



South African Anti-Money Laundering  
Integrated Task Force

## **Public Private Partnership on Illegal Wildlife Trade and Money Flows**

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**Directorate for Priority Crime Investigation**

**19 NOVEMBER 2024 @ DFFE CHAMPAGNE SPORTS**

# TOPICS

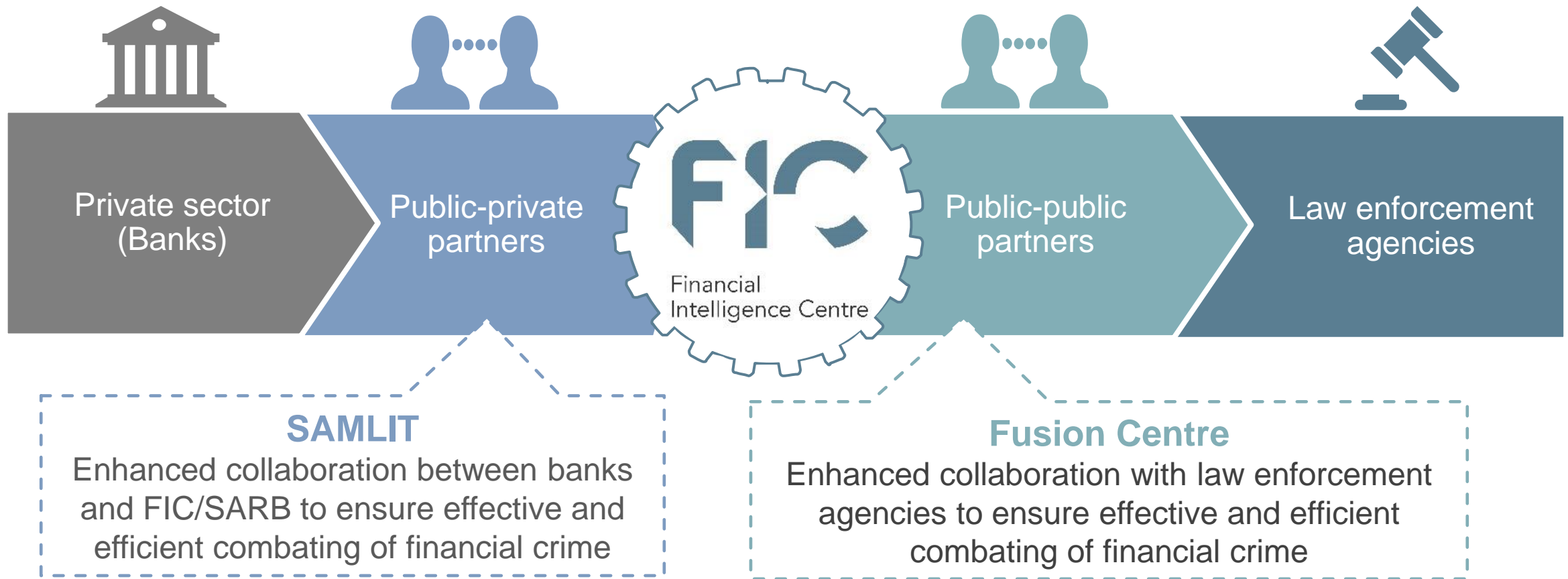
- Introducing the South African Anti-Money Laundering Integrated Taskforce (SAMLIT)
- Expert working group on IWT
- Tactical operations groups
- Practical Process Flow
- Conclusion

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# INTRODUCING SAMLIT – A PARTNERSHIP IN THE FIGHT AGAINST FINANCIAL CRIME



# FINANCIAL INFORMATION SHARING PARTNERSHIP



# SAMLIT

## Steering Committee

Administers and oversees all SAMLIT activities

- Charter – 9 December 2019
- Assisting in the effective and efficient combating of financial crime and
- Enhancing the collective understanding of financial crime trends



**SAMLIT** is a financial information sharing partnership between the banking sector, and the public sector. The basis for this partnership is to help **detect, prevent and disrupt financial crime**. The intention is also to enhance members’ understanding of national and international crime trends and, through sharing of knowledge and expertise, pave the way for linkages and information sharing, so that rapid action can be taken to address financial crime.



FINANCIAL FLOWS ASSOCIATED WITH  
**ILLEGAL WILDLIFE TRADE IN SOUTH AFRICA** >

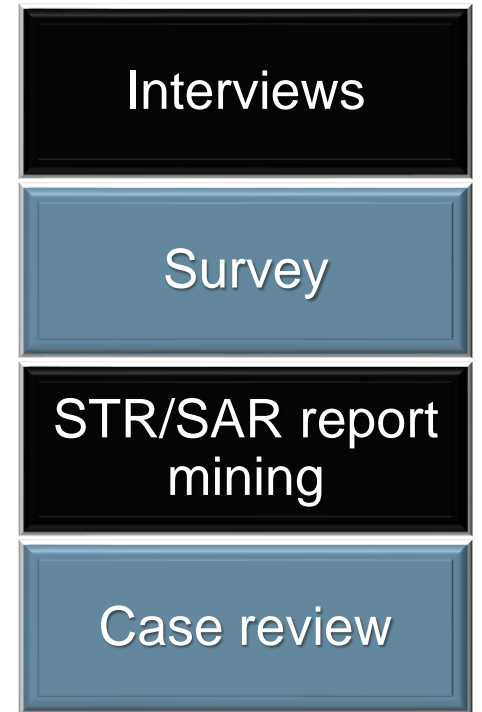
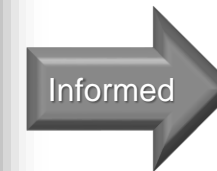
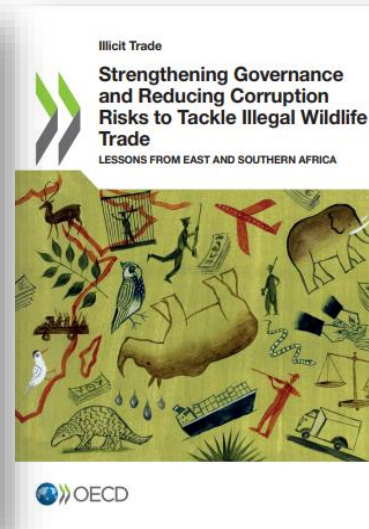
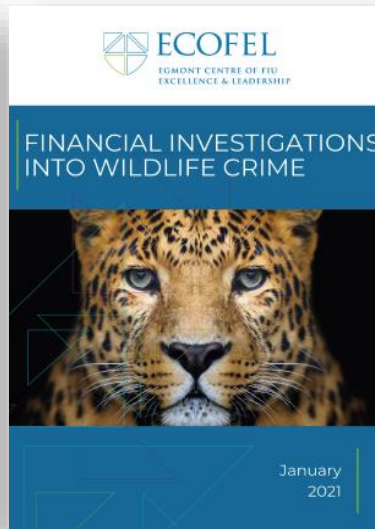
November 2021

# IWT EXPERT WORKING GROUP



# RESEARCH METHODOLOGY

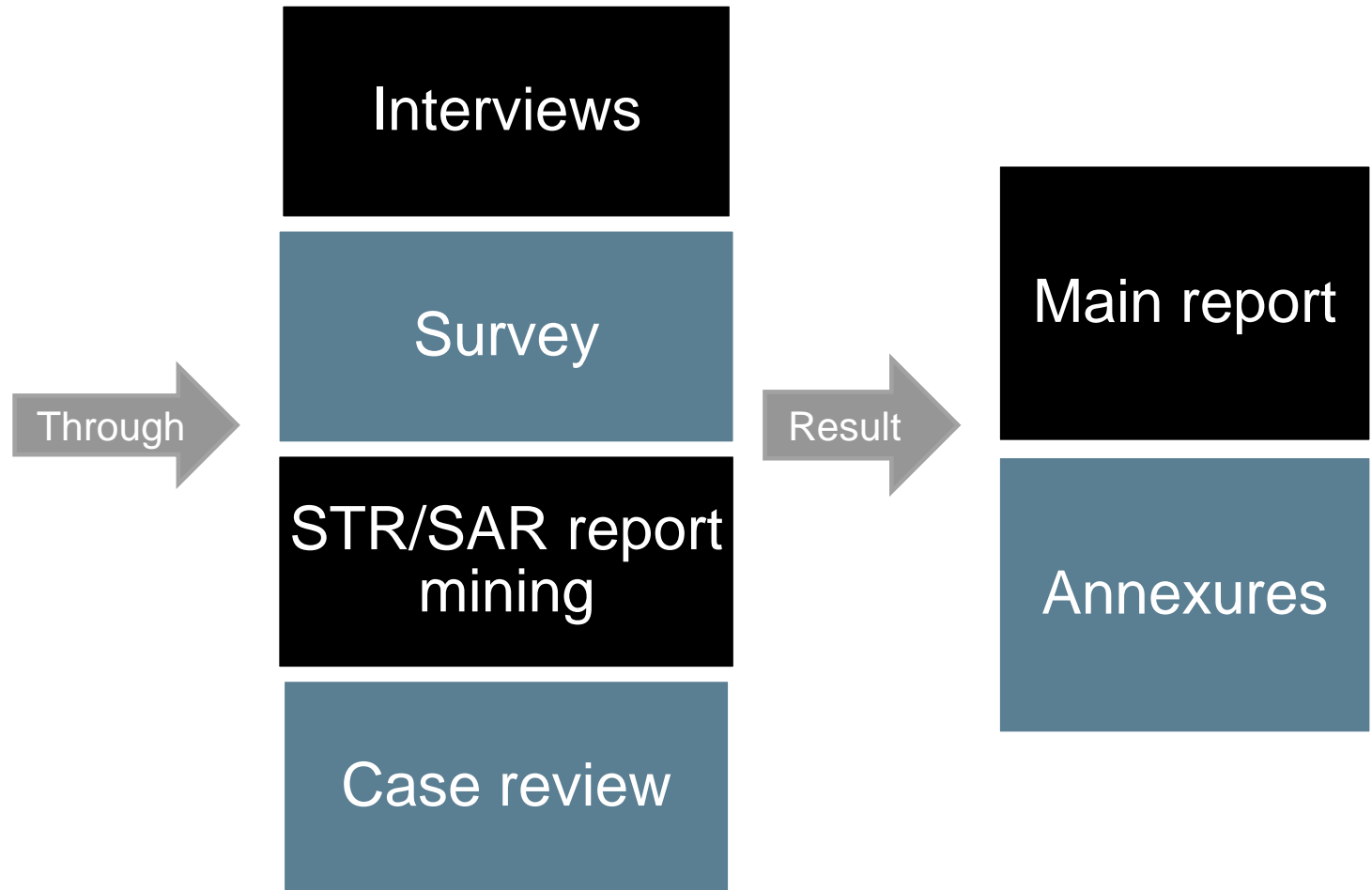
The groundwork for the research done by the EWG was laid by the seminal and insightful work contained in the below reports. These have helped immensely in shaping our approach and methodology, allowing us to apply a South African lens to the insights already gained by these researchers.



# WORK OF THE EWG

## Objectives:

- Increase **knowledge about the financial flows** linked with common IWT supply chains
- Assist financial institutions in identifying **red flags** regarding financial flows that may be associated with IWT
- Encourage effective **coordination between financial institutions and law enforcement** in identifying and disrupting financial flows from IWT
- Increase the **prospects of success of detection, financial investigations and money laundering prosecutions** linked to IWT





# KEY OBSERVATIONS

## Actors and product flows

- 6 levels, split evenly between domestic and international actors
- From poacher on ground to consumer abroad
- Growing domestic demand for product
- Co-mingling of products to disguise wildlife

## Financial flows

- Cash is still king – including cash intensive business as front companies
- IWT actors evade formal financial systems through use of bartering, Hawala, casino chips, etc
- Use of front companies – especially those linked to apparently legitimate imports and/or exports
- Identified “hot-spots” in SA
- Growing use of mobile money

## Positive developments

- Law enforcement and NPS focussed on financial crime
- Charges of ML and racketeering included in charge sheet
- 41% of survey respondents have created IWT specific training
- Enthusiastic about further collaboration
- Specificity in transaction monitoring is improving



# TACTICAL OPERATIONS GROUPS

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## Timely exchange of quality and actionable financial information

Tactical operations groups (TOGs) are flexible **operational partnerships** designed to enhance co-operation, collaboration and timely exchange of **quality and actionable** financial information between relevant banks, the FIC and investigation agencies.

## High priority financial crimes

It aims to **allow for the effective and efficient investigation** of high priority financial crimes.

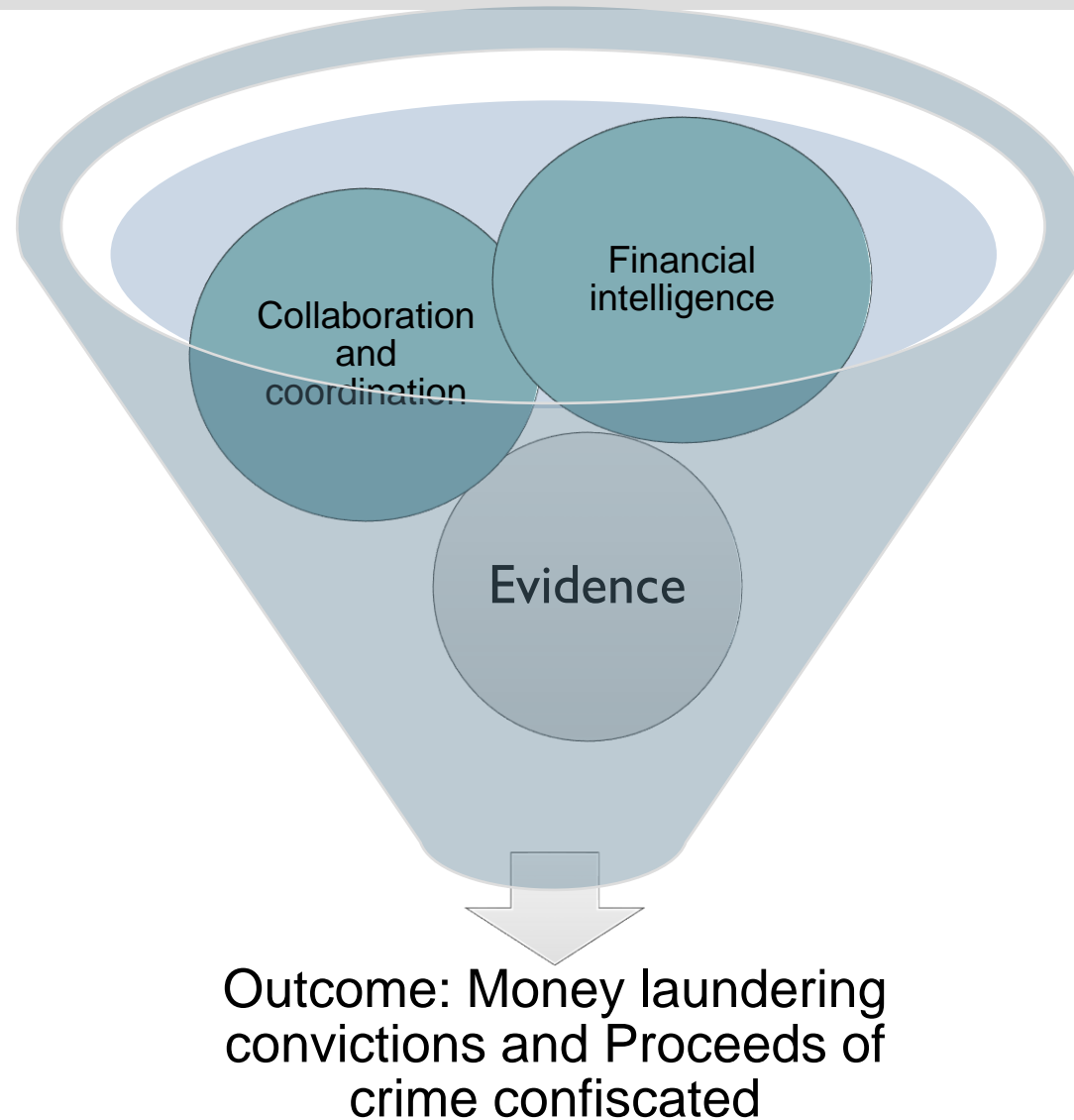
TOGs allow **for real time interface** and collaboration between key role players, facilitating speedy transmission of financial information from banks via the FIC to law enforcement, in a manner that can be easily assimilated and effectively used by law enforcement.

Collaboration

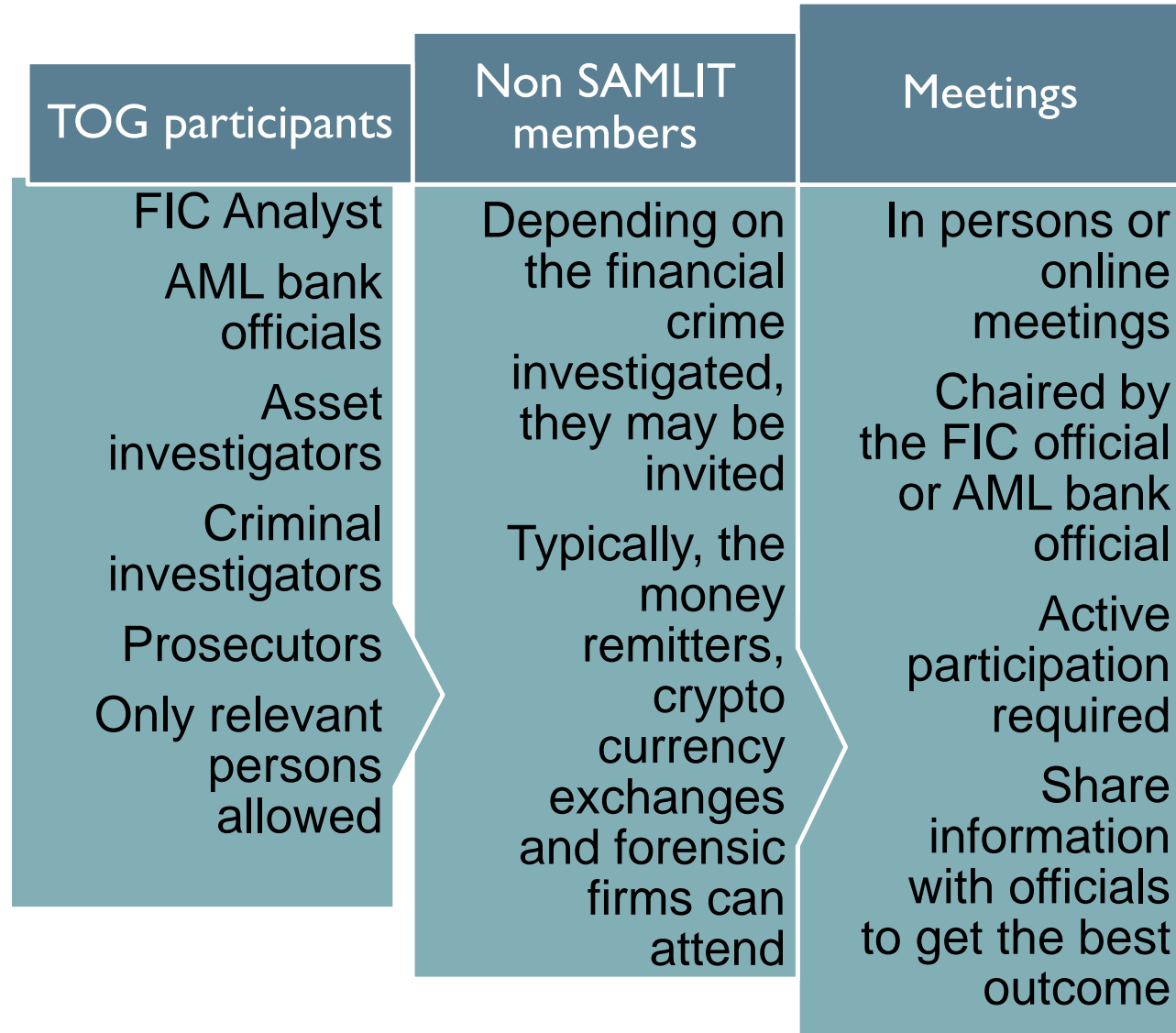
Timely exchange of financial intelligence and conversion thereof into admissible evidence, will result in effective and efficient investigations, prosecutions and asset forfeiture action.

High impact

# PURPOSE OF THE TACTICAL OPERATION GROUP



# HOW TACTICAL OPERATIONS GROUPS WORK



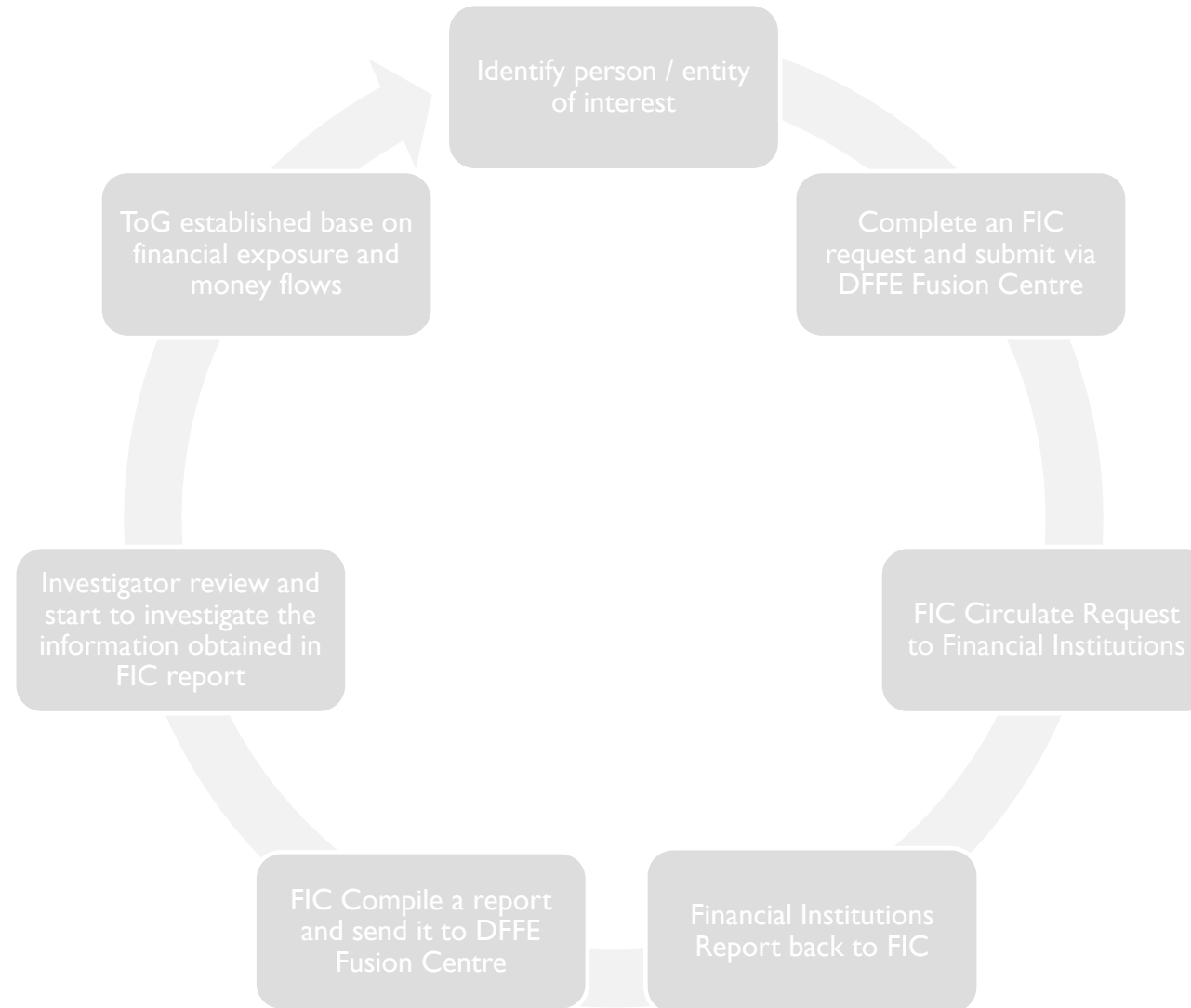
# IMPROVE EFFECTIVENESS RATINGS THROUGH THE TACTICAL OPERATIONS GROUPS

**IO 6-financial intelligence is used to enhance investigations**

**IO 7-successful investigations and prosecutions**

**IO 8-confiscate proceeds of crime**

# PRACTICAL PROCESS FLOW







CONCLUSION

# BENEFITS WORKING AS SAMLIT – IWT EXAMPLES

- Due to the collaboration with SAMLIT on IWT matters the FIC has seen **an increase of STR reporting**.
- Nine TOGs currently underway.
- Financial intelligence have started to play a **key role** in investigations.
- **Successful money laundering** conviction.

- The quality of the reporting filed after the TOG **engagements is improved** - beyond single transactions, but rather financial flows
- **Fluidity of communication** between the private and public sector has improved – resulting a **string of arrests and seizures** of rhino horns and reptiles.

# CONCLUSION

- If we cannot succeed in this vital mission of partnerships, criminals will continue moving their ill-gotten funds through the financial system in a transnationally undisturbed way, ensuring the expansion and increased power for their criminal organisations and enterprises.
- Dedication, hard work and adequate resources are required to ensure success of partnerships.

# THANK YOU

**PARTNERS:** Financial Intelligence Centre | South African Banking Risk Information Centre | The Banking Association South Africa  
The South African Reserve Bank (Financial Surveillance) and (Prudential Authority).

**Banking sector:** Absa Group Limited | African Bank Limited | Albaraka Bank | Bank of China | Bank of Taiwan South Africa Branch  
Bidvest Bank Limited | Capitec Bank Limited | China Construction Bank Corporation, JHB Branch | Citibank N.A., South Africa Deutsche  
Bank AG, JHB Branch | Discovery Limited | Finbond Mutual Bank | FirstRand Bank | GBS Mutual Bank | Grindrod Bank Limited Grobank  
Limited HBZ Bank Limited | Habib Overseas Bank Limited | HSBC Bank Investec Bank Limited | Nedbank Group Limited | Sasfin Bank  
Limited | Standard Chartered Bank | State Bank of India, South Africa | Standard Bank of South Africa Limited | TymeBank Limited