



Anti-Money Laundering Council

ANNUAL REPORT 2015



About the AMLC

In line with the policy of the State to protect the integrity and confidentiality of bank accounts, and to ensure that the Philippines shall not be used as a money laundering site for the proceeds of any unlawful activity, the Anti-Money Laundering Council (AMLC) was created by Republic Act (RA) No. 9160, otherwise known as the Anti-Money Laundering Act of 2001 (AMLA).

The AMLC's main task is to implement the AMLA, as amended by RA Nos. 9194, 10167, and 10365, and RA No. 10168, otherwise known as the Terrorism Financing Prevention and Suppression Act of 2012 (TF Suppression Act).

The AMLC is a *hybrid-type* of financial intelligence unit (FIU) because in addition to the core functions of an FIU (such as receipt, analysis and dissemination of suspicious transaction and other reports), it performs investigative and prosecutorial functions.

The AMLC is composed of the Governor of the Bangko Sentral ng Pilipinas (BSP) as Chairman, and the Commissioner of the Insurance Commission (IC), and the Chairperson of the Securities and Exchange Commission (SEC) as Members. The Chairman and Members act unanimously in the discharge of the functions of the AMLC.

To be a world-class financial intelligence unit that will help establish and maintain an internationally compliant and effective anti-money laundering regime which will provide the Filipino people with a sound, dynamic and strong financial system in an environment conducive to the promotion of social justice, political stability and sustainable economic growth. Towards this goal, the AMLC shall, without fear or favor, investigate money laundering and terrorist financing, and prosecute money laundering.



HON. AMANDO M. TETANGCO, JR.
Chairman, Anti-Money Laundering Council
Governor, Bangko Sentral ng Pilipinas

INTENSIFYING THE FIGHT AGAINST MONEY LAUNDERING AND TERRORIST FINANCING

This report documents the numerous accomplishments of the AMLC and its Secretariat in 2015, which have been geared toward preserving the integrity of the financial system by, among others, further reinforcing the areas of national and international cooperation and coordination in the fight against ML and TF.

In 2015, the Philippines, with its sound macro fundamentals, showed yet again strong economic performance. The country continued to post unprecedented growth in its economy, driven in part by a stable, responsive, and inclusive financial system that is deeply anchored in public confidence which, in turn, is reposed on secure and reliable financial transactions.

Notwithstanding this success, the Philippines remains to be actively informed and vigilant of the various threats that face the global community, which could undermine the stability of the domestic, as well as the international financial system and the world economy.

In this age of technological advancement, unprecedented challenges in the areas of money laundering (ML) and terrorism financing (TF) have evolved underscoring the fact that more needs to be done. Being fully aware of the ML and TF developing trends brought about by the information technology era, the Anti-Money Laundering Council (AMLC) took deliberate steps to fulfill its objective of preserving the integrity of the financial system by further reinforcing the areas of national cooperation and coordination.

One of the important actions undertaken by the AMLC is the conduct of a National Risk Assessment (NRA) using a risk-based approach, which is central to the Financial Action Task Force Recommendations.

Through the NRA, the AMLC, together with other government agencies, continues to review and map the country's vulnerabilities and weaknesses as regards ML and TF. This enables the Philippines to identify, assess, and understand its ML and TF risks in order to apply anti-money laundering and counter-financing of terrorism (AML/CFT) measures that correspond to the different levels of risk, with the end that the Philippines can more effectively target and prevent ML and TF.

Likewise, in light of the evolving information technology schematics, the AMLC recognizing the role of a robust database to inform standard setting and decision-making, introduced improvements in reportorial requirements and data analytics.

The 2015 AMLC Annual Report documents the numerous accomplishments that the Council and its Secretariat have achieved. Our efforts are complemented by the rest of the nation—you, our stakeholders—who remain actively involved and committed to the common cause. We thank you for helping us achieve our shared objectives in fighting ML and TF, not only on the national front but also in the international arena, and contributing to the continued integrity of the Philippine financial system.

The AMLC is grateful for having yet another opportunity to share with the public its undertakings and significant milestones in the country's fight against money laundering and terrorism financing. May this report bring hope upon the Filipino people, and remind us that together we can achieve a financial system that is inclusive, stable, safe, and with integrity.

“There are no magic wands, no hidden tricks, and no secret handshakes that can bring you immediate success, but with time, energy and determination you can get there.” These inspiring words by Darren Rose provide the construct upon which the year that was is founded upon. Indeed, the task of ensuring a jurisdiction safe from the crutches of money laundering and terrorist financing presents an ever dynamic and continuing challenge. A test, more so like a puzzle where we continuously work hard to find the pieces befitting current challenges.

Thus, with unrelenting resolve, the AMLC and its Secretariat’s men and women strive on with greater energy and determination. Truly, the year’s milestones reflect our focus to help secure the financial system in order to pave the way for development and progress under a regime of good governance. Working together with our partner agencies and other stakeholders, we endeavor under integrated and inclusive international and domestic policies, for a stable economic environment.

Another year older, we work forward with a positive perspective to keep on strengthening our country’s AML/CFT regime and sustaining comprehensive strategic initiatives to combat money laundering and terrorist financing. With continued trust and confidence, we make every effort to establish a strong, independent and relevant Philippine financial intelligence unit.



HON. TERESITA J. HERBOSA
Member, Anti-Money Laundering Council
Chairperson, Securities and Exchange
Commission

[T]he AMLC had vigorously investigated and pursued criminal elements in the illegal drug trade, investment scammers, and kidnappers. Without fear or favor, and at tremendous cost, we had also begun taking on various senior politicians and their assistants who are facing charges of plunder.

I can truly say that the AMLC has been true to its commitment to preserve the integrity of the financial system. The Council, aided by the Secretariat, roared like a lion as it upped the ante against money laundering and financing of terrorism. Thereby, it placed the Philippines among the ranks of distinguished financial intelligence units in the region. Moreover, the AMLC strengthened its position through its increasingly varied experience in the last five years, and has made itself better known beyond financial circles as it accelerated its anti-money laundering educational programs.

We at the AMLC had vigorously investigated and pursued criminal elements in the illegal drug trade, investment scammers, and kidnappers. Without fear or favor, and at tremendous cost, we had also begun taking on various personalities regardless of their positions who are facing charges of plunder. A good deal of our work, of course, will remain unrecognized, as we remain committed to protect the confidentiality of bank deposits, and to enhance public trust in our financial system.

As the AMLC intensified its anti-money laundering mission, it consistently – and quietly – cooperated with other government agencies in their respective efforts to fight crime and fulfill their mandates. Indeed, righteousness is as bold as a lion. We, in turn, are ever grateful for their cooperation with us.

We have also been successful in spearheading several amendments to the Anti-Money Laundering Act of 2001, and implementing rules. Our efforts have also been recognized by the Financial Action Task Force (FATF), thereby sparing the country from inclusion in the notorious “blacklist”.

The battle toward a clean and robust financial system will continue in breadth and intensity. I am confident that with your help and support we can accomplish this important task.

Maraming salamat po!

HON. EMMANUEL F. DOOC
Member, Anti-Money Laundering Council
Commissioner, Insurance Commission



Through the years, the AMLC has taken on bigger and bolder challenges in its fight against money laundering, with cases now involving larger amounts plundered from our national treasury, well-entrenched drug lords and complicated pyramiding scams. Without fear or favor, it has soldiered on against high profile personalities and cases.

When the cases were filed involving some of the highest officials of the land, as well as a number of notorious drug personalities, the mettle of the AMLC and its Secretariat was tested. I am proud to say that we have all been tested by fire. All these cases are gradually reshaping and redefining the increasing role of AMLC in fighting corruption, drug-related crimes and other predicate crimes.

The AMLC is successful due to its collaborative partnership with its domestic and global allies. Domestically, the AMLC has established close ties with various law enforcement agencies and other government offices, and cultivated valuable cooperation with the private financial sector from the banking, insurance, and securities industries. The strong collaboration of the AMLC with the public and private sector enables it to enlist their assistance for the more resolute prevention, detection, and investigation of money laundering offenses and prosecution of offenders.

International cooperation is equally important as domestic cooperation. Thus, the AMLC has likewise fostered international cooperation by the execution of Memoranda of Understanding with foreign FIUs to establish the mechanism for secure information-sharing.

All this became possible because of the hardworking employees of the AMLC Secretariat. As the AMLC nears its 15th year, the cases have become more numerous and much complicated. Money laundering techniques and typologies have become grander and more sophisticated. Nevertheless, the public can be assured that, guided by the AMLC mission to protect and preserve the integrity and confidentiality of bank accounts, to ensure that the Philippines shall not be used as a money laundering site for proceeds of any unlawful activity, and to extend cooperation in transnational investigation and prosecution of persons involved in money laundering and terrorist financing activities, the AMLC Secretariat will continue to work tirelessly and move forward.



ATTY. JULIA C. BACAY-ABAD
Executive Director
Anti-Money Laundering Council Secretariat

c o n t e n t s

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SECRETARIAT**

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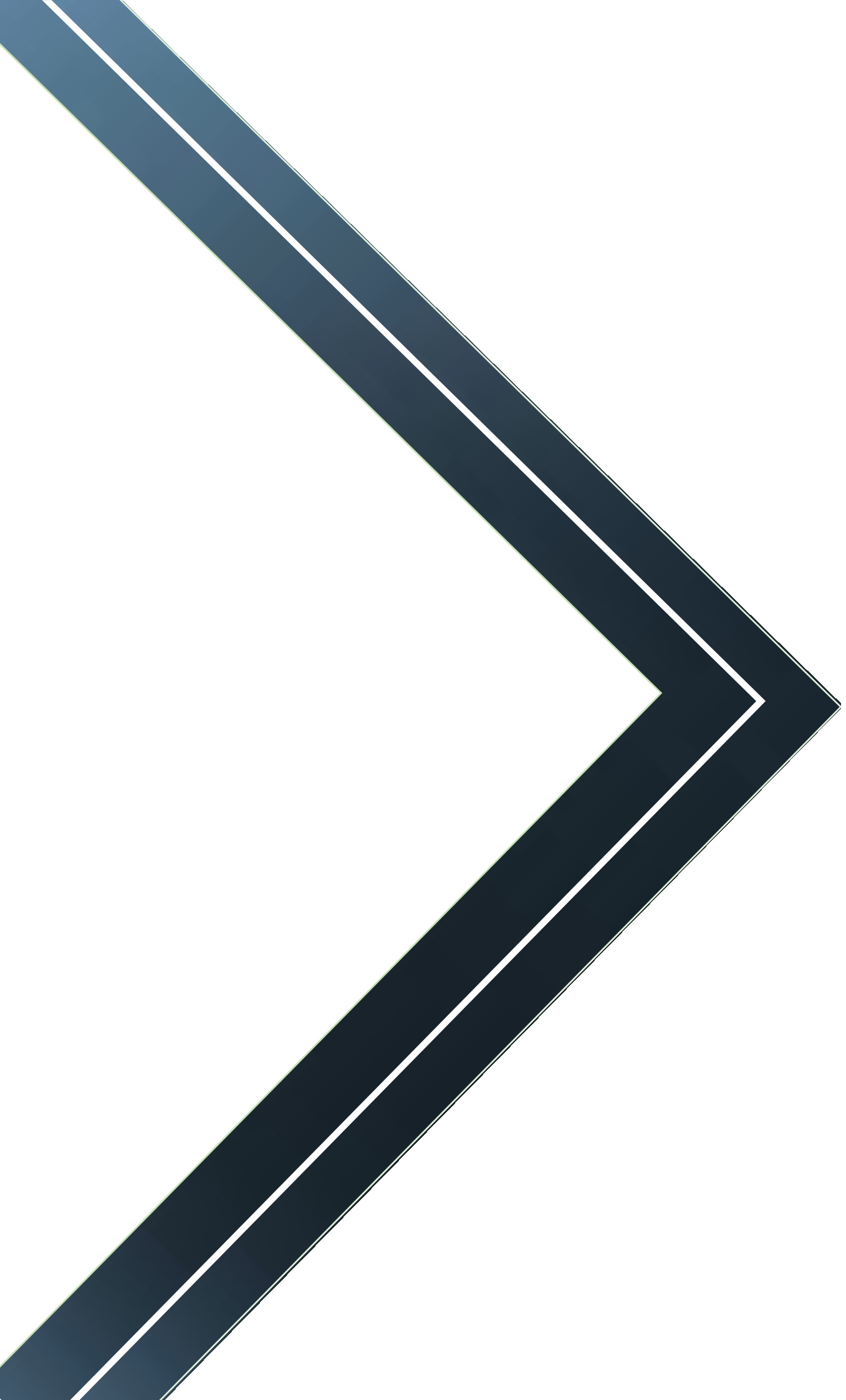
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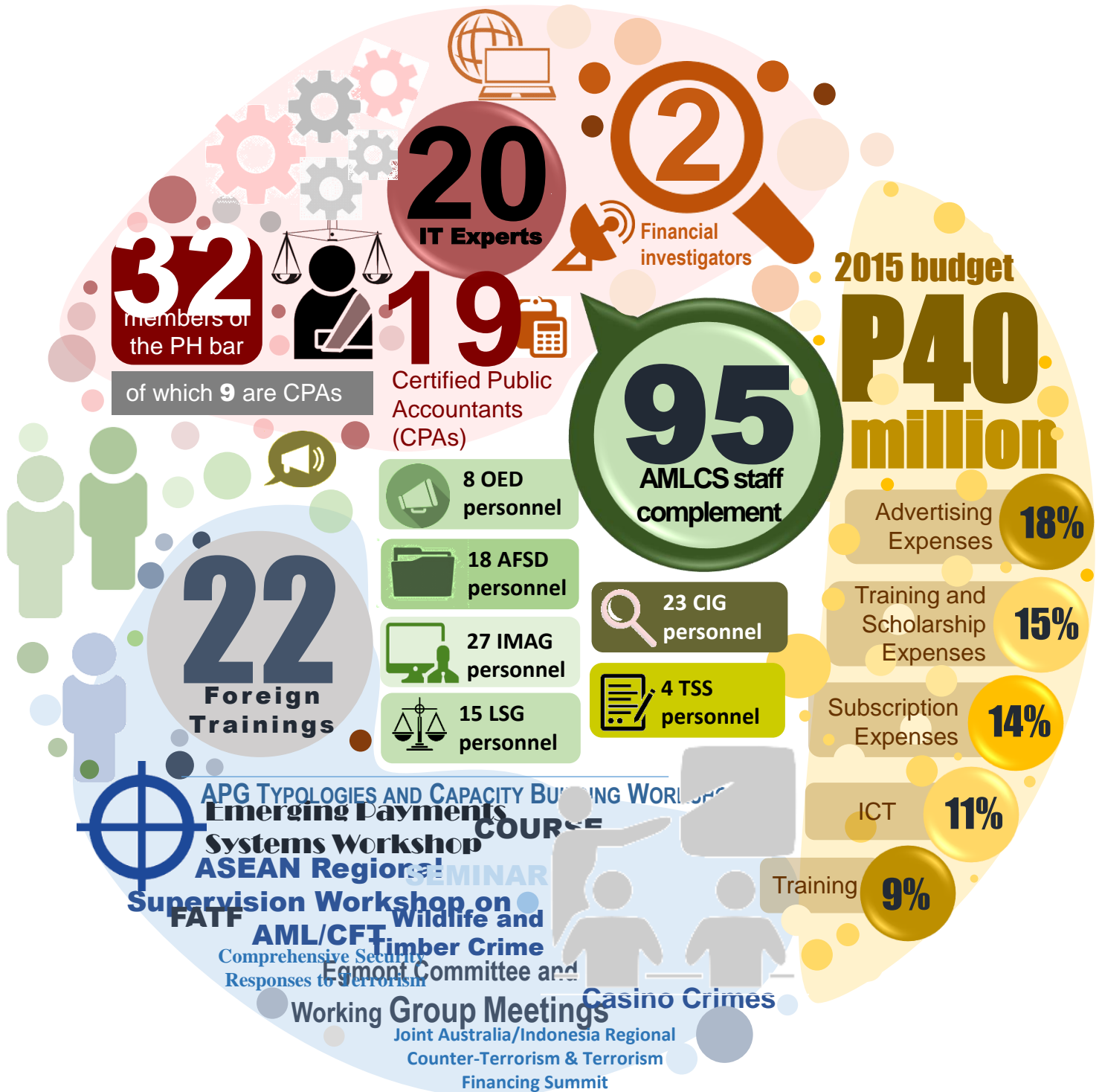


The AMLA authorized the AMLC to create a Secretariat to assist it in fulfilling its vision and mission and in undertaking any or all of its anti-money laundering operations.

Headed by an Executive Director who has a term of five (5) years and must be a member of the Philippine Bar, the Secretariat is composed of a team of talented and dedicated professionals who endeavor to better perform the functions of the AMLC.

There are six (6) organizational units in the AMLC Secretariat that support the AMLC in the discharge of its functions: Office of the Executive Director, Technical Services Staff, Administrative and Financial Services Division, Legal Services Group, Compliance and Investigation Group, and Information Management and Analysis Group (IMAG).

Most AMLC Secretariat personnel are professionals and experts in their field. Out of the Secretariat's 95 personnel, 32 are members of the Philippine Bar, 9 of whom are also certified public accountants (CPAs). In addition, there are 10 CPAs (including one forensic accountant), 20 information technology experts, 8 former BSP examiners, and 2 financial investigators, one a former police officer, and the other, a former law enforcement agent.



collection and analysis

2

As of 31 December 2015, the AMLC database showed one hundred eleven (111) additional covered persons (CPs) registered with the AMLC, tending a 4.26% growth compared to 2014 data. Among the BSP-supervised entities that registered with the AMLC were under the categories of foreign exchange (FX) dealers, money changers and remittance agents, and pawnshops with corresponding percentage increase of 36.84% and 9.12%, respectively. For the IC- and SEC-supervised CPs, insurance brokers, and financing companies that registered with AMLC increased by 10.14% and 3.42%, respectively. The CPs that reported covered transaction reports (CTRs)/suspicious transaction reports (STRs) likewise increased by 4.37% mostly under the categories of rural banks, financing companies, and mutual fund/investment companies.

Number of CPs Registered and Reporting to the AMLC

Supervising Authority	Years			Years		
	No. of CPs Registered with AMLC			No. of CPs Submitting Reports		
	2013*	2014*	2015	2013	2014	2015
BSP	1,755	1,855	1,935	890	930	957
IC	233	244	257	64	72	79
SEC	494	508	526	76	166	183
Total	2,482	2,607	2,718	1,030	1,168	1,219

**Note: 2013 and 2014 statistics on CPs under BSP, SEC, and IC in the 2014 Annual Report were revised.*

In order to ensure the quality of CTRs/STRs reported to the AMLC, the IMAG has fully implemented the use of a standard report format, namely the CTR/STR Format 1.0, starting 1 January 2016. All CPs are now mandated to submit their CTRs/STRs in the prescribed format, and abide by the guidelines on the mandatory information for each type of transaction. The table below shows the number of CTRs/STRs submitted per SA.

Number of CTRs and STRs per SA

Supervising Authority	2013		2014		2015	
	CTR	STR	CTR	STR	CTR	STR
BSP	45,531,805	94,270	43,804,450	94,483	35,657,724	145,861
IC	90,539	263	84,258	364	68,889	467
SEC	52,512	17	493,111	92	595,451	70
Total	45,674,856	94,550	44,381,819	94,939	36,322,064	146,398

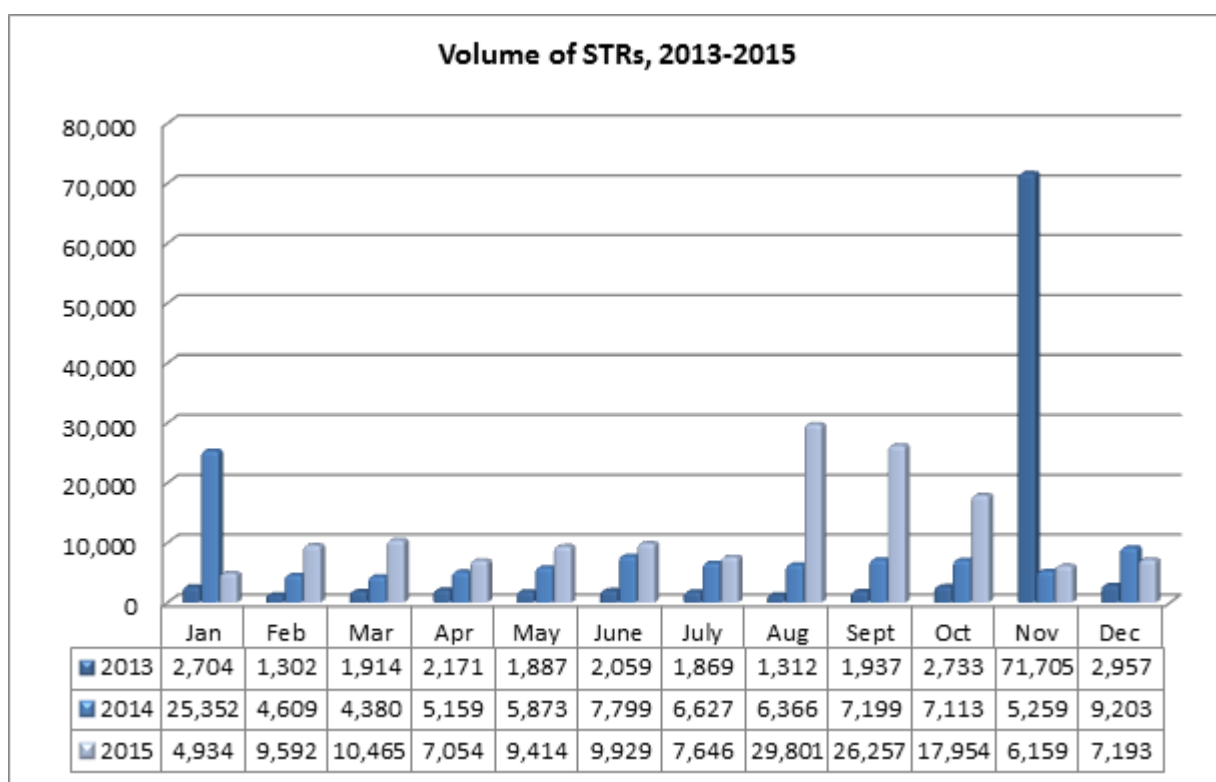
A decline by 18.16% in the reporting of CTRs was seen in 2015. The rationale for the decrease in CT reporting may be attributed to AMLC Resolution Nos. 10 and 10-C, Series of 2013. The former refers to the deferred reporting of “no or low risk” covered transactions while the latter refers to new policies in the data collection system required to be adopted by CPs for uniform implementation.

In 2015, the AMLC received 146,398 STRs, a 54.02% upsurge from the 2014 data of 94,939 STRs. The bulk of the STRs reported in the months of August, September, and October were related to violation of the Securities Regulation Code of 2000. These STRs pertained to the global investment scam involving several entities and individuals allegedly selling unregistered securities (i.e., gold) to the public without a license.

Swindling remains one of the top predicate crimes in 2015, accounting for

32% of the total STRs. Most of these STRs were related to ATM/credit card fraud.

Seemingly, the positive trend in the STRs for violations of the Electronic Commerce Act of 2000, Anti-Carnapping Act of 2002, violations of the Anti-Trafficking in Persons Act of 2003, and Financing of Terrorism, with annual growth rates of 733.70%, 5,916.67%, 1,266.40% and 1,238%, respectively, indicates the enhanced awareness of CPs in reporting suspicious transactions for new predicate crimes under RA No. 10365. Table 3 shows the three-year comparative STR data per predicate crime for the period 2013 to 2015.



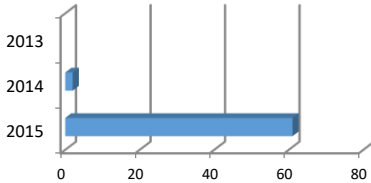
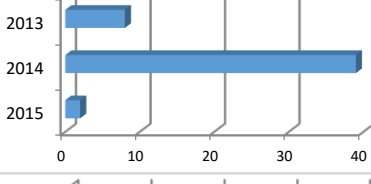
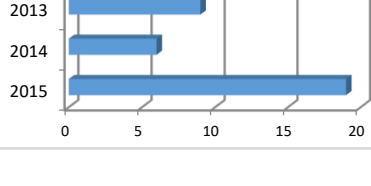
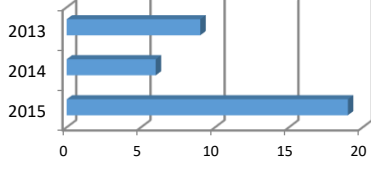
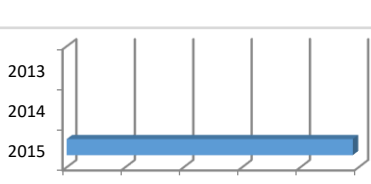
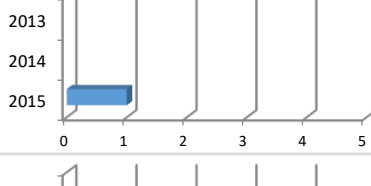
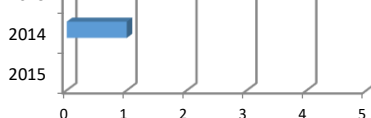
Summary of Suspicious Transaction Reports, 2013 to 2015

Unlawful Activity	Number of STRs			
	2013	2014	2015	
Swindling	13,743	31,485	46,835	
Qualified theft	569	580	881	
Fraudulent practices and other violations of the Securities Regulation Code of 2000	72,174	2,026	43,714	
Plunder	114	254	209	
Kidnapping for ransom	15	69	62	
Graft and corrupt practices	2,103	25,466	1,283	
Drug trafficking and related offenses	123	906	562	
Violations of the Electronic Commerce Act of 2000	254	3,799	6,524	
Bribery and Corruption of Public Officers		69	15	
Felonies or offenses of a similar nature that are punishable under the penal laws of other countries	19	191	160	
Smuggling	92	888	371	

Summary of Suspicious Transaction Reports, 2013 to 2015 (cont.)

Unlawful Activity	Number of STRs			
	2013	2014	2015	
Robbery and Extortion	11	53	75	
Malversation of public funds and property	5	26	74	
Terrorism and conspiracy to commit terrorism/acts of terrorism	3	13	11	
Financing of Terrorism	1	25	44	
Forgeries and Counterfeiting		2	138	
Jueteng and Masiao	14	44	41	
Hijacking and other Violations under RA6235; Destructive Arson and Murder	7	3	30	
Violations of the Anti-Trafficking in Persons Act of 2003	7	189	62	
Violations of the Anti-Carnapping Act of 2002	1	6	686	
Violations of the Anti-Child Pornography Act of 2009		281	292	

Summary of Suspicious Transaction Reports, 2013 to 2015 (cont.)

Unlawful Activity	Number of STRs			
	2013	2014	2015	
Violations of the Intellectual Property Code of the Philippines		2	61	
Violations of the Revised Forestry Code of the Philippines		2	23	
Violations of the Migrant Workers and Overseas Filipinos Act of 1995	8	39	2	
Violations of the Philippine Mining Act of 1995	9	6	19	
Violations of the Decree Codifying the Laws on Illegal/Unlawful Possession, manufacture, Dealing in, Acquisition or Disposition of firearms, ammunition or explosives		3	3	
Frauds and Illegal Exactions			98	
Violations of Anti-Fencing Law		4		
Violations of Special Protection of Children Against Abuse, Exploitation, and Discrimination Act			1	
Violations of the National Caves and Cave Resources Management Protection Act		1		

Strategic Analysis Function of the FIAS

Pursuant to Section 7(7) of the AMLA, as amended, and FATF Recommendation 29, the Financial Intelligence Analysis Staff (FIAS) has proposed a strategic analysis on the cross border investment fraud in the Philippines on 17 March 2015. The study uses descriptive and quantitative techniques in determining the impact of cross-border investment fraud to money laundering in the Philippines covering the period 2010 to 2014. It also considered available data from AMLC's database, search requests from Law Enforcement Agencies (LEAs), and ESW (Egmont Secure Web) requests for the same period.

Based on the STRs and other requests received by the AMLC from foreign counterparts, it appears that the Philippines has become a destination of proceeds of and channel for investment fraud, particularly those involving boiler room, recovery room, and advance fee fraud. The results of the study may be used by the AMLC, LEAs, and other state agencies to determine money laundering vulnerabilities of cross-border investment fraud, and to enhance their knowledge and understanding on the methods used to defraud their victims. It may also help establish policies and goals for AMLC, or more broadly for other entities within the AML/CFT regime.

Money Laundering Investigation

Unlike traditional FIUs which only receive, analyze, and disseminate financial information, the AMLC is also authorized under Section 7(5) of the AMLA, as amended, to “investigate suspicious transactions and covered transactions deemed suspicious after an investigation by the AMLC, money laundering activities, and other violations of this Act”. The AMLC, in its Resolution No. 6, Series of 2006, delegated the authority to investigate to the AMLC Secretariat.


In particular, the AMLC Secretariat performs the following functions related to investigation:

- a) Investigate suspicious transactions, covered transactions deemed suspicious after investigation by the AMLC, money laundering activities, and other violations of the AMLA, as amended;
- b) Investigate terrorist financing (TF) activities and other violations of the TF Suppression Act;
- c) Act on requests for investigation or information from domestic law enforcement and other agencies of the government, and requests for assistance from other jurisdictions and international organizations;
- d) Gather evidence for the purpose of establishing probable cause required in the filing of petitions for freeze order, applications for bank inquiry, civil forfeiture cases, and criminal complaints for money laundering; and
- e) Conduct administrative investigation on violation by covered persons of the AMLA, as amended, and its RIRRs.



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compliance,
investigation &
enforcement



One of the most effective tools used by the AMLC in money laundering investigations is bank inquiry. Section 11 of the AMLA, as amended, authorizes the AMLC to inquire into bank deposits and investments with any banking institution or non-bank financial institution as an exception to the Law on the Secrecy of Bank Deposits (RA No. 1405). In case the unlawful activity involves illegal drug trafficking, kidnapping for ransom, or terrorism, the AMLC only needs to issue a Resolution authorizing the AMLC Secretariat to inquire into the said bank account or investment. For other types of unlawful activities such as corruption, and *estafa* or swindling, among others, the AMLC has to file, through the OSG, an *ex parte* application for bank inquiry with the Court of Appeals (CA) to obtain the records pertaining to the said account or investment. If the CA finds probable cause that the bank account or investment is related to an unlawful activity, it will grant the application.

In 2015, a total of fifteen (15) bank inquiries were conducted, eleven (11) of which were court-authorized inquiries and four (4) were made pursuant to Resolutions issued by the AMLC. A total of 3,391 bank accounts were examined.

Despite having a limited number of investigators, the AMLC has investigated large corruption and fraud-related money laundering

cases which were given priority being of public interest. In 2015, AMLCS investigators were summoned to testify before the Sandiganbayan in petitions for bail filed by two (2) incumbent senators who were arrested for their involvement in the Priority Development Assistance Fund (PDAF) scam. Both petitions were eventually denied based on the testimonies of the AMLCS investigators.

The investigation conducted by the AMLCS in relation to the PDAF scam garnered for it the Best Egmont Case Award (BECA) in 2015. The BECA is an annual award being given by the Egmont Group to the adjudged best case from among entries submitted by member FIUs and selected based on the use of new methods and solutions, and collaboration with law enforcement agencies, among others. The evaluation is done in the course of Egmont Group's plenary sessions, and the Egmont Group handpicks the best presentations submitted by FIUs.

In order to address the challenges brought about by the amendments to the AMLA under RA No. 10365 (i.e., additional covered persons, and increase in the number of predicate crimes), as well as the increasing number of referrals from LEAs and foreign counterparts, the AMLC endeavors to augment its staff complement through

reorganization, and to enhance the investigation skills of its personnel through a more structured capacity building program.

Compliance and Enforcement

To ensure faithful compliance by covered persons with the law, Section 7(11) of the AMLA, as amended, authorizes the AMLC to impose administrative sanctions for violation of the AMLA, the RIRRs, as well as orders and resolutions issued by the AMLC. Further, Section 14(f) of the AMLA empowers the AMLC to impose administrative sanctions, including monetary penalties up to PHP500,000 per violation, warning or reprimand, upon any covered person, its directors, officers, employees, or any other person.

The BSP, the SEC, and the IC, as the regulatory and supervisory authorities for the banking, securities, and insurance sectors, respectively, conduct examination of covered persons and determine compliance with the requirements of the AMLA, as amended, and its RIRRs, particularly on customer due diligence, record-keeping, and submission of CTRs and STRs to the AMLC. Supervisory findings on AML are forwarded to the AMLC for administrative investigation.

The imposition of administrative sanctions has been held in abeyance pending the issuance of: (i) the RIRRs pursuant to the amendment of the AMLA under R.A. No. 10365; and (ii) the Guidelines in the Imposition of Administrative Penalties by the AMLC.

Money Laundering Typologies

1 Pioneer TF Case in the Philippines

A TF case related to the Abu Sayyaf Group (ASG)¹ is the first case filed by the AMLC pursuant to the TF Suppression Act. The case highlights the critical role of the AMLC as the Philippines' FIU that is able to trace, freeze, and seize funds related to terrorist financing notwithstanding bank secrecy laws and jurisprudence limiting access to bank records by LEAs.

In June 2014, a major Philippine newspaper publication reported

that the intelligence operatives of the PNP and the AFP arrested KM, a leader and alleged financier of ASG. KM was a vital officer in the ASG such that US Authorities, in 2009, offered a US\$500,000 bounty for either his termination or capture. Previously, KM was arrested in 2004 for multiple murder, multiple frustrated murder, and multiple attempted murder for a series of bombing incidents in Zamboanga City and Cotabato City in 2002. KM subsequently escaped from the Kidapawan provincial jail in 2007, and returned to the ASG to assist in its operations.

In a meeting of the Joint Terrorist Financing Investigation Group (JTFIG) held in August 2014, the PNP-Criminal Investigation and Detection Group (PNP-CIDG) and the PNP-Intelligence Group (PNP-IG) requested the AMLC to conduct a financial investigation on a bank account believed to be owned by KM. At the time KM was arrested in June 2014, he was in possession of an automated teller machine (ATM) card for a deposit account under the name of RST in M Bank. PNP-IG suspected that the said account may have been used by the ASG in funding its activities.

¹The ASG is a designated entity listed under entry no. QDe.001 of the United Nations Security Council Resolution (UNSCR) 1267/1989 (otherwise known as The Al-Qaida Sanctions List) covering individuals and entities associated with Al-Qaida. The ASG is a major terrorist organization based in the Southern portion of the Philippines and is notorious for carrying out illegal activities such as bombings, kidnappings, assassinations, rape, extortion, and drug trafficking.

PNP-IG confirmed that apart from being actively involved in kidnapping for ransom and terrorist activities of ASG, KM also solicited funds from ASG supporters in Saudi Arabia, and served as the courier of funds to its former leader, KJ. PNP-IG believed that KM received PHP30,000 (approximately USD643) from ASG leader IH, and the said amount was deposited to the account linked to the ATM card in the name of RST.

The AMLC conducted financial investigation on the deposit account related to the ATM card recovered from KM. Taking into consideration the CTRs and STRs submitted by M Bank on the said deposit account, the AMLC issued Resolution No. TF-04 dated 25 March 2015 directing M Bank to immediately freeze and preserve the funds in the subject deposit account pursuant to AMLC Resolution TF-01 dated 19 September 2012, and Section 11 of RA No. 10168.

AMLC's investigation showed that the account was opened on 01 September 2011 using identification (ID) cards such as driver's license

and social security card purportedly issued by the Land Transportation Office (LTO) and Social Security System (SSS), respectively. Verification by the AMLC with LTO and SSS revealed, however, that the said government agencies have no record of the issuance of such ID cards. Evidence showed that RST is fictitious and non-existent, and thus could not have opened, much less maintained a bank account. The investigation also revealed that KM possessed, collected, used, and conveyed funds to ASG for the commission of its terrorist acts. KM admitted that he sent money to the ASG to buy weapons to commit terrorist acts in the Philippines.

The AMLC concluded that KM and IH used RST's account for ASG's operations, and that the subject account is effectively controlled by the ASG through KM. M Bank froze the funds in the subject bank deposit account amounting to PHP150,003.22 (approximately US\$3,260).

The AMLC continues to investigate other leads related to transactions in the said bank deposit account for the possible filing of civil forfeiture

cases against other funds and properties that may be identified, and the filing of criminal complaint for TF against KM and other officers of the ASG.

The AMLC investigation underscores the importance of a robust compliance and monitoring system of banks and other financial institutions in the detection and prevention of terrorist financing. Further, close cooperation with law enforcement and other government agencies is essential in order to effectively trace, seize, and forfeit funds used or to be used for TF, and hurdle impediments such as bank secrecy laws to facilitate prosecution of the said crime.

2 **"Boiler Room – Recovery Room" Scheme – Execution of an MLAT Request**

This case stemmed from two (2) requests for assistance from the National Bureau of Investigation (NBI), and two (2) Mutual Legal Assistance (MLA) requests from a court in Country B in connection with the investigation of a criminal syndicate for fraud and possible money laundering activities.

As a background, the Philippines has no existing Mutual Legal Assistance Treaty (MLAT) with Country B. The request was made pursuant to the United Nations

Convention on Transnational Organized Crime (UNTOC) and Section 13 of the AMLA, as amended, authorizing the AMLC to execute a request for assistance from a foreign State in the investigation or prosecution of a money laundering offense, in recognition of the principles of mutuality and reciprocity. A reciprocity certificate was issued by the Federal Public Service Justice of Country B for this purpose.

The criminal syndicate's scheme is comprised of two (2) phases: (i) the "Boiler Room" Operation, where victims are induced to "invest" in fake products by transferring funds to the syndicate's bank accounts in Hong Kong; and (ii) the "Recovery Room" Operation, where the syndicate will try to defraud the victims for the second time by representing themselves to be agents of law offices or fraud examiners who offer their assistance to the victims in recovering their "investments". All the victim had to do was to give an advance fee to allegedly defray the payment of taxes, hiring of lawyers, and other expenses.

Confidential documents received by Country B from Hong Kong authorities revealed that the criminal syndicate made fund transfers from Company FL's Hong Kong bank account to bank accounts in the Philippines. Further, classified information also confirmed that Company FL is involved in several "Boiler Room" operations. LEAs from Country B have established that the criminal syndicate has been active fifteen (15) times since 2009. It is estimated that the syndicate's fraudulent activities yielded proceeds amounting to more than ten million euros (€10,000,000) from Country B alone.

AMLC's investigation showed that the bank accounts subject of the requests were indeed involved in "Boiler Room" and "Recovery Room" operations. The volume of transaction reports received by the AMLC, involving substantial inward remittances from other countries, raised suspicion that the fund transfers are probably related to fraud and/or money laundering committed by the criminal syndicate. Notably, the same bank accounts and personalities are being investigated by Country B authorities for fraud and/or money laundering.

The AMLC filed an *ex-parte* petition for issuance of a freeze order, and *ex-*

parte application for bank inquiry to: (i) identify the perpetrators of the scheme; (ii) trace the proceeds of the fraudulent activities transferred to the Philippines; and (iii) gather evidence for filing of appropriate cases in court. Thereafter, the CA issued a freeze order, and order of bank inquiry based on the aforesaid petition and application. Examination and inquiry into the subject bank accounts were conducted, and the bank documents obtained were transmitted to the Embassy of Country B through the Philippine Department of Justice (DOJ).

3 Laundering the Proceeds of Corruption Using Cash, Corporate Vehicles and Trusts, Nominees and Gatekeepers

A number of construction projects were undertaken during the term of JB as Mayor of the City of M, including: (1) a new parking building; and (2) a new high school building. These projects were the subject of hearings by the Senate, and an investigation by the Office of the Ombudsman, among others, based on complaints of overpricing.

For the new parking building, the complaints alleged that the new parking building consisting of eleven (11) storeys with a total floor area of 31,928 sq. m. should have cost around PHP245 million based on data from the National Statistics Office. However, the building was constructed at a cost of PHP1.560 billion or an overprice of more than PHP1.3 billion. The

complaints also alleged that the new high school building consisting of ten (10) storeys with a total floor area of 18,373 sq.m. should have cost approximately PHP147 million although the building contractor was paid a total of PHP1.3 billion. The construction of both buildings started in 2007 when JB was mayor, and was undertaken by the same contractor which allegedly secured both projects through simulated biddings. Both buildings were scheduled to be completed by 2014, when JB's son succeeded him as mayor of the City of M. However, both buildings remained unfinished upon turnover to the City of M Government in 2015.

EM, JB's vice mayor during his term in the City of M, testified

before the Senate that for every project in the City of M, JB had a thirteen-percent (13%) share. For every collection by the contractor, the City Engineer delivered money to EM's office placed in three (3) bags—one (1) colored black, and the two (2) colored gray—marked with letters “J”, “E” and “G”. The bag marked letter “J” would be delivered to JB's son who eventually succeeded him as mayor; the bag with letter “E” would be delivered to EB, JB's Secretary, for the personal needs or expenses of JB; and, the bag with letter “G” to GL, JB's finance officer and coordinator with the private sector. The frequency of delivery of the bags depends upon the release of funds for ongoing projects at the City of M, although it was purported that EM usually delivered the bags containing the money two to three times weekly. EM estimated that each bag contained around PHP1,500,000 to PHP2,000,000, but on occasion, as much as PHP10,000,000.

Acting on the referral of the Ombudsman and taking note of the conduct of the Senate hearings, among others, the AMLC, through the OSG, filed an *ex-parte* application for bank inquiry into the bank accounts of JB; his son; his close associates, EB and GL; his former vice mayor, EM; his close friend, AT; and his suspected dummy entities.

AMLCS investigation revealed that several bank accounts, especially those of JB, and his joint accounts with EB and GL, among others, exhibited multiple large transactions amounting to billions of pesos coinciding with the period of the construction of the parking and high school buildings. In the case of JB, EM, and EB, among other government officials, the volume, frequency, and number of transactions were not consistent with the declared net worth in their respective Statements of Assets, Liabilities and Net Worth (SALN) from 2007 to 2014, coinciding with the period of construction of projects. Investigation also showed that the alleged election contributions to JB were not deposited directly to any of his accounts but passed through the joint accounts of EB and GL, consistent with EM's testimony that some of the bags of cash that he personally delivered to GL were intended to fund JB's election campaign.

Shortly after the Senate started conducting hearings in August 2014 regarding the said projects, EB and GL began selling securities in their names, making inter-account transfers within the same bank, pre-terminating time deposits and investment placements, encashing checks, withdrawing bank deposits, and closing bank accounts. Inasmuch as both EB and GL's annual incomes, even if combined, were

disproportionate to the amount of funds transacted, the AMLC determined that the funds they transacted were for the benefit of another person, and JB appeared to be their common link. Both EB and GL are known to be close associates of JB, and were summoned to attend the Senate hearings. However, both went into hiding and have been missing since the Senate hearings started.

The AMLC also conducted an investigation on the bank accounts of AT, a close friend of JB suspected to be acting as a dummy for the latter in several companies and acquiring properties.

The Senate conducted hearings on the ownership of certain properties in B province, including a 350-hectare hacienda, which allegedly belong to JB and were purportedly funded through kickbacks in various projects in the City of M during his mayoralty. EM testified that the overpayment in the construction projects was used to fund the purchase, construction works, and improvements in the said hacienda. To dispute the allegation that JB owns the hacienda, AT claimed that his company, SC RED Corporation (SC RED), is the true owner thereof. However, AT failed to present any certificate of title to support his allegation. Examination of the bank accounts of AT and SC RED did not show any payment for the hacienda's power consumption

which is inconsistent with AT's claim of ownership. Instead, it was actually AGF, Inc., a company incorporated by JB and his wife, which had been paying for the electricity bills of the hacienda. Although JB already divested his shares in the company, records with the SEC showed that the directors and officers of AGF, Inc. were the same persons implicated by EM in the Senate hearings for the construction projects. Analysis of the bank accounts of AGF, Inc. also showed that JB continued to receive funds from the said company.

The AMLC also inquired into the accounts of SB Law Firm which has multiple links to JB, whose daughter is a partner in the firm. One of the senior partners of the firm is a major shareholder in GH, Inc., a company managed by AT and

also allegedly owned by JB through dummies. The firm also represented JB and his son during the said Senate hearings. AMLC's investigation discovered that multiple checks involving millions of pesos were drawn against the accounts of persons linked to JB and his alleged dummy entities, and eventually deposited, credited, or transferred to SB Law Firm's accounts. Bank documents also established that SB Law Firm was principally involved in the transfer of funds across accounts owned by persons and entities with clear and discernible links to JB.

In May 2015, the AMLC, through the OSG, filed with the CA a petition for issuance of freeze order on 242 bank accounts, insurance policies, and securities in the names of the aforementioned parties. The CA issued an order to freeze said

assets upon finding of the existence of probable cause that the subject bank accounts are related to the unlawful activity of violation of RA No. 3019 or the Anti-Graft and Corrupt Practices Act, in relation to plunder under RA No. 7080. Prior to the expiry of the freeze order in November 2015, the AMLC filed a petition for civil forfeiture against most of the funds and assets subject of the freeze order.

4

PROSECUTION OF MONEY LAUNDERING AND RELATED CASES

Under the AMLA, as amended, the AMLC is authorized to institute civil forfeiture actions and all other remedial proceedings through the OSG and to cause the filing of complaints with the DOJ or the Office of the Ombudsman (OMB), as the case may be, for the prosecution of money laundering offenses.

The year 2015 ended with AMLC having a total of fifty (50) money laundering cases, of which sixteen (16) cases are pending preliminary investigation before the DOJ, one (1) case in the Sandiganbayan, and thirty-three (33) cases in the Regional Trial Court (RTC). In addition, there were fifty-eight (58) petitions for civil forfeiture, four (4) applications for bank inquiry, and six (6) petitions for freeze order.

There were a total of twenty-seven (27) cases filed in 2015: eleven (11) applications for bank inquiry; eight (8) petitions for freeze order; and eight (8) petitions for civil forfeiture.

Among the terminated or decided cases as of 31 December 2015, one hundred nine (109) were applications for bank inquiry; eighty-six (86) were petitions for freeze order; eighteen (18) were petitions for civil forfeiture; twenty-nine (29) were criminal complaints before the DOJ; and six (6) were criminal cases before the RTC.

Petition for Civil Forfeiture

Under Section 12 of the AMLA, as amended by RA No. 10365, the AMLC may seek forfeiture of any asset the value of which is equal to the proceeds of an unlawful activity. This measure greatly enhances the asset recovery efforts of the AMLC by allowing it to forfeit any monetary instrument or property in the event that the assets deemed to be proceeds of an unlawful activity or a money laundering offense cannot be located, or has been substantially altered, destroyed, concealed, removed, converted, transferred,

or is located outside the Philippines or commingled with other monetary instrument or property.

With this amendment, the unavailability of the assets deemed proceeds of an unlawful activity or money laundering offense due to the aforementioned circumstances does not preclude the Government from pursuing the forfeiture case.

The tables below show relevant statistics on the freeze order and civil forfeiture cases of the AMLC.

Properties Subject of Pending Civil Forfeiture Cases (as of 31 December 2015)

	Amount
Cash and Other Monetary Instruments	PHP 1,507,556,001.16
Value of Insurance Policies	138,016,323.25
Value of Shares of Stock	44,543,578.66
Estimated Value of Real Property	412,273,024.33
Estimated Value of Motor Vehicles	126,734,000.00
Sub-total	PHP 2,229,122,927.40

Foreign Denominations:

Foreign Currency	Currency Denomination	Amount	Exchange Rate	PHP Equivalent
US Dollar	USD	6,939,014.96	47.1660	327,285,579.60
Hong Kong Dollar	HKD	561,960.34	6.0857	3,419,922.04
Japanese Yen	JPY	4,299,806.20	0.3920	1,685,524.03
Euro	EUR	108,445.67	51.741	5,611,098.26
British Pound	GBP	6,661.88	70.1783	467,519.41
Chinese Yuan	CNY	3,016.88	7.2697	21,930.94
Australian Dollar	AUD	284,742.64	34.2652	9,756,763.51
Swiss Franc	CHF	76.57	47.7727	3,657.96
Canadian Dollar	CAD	664.15	33.9324	22,536.20
Sub-total			PHP348,274,531.95	

TOTAL AMOUNT SUBJECT OF CIVIL FORFEITURE

PHP 2,577,397,459.35

Properties Subject of Pending Freeze Orders (as of 31 December 2015)

	Amount (PHP)
Cash and Other Monetary Instruments	43,192,233.33
Value of Insurance Policies	107,039.15
Value of Shares of Stock	-
Estimated Value of Real Property	-
Estimated Value of Motor Vehicles	-
<i>Sub-total</i>	43,299,272.48

Foreign Denominations:

US Dollar (USD3,556.81 @ PHP47.1660)	167,760.50
<i>Sub-total</i>	167,760.50

TOTAL AMOUNT SUBJECT OF FREEZE ORDER	PHP 43,467,032.98
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As of 31 December 2015, a total of PHP163,558,537.23 had been ordered forfeited by the courts, out of which PHP43,427,042.38 was remitted to the National Treasury; PHP96,537,083.72 was turned over to the Office of the Ombudsman; and PHP2,401,568.50 was returned to the victims' families. An amount of PHP21,192,842.63 is still pending execution.

Amount of Criminal Proceeds Civilly Forfeited (as of 31 December 2015)

	Amount
Forfeited and Remitted to the National Treasury	PHP 43,427,042.38
Forfeited and Turned Over to the Office of the Ombudsman	96,537,083.72
Forfeited and Returned to the Victims' Families	2,401,568.50
Forfeited but Pending Execution	21,192,842.63
<i>TOTAL AMOUNT CIVILLY FORFEITED</i>	<i>PHP 163,558,537.23</i>



5 Domestic and International Cooperation and Training

The AMLC is continuously improving the cooperation mechanism of the Philippines' AML/CFT regime. It maintains strong partnership with other FIUs, international bodies, domestic and international LEAs, intelligence agencies, prosecution and judicial authorities, and other relevant domestic government agencies in combating money laundering, its predicate crimes, and TF.

The AMLC believes that strengthening the close coordination among, and enhancing the capacity of the relevant stakeholders in the Philippines' AML/CFT regime would lead to a more effective implementation of the country's AML/CFT plans and strategies.

Domestic Cooperation

1. NALECC Sub-Committee on AML/CFT

In order to foster and further enhance the domestic cooperation and coordination mechanism among the government sector AML/CFT stakeholders, the National Law Enforcement Coordinating Committee (NALECC) Sub-Committee on AML/CFT chaired by the Executive Director of the AMLC Secretariat meets regularly. The regular meetings held by the Sub-Committee include briefings and lectures on topics which enhance the knowledge and capacity of member-agencies in the performance of their respective functions. In 2015, the following briefings were conducted:

Bureau of Internal Revenue's (BIR) Lifestyle Check and Customs Operations of Other Jurisdictions

112th Meeting of the Sub-Committee on AML/CFT held on 4 February 2015 at the BIR National Office Bldg., Agham Road, Diliman, Quezon City

The Cooperative Development Authority and Functions of PNP Highway Patrol Group (PNP-HPG)

115th Meeting of the Sub-Committee on AML/CFT held on 25 May 2015 at the Camelot Hotel, Quezon City

The Philippine Center on Transnational Crime (PCTC)

118th Meeting of the Sub-Committee on AML/CFT held on 27 August 2015 at the OSETC Conference Room, PCTC Bldg., Camp Crame, Quezon City

Concept of Bitcoins, Bitcoin Landscape in the Philippines, and Bitcoin Typologies

113th Meeting of the Sub-Committee on AML/CFT held on 13 March 2015 at the Department of Environment and Natural Resources (DENR), Quezon City

The Criminal Investigation and Detection Group and The Office of the Ombudsman

116th Meeting of the Sub-Committee on AML/CFT held on 30 June 2015 at the PNP-CIDG Conference Room, Camp Crame, Quezon City

The Department of Foreign Affairs

119th Meeting of the Sub-Committee on AML/CFT held on 30 September 2015 at the Department of Foreign Affairs (DFA) Main Building, Pasay City

Airport Operations in Ninoy Aquino International Airport (NAIA) Terminal 3 and Functions of the Manila International Airport Authority (MIAA)

114th Meeting of the Sub-Committee on AML/CFT held on 17 April 2015 at the Civil Aviation Authority of the Philippines (CAAP), Pasay City

The Chain Distribution Schemes

117th Meeting of the Sub-Committee on AML/CFT held on 5 August 2015 at the Department of Trade and Industry, Industry and Investments Building, Makati City

The Emerging Terrorism Financing Risks

120th Meeting of the Sub-Committee on AML/CFT held on 29 October 2015 at the Executive Business Center, BSP, Malate, Manila

The NALECC Sub-Committee on AML/CFT also assisted its member-agency, the Bureau of Customs (BOC), through the issuance of Resolution No. 01-2015 dated 13 March 2015 declaring its support to the BOC's proposal to the MIAA, which subsequently became a member-agency of the Sub-Committee on AML/CFT, for the installation of walk-thru metal detector and X-ray scanning machines at the arrival areas of the NAIA. Said metal detectors and X-ray scanning machines were subsequently installed.

Moreover, the Sub-committee expanded its membership and admitted MIAA, the PNP-Highway Patrol Group, and Office of the Ombudsman as members. The Sub-Committee issued resolutions which were favorably acted upon by the NALECC.

Resolution No.	Date	Subject
02-2015	25 May 2015	Approval of Membership of the MIAA in the Sub-Committee on AML/CFT
03-2015	30 June 2015	Approval of Membership of the PNP-HPG in the Sub-Committee on AML/CFT
04-2015	5 August 2015	Approval of the Membership of the Office of the Ombudsman in the Sub-Committee on AML/CFT

In recognition of the AMLC's winning the Best Egmont Case Award for its investigation of the PDAF Case, the Sub-Committee issued Resolution No. 05-2015 dated 27 August 2015 commending the AMLC, the NBI, and the Office of the Ombudsman for their active involvement in the investigation and prosecution of the said case.

2. Memorandum of Agreement (MOA) with relevant Government Agencies

For 2015, the AMLC executed three (3) MOA with the following government agencies:

Government Agency	Date of Execution
PNP-HPG	17 April 2015
Office for Transportation Security (OTS)	30 June 2015
Philippine National Police—Anti-Cybercrime Group (PNP-ACG)	29 October 2015

Subject to confidentiality, the MOA authorizes the parties to share information for intelligence purposes as it promotes and encourages cooperation and coordination between them to effectively prevent, control, detect, and investigate money laundering, financing of terrorism, and certain unlawful activities under Section 3(i) of the AMLA.

As of 31 December 2015, the AMLC has signed a total of twenty-three (23) MOAs with different government agencies.

3. Philippine National AML/CFT Risk Assessment

In the first three quarters of 2015, the different Sub-Working Groups and the National Risk Assessment (NRA) Secretariat conducted research, gathered relevant data and information, and held several meetings and focus group discussions with various AML/CFT stakeholders. During the fourth quarter of 2015, the NRA Secretariat consolidated and reviewed the reports of the different NRA Sub-Working Groups. The NRA Report is expected to be finalized by the second quarter of 2016.

4. Updating of the RIRRs of the AMLA, as amended

A Technical Working Group was formed to draft the proposed updated Revised Implementing Rules and Regulations (RIRRs) of the AMLA, as amended. The draft was transmitted to the Supervising Authorities for their comments before being evaluated and considered. The revised draft was then provided to the different associations and federations of CPs for their comments during the second quarter of 2015. During the third quarter of 2015, their comments were also evaluated and considered. In October 2015, the revised draft was referred to the Legal Services Group for comments and inputs. The updated RIRR is expected to be approved and published in the first quarter of 2016.

5. Comments and Inputs on Various MOUs/Paper

- In connection with the Philippines' preparation for the European Union's Generalized Scheme of Preferences Plus (EU GSP+) Monitoring Mission on 14-18 September 2015, the AMLC Secretariat provided inputs on the recent concrete anti-money laundering developments and achievements in relation to the implementation of relevant United Nations Conventions. The AMLC Secretariat also participated during the conduct of the Monitoring Mission on the aforesaid dates. Subsequently, the application of the Philippines was accepted by the EU which now allows the Philippines to export some products to the EU at zero tariff rates.
- The AMLC Secretariat also provided inputs and comments on the revised draft of the proposed Memorandum of Understanding (MOU) between Canada and the Philippines on Cooperation in Preventing and Combating Terrorism and Transnational Crime. The AMLC Secretariat also participated in a number of meetings on the subject organized by the Department Foreign Affairs.
- Likewise, the AMLC Secretariat provided inputs and comments on the proposed MOU between the Philippines and the State of Kuwait on Combating Terrorism and Related Crimes.
- The AMLC Secretariat gave comments and inputs on the second draft of the outcome document (Doha Declaration) of the 13th United Nations Congress on Crime Prevention and Criminal Justice.
- The AMLC Secretariat reviewed and provided comments on the proposed agreement on the establishment of the German-Philippine Chamber of Commerce (GPCC), particularly the provision on the free transfer of funds.

International Cooperation

1. Provision of AML/CFT Experts

Upon invitation from the Asia Pacific Group (APG) on ML, the AMLC nominated Atty. Roland C. Villaluz and Mr. Alvin Bermido as qualified Experts for the Quality and Consistency Review of the Scoping Note and Second Draft Mutual Evaluation Reports (MER) of Fiji and Bangladesh, respectively. The reports on the reviews of the MERs of Fiji and Bangladesh were taken up during the 2015 APG Plenary Meeting in New Zealand.

The AMLC also nominated Atty. Arnold G. Frane as Legal Expert for the 2015 Mutual Evaluation (ME) of Bhutan. The ME was conducted in November and December 2015.

2. Request for Assistance and Information

In 2015, the AMLC received sixty-eight (68) requests for assistance and/or information from foreign FIUs which are members of the Egmont Group of FIU. These requests were acted upon and given due course by the AMLC.



Training

1. AML Education and Public Information Program

In 2015, the AMLC Secretariat conducted a total of two hundred twenty-six (226) lectures and seminars for various stakeholders, LEAs, the academe, private sector, and other CPs. The said lectures and seminars were attended by 9,924 participants. The topics of these seminars include the following:

- a. AMLA, as amended, and its RIRRs;
- b. TF Prevention and Suppression Act of 2012;
- c. Rule on Civil Forfeiture, Asset Preservation and Freeze;
- d. Financial Investigation and ML/TF Typologies;
- e. BSP Circular No. 706 (Updated AML Rules and Regulations);
- f. AML Risk Rating System; and
- g. Money Laundering and TF Prevention Program.

2. The AMLC, in cooperation with the AUSTRAC, conducted the following trainings:

a. Workshop on Corruption Vulnerabilities

24-26 February 2015, Dusit Thani Hotel, Makati City

The objectives of this workshop were as follows:

- i. To assess the corruption and money laundering vulnerabilities of high -risk sectors in the Philippines;
- ii. To identify the role of concerned government agencies in the investigation and prosecution of money laundering cases; and
- iii. To develop administrative measures to address the identified corruption and money laundering vulnerabilities.

Representatives from the AMLC Secretariat, BIR, Civil Service Commission, Commission on Audit, and Office of the Ombudsman participated in the said workshop.

b. Workshop on Money Laundering and Corruption Vulnerabilities in the Designated Non-Financial Businesses and Professions (DNFBPs), and the Non-Profit Organization (NPO) Sector

28-30 July 2015, Dusit Thani Hotel, Makati City

The objective of the workshop was to identify the risks, vulnerabilities, challenges, and issues in combating corruption and money laundering activities associated with DNFBPs and NPOs.

The workshop was attended by representatives from the AMLC Secretariat, Office of the Ombudsman, SEC, IC, Department of Social Welfare and Development, Cooperative Development Authority, Caucus of Development NGO Networks (CODE-NGO), Confederation of Philippine Jewelers, Inc., Integrated Bar of the Philippines, Philippine Institute of Certified Public Accountants, and Philippine Amusement and Gaming Corporation.

c. AUSTRAC Regional Forum: Working Together to Combat Corruption and Money Laundering in High Risk Sectors

12-15 October 2015, Dusit Thani Hotel, Makati City

The forum aimed to enhance the regional understanding of the challenges associated with high-risk sectors identified by the FATF, focusing on politically exposed persons, DNFBPs, and NPOs. The forum was designed to assist in the AML/CFT priorities of all participant-jurisdictions, and to enhance understanding and compliance with international AML measures and anti-corruption best practices. It also aimed to enhance understanding of the parallel association between corruption and money laundering, and how to strengthen coordination between FIUs and anti-corruption agencies.

The forum was participated by representatives from Cambodia's FIU and Anti-Corruption Authority, Thailand's Anti-Money Laundering Office and Anti-Corruption Commission, Bank Negara Malaysia, AMLC Secretariat, and Office of the Ombudsman.

3. Foreign Training, Meetings, and Conferences Participated by AMLC Secretariat Personnel

In order to enhance the AML/CFT capacity of its personnel, the AMLC Secretariat sent its personnel to the following trainings and seminars:

Recovering the Proceeds of Crime from Wildlife and Timber Crime Workshop

20-22 January 2015, Bangkok, Thailand

Egmont Committee and Working Group Meetings

26-30 January 2015, Berlin, Germany

Course on Comprehensive Security Responses to Terrorism

10 February-13 March 2015, Honolulu, Hawaii

APG/ASEAN Regulatory/Supervisory Workshop

22-24 April, 2013, Kuala Lumpur, Malaysia

ASEAN Regional Supervision Workshop on AML/CFT

3-8 May 2015, Kuala Lumpur, Malaysia

Counter-Terrorism Inter-Agency Visit to Australia

10-15 May 2015, Sydney, Australia

FATF Plenary and Working Group Meetings

19-22 October 2015, Paris, France

6th Session of the Conference of State Parties to the United Nations Convention Against Corruption

2-6 November 2015, St. Petersburg, Russia

Deutsche Bundesbank's Seminar on Combating Money Laundering

2-6 November 2015, Frankfurt, Germany

FATF Plenary and International Cooperation Review Group (ICRG) Meetings
23-27 February 2015, Paris, France

ASEAN Regional Supervision Workshop on AML/CFT
3-6 March 2015, Kuala Lumpur, Malaysia

Emerging Payments Systems Workshop
3-6 March 2015, Jakarta, Indonesia

Casino Crimes Workshop International Law Enforcement Academy (ILEA)
9-13 March 2015, Bangkok, Thailand

ASEAN Regional Prosecutors, Judges and Investigators Workshop
30 March to 3 April 2015, Kuala Lumpur, Malaysia

23rd Egmont Group Plenary Meeting
8-12 June, 2015, Bridgetown, Barbados

FATF Plenary and Working Group Meetings
22-26 June 2015, Brisbane, Australia

18th APG Annual Meeting and Forum on Technical Assistance and Training
13-17 July 2015, Auckland, New Zealand

ASEAN Regional Prosecutors, Judges and Investigators Workshop
15-18 September 2015, Siem Reap, Cambodia

Asset Recovery Interagency Network-Asia Pacific (ARIN-AP) Annual General Meeting
2-5 November 2015, Sydney, Australia

APG Typologies and Capacity Building Workshop
16-20 November, 2015, Kathmandu, Nepal

Joint Australia/Indonesia Regional Counter-Terrorism Terrorism Financing Summit
17-18 November 2015, Sydney, Australia

Terrorist Financing Investigation Workshop
8 December 2015, Seremban, Malaysia

Most of the training and seminars were coordinated by the AMLC Secretariat with the foreign donors and providers during the 2014 APG Plenary and Technical Assistance and Training Meeting.



Resolution No. 17
dated 25 March 2015 –
Approving the hosting of
the Egmont pilot courses
on Securing an FIU and
FIU Information System
Maturity Model



Resolution No. 18
dated 25 March 2015 –
Approving the proposed
Memorandum of
Agreement between
AMLC and the Philippine
National Police – HPG



Resolution No. 20
dated 25 March 2015 –
Setting the threshold
amount for the forfeiture
of drug-related cash
and/or other property to
at least Php 100,000.



Resolution No. 33
dated 23 June 2015 –
Approving the revised
proposed Memorandum
of Agreement between
the AMLC and the Office
for Transportation
Security



Resolution No. 47
dated 19 August 2015 –
Approving the AMLC
template for
Memorandum of
Agreement with other
government agencies



Resolution No. 55
dated 28 September 2015
– Approving the proposed
Memorandum of
Agreement between the
AMLC and the PNP-ACG



Resolution No. 63
dated 16 October 2015 –
Approving and adopting
the new Official Seal of
the Anti-Money
Laundering Council

6 Relevant AMLC Resolutions

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