

SPECIAL
INVESTIGATION
COMMISSION
Fighting Money Laundering

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SPECIAL
INVESTIGATION
COMMISSION

Fighting Money Laundering



Banque du Liban

Special Investigation Commission

Fighting Money Laundering



Dear SIC Members, Secretary and Staff

It gives me great pleasure to present to you the first annual report, which concludes the operations of the Commission for the period ending December 31, 2001. Notwithstanding the belief that Lebanon does not witness any large scale of money laundering related activities, still we regard Law 318 as a milestone on the path for Lebanon to attain the recognition it deserves by the international community. We, as well, consider Law 318 essential in promoting the integrity of our banking and financial sectors and maintaining its attractiveness for investors.

Pursuant to Law 318, the Commission proceeded on setting the stage for implementing the provisions of the Law and engaged itself in operational, regulatory and organizational matters that were necessary to discharge its duties under the said law. The Commission issued three circulars, including a special form to be used by various reporting entities when reporting suspicious transactions. On May 18, 2001, Banque du Liban issued circular No. 83 that dealt with KYC and other related matters.

As indicated in the report, the Commission received twenty-nine cases since commencing its operations. Banking secrecy was lifted off twenty-two cases that were passed on to the competent authority and the concerned party as called for by Law 318. It is worth mentioning that seventeen cases originated from competent foreign authorities and that our commission was forthcoming in cooperating with several foreign authorities in the fight against terrorism.

The Commission hired its Secretary, Dr. Muhammad Baasiri, who previously served for ten years as chairman of the Banking Control Commission, and who also was the IMF external consultant with the Central Bank of Oman. The Secretary oversees three units: Audit & Investigation Unit, Financial Investigation Administrative Unit and Information Technology & Security Unit.

The Secretariat that is mandated to carry out the decisions of the Commission was heavily engaged in investigating the cases reported to the Chairman, training and development of staff and setting up systems and procedures that are necessary to ensure the proper professional standing. The Secretariat also started evaluating compliance of reporting entities.

Looking forward, we at the Commission and at Banque du Liban will remain committed towards promoting best practices and international standards in the financial sector by requiring banks and other reporting entities to have in place the adequate systems of internal controls to prevent and monitor suspicious transactions. The Commission is also keen on coordinating with local interagency and foreign competent authorities in the fight against money laundering. We will continue to create the necessary awareness concerning methodologies and technological evolution through seminars and group discussions. Training the SIC's staff is an on-going process and it will always receive our priority.

Concluding, I would like to point out to your good attention that due to the efforts exerted by the people of the Commission, I remain optimistic that Lebanon will be deservedly removed from the list of Non Cooperating Countries and Territories and that Lebanon will be an effective player in the international arena in matters concerning the fight against money laundering.

Very truly,

Riad Salamé
Banque du Liban, Governor
Special Investigation Commission, Chairman



Special Investigation Commission
Fighting Money Laundering



Dear SIC Staff

Let me begin by expressing my deepest regards to the efforts made by all of you in the course of discharging your duties as prescribed by the Law. The team spirit prevailing at the Secretariat has been the driving force behind all the accomplishments achieved to date.

Since September 1, 2001 the day we commenced our duty, a tremendous amount of work has been done in implementing the related Law and circulars. Several cases were investigated in the most professional manner, and the proper recommendations were passed on to the Commission for decision. Due to the collaborative effort shared by every staff member, I am proud to announce that our organization is being run in line with standards similar to those existing at reputable counterparts. Your continuous training and development has tremendously contributed to the high standing of the Secretariat. This report, the SIC website, the examination and compliance manuals, the application system (SIERS) are only samples of what has been achieved to date.

On this occasion, I would like to extend my sincerest appreciation to the commitment and support lent to us by the Commission and its Chairman, that enabled us to carry out the decisions of the Commission in an effective and efficient manner.

We at the Secretariat, proudly feel that we belong to an institution that embodies integrity and professionalism as prerequisites for success. As we move forward, I would like to assure you that with hard work and dedication to excellence, your institution is guaranteed to gain the recognition it deserves, both locally and internationally.

Sincerely,

Muhammad Baasiri
Special Investigation Commission, Secretary



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SPECIAL INVESTIGATION COMMISSION

Fighting Money Laundering

Introduction

The Special Investigation Commission (SIC) was established in April 2001 as the latest and most effective measure to manage anti-money laundering efforts in Lebanon. The establishment of the SIC which came through passing of Law 318, was partially a continuing development of the quickly evolving Lebanese anti-money laundering laws and regulations, as well as a response to the growing international demands to comply with newly established international standards.

The SIC has been given special importance to reflect the seriousness that the banking community in Lebanon in particular, and the Government in general, place on Lebanon's credibility in the international financial community. This is because this credibility is critical for an economy and a banking sector that depend heavily on inward remittances and free capital movements.

Money laundering activities have globally reached in the recent past unprecedented levels due to the globalization process that involves various financial operations across the world. The IMF estimates the volume of such activities at around 2% to 5% of the world GDP.

In the face of the rising concerns, the G-7 countries decided in 1989 to set up the Financial Action Task Force (FATF) to deal with the combating of money laundering. FATF, which consists of twenty-nine countries and two regional organizations, is primarily concerned with alerting the various countries to the dangers and implications of money laundering activities, monitoring their trends and issuing recommendations in order to take appropriate measures to combat those activities, as well as to assess the progress made thereon.

In April 1990, FATF issued forty recommendations thus setting the stage for a comprehensive action plan for combating money laundering. In February 2000, FATF published twenty-five criteria describing practices that could hinder international cooperation in the combating of

money laundering. Subsequently, and during the year 2000, FATF reviewed the related systems existing in several countries and in June of same year fifteen countries and jurisdictions, including Lebanon were placed on the list of Non-Cooperating Countries and Territories (NCCT).

FATF placed Lebanon on the NCCT list, as it considered it to be deficient with respect to fifteen criteria, with its Banking Secrecy Law being an obstacle that hinders the competent authorities in their investigation of money laundering activities, and hence Lebanon's cooperation with the international community was considered unsatisfactory. Accordingly, FATF asked the NCCT to take corrective measures and have in place adequate systems for fighting money laundering in order to avoid any possible sanctions.

Prior to Law 318, Lebanon took significant steps regarding the issue of combating money laundering. In 1996, a "Due Diligence" convention was signed between the Lebanese Bankers Association and member banks outlining procedures and specifics such as verifying the identity of customers and beneficial owners for the purpose of combating the laundering of proceeds related to illegal trade of narcotics. Banque du Liban and the Banking Control Commission officially adopted the Convention and required banks and financial institutions to comply with it.

Since June 2000, Governor Riad Salamé and his team from Banque du Liban have been meeting on several occasions with the FATF Review Group and discussing further steps that Lebanon needs to take and those that have been started for the purpose of removing Lebanon from the NCCT list and complying with the international standards.

On April 20, 2001, the Lebanese Parliament passed Law 318 and shortly after, Banque du Liban issued circular 83 that outlines the regulations on the control of financial and banking operations for fighting money laundering in line with international standards concerning the combating of money laundering.

Following the enactment of the above Law, the Special Investigation Commission commenced its operations and decided on important administrative matters, including the appointment of the Secretary and staff, drawing up of the organizational chart and laying down the bylaws.

Through its Chairman, its members and executive staff, the Special Investigation Commission has quickly proved its efficiency in fighting money laundering. For this purpose, it held a series of meetings and took the necessary decisions and measures concerning various issues that were discussed in depth, with the contribution of two non-voting experts, the Third Vice-Governor of the Banque du Liban and the Director of the BDL Legal Department. It is to be noted that both of them have actively participated in the preparation of Law 318 and the

relevant regulatory texts, and in the preparation of the SIC regulatory texts. They participated also in the various meetings held with the Financial Action Task Force on money laundering to discuss the measures that have been taken by the Lebanese authorities, in order to have Lebanon removed from the list of non-cooperating countries and territories.

The seriousness given to anti-money laundering efforts has been reflected by the finality of the authority the law vested in the Special Investigation Commission. The effectiveness of the SIC stems also in great part from the fact it enjoys both independence and immunity. These privileges and protections are both given to it (a) by the law which established the SIC and (b) by virtue of the professional capacity of the individuals who compose the SIC.

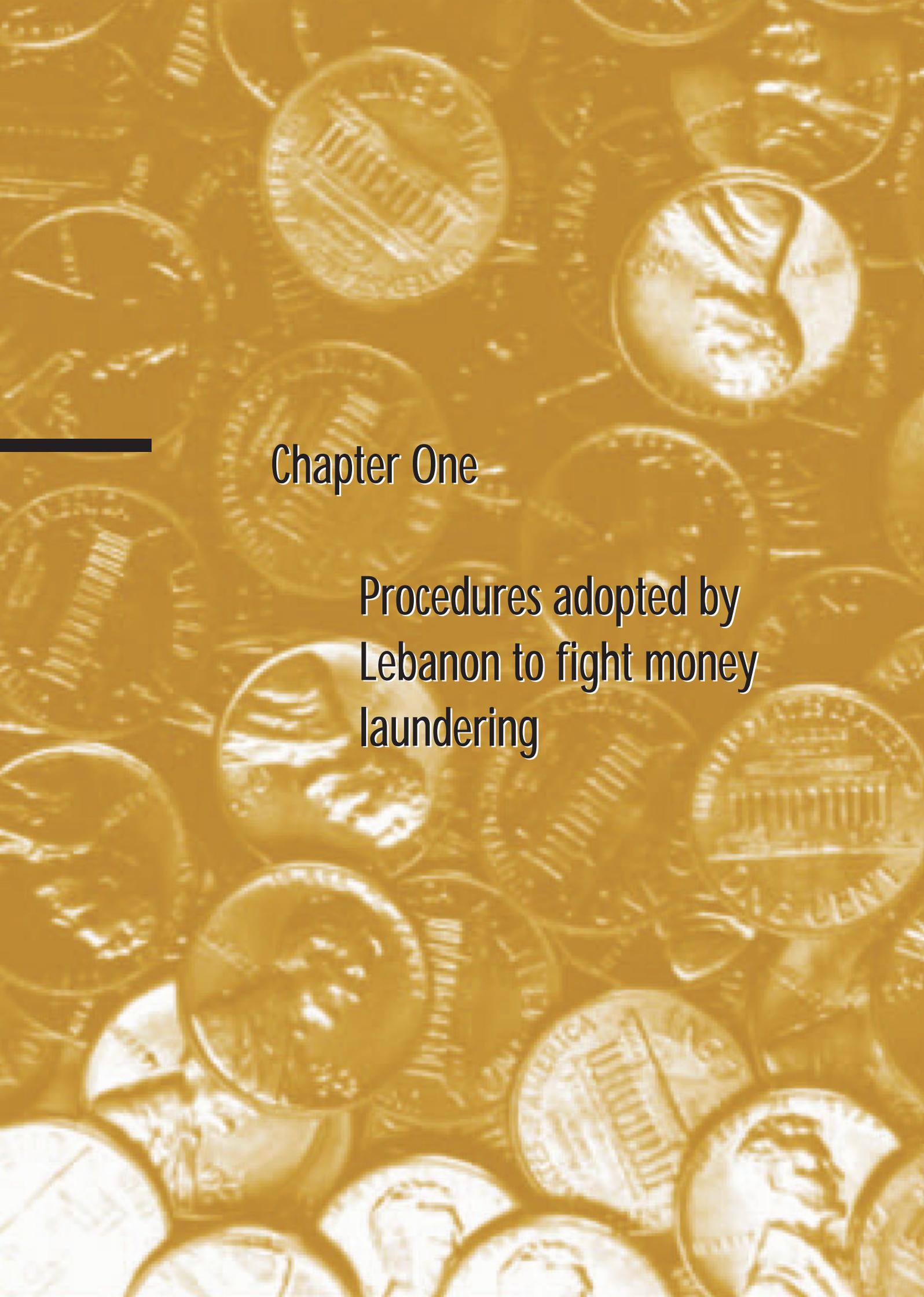
The Special Investigation Commission that was set up by the above Law is an independent legal entity with judicial status. The Commission has the exclusive right to lift banking secrecy for use by the competent authorities and the Higher Banking Commission. Within the scope of their duties under the provision of this Law, the Chairman, members of the Commission, Secretary, and the staff and delegates shall enjoy immunity. In consequence, they may not be prosecuted or sued, neither collectively nor individually, for any civil or criminal liability related to the discharging of their duties, including offences specified by the Banking Secrecy Law of September 3, 1956, except when any of them discloses banking secrecy. In discharging their duties under the provisions of this Law, or according to the decisions of the Commission, the banks operating in Lebanon and their staff shall enjoy the same immunity.

The independence and immunity of the SIC is also ensured by the fact that the SIC board is composed of some of the most senior officials in the banking regulatory and legal fields, who each individually have their immunity and privileges. As a case in point, the Governor of the Central Bank, who is also the SIC Chairman, enjoys full independence and immunity under Lebanese Laws in his capacity as Governor, and he is appointed for a fixed, six-year term that cannot be curtailed. The SIC other members are:

- (i) The President of the Banking Control Commission, or the member of the Commission designated by him.
- (ii) The judge appointed to the Higher Banking Commission, or his alternate.
- (iii) The attorney appointed by the Council of Ministers, or his alternate.

To confirm its credibility very quickly, the SIC first appointed Secretary is practically the most senior and specialized official that could fill this position, by virtue of his being the former chairman of Lebanon's Banking Control Commission for two consecutive five-year terms.

The SIC Secretariat staff are all university graduates and possess solid experience in fields such as: central banking, accounting & auditing, law and finance. In addition, the IT & security personnel enjoy a good command of their fields. The staff is undergoing rigorous and continuing training, both locally and abroad with foreign counterparts, and efforts are made for them to acquire knowledge in line with international standards.

The background of the entire page is a dense, overlapping pattern of gold coins. The coins are slightly out of focus, creating a textured, shimmering effect. The text is overlaid on this background.

Chapter One

Procedures adopted by Lebanon to fight money laundering

First: Law 318

● Article 1

Under the provisions of this Law, illicit funds are to be understood as any asset resulting from any of the following offences:

- 1 The growing, manufacturing or trading of narcotics.
- 2 Acts committed by associations of wrongdoers, that are specified by Articles 335 and 336 of the Criminal Code, and internationally identified as organized crime.
- 3 Terrorist acts, as specified in Articles 314, 315 and 316 of the Criminal Code.
- 4 Illegal arm trade.
- 5 The offences of stealing or embezzling public or private funds or their appropriation by fraudulent means, and which are punishable under Lebanese law by a criminal penalty.
- 6 Counterfeiting money or official documents.

● Article 2

Money laundering is any act committed with the purpose of:

- 1 Concealing the real source of illicit funds, or giving, by any means, a false statement about the said source.
- 2 Transferring or substituting funds known to be illegal for the purpose of concealing or disguising their source, or helping a person involved in the offence to dodge responsibility.
- 3 Acquiring, holding or using illicit funds, or investing such funds in purchasing movable or immovable assets, or in carrying out financial operations, while being aware of the illicit nature of these funds.

● Article 3

Any person who undertakes money-laundering operations, or intervenes or participates in such operations, shall be punishable by imprisonment for a period of three to seven years, and by a fine of no less than twenty million Lebanese pounds.

● Article 4

Institutions not subjected to the provisions of the Banking Secrecy Law of September 3, 1956, including individual institutions, namely exchange offices, financial intermediation companies, leasing companies, mutual funds, insurance companies, as well as companies promoting, building and selling real estate, and merchants dealing with high-value commodities (jewelry, precious stones, gold, art collections, antiques) must keep special records for operations that exceed an amount to be determined by the Banque du Liban in the regulations to be set out under Article 5 of this Law.

They must also ascertain, through official documents, the identity and address of each client, and must keep, for a period of no less than five years, photocopies of these documents, as well as photocopies of the operation-related documents.

● Article 5

Institutions subjected to the provisions of the Banking Secrecy Law of September 3, 1956 must control their operations with clients, in order to avoid involvement in what may conceal money-laundering operations resulting from any of the offences specified by this Law.

Within one month from the enforcement of this Law, the Banque du Liban shall establish and publish regulations setting out the rules of such control, including, as a minimum, the following obligations to be met by banks and financial institutions:

- a To ascertain the true identity of their permanent clients and that of the beneficial owner, when operations are carried out through proxies, through figureheads acting for individuals, institutions or companies, or through numbered accounts.
- b To apply the same identity verification process to transient clients, when the value of the requested operation or series of operations exceeds a specified amount.
- c To keep, at least for a five-year period after completing the operations or closing the accounts, photocopies of all operation-related documents, as well as photocopies of official documents about the identity of operators.
- d To identify signals revealing the existence of

money-laundering operations, and set out the principles of due diligence that could detect suspicious operations.

- e To refrain from delivering incorrect statements that aim at misleading administrative or judicial authorities.
- f To ensure that their auditors monitor the implementation of regulations to be set out under this Article, and that they report any violation to the Governor of the Banque du Liban.

● Article 6

- 1 An independent, legal entity with judicial status shall be established at the Banque du Liban, and shall discharge its duties without being under the authority of the Banque du Liban. Its mandate is to investigate money-laundering operations, and to monitor compliance with the rules and procedures stipulated by this Law. It will be named hereafter “**the Special Investigation Commission**” or “**the Commission**”.
- 2 The Special Investigation Commission shall consist of:
 - The Governor of the Banque du Liban or, in case of impediment, one of the Vice-Governors designated by him. *Chairman*
 - The President of the Banking Control Commission or, in case of impediment, a member of the Commission designated by him. *Member*
 - The judge appointed to the Higher Banking Commission or, in case of impediment, the alternate judge appointed by the Higher Judicial Council for a period equal to the term of the judge. *Member*
 - A member and his/her alternate recommended by the Governor of the Banque du Liban and appointed by the Council of Ministers. *Member*
- 3 The Special Investigation Commission shall appoint a full-time Secretary, who shall be responsible for the tasks assigned to him by **the Commission**, and for implementing its decisions. The Secretary shall directly supervise a special body of auditors designated by the Commission for the purpose of controlling and verifying the implementation of the

obligations mentioned in the said law. The said control shall be done on a continuous basis. And none of these shall be bound by the provisions of the Banking Secrecy Law of September 3, 1956.

- 4 The mission of the Special Investigation Commission is to investigate operations that are suspected to be money-laundering offences, and to decide on the seriousness of evidence and circumstantial evidence related to any such offence or offences.

When accounts opened at banks or financial institutions are suspected to have been used for money-laundering purposes, the lifting of banking secrecy provisions to the benefit of the competent judicial authorities and the Higher Banking Commission represented by its Chairman, shall be the exclusive right of the Commission.

- 5 The Commission is convened by its Chairman. It shall meet, at least, twice a month and as needed. The legal quorum requires the presence of three members at least.
- 6 The Commission shall take its decisions at a majority of the attending members. In case of a tie, the Chairman shall have a deciding vote.
- 7 The Commission shall establish, within one month from the enforcement of this Law, its own functioning rules and regulations governing its regular and contractual staff who are subjected to private law, namely the obligation of confidentiality.

In the framework of the budget prepared by the Commission and approved by the Central Council of the Banque du Liban, the expenses of the Commission and of its ancillary bodies shall be borne by the Banque du Liban.

● Article 7

- 1 The concerned parties referred to in Articles 4 and 5 of this Law must immediately report to **the Commission** the details of operations they suspect to be concealing money laundering.
- 2 In discharging their duties, the auditors of the Banking Control Commission must, through their Chairman, report to **the Commission** any operations they suspect to be concealing money-laundering operations.

● Article 8

- 1 Upon receiving information from the concerned parties mentioned in Article 7, or from official Lebanese or foreign authorities, **the Commission** shall convene immediately to consider the case.
- 2 After perusing the received information, **the Commission** shall, within a period of three working days, take a temporary decision to freeze renewable period of five working days, when the source of funds remains unknown or suspected to proceed from a money-laundering offence. During the said period the suspected account(s) for a one-time r, **the Commission** shall continue the investigation of the suspected account(s) either directly or through a delegated member of **the Commission** or a designated concerned responsible, or through its Secretary or an appointed bank auditor. All designated persons shall discharge their duties under the obligation of confidentiality, but without being bound by the provisions of the Banking Secrecy Law of September 3, 1956.
- 3 After completing its investigations, **the Commission** shall take, during the temporary freezing period of the suspected account(s), a final decision on whether to free the said account(s) if the source of funds is not found to be illicit, or to lift banking secrecy regarding the account (s) and maintain the freezing. If, at the end of the period stipulated in Paragraph 2 above, the Commission does not render any decision, the said account (s) shall be automatically deemed free. The final decision of **the Commission** is not subject to any ordinary or extraordinary form of administrative or judicial recourse, including recourse against abuse of authority.
- 4 In case of a decision on lifting banking secrecy, **the Commission** shall send a certified copy of its justified, final decision to the State Prosecutor of the Supreme Court, the Higher Banking Commission through its Chairman, the concerned party, the concerned bank, and the concerned foreign authority. This shall be effected either directly or through the official party through which the information has been received.

● Article 9

The Chairman of **the Commission** or his/her

directly designated delegate may communicate with any Lebanese or foreign judicial, administrative, financial, or security authority, in order to request information or know the details of previous investigations that are linked or related to ongoing investigations by **the Commission**. And the Lebanese authorities must immediately respond to such an information request.

● Article 10

The Commission shall establish a central system named **the Financial Investigation Administrative Unit**, which will function as the competent authority and the official center for monitoring, collecting and archiving information on money-laundering offences, and for exchanging information with foreign counterparts.

The Financial Investigation Administrative Unit shall periodically provide **the Commission** with all available information on money-laundering offences.

The Commission shall determine the number of the members of this unit, their functions and their compensation. When necessary, it shall take statutory disciplinary measures, including termination of employment in case of breach of duty, without precluding the possibility of civil or criminal prosecution. All these persons shall be submitted to the same obligations that bind the members of **the Commission**, especially the obligation of confidentiality.

● Article 11

Except for a decision by **the Commission** to lift banking secrecy, the reporting obligation stipulated by the present Law is absolutely confidential. This absolute confidentiality shall apply to any reporting, natural or moral person, as well as to the documents submitted for this purpose, and to the documents and procedures related to each stage of the investigation.

● Article 12

Within the scope of their duties under the provisions of this Law, the Chairman and members of **the Commission**, and **the Commission's** staff and delegates, shall enjoy immunity. In consequence, they may not be prosecuted or sued, neither collectively nor individually, for any civil or criminal liability related to the discharging of their duties, including offences specified by the

Banking Secrecy Law of September 3, 1956, except when any of them discloses banking secrecy.

In discharging their duties under the provisions of this Law, or according to the decisions of **the Commission**, the bank and its staff shall enjoy the same immunity.

● **Article 13**

Any person who violates the provisions of Article 4, 5, 7 and 11 of this Law shall be punishable by imprisonment for a period of two months to one year and a fine not exceeding ten million Lebanese pounds, or by either penalty.

● **Article 14**

The State shall confiscate any movable or immovable assets that are proved, by a final court ruling, to be related to, or proceeding from, offences listed in Article 1 of this Law, unless the owners of the said assets prove in court their legal rights thereupon.

● **Article 15**

The reservations specified in Paragraphs 2, 3 and 4 of Article 1 of Law No. 426 of May 15, 1995, related to the ratification of the 1988 United Nations Convention on Fighting Illegal Trade of Narcotics and Psychotropic Drugs, are repealed, as well as the provisions of Article 132 of Law 673 of March 16, 1998, on Narcotics, Psychotropic Drugs and their Raw Materials.

● **Article 16**

Upon entry into force of this Law, any legal provision that is contrary to, or inconsistent with its provisions, especially those specified in the Banking Secrecy Law of September 3, 1956, and those of Law 673 of March 16, 1998, on Narcotics, Psychotropic Drugs and their Raw Materials, shall cease to be operative.

● **Article 17**

This Law shall enter into force on its publication date in the Official Gazette.

Second: Regulations on the control of financial and banking operations for fighting money laundering

Banque du Liban issued circular No. 83 on May 18, 2001 concerning regulations on the control of financial and banking operations for fighting money laundering.

● Article 1

These Regulations are set under the provisions of Article 5 of Law No. 318 on fighting money laundering.

Section I Control on financial operations for fighting money laundering

● Article 2

All banks and financial institutions operating in Lebanon must exercise control on their operations with clients to avoid involvement in money-laundering operations resulting from any of the offences specified in Law No. 318 of April 20, 2001. For this purpose, they must adopt, for indicative purposes but not restrictively, the compulsory rules set out in these Regulations.

Section II Checking the client's identity, determining the economic right's owner (the actual beneficiary of the intended operation) and the consequences of non-verification

● Article 3

Checking the client's identity

1 Banks and financial institutions must, as far as they are concerned, check the identity of all their permanent and transient clients, especially in the following instances:

- › Opening accounts of any kind, including fiduciary accounts and numbered accounts.
- › Conducting lending operations.
- › Concluding contracts for leasing bank safes.
- › Conducting cashier's operations when the

› amount exceeds US\$ 10,000 or the equivalent in any other currency.

Cashier's operations include cash payments by the client at the counter (depositing funds, exchanging currencies, purchasing precious metals, purchasing financial instruments in cash, cash subscription to vouchers at the counter, purchasing traveler's checks in cash, orders for current transfers in cash, etc.).

- 2 Regardless of the operation's value, the officer in charge of the operation must also check the client's identity:
 - a if he notices that, on the same account or on multiple accounts of the same person, several cashier's operations are being effected separately for an amount less than the minimum specified in Paragraph 1 of this article;
 - b if he suspects that a client is making a money-laundering attempt.
- 3 In order to check the client's identity, the officer in charge of the operation must:
 - I. *Request the following documents from the client:*
 - a In case the client is a natural person: a passport, an identity card, an individual civil registration, or a residence permit.
 - b In case the client is a legal entity: duly registered documents regarding its statutes, its registration certificate, the identity of the person empowered to sign on its behalf, and the identity of its legal representative.
 - c In case the operation is effected through an authorized representative: the original power of attorney or a certified copy, in addition to documents regarding the identity of both the client and the authorized representative.
 - d In case the operation is effected by correspondence: an authentication of the client's signature on the same document or separately. The signature's authentication or the verification of the non-resident client's identity may be obtained from a correspondent or affiliated bank, or from a branch or a representative office of the concerned bank, or from another bank whose authorized signatures can be verified.
 - II. *Keep, for five years at least after carrying out the operation or closing the account, the full name and residential address of the client, in addition to*

copies of all documents used to check the client's identity.

● Article 4

The bank/financial institution shall request from each client a written statement about the identity of the economic right's owner (the actual beneficiary) regarding the intended operation, including the full name and residential address of the said owner (the name of the institution, its head office and home country, in case the owner is a legal entity or a company). The bank/financial institution shall keep a copy of this statement if it has doubts that the client is not the economic right's owner, or in case the client states that the said owner is a third party, especially when cashier's operations are carried out for an amount exceeding ten thousand US dollars or its equivalent, as mentioned in Article 3, Paragraph 1 of these regulations.

● Article 5

Doubts about the identity of the economic right's owner would arise in the following instances, which are mentioned for indicative purposes but not restrictively:

- a When a power of attorney is given to a non-professional person (who, for instance, is not a lawyer, a fully authorized representative, or a financial intermediate) and when it appears that the relationship to the client does not justify the proxy operation; or when the business relationship is conducted through nominees or numbered accounts, or through umbrella institutions or companies.
- b When the financial status of the client intending to make the operation is known to the officer in charge, and when the operation's value is disproportionate to the financial status of the said client.
- c When, through the conduct of business with the client, any other indicator draws the attention of the bank/financial institution.

● Article 6

The bank/financial institution must immediately inform the Governor of the Banque du Liban in his capacity as Chairman of the Special Investigation Commission, established by virtue of Article 5 of Law No. 318 of April 20, 2001, when it holds

evidence or has doubts that an operation involves money laundering, especially:

- When it has persistent doubts about the credibility of the written statement submitted by the client regarding the identity of the economic right's owner, or when it discovers that false information has been given on the identity of the said owner.
- When it realizes that it was misled in the course of checking the client's identity, while having serious and precise doubts about the information provided by the client.

● Article 7

The bank/financial institution shall periodically check again the identity of the client or the identity of the economic right's owner, especially when it has doubts about the veracity of previously submitted information, or when changes have occurred in the client's identity or in the identity of the economic right's owner.

Section III The obligation to control certain operations

● Article 8

- 1 The bank/financial institution must enquire from the client about the source and destination of funds, the object of the operation, and the identities of both the beneficiary and the economic right's owner, when it finds that the intended operation has the following characteristics:
 - a A cashier's operation, as described in Article 3, Paragraphs 1 and 2 of these Regulations.
 - b An operation to be carried out in exceptionally complicated circumstances. In this respect, the bank/financial institution should assess the said circumstances not only in relation to the nature and type of the operation, but also in relation to its apparent goal.
 - c An operation that seems to have no economic rational or legitimate objective, especially when there is a discrepancy between the operation and the client's professional activity, or even between the

operation and the client's habits and personality.

- 2 The bank/financial institution must immediately inform the Governor of the Banque du Liban in his capacity as Chairman of the Special Investigation Commission when, in light of the answers received, it has serious doubts that the operation is an attempt to launder funds resulting from any of the offences specified by law.

● Article 9

Banks and financial institutions must, as far as they are concerned, take into consideration, for indicative purposes but not restrictively, the following indicators on money laundering:

- 1 Exchanging big quantities of small-denomination bills with large-denomination bills.
- 2 Undertaking large or recurrent cambio operations, by using cash funds.
- 3 Making large or recurrent deposits totaling a large amount, compared with the apparent activities of the client.
- 4 Operating an account for the main purpose of transferring to or receiving from foreign countries large amounts of money, while it appears to the officer in charge of such operations that the client's activities do not justify these operations.
- 5 Receiving or cashing bearer checks issued abroad, or large-amount cheques alleged to be the result of gambling gains.
- 6 Undertaking large or recurrent operations related to offshore activities but considered by the bank or the financial institution as disproportionate to these activities.

Section IV Final provisions

● Article 10

Within six months from the issuing date of these regulations, each bank/financial institution must:

- 1 Prepare a training program on the methods of controlling financial and banking operations for fighting money laundering.
- 2 Appoint, at the headquarters and branch

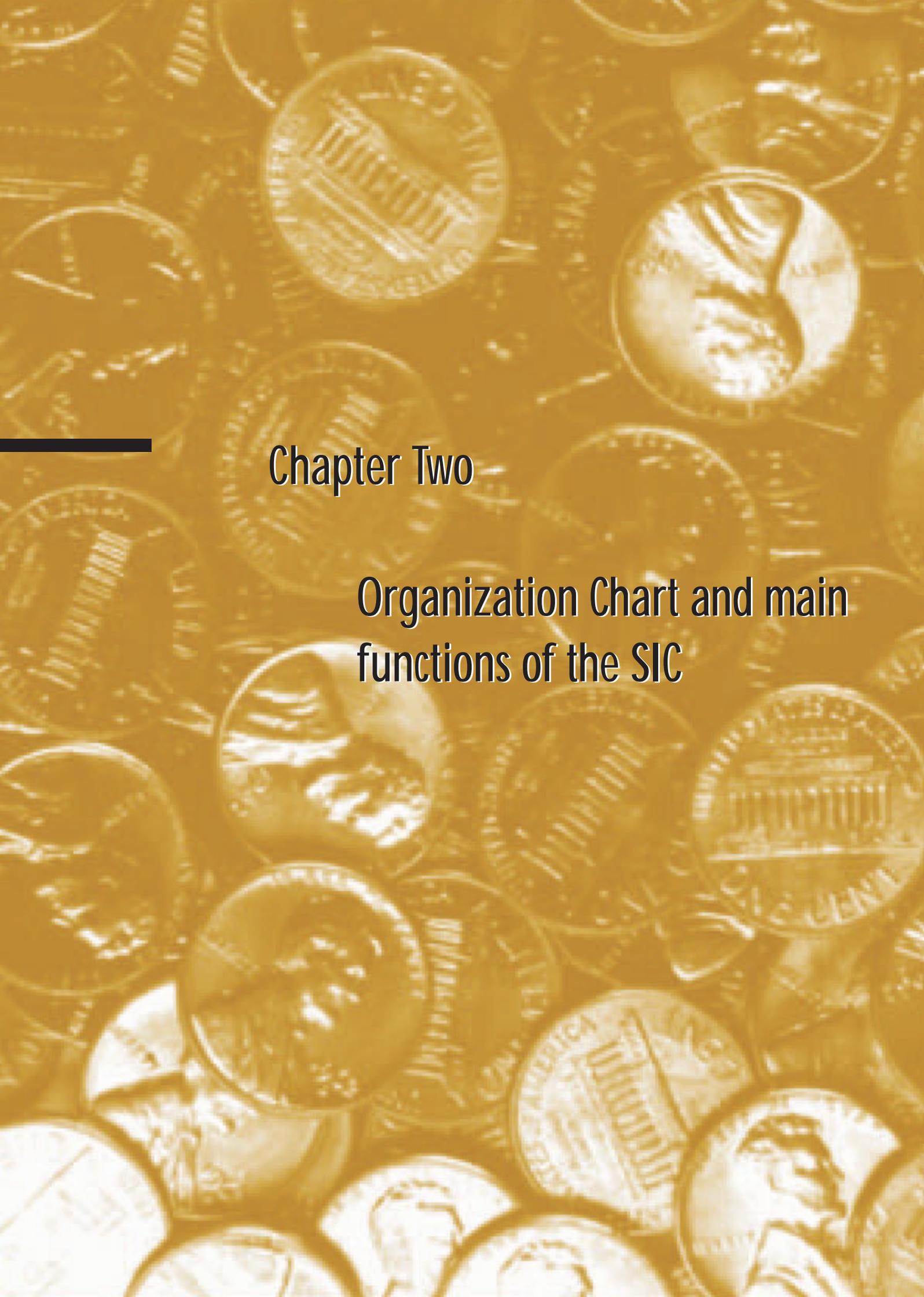
levels, the staff responsible for implementing the training program.

- 3 Ensure an ongoing training of the staff responsible for the program.
- 4 Establish a central archive of collected information on money-laundering operations, and on the ways to fight them.
- 5 Ensure that the officials and staff responsible for the training program attend relevant seminars, workshops and lectures, in order to keep abreast of money-laundering fighting methods.
- 6 Prepare a procedure guide on the implementation of the provisions of the Law on Fighting Money Laundering and the provisions of these Regulations.

● Article 11

The auditor of the bank/financial institution has the obligation:

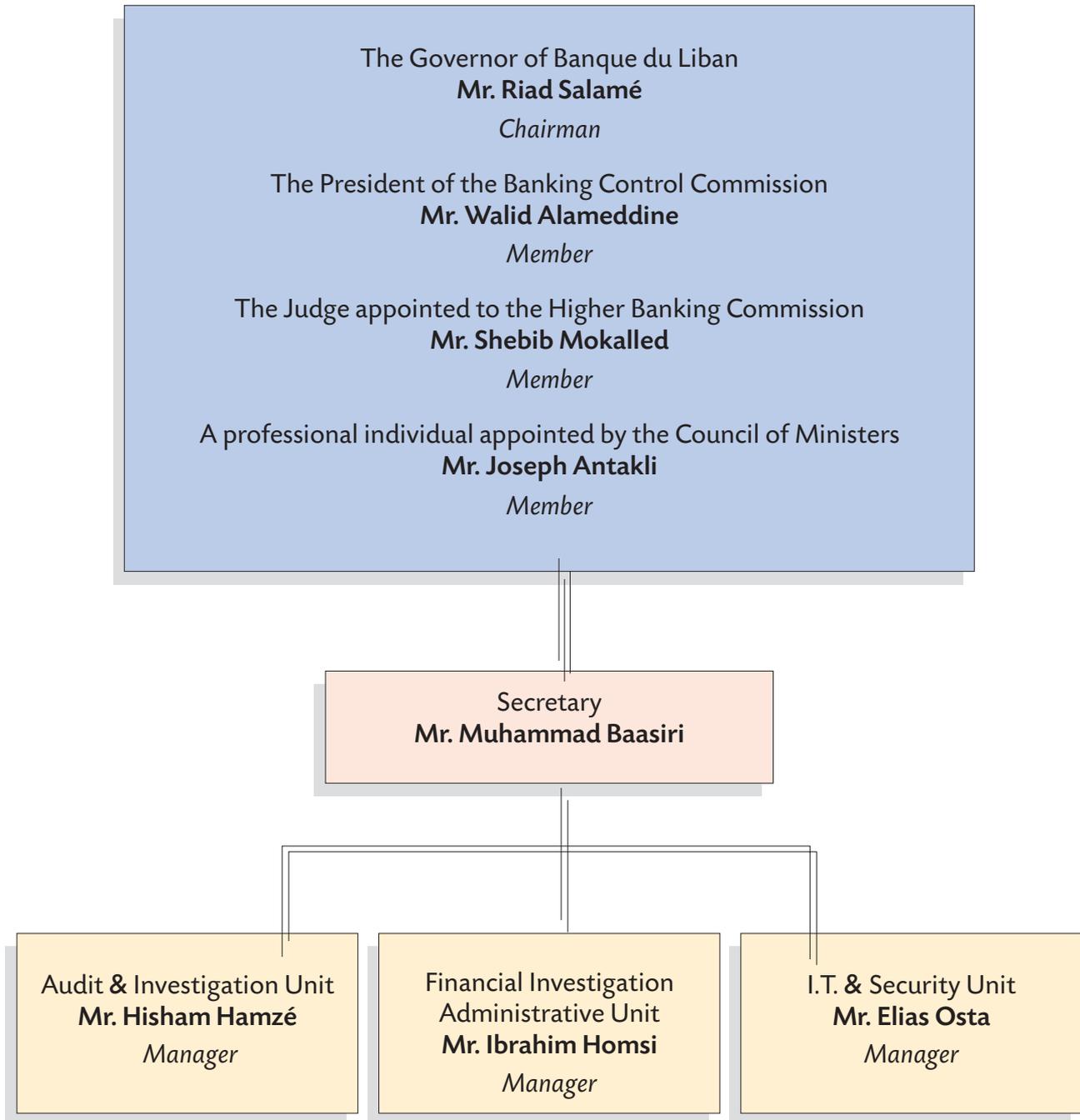
- 1 To review the internal auditing procedures, in order to ascertain compliance by the bank or the financial institution with the provisions of these Regulations. In this respect, the auditor shall prepare a semi-annual report to be submitted to the board of directors of the bank or financial institution, and also to the Banking Control Commission. This report shall include the results of the auditor's review, in addition to recommendations about the ways to enhance the control of financial and banking operations for fighting money-laundering operations.
- 2 To report immediately to the Governor of the Banque du Liban, in his capacity as chairman of the Special Investigation Commission, any operation considered or suspected to be concealing money laundering.

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Chapter Two

Organization Chart and main functions of the SIC

1. SIC Organization Chart



2. Commission members

1 The Special Investigation Commission is composed of:

The Governor of Banque du Liban, **Mr. Riad Salamé**, or the Vice-Governor designated by him.

Chairman

The President of the Banking Control Commission, **Mr. Walid Alameddine**, or the member of the Commission designated by him.

Member

The judge appointed to the Higher Banking Commission, **Mr. Shebib Moukalled**, or his alternate judge **Ahmad Al-Moallem**.

Member

The attorney appointed by the Council of Ministers, **Mr. Joseph Antakli**, or his alternate attorney **Mr. Jean Moubarak**.

Member

2 Article 6 of Law 318 of 20/4/2001 specifies the mission and tasks of the Commission as follows:

- To investigate operations that are suspected to be money laundering offences, and to decide on the seriousness of evidence and circumstantial evidence related to any such offence or offences.
- When accounts opened at banks or financial institutions are suspected to have been used for money laundering purposes, the lifting of banking secrecy to the benefit of the competent judicial authorities and the Higher Banking Commission, represented by its Chairman, is the exclusive right of the Commission.
- The Commission is convened by the Chairman and meets, at least, twice a month and as needed. The legal quorum requires the presence of at least three members.
- The Commission takes its decisions at a majority of the attending members. In case of a tie, the Chairman has a deciding vote.

3. The SIC Secretariat

In reference to Law 318 of April 20, 2001 and SIC decision of July 4, 2001, the Secretariat was organized as follows:

1 The Secretary

The Special Investigation Commission appointed Dr. Muhammad Baasiri Secretary of the Commission, beginning September 1, 2001.

The Secretary is entrusted with tasks that include:

- Forwarding the Commission's decisions to concerned parties.
- Implementing and following up the Commission's decisions.
- Investigating the suspected account(s) on behalf of the Commission.
- Producing analytical reports on suspected account(s).
- Observing domestic and foreign laws and regulations, and to make recommendations on updating laws and regulations enforced in Lebanon for fighting money laundering offences, if warranted.
- Submitting to the Commission recommendations on updating the Regulations on the control of financial and banking operations for fighting money laundering.
- Submitting to the Commission recommendations concerning the introduction of internal auditing procedures to all sectors, namely in agriculture, industry, trade and services, for the purpose of preventing money laundering activities in the said sectors.
- Supervising directly:
 - The Audit and Investigation Unit
 - The Financial Investigation Administrative Unit
 - The Information Technology and Security Unit.

2 The Audit and Investigation Unit (AIU)

The Audit and Investigation Unit is composed of nine staff members.

This unit is entrusted with tasks that include:

- Gathering evidence on operations that may constitute money laundering offences.
- Verifying and investigating information provided by the Financial Investigation Administrative Unit.
- Verifying that reporting entities are implementing money laundering fighting procedures in accordance with the Law and regulations.

- Submitting to the Commission, through the Secretary, the findings of their investigations on operations suspected to be involving money laundering.
- Submitting to the Commission, through the Secretary, periodical reports verifying that reporting entities are in compliance with the prescribed preventive measures on fighting money laundering.

3 Financial Investigation Administrative Unit (FIAU)

The Financial Investigation Administrative Unit is composed of seven staff members.

This unit is entrusted with tasks that include:

- Receiving and collecting information from various sources concerning suspicious transactions.
- Incorporating, archiving and analyzing this information through specific programs, and comparing it with formerly available information.
- Submitting to the Secretary information on suspected operations, for verification and investigation.
- Following up on the findings of investigations, and safeguarding relevant information on computers.
- Establishing a databank organized by sector, geographic distribution, and by names of persons involved or possibly involved in money laundering operations. This also includes data on information sources and on the nature of suspected operations.
- Updating this databank with respect to rulings and related documents concerning the persons who committed such offences in Lebanon.
- Preparing periodic reports on the nature and size of received information and on the results of information analysis, and submitting these reports to the Commission through the Secretary.
- Classifying according to sources, the information related to money laundering operations:
 - a Information received from banks and finance companies, which are covered by the Banking Secrecy Law, may be provided to domestic or foreign competent authorities only by a decision of the Commission.
 - b Information received from institutions that are not covered by the Banking Secrecy Law may be provided to requesting authorities in accordance with procedures decided by the Commission.
- Monitoring domestic and foreign laws and regulations, and making recommendations on updating the relevant existing laws and regulations.

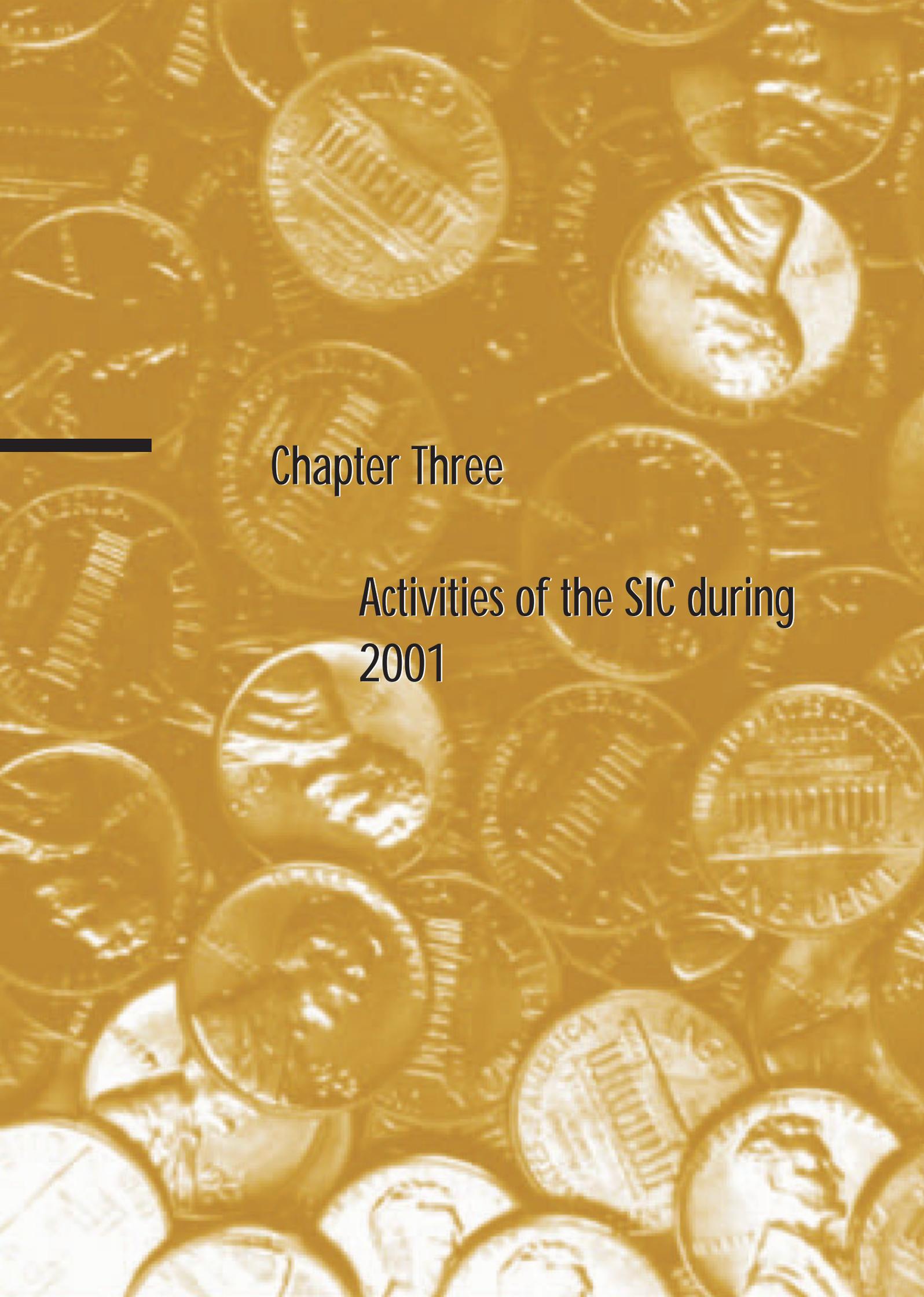
- Coordinating with the Information Technology and Security Unit on building and updating a website on fighting money laundering
- Submitting to the Commission recommendations on updating the Regulations on the Control of Financial and Banking Operations for Fighting Money Laundering.
- Undertaking studies requested by the Commission.
- Enhancing cooperation with foreign institutions and counterparts.
- Submitting to the Commission, through the Secretary, an analytical report on suspected account(s).
- Submitting to the Commission recommendations on ways to introduce internal auditing procedures to all sectors, namely in agriculture, industry, trade and services, in order to prevent the introduction of money laundering practices to these sectors.

4 The Information Technology and Security Unit (IT & Security)

This unit is composed of seven staff members.

This unit is entrusted with tasks that include:

- Developing the required application system.
- Maintaining and developing programs in-line with the evolving work and needs of the various units.
- Setting up information programs, security procedures, and ensuring their efficiency.
- Controlling access to the SIC Secretariat offices.
- Operating and managing the monitoring system.
- Maintaining security and ensuring the safety of staff and assets.
- Providing technical help in building a website.

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Chapter Three

Activities of the SIC during 2001

1. Issuing circulars

- a) SIC Circular 1 issued on July 4, 2001 addressed to institutions not covered by the Banking Secrecy Law of 1956, requires that they abide by Law 318 of April 20, 2001 and keep records documenting transactions exceeding \$ 10,000 or their equivalent in any currency. The circular also requires that they file suspicious transaction reports as per an attached format.
- b) SIC Circular 2 issued on July 20, 2001 addressed to banks and finance companies covered by the Banking Secrecy Law of 1956,. requires that they forward to the Governor of Banque du Liban, Chairman of SIC, information pertaining to money laundering activities in a sealed envelop stamped with the words "Top Secret".
- c) SIC Circular 3 issued on October 16, 2001 superseded circular 1 in introducing a unified STR form to be used by all reporting entities covered by Law 318 when filing suspicious transactions.

2. Tabulation of institutions covered by Law 318

- a) Institutions not covered by the Banking Secrecy Law including:

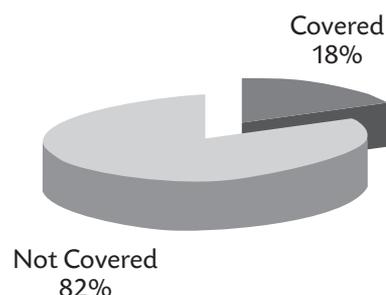
Five brokerage companies operating in Lebanon, three financial leasing companies, 365 money dealers that are formally registered with the Banque du Liban and 64 insurance companies.

Since there are no available statistics that determine the number of high commodity traders, statistics on this category is limited to the syndicate of jewelers, which has provided us with a list of 385 registered traders.

In the real estate sector, no available accurate statistics exist on promoting, building and selling of real estate.
- b) Institutions covered by the Bank Secrecy Law of 1956:
 - Banks: There are 67 banks, 46 of which are commercial, 13 are branches of foreign banks and 8 are special banks.
 - Finance companies: There are 27 finance companies, 26 of which are Lebanese and 1 is foreign.

Institutions covered by Law 318	No.
Covered by Banking Secrecy Law	
Banks	67
Finance companies	27
Total	94
Not covered by Banking Secrecy Law*	
Brokerage	5
Financial leasing companies	3
Money dealers	365
Insurance companies	64
Total	437
Grand Total	531

*Excluding companies promoting building and selling real estate and merchants dealing with high-value commodities due to lack of statistical data



3. Building a database bank

This databank includes data on institutions covered by law 318, information regarding accounts previously investigated by the Commission along with conclusions and decisions taken by the SIC concerning those investigations.

It also encompasses lists of individuals and groups associated with terrorism. In addition, this databank includes names of persons and institutions suspected to be involved with one of the crimes stated in Law 318. Moreover this system caters for generating a whole array of statistical data and other useful information.

SIERS (Special Investigation Commission Information Entry and Retrieval System) operates under Windows 2K server and SQL server 2K. SIERS was developed in-house by the IT & Security Unit using Visual Basic as its development platform. This application system incorporates an extensive use of the built-in SQL English query function for easy manipulation of data.

4. Creating awareness

The following represent a few examples of the efforts made in the course of creating the necessary awareness in regards to combating money laundering.

- a The process of creating awareness started in vigor since the enactment of law 318, and continued at an accelerating pace throughout the year. The Chairman made numerous appearances in front of representatives of the different sectors of the economy, through seminars, interviews and other in which he conveyed the steps taken by Lebanon and the Commission to comply with international standards concerning the fight on money laundering.

- b) Under the patronage of H.E. the United Kingdom Ambassador and the Governor of Banque du Liban, a three-day seminar "Fighting Money Laundering" in collaboration with the U.K. embassy was sponsored. From the 9th till the 11th of October 2001, the SIC staff attended this seminar along with two hundred participants from banks, financial institutions, and other sectors of the economy. During the seminar, the Governor briefed the audience on the efforts made by BDL in assisting, preparing and enacting Law No. 318 on fighting money laundering and on the implementation progress achieved to date. Experts from Charles Kendall & Partners LTD stressed various procedures used to fight money laundering in the United Kingdom, and more importantly shared with the audience their international experience. The Third Vice Governor and the Head of the Legal Department of Banque du Liban highlighted the judicial aspects of fighting money laundering. The SIC Secretary highlighted the functions of each of the Secretariat units along with money laundering warning signs. The Secretary stressed the importance for financial institutions to have in place adequate systems of internal controls to prevent, monitor, detect and report suspicious financial crimes, including proper MIS and KYC procedures.

- c) The Secretary met with representatives of the various types of reporting entities; banks, insurance companies, money dealers, jewelers, accountants and explained the legal, regulatory and procedural aspects concerning the issue of fighting money laundering. As an example, the Secretary addressed the members of The Institute of Internal Auditors (IIA) Lebanon chapter on December 11, 2001, and briefed the audience on efforts made by the SIC to fight money laundering. The audience, consisting mainly of chief internal auditors of various banks, appreciated the emphasis placed by the SIC on the need for banks to have adequate systems of internal controls for the purpose of preventing, monitoring, detecting and reporting money laundering related activities.

5. Selection of typologies

Since its inception, the SIC received 29 cases relating to money laundering activities, nine of which relate to terrorism. All were investigated and banking secrecy was lifted off 22 cases and the frozen funds amounted around LBP 7.9 billion (US\$5.2 million).

The following is a selection of the types of cases that the SIC received and investigated in 2001.

Case 1. Embezzlement of private funds

The Regional Prosecutor at the Special Division of Service for Financial Delinquency in Stockholm, asked that Lebanese authorities' assist in a criminal case related to a suspicious account at a Lebanese bank.

In 1998 a businessman was appointed to manage for a Swedish company a 300 million SEK Danish stock portfolio.

On March 26, 1997 the said person opened 6 accounts in different currencies with a Lebanese bank (USD, CHF, SEK.) and financed them through a series of incoming transfers.

Between June 1998 and February 1999, the said person was engaged in trading activities with an offshore company (fake prices). The trading activities brought about losses to his employer, while generating profits to the offshore, which was managed by a friend of his.

On August 23, 2001, the SIC decided:

- To send a certified copy of the audit and investigation report including information and documents to the Office of the Regional Prosecutor in Stockholm.
- To point out to the Regional Prosecutor the fact that the offence in question was committed prior to law 318 on fighting money laundering.
- To ask the Regional Prosecutor to abstain from using this information in courts without prior written consent of the SIC.

On September 7, 2001 the report was mailed to the Office of the Regional Prosecutor in Stockholm.

Case 2. Embezzlement of public funds

In a letter addressed to the Lebanese authorities, the International Criminal Tribunal stated that a previous head of state had embezzled and transferred public funds to accounts held in names of individuals and offshore companies at Lebanese banks. The relevant Lebanese authorities

were asked to provide the following:

- Account opening documents
- Bank statements
- Vouchers of deposits and withdrawals along with statements revealing the identity of beneficial owners.

On the 7th of Sep. 2001, the SIC sent a copy of the report, including information and documents required by the prosecuting authority, asking the latter to abstain from using this information in courts without prior written consent of the SIC. This was due to the fact that the offence in question had been committed before the promulgation by Lebanon of law 318 of April 20, 2001 on fighting money laundering.

Case 3. Terrorism

On December 12, 2002 the SIC received from the Lebanese Ministry of Foreign Affairs a list, communicated to it by the Permanent Mission of Lebanon to the United Nations, containing the names of "Senior UNITA Officials and immediate adult family members" issued by the Chairman of the Security Council Committee established pursuant to Resolution 864 (1993), requesting the Lebanese authority to freeze their accounts.

The SIC convened on December 29, 2001 and asked banks and other financial institutions, through the Secretary, to report if the said individuals have accounts with any of them.

On January 14, 2002, the SIC Chairman informed the Chairman of the said Security Council Committee, through the Ministry of Foreign Affairs, that all banks and financial institutions operating in Lebanon reported the non-existence of any account relating to the above mentioned list.

Case 4. Forgery

On August 10, 2001 a Lebanese bank received and notified the SIC of illicit wire transfers originating from U.S. banks in favor of a Lebanese company. Correspondence between the U.S. banks and the Lebanese bank showed the transfers as being the result of fraudulent activities. The Lebanese company was not able to justify the transfers.

Following the SIC examination, it was unanimously decided to:

- 1 Freeze and lift bank secrecy off the suspicious account.
- 2 Forward certified copy of the decision to:
 - ▶ The General Prosecutor at the Supreme court.
 - ▶ The Higher Banking Commission.
 - ▶ The concerned bank.

Case 5. Embezzlement of public funds

The Interpol asked the Attorney General of Lebanon to assist by providing information pertaining to fraudulent money transfers, which originated from Australia. The Interpol had suspected that part of this amount was transferred to Lebanon. Three people including an Australian national (arrested in Australia) were involved in the fraud. The SIC initiated an investigation which revealed, that the two individuals had accounts with a Lebanese bank (checking US dollar, saving US dollar, and saving Australian dollar) and that the Australian had one saving account. Numerous transfers initiated by various parties in Australia and Hong Kong via correspondent banks had financed the suspicious accounts. It is important to note that the account of the Australian showed no activities and that the transfers were later diverted to their saving accounts.

On October 19, 2001 the SIC decided the following:

- 1 Freeze all accounts and lift bank secrecy.
- 2 Send a copy of the SIC decision to the following parties:
 - The General Prosecutor at the Supreme Court.
 - The Higher Banking Commission.
 - The concerned bank.

Case 6. Organized Crime

By a letter dated November 23, 2001 a Lebanese bank informed the SIC that an information printed in a local newspaper on November 23, 2001 mentioned that the police in Spain arrested members of a ring allegedly led by a Lebanese citizen. The members of the ring were arrested in Madrid and in Tenerife, in the Canary Islands.

The Lebanese bank advised the SIC that it has frozen an account at one of its branches opened in the name of the suspect notwithstanding the fact that the bank is not sure if the holder of the account is the same person arrested and requests the SIC to take appropriate measures.

By a letter dated November 28, 2001, a second Lebanese bank relying on the same information published in the local newspapers, informed the SIC that the suspect has a joint account with his brother. The bank also mentioned that a third person, who is residing in the Canary Islands, receives transfers to his account at the same bank in Beirut and through a power attorney given in favor of the suspect's brother, the latter remits the amounts transferred by the person residing in the Canary Islands partly or in full into the joint account.

On December 3, 2001 the SIC took the following decision:

- 1 To freeze temporarily the account of the suspect at the first bank for a one-time renewable, five-day period.

- 2 To freeze temporarily the accounts of the suspect, his brother and the third person residing in the Canary Islands at the second bank for a one-time renewable, five-day period.
- 3 To request the Secretary of the SIC to investigate the account at the two banks and to provide the SIC, in a strictly and confidential manner and as soon as possible, about the results of his investigation before the end of the freezing period.

After investigating the accounts at the two said banks, the SIC took the following decision on December 19, 2001:

- 1 To lift banking secrecy on the accounts at the two said banks to freeze them.
- 2 To transmit a certified copy of the decision to:
 - The General Prosecutor at the Supreme Court.
 - The Higher Banking Commission.
 - The concerned banks.

6. Staff training and development

The SIC believes that its people are its greatest asset, and are essential in promoting best practices and international standards concerning the fight on money laundering. The Commission is committed towards developing its staff and employing the latest technology. Every staff member undergoes intensive training, which should help him/her acquire professional skills. This is being achieved through in-house training and attending seminars and training course, in Lebanon and abroad.

Realizing the importance of continuous training, the SIC has scheduled to send several staff members to train with foreign counterparts. Realizing the must to continuously train its staff, the SIC has allocated the equivalence of 25% of its professional staff salaries to training in year 2002 budget.

7. Cooperation with international organizations

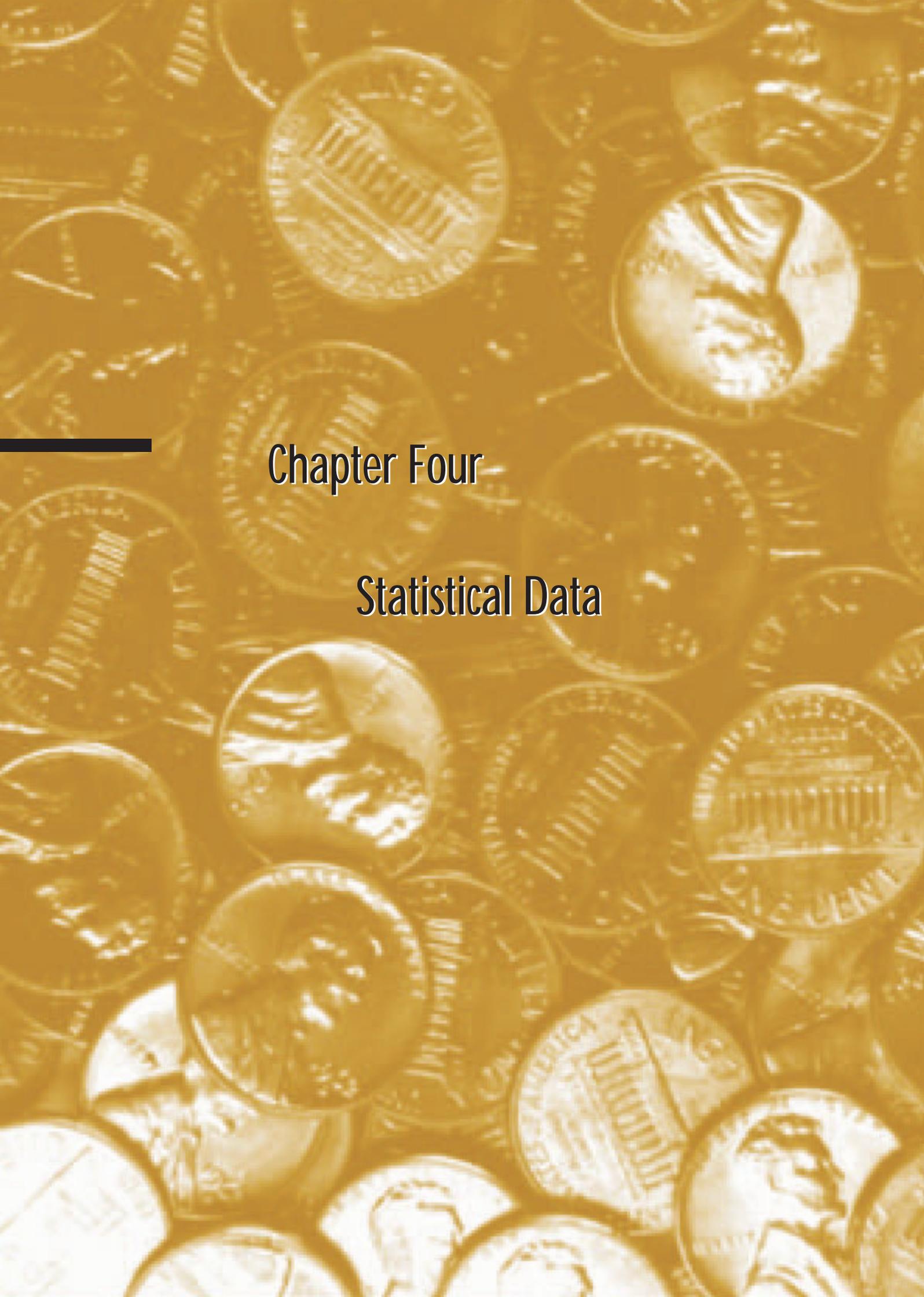
The Commission has cooperated and exchanged information within the framework of the law with international organizations, foreign authorities and governments. As well, the Commission has been forthcoming in cooperating with the international community on matters relating to terrorism.

Looking forward to becoming an active player in the world community, the Commission has initiated the process of joining the Egmont Group of FIUs. In this regard, the SIC expects to sign with various countries memoranda of understanding for cooperation in exchanging financial intelligence related to money laundering, according to the model of MOU prepared by the Egmont Group.

8. SIC website

8. SIC website

The SIC website, which outlays the mission of the SIC, serves as an effective tool to create the necessary awareness in the community. It transmits the latest development in terms of news and events, updates the legal and regulatory changes and highlights SIC activities. Law, regulations and forms may be downloaded.

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Chapter Four

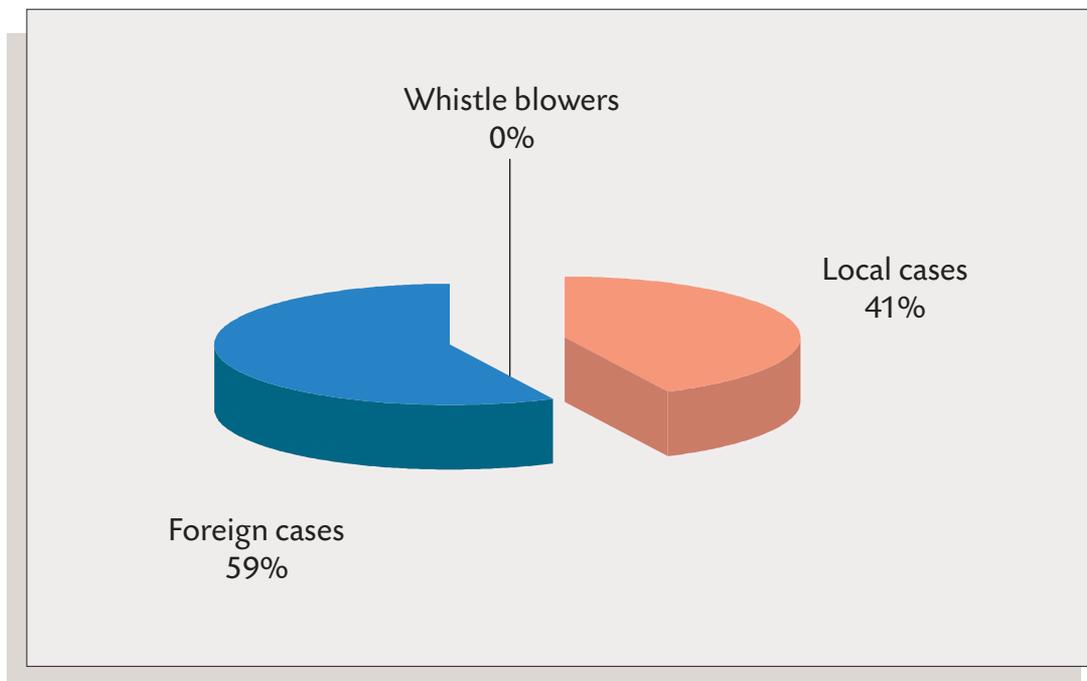
Statistical Data

1- Suspicious Transactions Reported to the SIC

	No. Of cases passed on*	% of Total	No. of cases not passed on**	% of Total	Total	% of Total
Local cases	6	27.27	6	85.71	12	41.38
Foreign cases	16	72.73	1	14.29	17	58.62
Whistle blowers	0	0	0	0	0	0
Total	22	100	7	100	29	100

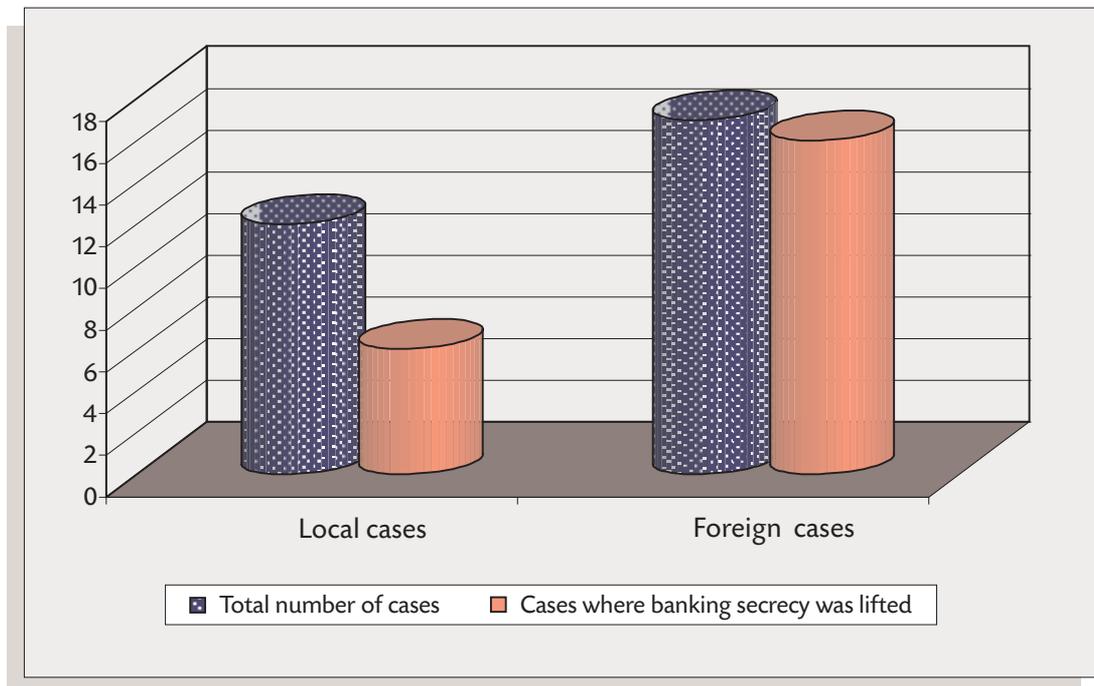
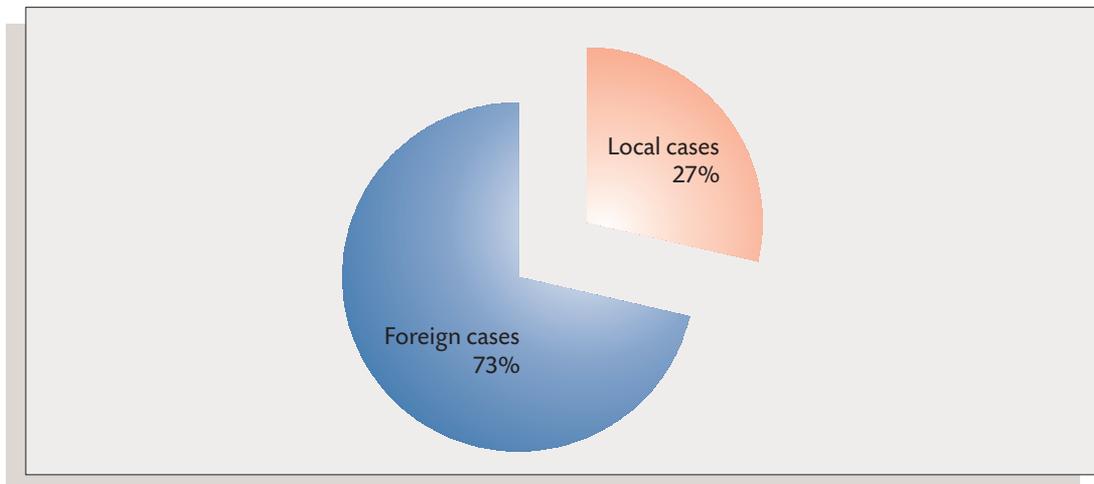
* Cases forwarded to the General Prosecutor or to informing sources

** Cases decided not to fall within the framework of law 318.



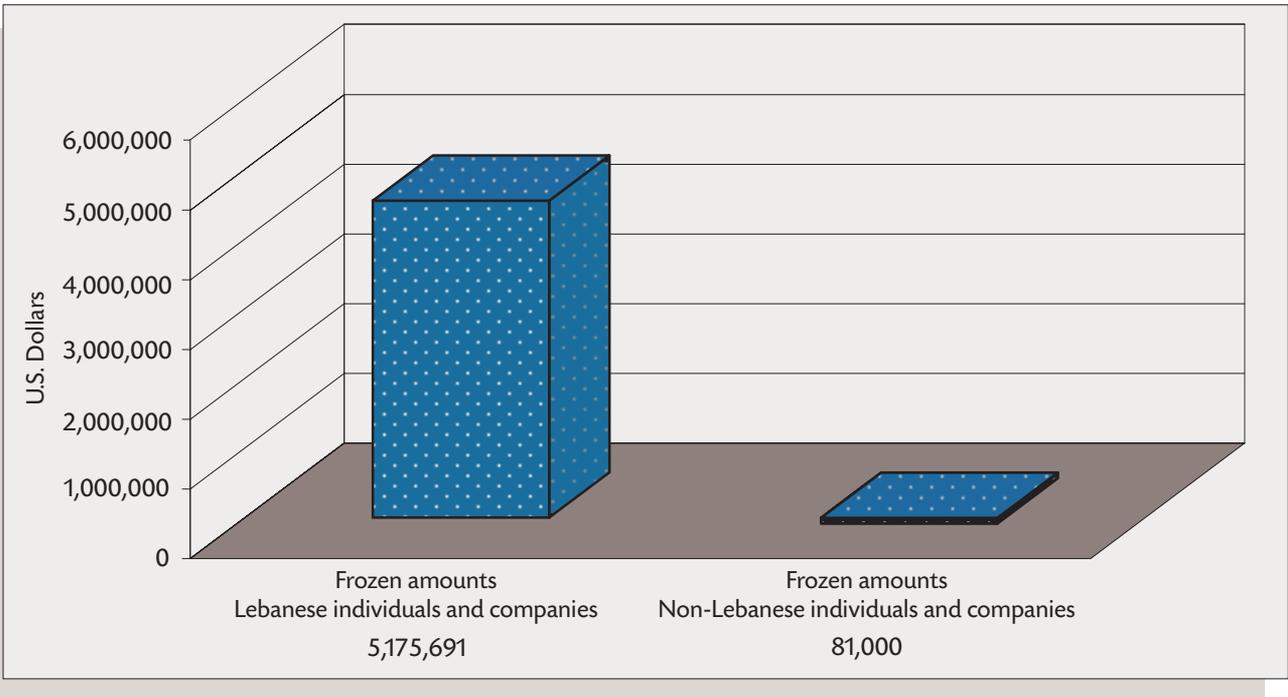
2- Transactions where Banking Secrecy Was Lifted

Type of source	(1)		(2)		% (2) / (1)
	Total of cases	% of total	Cases where banking secrecy was lifted	% of total	
Local cases	12	41.38	6	27.27	50.00
Foreign cases	17	58.62	16	72.73	94.12
Total	29	100	22	100	75.86



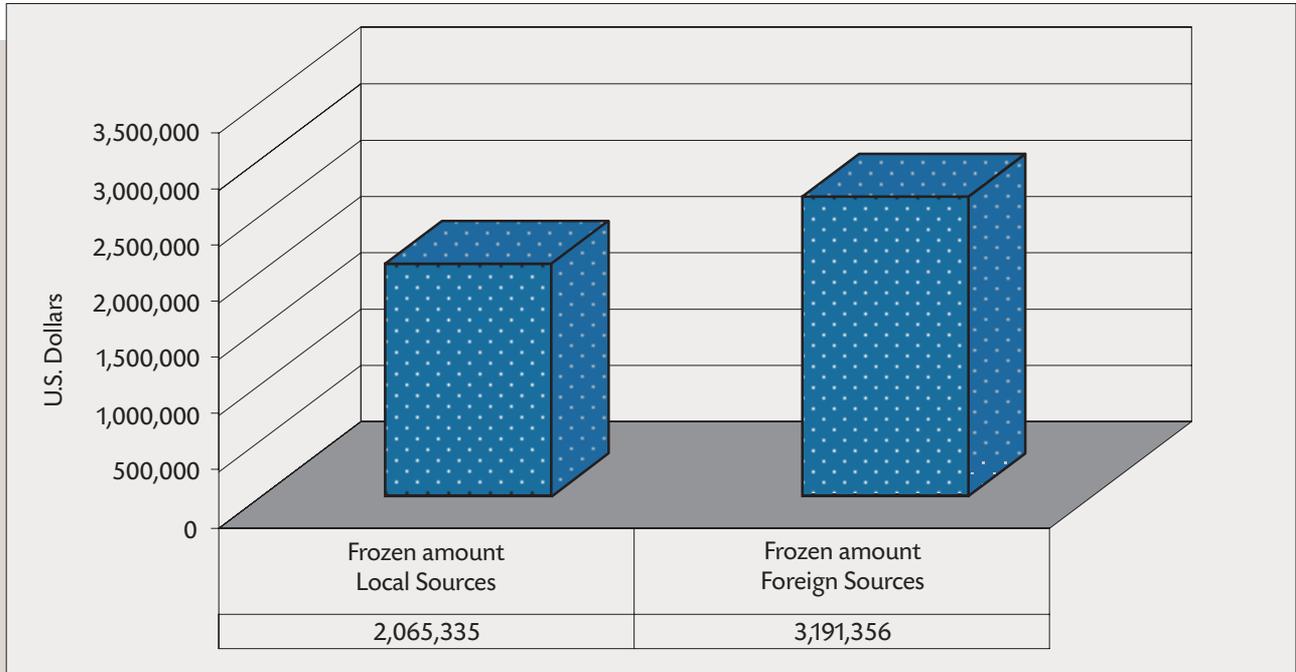
3- Amount of Reported Transactions Passed on to the General Prosecutor (Lebanese/non-Lebanese)

	Amount of reported transactions		Frozen amounts	
	c/v LL	c/v USD	c/v LL	c/v USD
Lebanese individuals and companies	18,021,761,868	11,954,734	7,802,354,469	5,175,691
Non-Lebanese individuals and companies	10,343,628,777	6,861,445	122,107,500	81,000
Total	28,365,390,645	18,816,179	7,924,461,969	5,256,691



4- Amount of Reported Transactions Passed on to the General Prosecutor by Reporting Source (Local/Foreign)

	Amount of reported transactions		Frozen amounts	
	c/v LL	c/v USD	c/v LL	c/v USD
Local sources	14,057,737,500	9,325,199	3,113,492,513	2,065,335
Foreign sources	14,307,653,145	9,490,981	4,810,969,456	3,191,356
Total	28,365,390,645	18,816,180	7,924,461,969	5,256,691



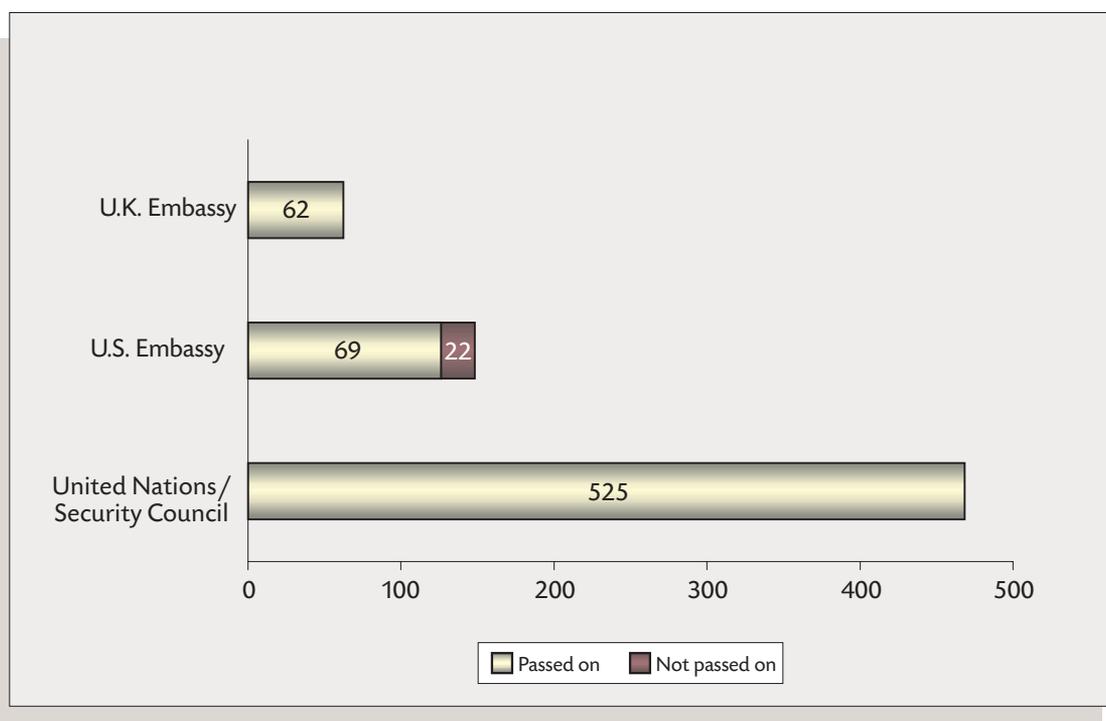
5- Cases Related to Terrorism *

Per number of names

Cases	United Nations/ Security Council	U.S. Embassy	U.K. Embassy	SIC Decision
Case I	3	---	---	Passed on
Case II	---	27	---	Passed on
Case III	84	---	---	Passed on
Case IV**	---	39	---	Passed on
Case V	---	22	---	Not passed on
Case VI	281	---	62	Passed on
Case VII	---	---	---	Passed on
Case VIII	157	3	---	Passed on
Case IX	---	---	---	Passed on
Total	525	91	62	

* Some of the STR's are repeated in the multiple lists

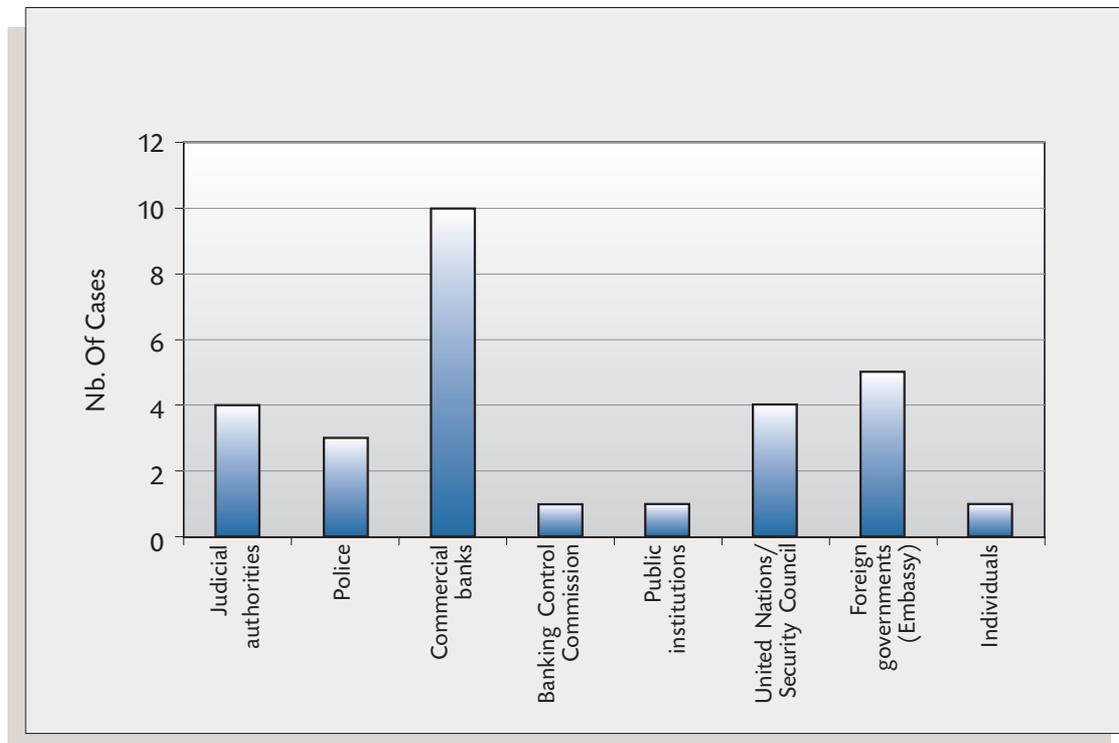
** One account was reported and frozen in the amount of \$ 2.19



6- Transactions by Type of Reporting Source

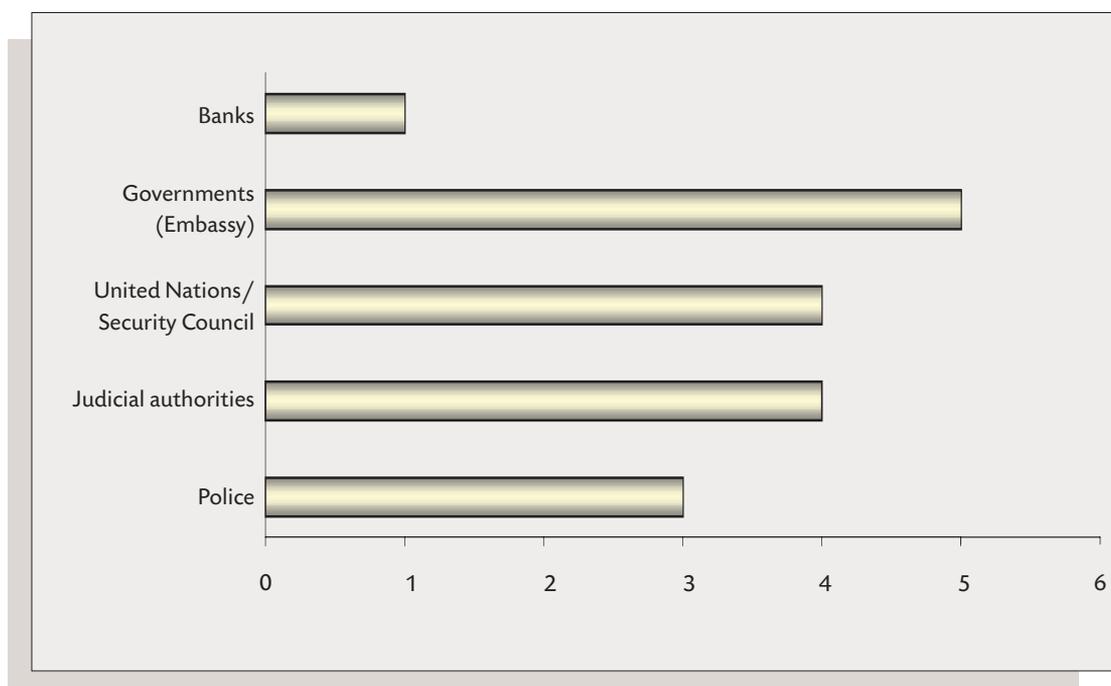
Type of reporting source	Reported cases	
	Number	% total
Judicial authorities*	4	13.79
Police	3	10.35
Commercial banks	10	34.48
Banking Control Commission	1	3.45
Public institutions	1	3.45
United Nations/Security Council	4	13.79
Foreign governments (Embassy)	5	17.24
Individuals	1	3.45
Total	29	100

* Includes a request from the International Criminal Tribunal



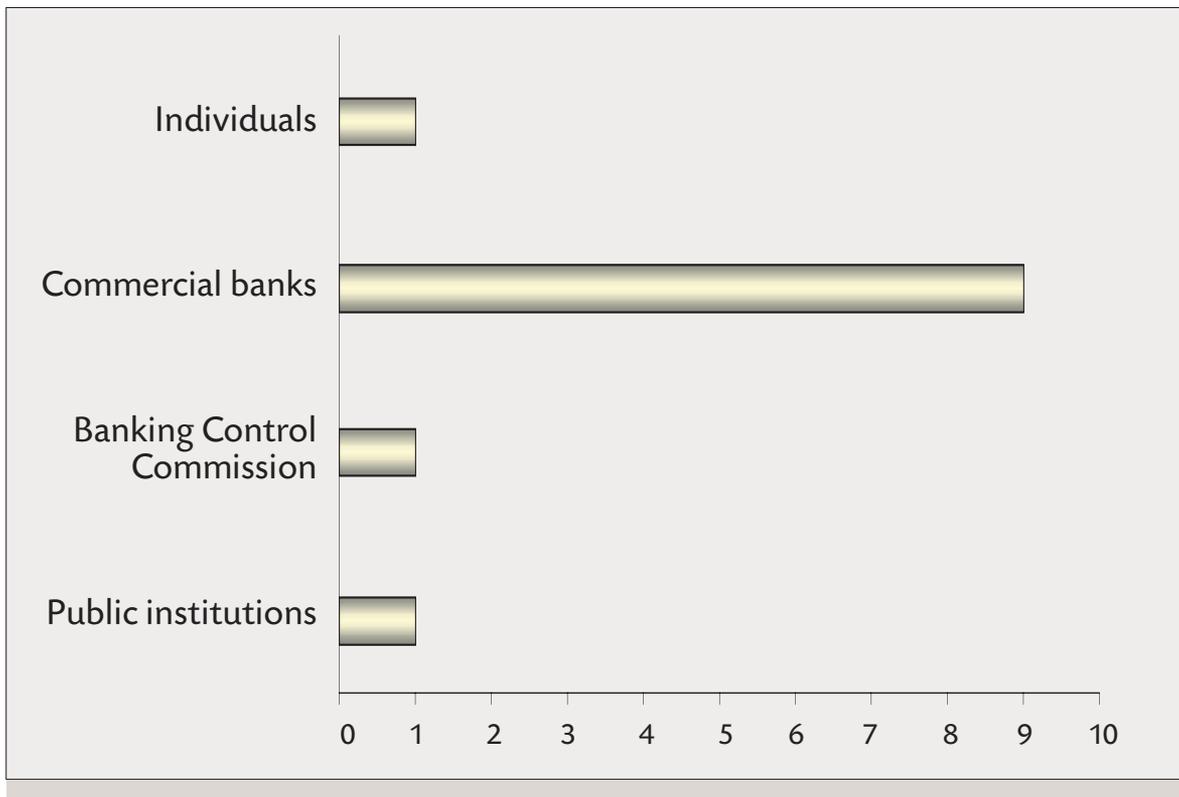
6.1- Tabulation of Cases by Type of Foreign Source

Type of source	Reported cases	
	Number	% total
Police	3	17.65
Judicial authorities	4	23.53
United Nations/Security Council	4	23.53
Governments (Embassy)	5	29.41
Banks	1	5.88
Total	17	100



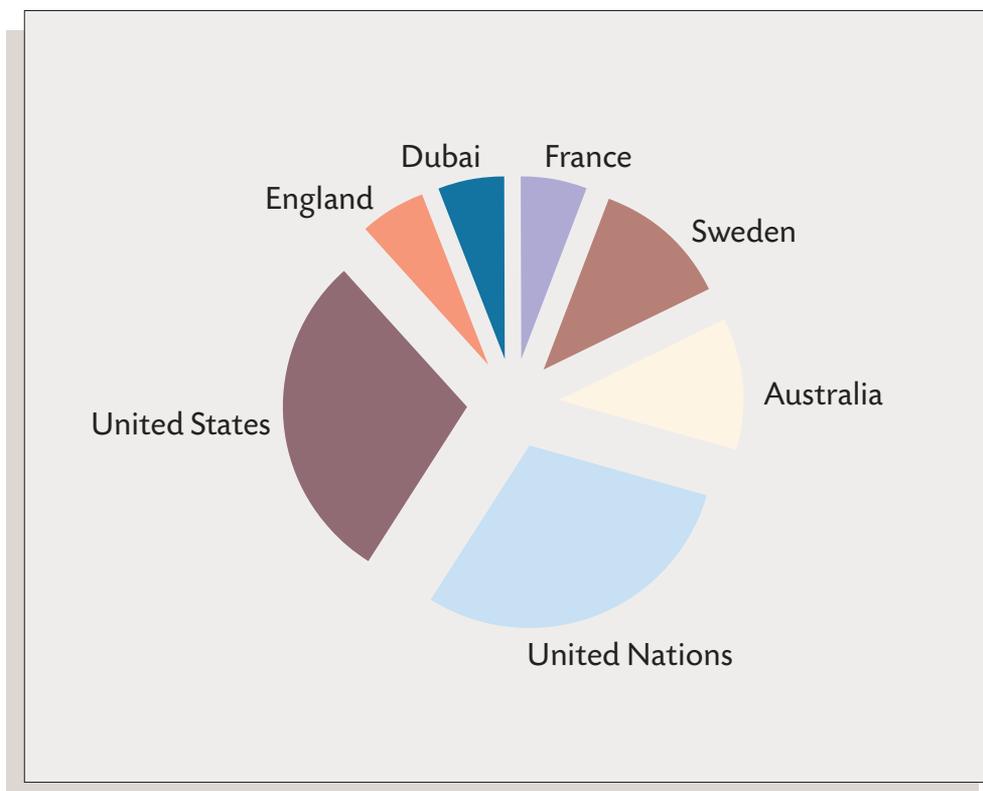
6.2- Tabulation of Cases by Type of Local Source

Type of source	Reported cases	
	Number	% total
Individuals	1	8.33
Banking Control Commission	1	8.33
Commercial banks	9	75.00
Public institutions	1	8.33
Total	12	100



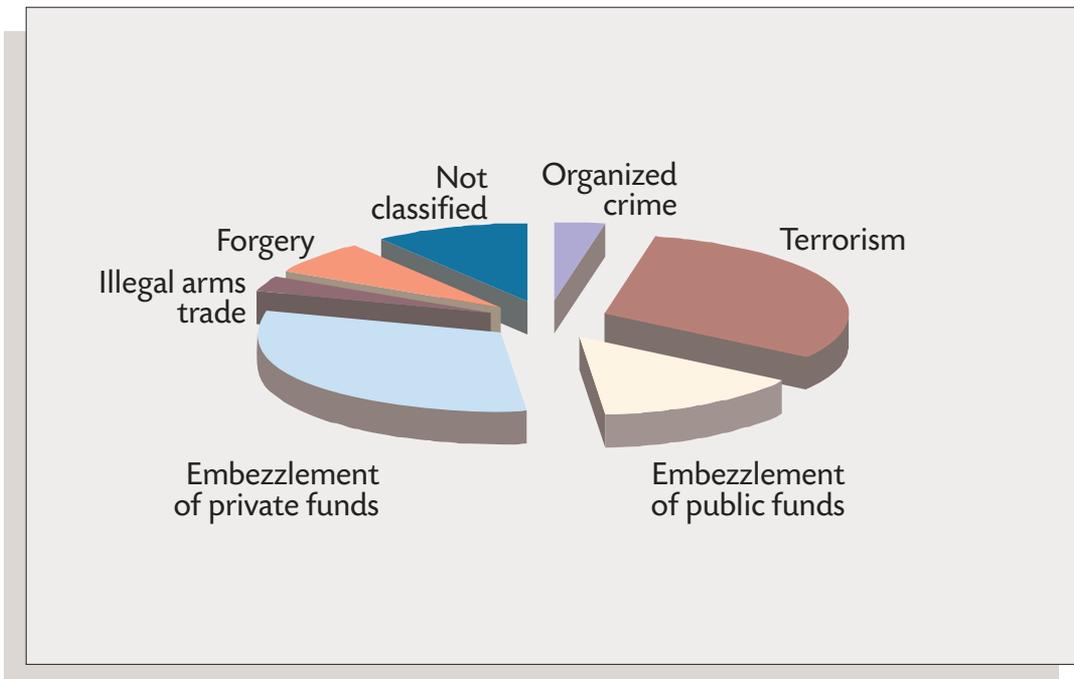
7- Breakdown of Transactions by Foreign Source

Country	Reported cases	
	Number	% total
France	1	5.88
Sweden	2	11.76
Australia	2	11.76
United Nations	5	29.41
United States	5	29.41
England	1	5.88
Dubai	1	5.88
Total	17	100



8- Breakdown of Transactions by Nature of Crime

Name of crime	Reported cases	
	Number	% total
Organized crime	1	3.45
Terrorism	9	31.03
Embezzlement of public funds	4	13.79
Embezzlement of private funds	9	31.03
Illegal arms trade	1	3.45
Forgery	2	6.90
Not classified	3	10.34
Total	29	100



9- Geographical Distribution of Reported Transactions

Name of district	Reported cases	
	Number	% total
Beirut	20	68.97
Mount-Lebanon	3	10.34
North-Lebanon	3	10.34
South-Lebanon	1	3.45
Bekaa	2	6.90
Total	29	100

