

# STATISTICS REPORT | 24

A breakdown of  
Suspicious Activity Reports

# Q3



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# Introduction

This report presents the recorded data of Suspicious Activity Reports (SARs) received by the Gibraltar Financial Intelligence Unit (GFIU) for the third quarter of 2024. Reporting of suspicious activity is a cornerstone of the international Anti-Money Laundering and Combatting the Financing of Terrorism (AML/CFT) framework. As the central agency for the receipt of disclosures filed by reporting entities, the GFIU not only receives information as required by Gibraltar’s legislative framework, but also as required by the Financial Action Task Force (FATF) Recommendation 20 and 23.

The information reported to the GFIU will also help us better understand suspected criminal activity, the evolving threats, and modus operandi, enabling us to most effectively work with partners to mitigate the risk to our financial reputation.

## METHODOLOGY

The GFIU publishes a series of quarterly reports regarding the SARs received by the GFIU. The main objective of this report is to provide an overview of the trends related to money laundering, terrorist financing and proliferation financing. The statistics are based on data collected by the GFIU from its online reporting portal, THEMIS. Data is dependent on the current reports being processed. For example, the outcome of each SAR may vary when compared to other reports that GFIU publishes as further information may have been requested. However, the differences will be minor.

**Note:** A Suspicious Activity Report is a report submitted to the GFIU, with information related to money laundering, terrorist financing and proliferation financing. Also known as, a ‘disclosure’, it can refer to any information acquired by the Reporter in the course of business deemed suspicious and of potential interest to Law Enforcement Agencies. Another recognised form of referring to a SAR is ‘STR’ (Suspicious Transaction Report) but the GFIU will refer to it as a SAR throughout this document. The term ‘disclosure’ and ‘SAR’ are used interchangeably but both have the same meaning.

Additional resources are available at [www.gfiu.gov.gi](http://www.gfiu.gov.gi).

# Key Statistics

1,455 SARs were received in Q3 2024. This represents a 23% increase compared to Q3 2023 (1,181) and a 12% increase compared to Q2 2024 (1,301).

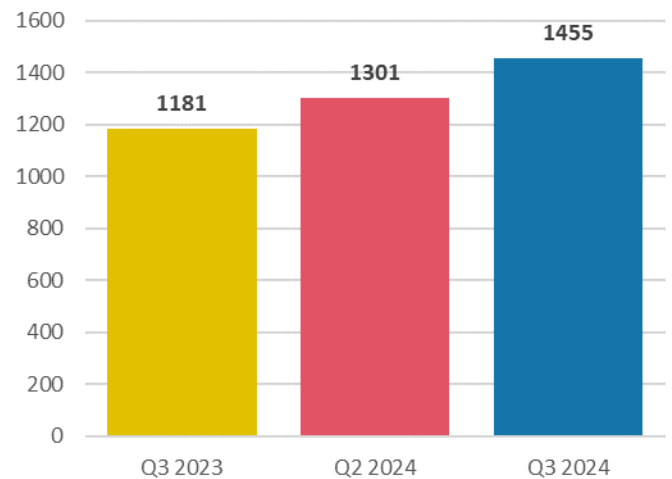
567 SARs were received in July 2024. This represents the highest number of monthly SARs since Themis was introduced in 2019.

There was an increase in SARs submitted under the Terrorism Act 2018, primarily from the DLT, Gaming and Banking sectors. These were submitted primarily as a result of LEA enquiries or exposure to the Dark Web.

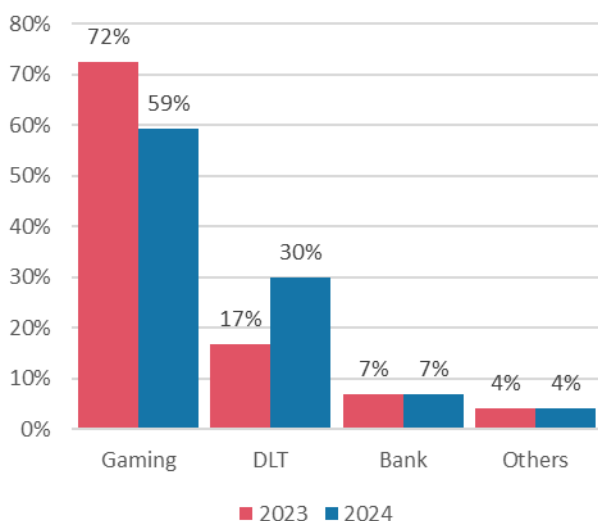
The number of SARs submitted in the first three quarters of 2024 (3,815) saw an 8% increase compared to the number submitted for the same period in 2023 (3,532).

46 reporting entities submitted SARs during Q3 2024.

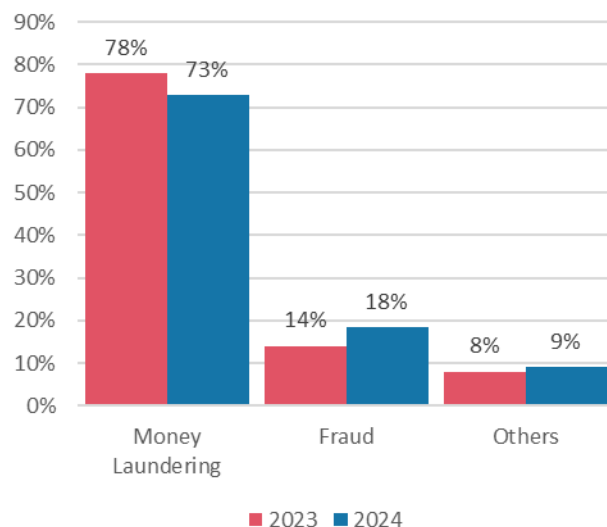
No. of SARs



Reporting Sectors



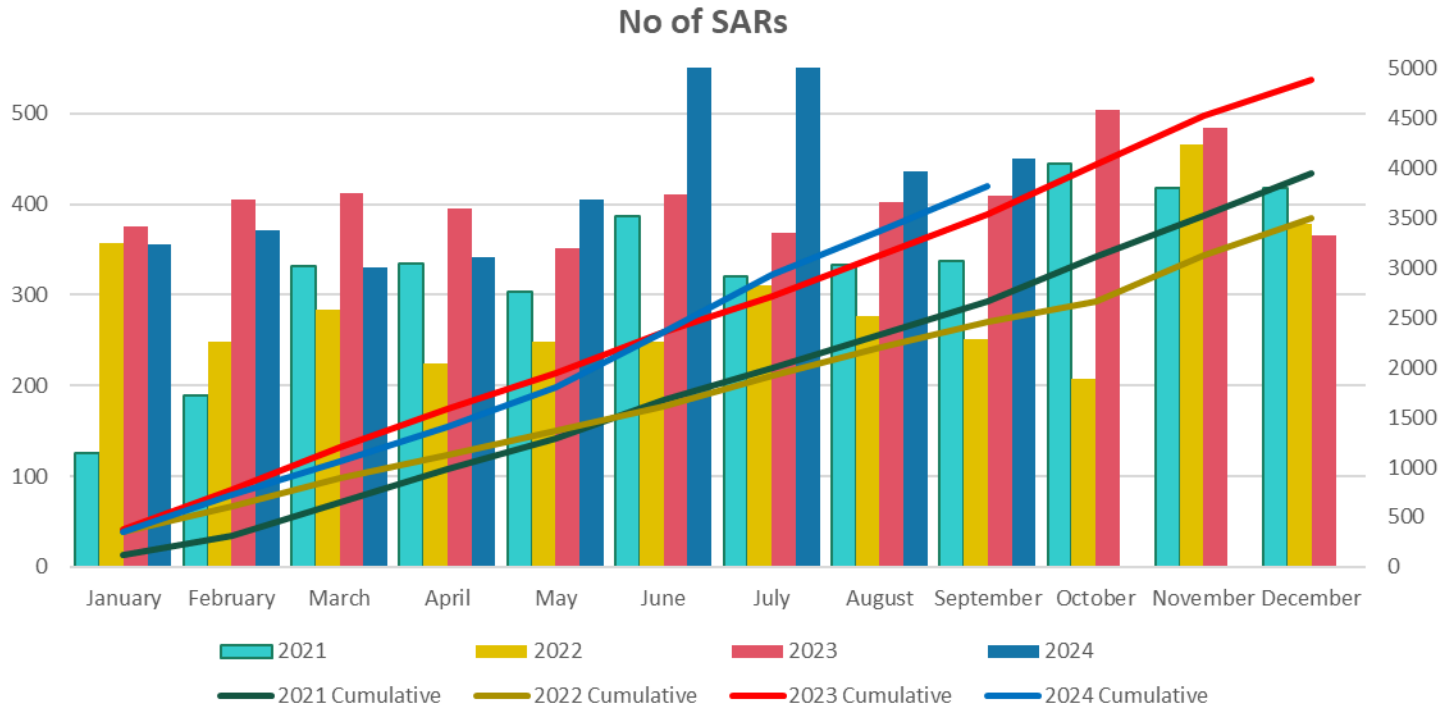
Suspected Criminality



The main reporting sectors for Q3 2024 remain the Gaming, DLT and Banking sectors.

As in previous years, Money Laundering and Fraud remain the principal suspected criminality reported. The principal grounds for suspicion continue to be adverse open source and adverse, inadequate or failure to provide due diligence.

# Number of Monthly SARs



Month	2021		2022		2023		2024	
	Number	Cumulative	Number	Cumulative	Number	Cumulative	Number	Cumulative
January	125	125	357	357	375	375	356	356
February	189	314	249	606	405	780	372	728
March	332	646	284	890	413	1193	331	1059
April	334	980	225	1115	395	1588	341	1400
May	303	1283	249	1364	352	1940	405	1805
June	387	1670	248	1612	411	2351	555	2360
July	321	1991	311	1923	369	2720	567	2927
August	333	2324	277	2200	402	3122	437	3364
September	338	2662	251	2451	410	3532	451	3815
October	445	3107	208	2659	504	4036		
November	418	3525	466	3125	485	4521		
December	418	3943	378	3503	366	4887		

# Findings by Reporting Sector

Gaming remains the top reporting sector with 60% of SARs submitted in Q3 2024. The DLT sector continues with its increase in the reporting of SARs and now represents 33% of SARs submitted in Q3 2024.

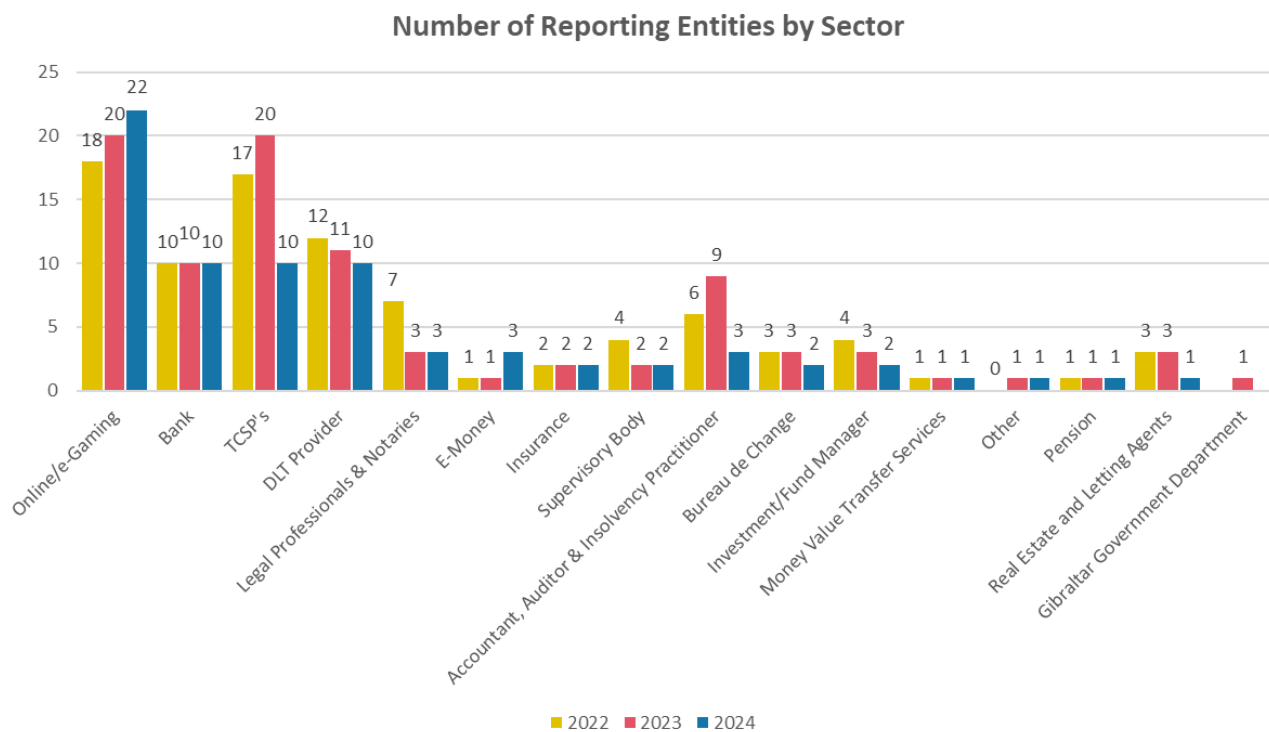
1,455 SARs were received in Q3 2024. This represents a 23% increase compared to Q3 2023 (1,181) and a 12% increase compared to Q2 2024 (1,301).

The Gaming sector submitted 870 SARs in Q3 2024. This is an increase of 186 SARs compared to Q2 2024 (684) and similar to the number of SARs submitted in Q3 2023 (850). This increase is in contrast to the decreasing trend of SARs from the Gaming sector in previous quarters.

If the Gaming sector is excluded, 585 SARs were received in Q3 2024. This represents a 77% increase compared to Q3 2023 (331) and a 5% decrease compared to Q2 2024 (617).

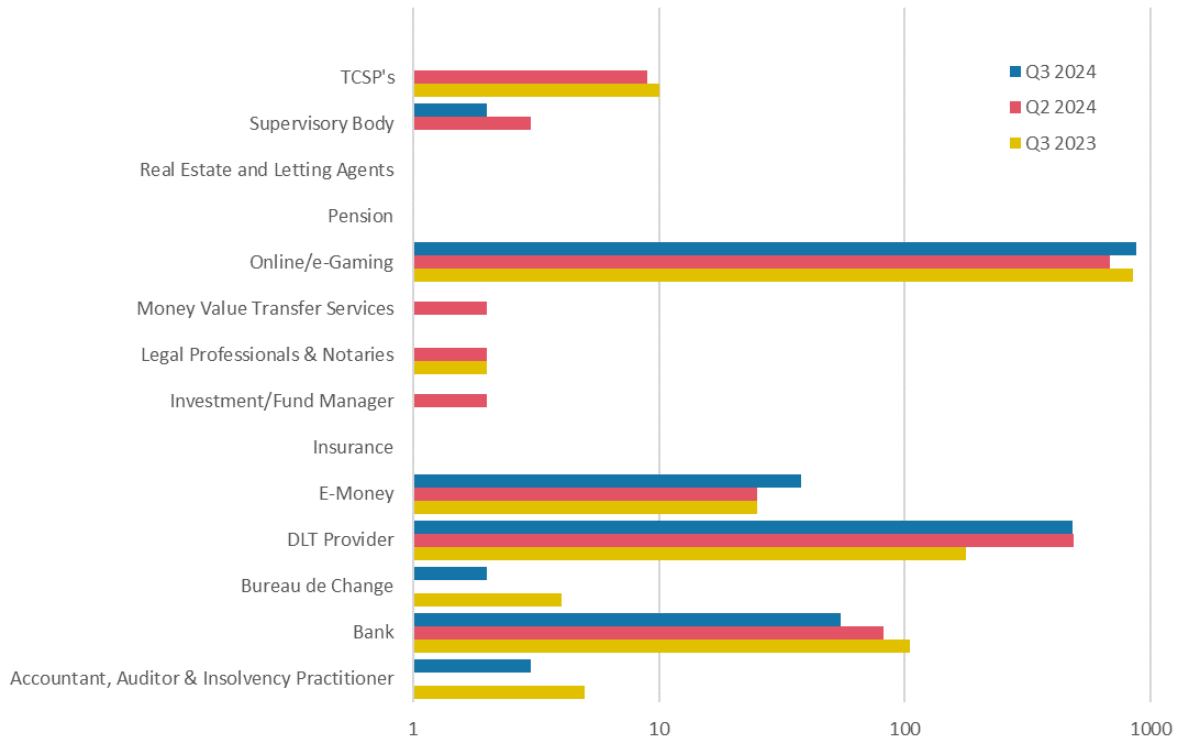
46 reporting entities submitted SARs during Q3 2024. 73 reporting entities have submitted SARs during 2024

The chart below shows the number of reporting entities for each reporting sector which submitted a SAR in 2022, 2023 and 2024.



The chart and table below shows a comparison between Q3 for 2023 and Q2 and Q3 for 2024.

Number of SARs per Sector



Sector	Q3 2023		Q2 2024		Q3 2024	
	SARs	%	SARs	%	SARs	%
Accountant, Auditor & Insolvency Practitioner	5	0.42%	-	-	3	0.21%
Bank	105	8.89%	82	6.30%	55	3.78%
Bureau de Change	4	0.34%	1	0.08%	2	0.14%
DLT Provider	177	14.99%	488	37.51%	482	33.13%
E-Money	25	2.12%	25	1.92%	38	2.61%
Insurance	1	0.08%	1	0.08%	-	-
Investment/Fund Manager	-	-	2	0.15%	1	0.07%
Legal Professionals & Notaries	2	0.17%	2	0.15%	1	0.07%
Money Value Transfer Services	-	-	2	0.15%	-	-
Online/e-Gaming	850	71.97%	684	52.57%	870	59.79%
Pension	-	-	1	0.08%	-	-
Real Estate and Letting Agents	1	0.08%	1	0.08%	-	-
Supervisory Body	1	0.08%	3	0.23%	2	0.14%
TCSP's	10	0.85%	9	0.69%	1	0.07%
<b>Total</b>	<b>1,181</b>	<b>100.00%</b>	<b>1,301</b>	<b>100.00%</b>	<b>1,455</b>	<b>100.00%</b>

# Criminality vs Sector

The table below shows the criminality reported by different reporting sectors in Q3 2024.

Suspected Criminality	Accountant, Auditor & Insolvency Practitioner	Bank	Bureau de Change	DLT Provider	E-Money	Investment/Fund Manager	Legal Professionals & Notaries	Online/e-Gaming	Supervisory Body	TCSP's	Total
Corruption	-	1	-	1	-	-	-	-	-	-	2
Drugs Trafficking	-	-	-	14	-	-	-	1	-	-	15
False Accounting	-	1	-	-	-	-	-	-	-	-	1
Forgery	-	-	-	1	1	-	-	5	-	-	7
Fraud	3	29	1	107	22	1	-	135	-	-	298
Money Laundering	-	17	1	309	13	-	1	673	2	-	1,016
Robbery/ Theft	-	-	-	-	-	-	-	3	-	-	3
Sanctions	-	-	-	11	1	-	-	-	-	-	12
Sexual Exploitation	-	-	-	35	-	-	-	-	-	-	35
Tax Crimes	-	5	-	-	-	-	-	50	-	1	56
Terrorism	-	-	-	1	1	-	-	2	-	-	4
Terrorist Financing	-	2	-	3	-	-	-	1	-	-	6
<b>Total</b>	<b>3</b>	<b>55</b>	<b>2</b>	<b>482</b>	<b>38</b>	<b>1</b>	<b>1</b>	<b>870</b>	<b>2</b>	<b>1</b>	<b>1,455</b>



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# Findings by Suspected Criminality

Themis works on a 'principal crime system', which means that in cases which contain more than one type of offence, it will record the principal suspected criminality. As this is a subjective assessment, there may be inconsistencies between MLROs. Significantly, Money Laundering was the most reported suspected criminality in Q3 of 2024, and therefore continues the trend with the previous quarters, and years.

The chart and table below shows a comparison between Q3 2023 and Q2 and Q3 for 2024.



Suspected Criminality	Q3 2023		Q2 2024		Q3 2024	
	SARs	%	SARs	%	SARs	%
Business Email Compromise	1	0.08%	-	-	-	-
Corruption	2	0.17%	1	0.08%	2	0.14%
Drugs Trafficking	6	0.51%	8	0.61%	15	1.03%
False Accounting	-	-	1	0.08%	1	0.07%
Forgery	20	1.69%	11	0.85%	7	0.48%
Fraud	201	17.02%	238	18.29%	298	20.48%
Human Trafficking & Migrant Smuggling	7	0.59%	-	-	-	-
Insider trading and market manipulation	2	0.17%	-	-	-	-
Money Laundering	865	73.24%	971	74.63%	1,016	69.83%
Organised Crime	-	-	2	0.15%	-	-
Robbery/ Theft	4	0.34%	1	0.08%	3	0.21%
Sanctions	4	0.34%	23	1.77%	12	0.82%
Sexual Exploitation	42	3.56%	12	0.92%	35	2.41%
Tax Crimes	26	2.20%	31	2.38%	56	3.85%
Terrorism	1	0.08%	1	0.08%	4	0.27%
Terrorist Financing	-	-	1	0.08%	6	0.41%
<b>Total</b>	<b>1,181</b>	<b>100%</b>	<b>1,301</b>	<b>100.00%</b>	<b>1,455</b>	<b>100.00%</b>

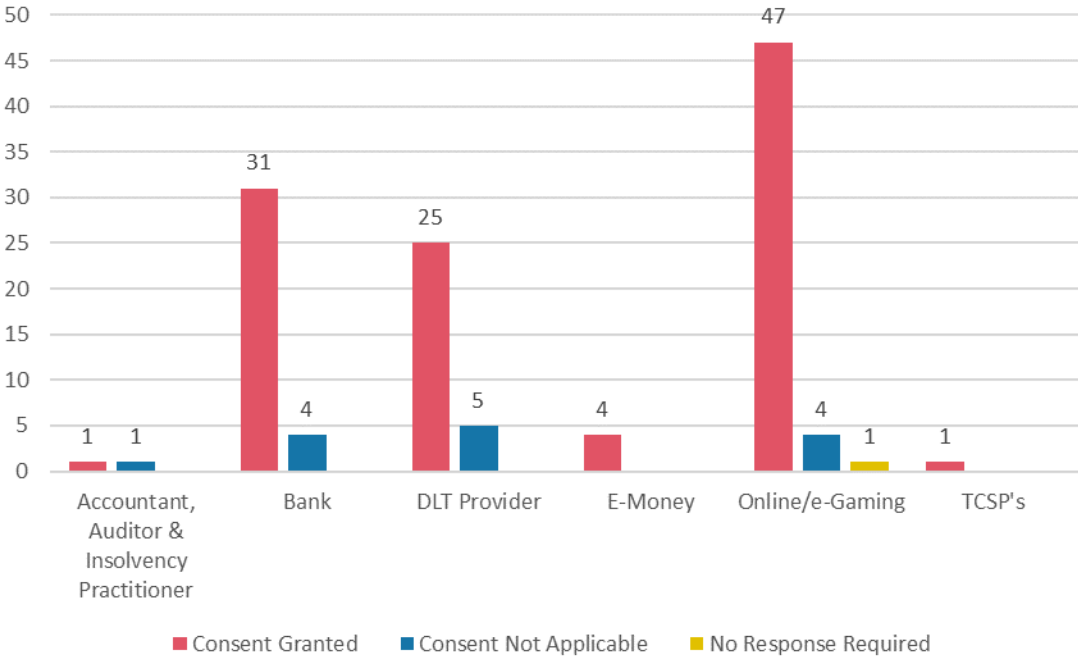
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# Findings of Consent/ Defence Against Money Laundering (DAML) Requests

Consents/ DAMLs requests received in Q3 2024, include some requests received for SARs submitted prior to Q3 2024.

124 DAML requests were received in Q3 2024. Of these 109 (88%) were granted.

DAML requests were received from six reporting sectors.



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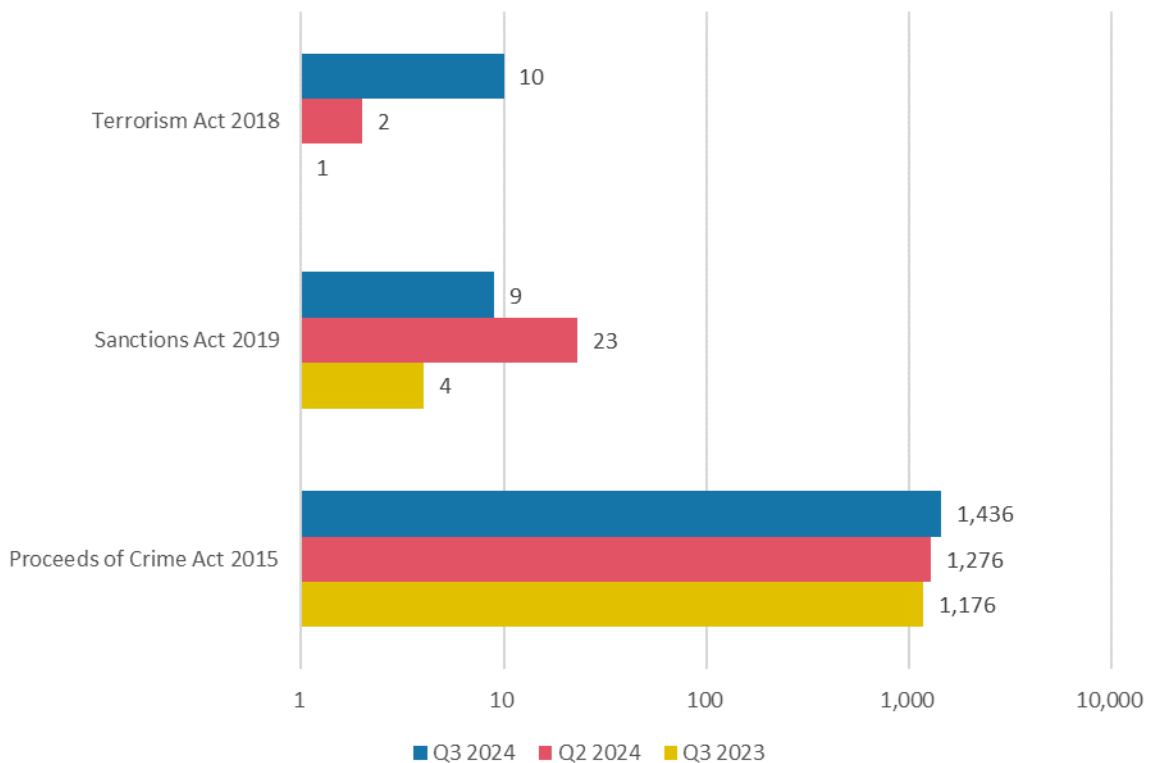
# Submission of SARs by Legislation

The main legislation used to submit SARs continues to be the Proceeds of Crime Act 2015 with 99% of SARs submitted under this legislation in Q3 2024.

There was an increase in SARs submitted under the Terrorism Act 2018, primarily from the DLT, Gaming and Banking sectors. These were mostly as a result of LEA enquiries or exposure to the Dark Web.

SARs received under the Sanctions Act mostly related to exposure to sanctioned exchange.

The chart below shows a comparison between Q3 for 2023 and Q2 and Q3 for 2024.



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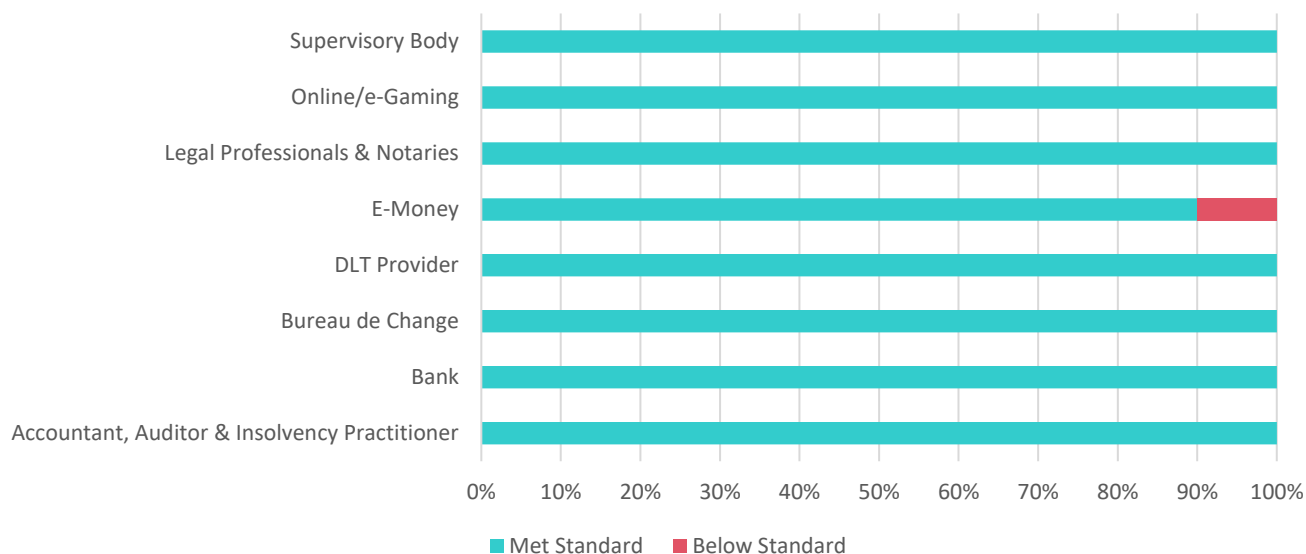
# Feedback Provided to the Reporter

Quality feedback provided to the Reporter [Money Laundering Reporting Officer/ Nominated Officer] is comprised of ratings given for the following five criteria.

- Supporting documentation necessary for the GFIU must be submitted with the SAR for the effective analysis of the information disclosed.
- There must be a suspicion of a predicate offence, money laundering or terrorist financing within the information disclosed to GFIU.
- All background information contained in the SAR on the relationship with the reported subject must be described in sufficient detail.
- The content of the information must be clear and complete.
- When Consent/DAML has been requested, the information contained within the request must include the suspicion (within the narrative of the grounds for suspicion), the criminal property and the prohibited act.

99% of the SARs received in Q3 2024, to which feedback has been provided were deemed to have met standards.

The chart below provides the percentage of Q3 2024 SARs to which feedback has been provided, broken down by sector and whether they met standards.





**Gibraltar Financial Intelligence Unit**  
HM Government of Gibraltar



Suite 945 Europort  
Gibraltar  
GX111AA  
+350 20070211  
admin@gfiu.gov.gi