

# **ESTRATEGIA NACIONAL**

**PARA PREVENIR Y COMBATIR EL LAVADO DE ACTIVOS Y EL FINANCIAMIENTO DEL TERRORISMO**

## **Asset Laundering Case Involving Corruption**

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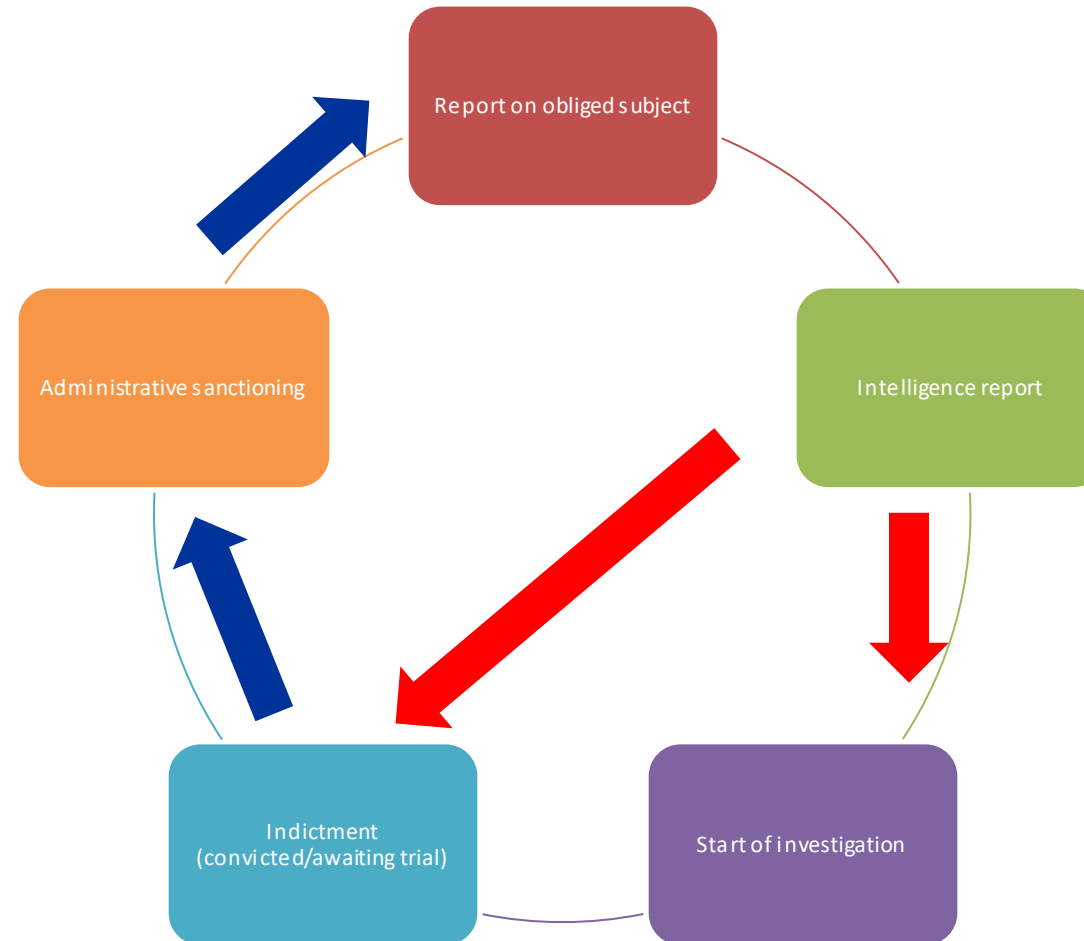
**June 14, 2021 (Fifth session)**

## Agenda

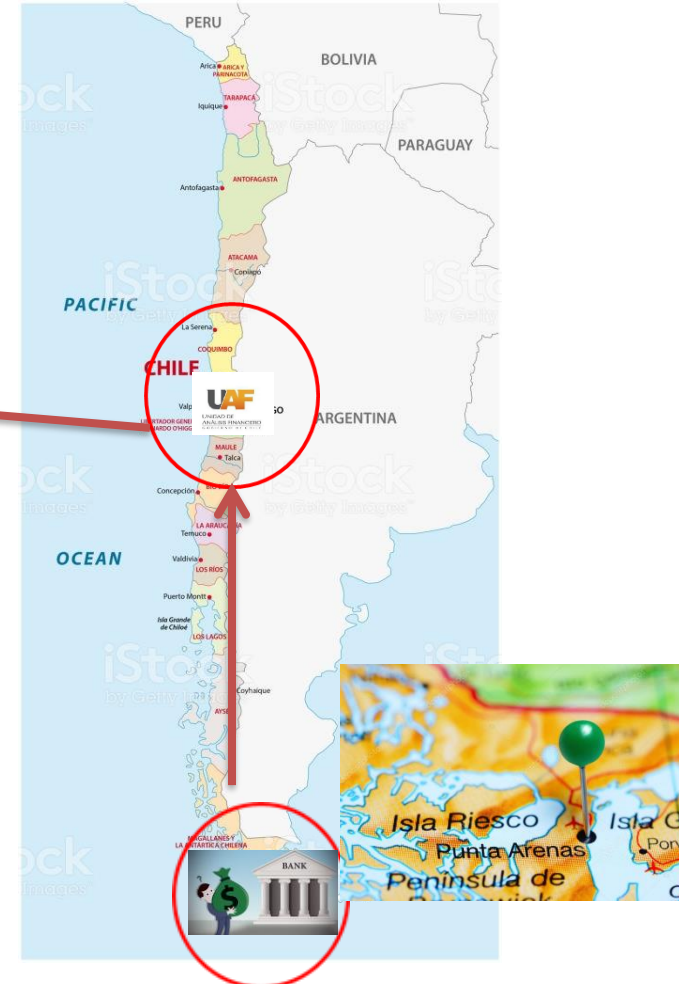


- I. Cyclical collaborative process between the UIF and the OIC.
- II. Challenges of "investigating in reverse", using the potentialities of the system.
- III. Structure of the Austral Green Case/results.
- IV. Administrative consequences due to a lack of reporting.
- V. Conclusions

## Cyclical Collaborative Process

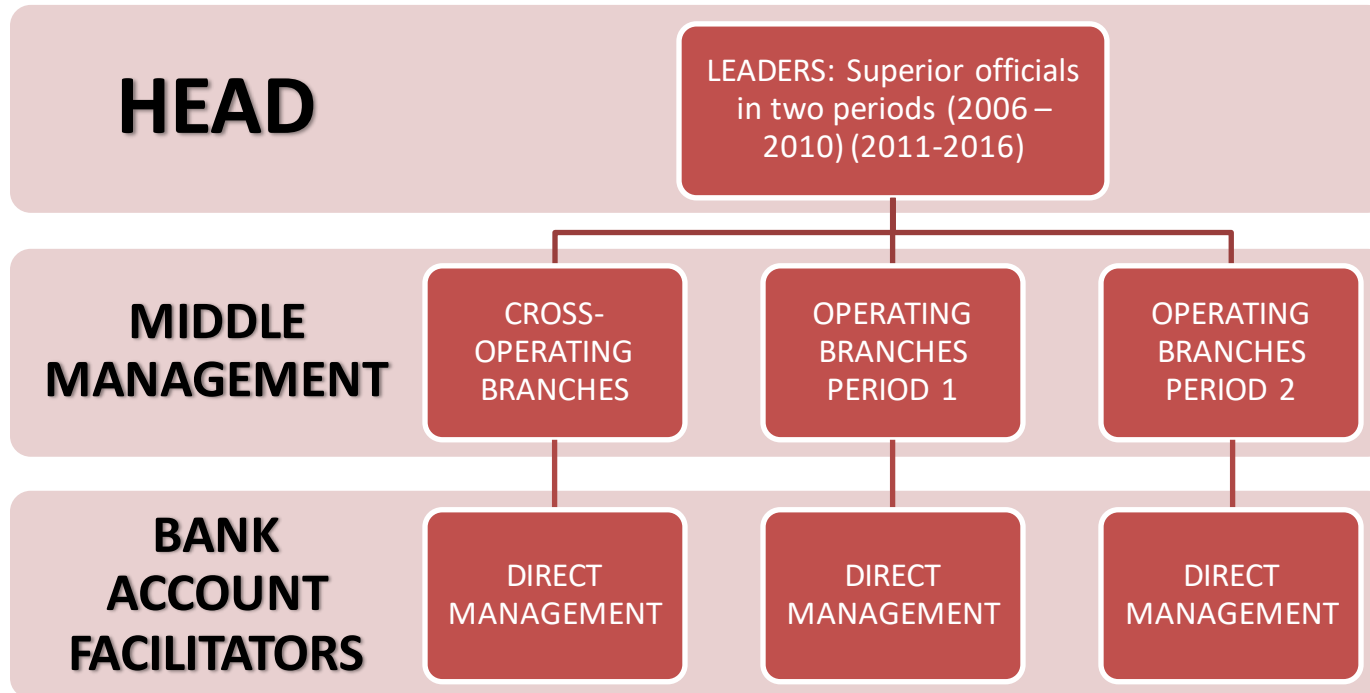


## Challenges of "investigating in reverse", using the potentialities of the system.



**"AUSTRAL GREEN" CASE**  
EMBEZZLEMENT OF THE CARABINEROS  
DE CHILE FOR AT LEAST 40,000.00

## Structure of the case

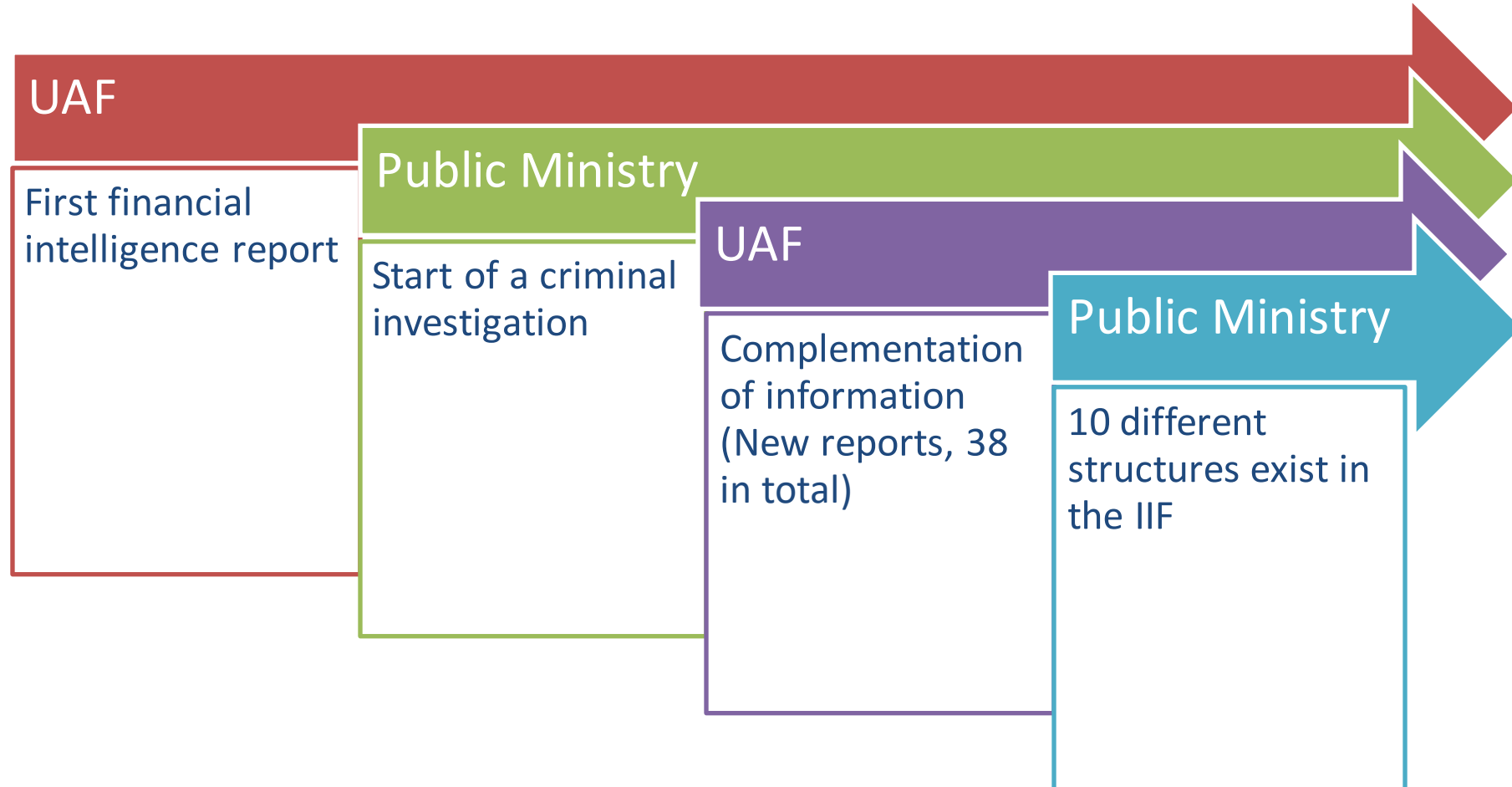


**12** intelligence reports in other structures

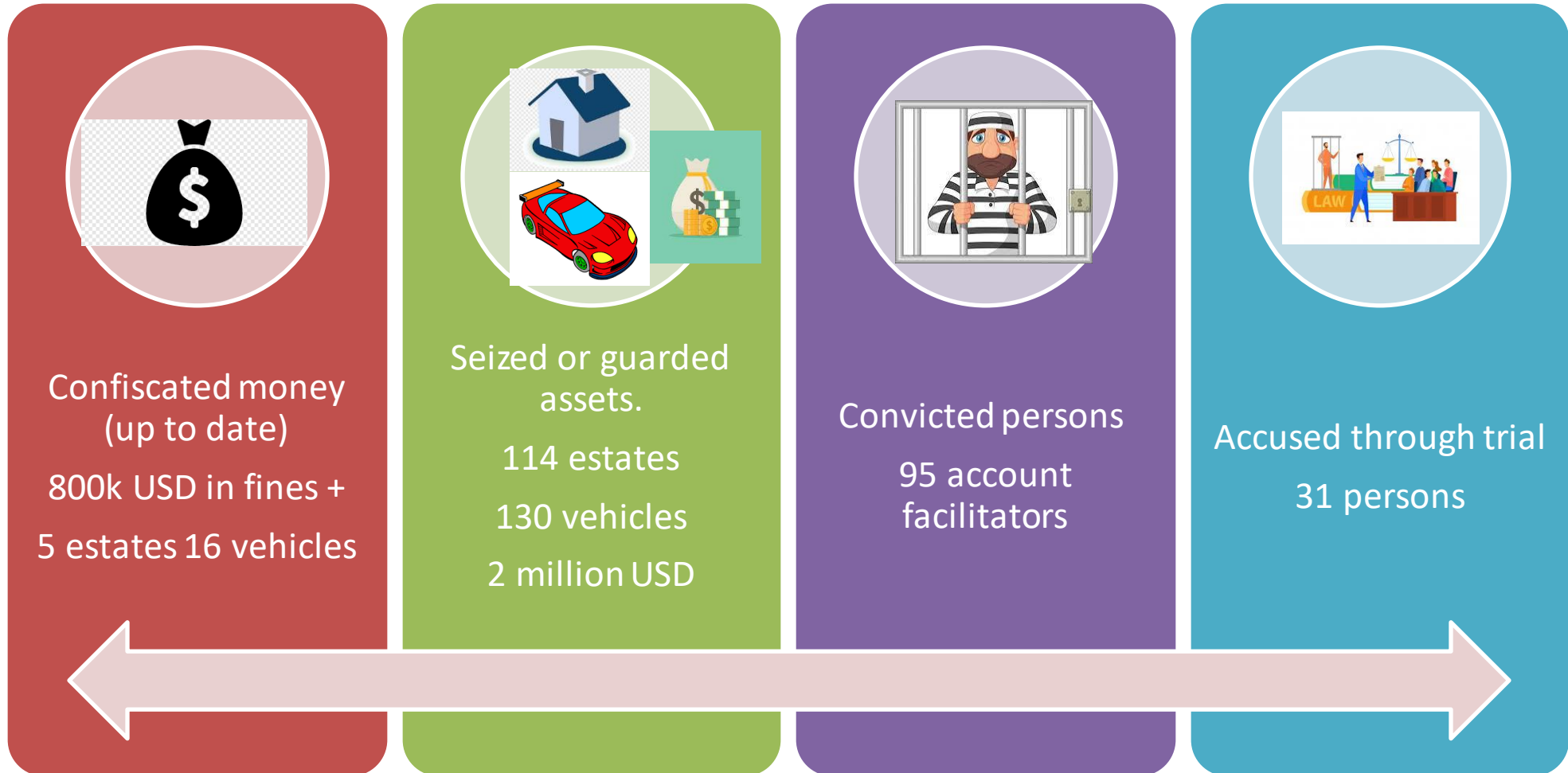


**26** intelligence reports in main structure

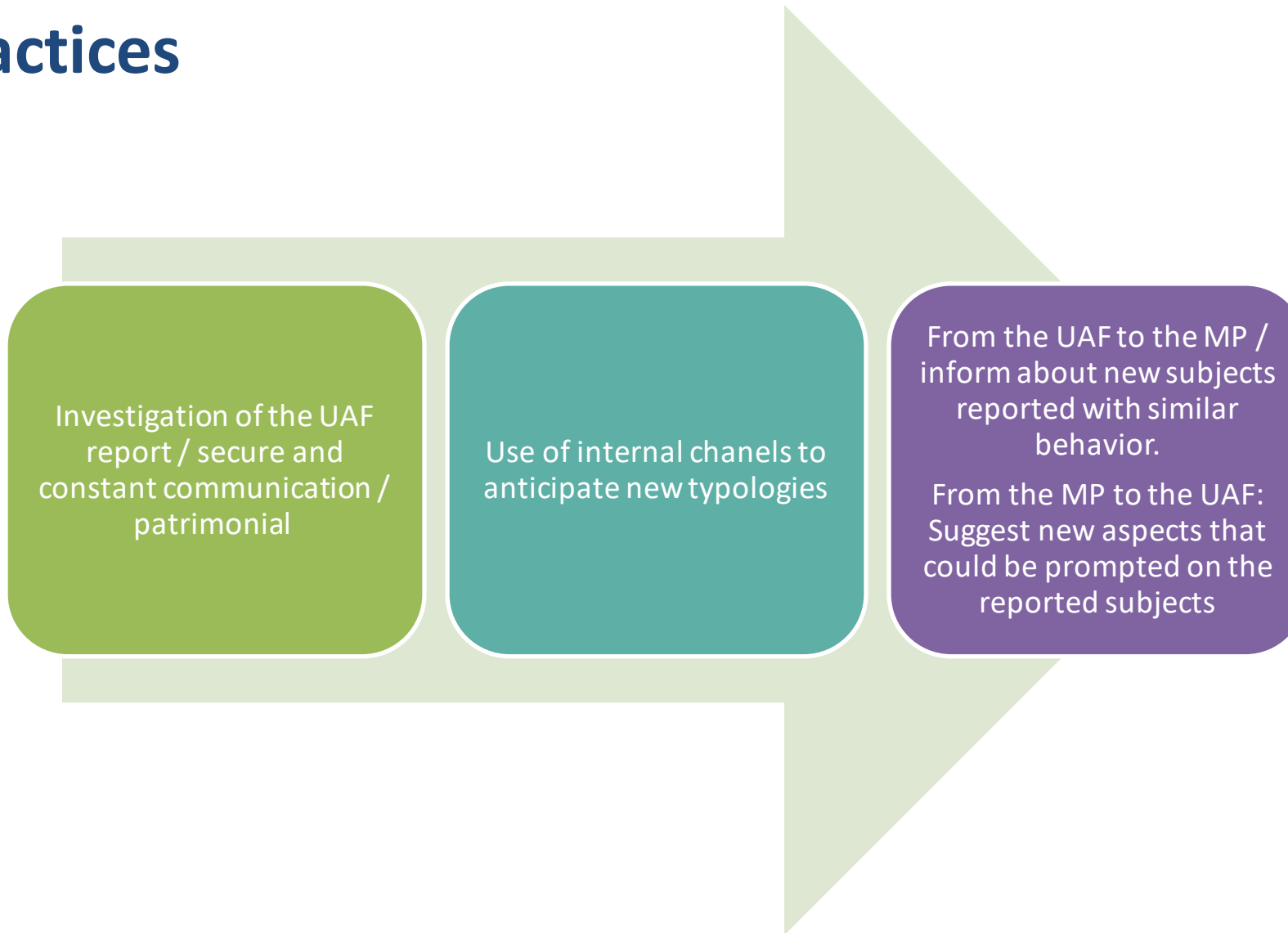
## Flux of information



## Results of the case



## Good practices





# Administrative Consequences Due to a Lack of Report

## Legal Framework

Law 19.913 states "*A suspicious operation is understood to be any act, operation or transaction that, according to the uses and customs of the activity in question, is unusual or lacks any apparent economic or legal justification...*".

Obligation supplemented by **regulatory norm**. The report must be made in the **shortest time possible**.

Failure to comply with the legal and regulatory mandate enables the imposition of sanctions, after an administrative procedure.



## II. Fraud and Late Reporting

Large-scale tax fraud in the police was carried out, among others, through banking institutions.

After the fraud was made public, a group of banking entities reported as suspicious deposits received by public officials of the institution where the fraud occurred.

An intelligence analysis report showed that some of these reports took place more than **2 years** after the transaction occurred.

The delay was considered a violation of the obligation to report in the "**shortest time possible**".



## III. Suspicion Rating



Operations became suspicious once fraud was known.



Known origin and "legality" of state funds.



Orientation to determine prior crimes or laundered assets.



Revision of previous questions with new criteria.



Suspicion as an objective question. Alert signals defined by the UAF.

## Conclusions:

1. Importance of **collaborative work**, respecting the fields of competence of each institution.
2. Collaboration does not end in certain activities or milestones, **it must be maintained continuously**.
3. The various institutions that are part of the ML/TF system that act collaboratively achieve **important synergies**.



**THANK YOU VERY MUCH**

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