette of the Republic of Slovenia No. 10/08) determine that the obliged entities from Article 4 of the APMLFT have to provide for regular professional training related to the detection and prevention of money laundering and terrorist financing of all employees performing duties according to the APMLFT. Article 70 of the APMLFT also prescribed, that the OMLP takes an active role in such an education as well.

*On this basis and within the international cooperation, the representatives of the OMLP performed 28 hours and 25 minutes of lectures in 2016 within different seminars in Slovenia and abroad.*

## **6. INTERNATIONAL COOPERATION**

The legal basis for the international activities of the OMLP is determined by Articles 65, 66 and 67 of the APMLTF (or Articles 105, 106 and 108 of APMLFT-1, which came into force on 19 November 2016), authorizing the OMLP to exchange the information with foreign counterparts competent for the prevention of money laundering and terrorist financing. The chapter of the APMLTF referring to the international cooperation also determines conditions under which the OMLP can temporarily postpone a transaction on the basis of the initiative of the foreign FIU and enables the OMLP itself to give (within its obligations of the prevention of money laundering and terrorist financing) an initiative to a foreign authority for the temporary postponement of transaction on the basis of the grounded suspicion on money laundering and terrorist financing.

The OMLP has obtained certain competences on the basis of the Council of Europe “Convention No. 198 on laundering, search, seizure and confiscation of the proceeds from

crime and on the financing of terrorism” (hereinafter: Convention No. 198), which was adopted by the Board of Ministers of the Council of Europe on 16 May 2005. Slovenia signed it on 28 March 2007, ratified on 26 April 2010, so it came into force on 1 August 2010. The OMLP was foreseen as the central authority, competent for receiving and sending the requests referring to the money laundering, search, seizure and confiscation of the proceeds from crime and financing of terrorism.

Below you will find the activities of the OMLP from the field of the bilateral cooperation.

### **Bilateral cooperation**

**For bilateral cooperation of OMLP, numerous contacts with its foreign counterparts were characteristic in the year 2016 as well.**

**In 2016, the OMLP sent on the basis of Article 65 of APMLFT (Article 105 of APMLFT-1) 193 requests in 115 cases to 41 countries and on the basis of Article 67 of APMLFT (Article 108 of APMLFT-1) sent another 122 spontaneous information to 16 countries.**

**On the basis of the Article 66 of APMLFT (Article 106 of APMLFT-1), the OMLP received 131 requests in 119 cases from 40 countries and on the basis of the Article 67 of APMLFT (Article 108 of APMLFT-1) 24 spontaneous information from 13 countries.**

In comparison with the year 2015, when OMLP sent 201 requests in 165 cases to 37 countries and received 165 requests in 135 cases from 37 countries, it could be established **that the number of sent requests decreased for 4% and the number of received requests for 20%**

**With regard to spontaneous information on the basis of the Article 67 of APMLFT (Article 108 of APMLFT-1), the OMLP sent in 2015 53 such information and received 15 of them. It could be established, that the number of spontaneous information increased significantly in 2016, as the number of such information, sent by OMLP was higher for more than 130% and the number of received information was higher for 60%.**

The majority of information was exchanged with FIUs from Italy, Croatia, Austria, Germany and Serbia.

### **Memorandum of Understanding**

The existing cooperation between FIUs can also be upgraded with signing of legally non-binding documents, so called “Memorandum of Understanding”. In 2016, the OMLP signed such document with FIU St. Maarten.

## **6 FINANCIAL AND MATERIAL OPERATIONS**

The budget funds intended for the OMLP operations in the year 2016 amounted to **708.897 EUR**, which were divided as follows:

- 648.020 EUR - for salaries, other personal incomes and contributions of the employer for the social security
- 45.393 EUR - for costs of goods and services
- 5.527 EUR - for the membership fee of the EGMONT group.