



## Anti-Money Laundering (AML) Training

### *The Three Stages of Money Laundering*

#### Placement

Placement is the process of moving illegal money \_\_\_\_\_ from direct association with the crime and \_\_\_\_\_ it into the financial system.

- Intermingle the illegal cash with \_\_\_\_\_ deposits to obscure the audit trail.
- A \_\_\_\_\_ the cash gained from the crime to legitimate cash businesses such as car parks, strip clubs, car washes, and casinos.
- Turn the cash into debt by making \_\_\_\_\_ in cash to businesses which seem to be legitimate or are connected with legitimate businesses.
- Purchase \_\_\_\_\_ value goods for personal use.
- Buy expensive gifts to \_\_\_\_\_ with cash.
- Purchase the services of high value individuals using cash or \_\_\_\_\_.
- “S\_\_\_\_\_” which is the process of making many small transactions below AML reporting thresholds into bank accounts.
- P\_\_\_\_\_ taking smaller amounts of cash across borders below the customs declaration threshold.

Other kinds of placement include:

- False invoicing



- Using trusts and offshore companies for hiding the identity of the real owners.
- Or using third parties like attorneys or accountants to hold on to the funds as part of a proposed transaction.

### Layering

Layering is the second stage of the money laundering process where illegal funds or assets are m\_\_\_\_\_, d\_\_\_\_\_, and d\_\_\_\_\_ to conceal their origin.

Examples:

- Trusts
- Shell Companies
- Walking Accounts
- “Instant Banks”
- Intermediaries

By using different kinds of layering over and over again, money launderers make \_\_\_\_\_ transactions as difficult as possible for authorities.

### Integration

Integration makes money \_\_\_\_\_ to the criminal appearing as normal income.

it can come back to the criminal through...

- The sale or transfer of high-dollar items such as expensive cars and jewelry, the sale or transfer of \_\_\_\_\_.



- L\_\_\_\_\_ purchases of securities or other financial instruments, loans, or other “legitimate” transactions with legal entities controlled by the launderer.

Without the \_\_\_\_\_, the black money can be fully integrated, spent, and put back in to the pocket of the criminal.