

« MAPPING KNOWLEDGE IN THE FIGHT AGAINST FRAUD »

CENTRO DI RICERCA
IMPRESAPIENS



SAPIENZA
UNIVERSITÀ DI ROMA



2nd Workshop of the project “101101784 — 2022-IT-FRED2” Fraud Repression through **ED**ucation2

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Suspicious Transactions Directorate
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Prevention and Repression: where are we?

Repression

Criminal Laws

Investigative Bodies
and Judicial
Authorities

Prosecution
of Crimes



Prevention

ad hoc
Legislation

Administrative
Public Authorities
and Private Bodies

Detection and
financial analysys
based on STRs

complementarity and coordination

FIU fundamental characteristics

The FIU is the **central national unit** responsible for receiving and analyzing **suspicious transaction reports** and other information relating to possible money laundering activities, associated predicate crimes or terrorist financing activities.

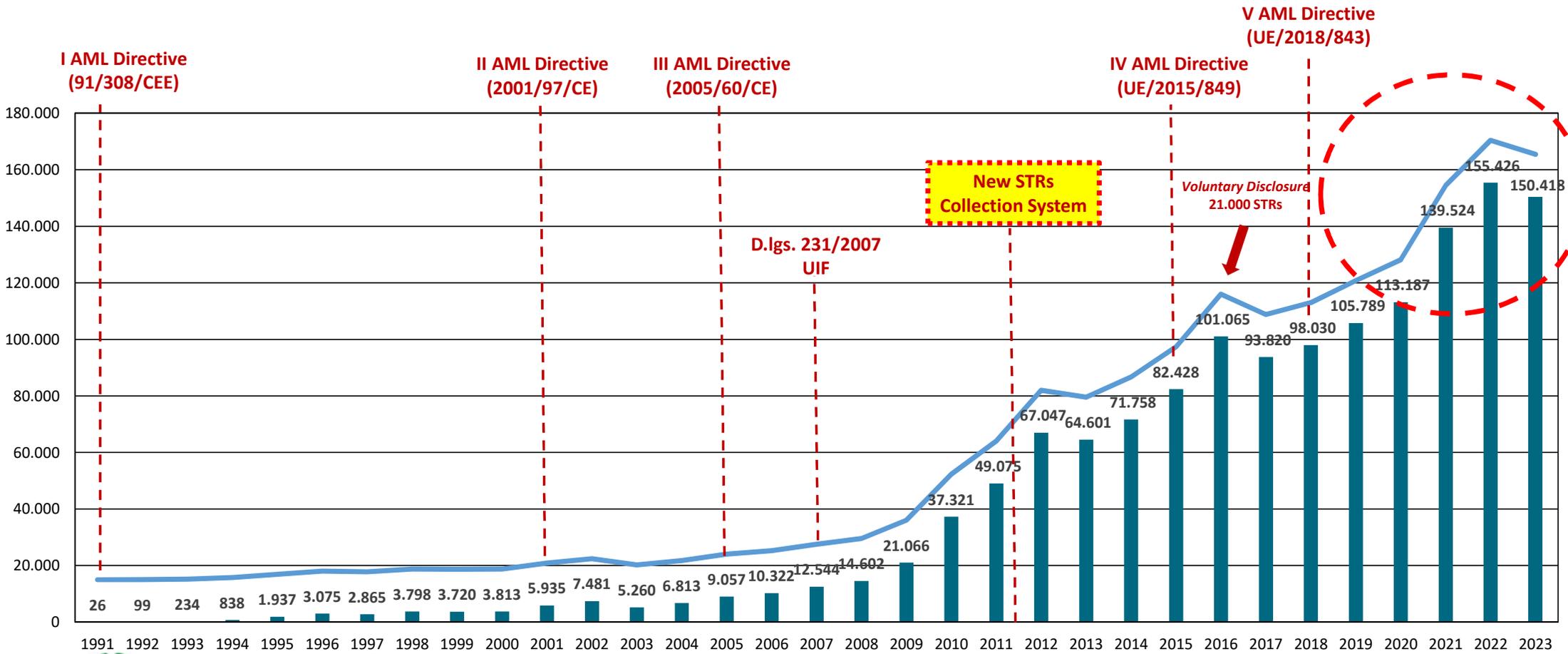
Each FIU is **autonomous** and operationally **independent**: it therefore has the authority and ability to carry out its functions, including the ability to autonomously decide to analyze, request and disseminate specific information.

The FIU is responsible for communicating the **results of its analyzes** and any other relevant information to the competent authorities if there are suspicions of money laundering, associated predicate crimes or terrorist financing.

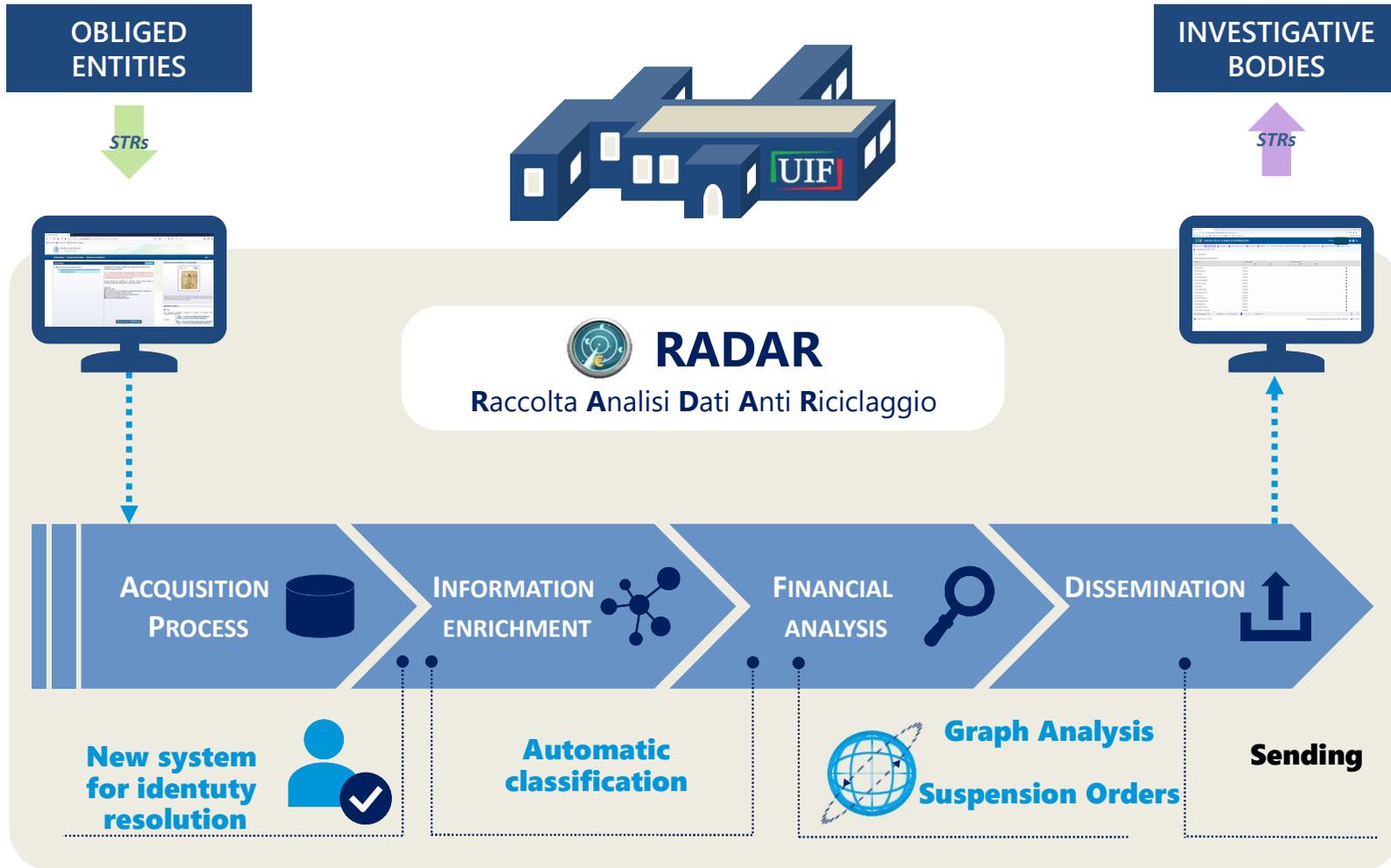
The FIU is empowered to obtain **additional information** from all obliged entities (potentially around 2 million entities, including public administrations)

The Italian FIU fully responds to this model ...

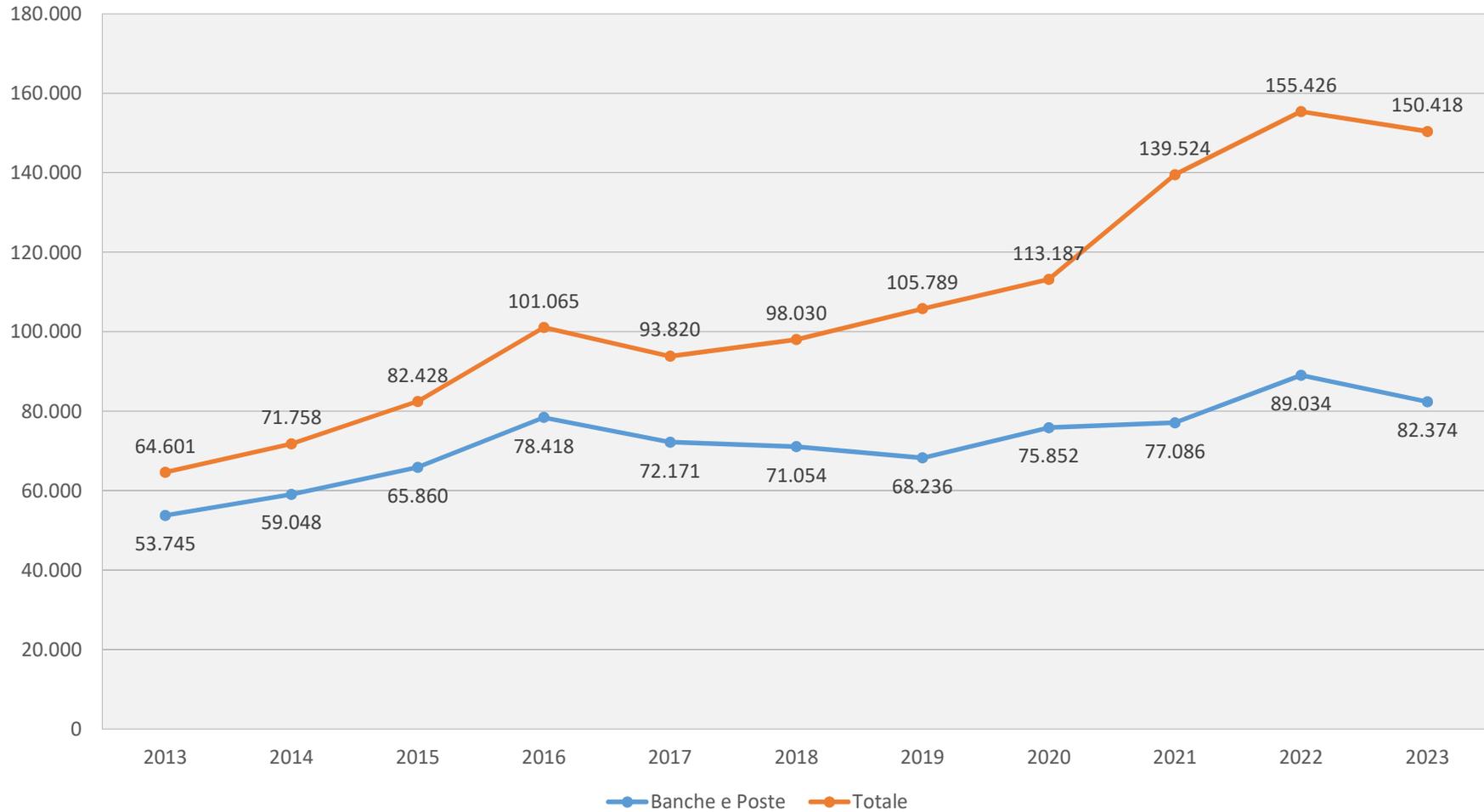
GAFI, MER on Italy: «The UIF is a well-functioning financial intelligence unit. It produces good operational and high quality strategic analyses that add value to the STRs. Its technical notes serve the GdF-NSPV and DIA in launching ML, associated predicate crimes, and TF investigations».



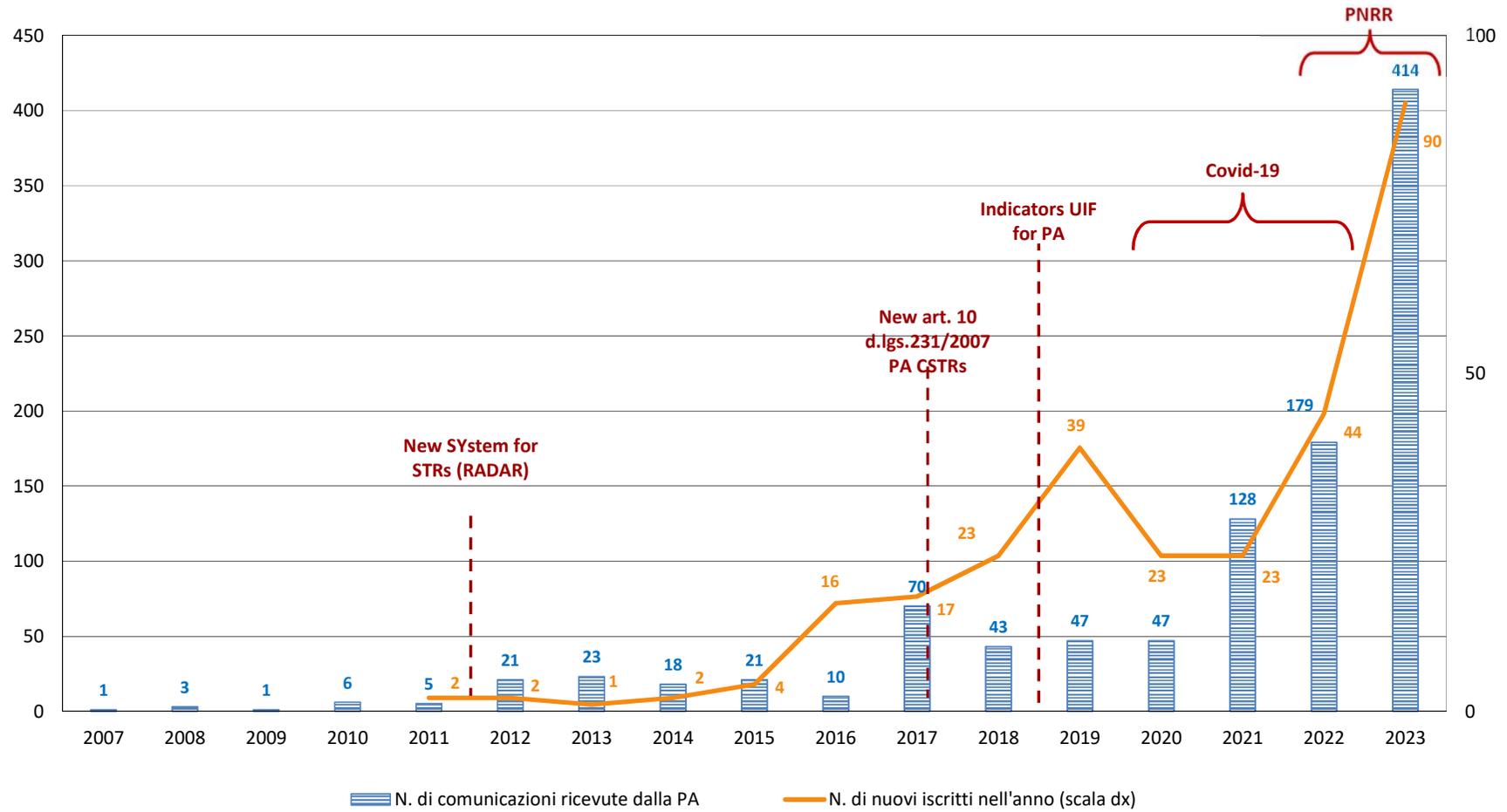
STRs financial analysis process



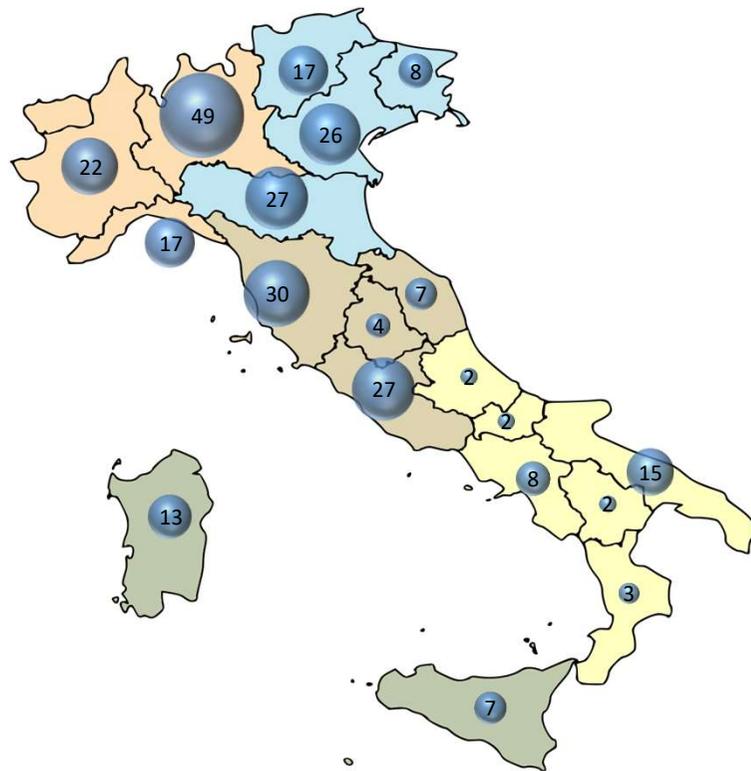
STRs Trend – typologies of contributors (Banks vs Special Sectors)



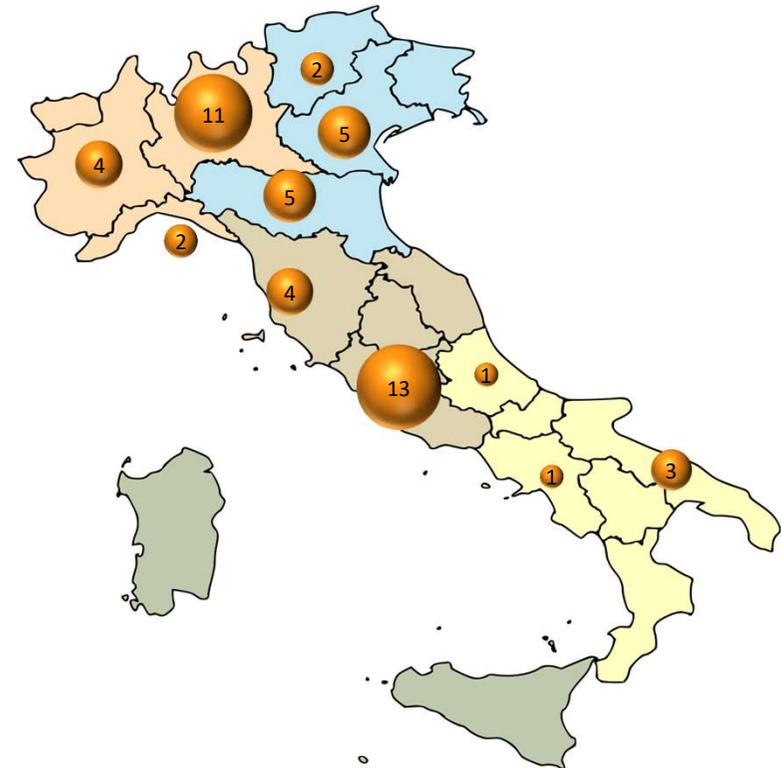
STRs Trend – typologies of contributors (Public Offices)



Public Offices Geographical Distribution



Registered PA



Active PA

* 31/12/2023

The tools for fulfilling obligations (Focus NRRP)

NRRP Guidelines issued by State General Accounting (MEF)



Piano Nazionale per la Ripresa e la Resilienza (PNRR)

Linee Guida per lo svolgimento delle attività di controllo e rendicontazione degli interventi PNRR di competenza delle Amministrazioni centrali e dei Soggetti attuatori

Ver. 1.0 (agosto 2022)



✓ a) SGA Circular Letter n. 30 of 11.08.2022

recalls the importance of activating **adequate management and control systems** to ensure the correct use of financial resources and the achievement of objectives within the set deadlines; «Central administrations» and «Implementing entities» are **required to carry out checks on the data required by the anti-money laundering legislation** (e.g. “beneficial ownership”)

✓ b) Guidelines for carrying out checks and reporting activities of NRRP

par. 3.4 describes the **regulatory framework on AML** and the institutional architecture of the prevention system, drawing attention to: role of the FIU, Instructions of 23 April 2018, Communication of 11 April 2022, Press Release of 29 May 2023

✓ c) SGA Circular Letter n. 27 of 15.09.2023 on STRs

provides functional indications to enhance anti-money laundering safeguards in the NRRP context, integrating what has already been reported in the "Guidelines" and in the UIF Communication of 11 April 2022 and in the **UIF thematic newsletters**

c) provides functional indications to enhance anti-money laundering safeguards in the NRRP context

List of **specific behavioral profiles** at risk to be taken into consideration during the in-depth investigations requested with regard to the **beneficial owners**, the characteristics and **economic conditions of the subjects** requesting access to the benefits falling within the perimeter of the NRRP; in particular:

*Risk profiles concerning the **ownership, managerial and control structures** of the company requiring funds*

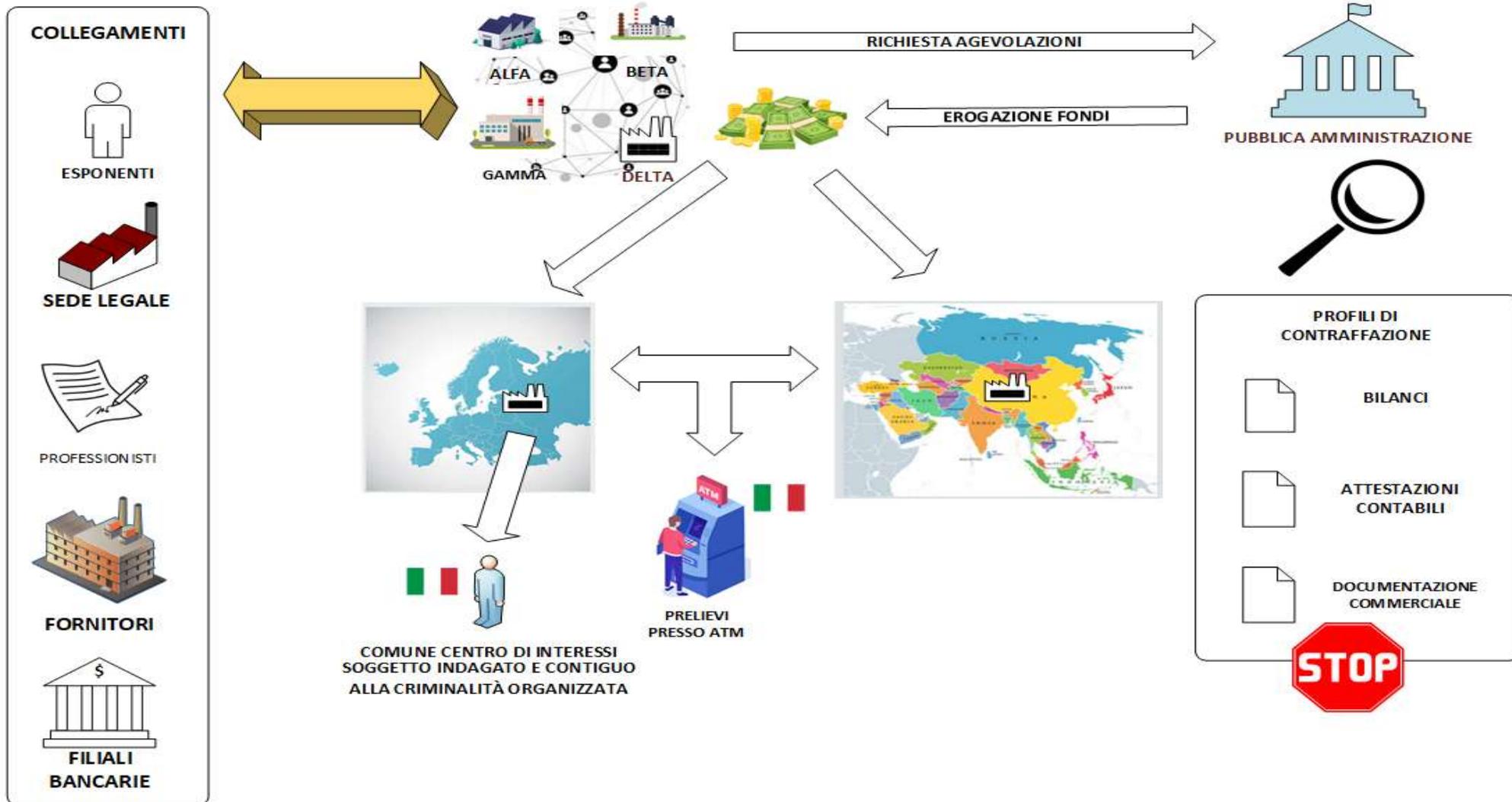
*Risk profiles concerning the **methods of relating** to the Administration, as well as the **documentation** presented by the company*

*Risk profiles concerning the **economic and financial situation**, as well as the company's activity*



Any difficulty or impossibility of identifying the beneficial owner(s) of the companies involved in the implementation of the interventions of the Plan does not imply any automatic sending of the STRs to the FIU, but constitutes an element to be evaluated together with the any further anomaly elements

Typologies – case n. 1



Typologies – case n. 9

