Gibraltar Financial Intelligence Unit
HM Government of Gibraltar

QUARTERLY STATISTICS REPORT

A breakdown of Suspicious Activity Reports:

Q3 - 2022

Contents

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 2022. 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 GFIU will refer to it as a SAR throughout this document. 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.

Key Statistics

839 SARs were received in Q3 2022. This represents a 15% decrease compared to Q3 2021 (992) and 16% increase compared to Q2 2022 (722). These differences can mainly be attributed to the number of SARs received from the Gaming sector.

The first nine months of 2022 has seen a decrease of 7.9% in the number SARs received (2,451) when compared to the same period for 2021 (2,661).

839 SARs
received by the
GFIU in Q3 2022

82%
received from the
Gaming Sector 2022

9%
received from the
DLT Sector

**Top two
suspected criminalities
reported in 2022**
Money Laundering
Fraud

992 SARs
received by the
GFIU in Q3 2021

83%
received from the
Gaming Sector 2021

11%
received from the
DLT Sector

**Top two
suspected criminalities
reported in 2021**
Money Laundering
Fraud

The two main reporting sectors for Q3 2022 remain the Gaming and DLT sectors.

The number of SARs received from the Gaming sector during the first three quarters of 2022 (2,014) has decreased by 7% compared to the same period in 2021 (2,163).

The number of SARs received from the DLT sector during the first three quarters of 2022 (222) has decreased by 29% compared to the same period in 2021 (314).

Number of Monthly SARs
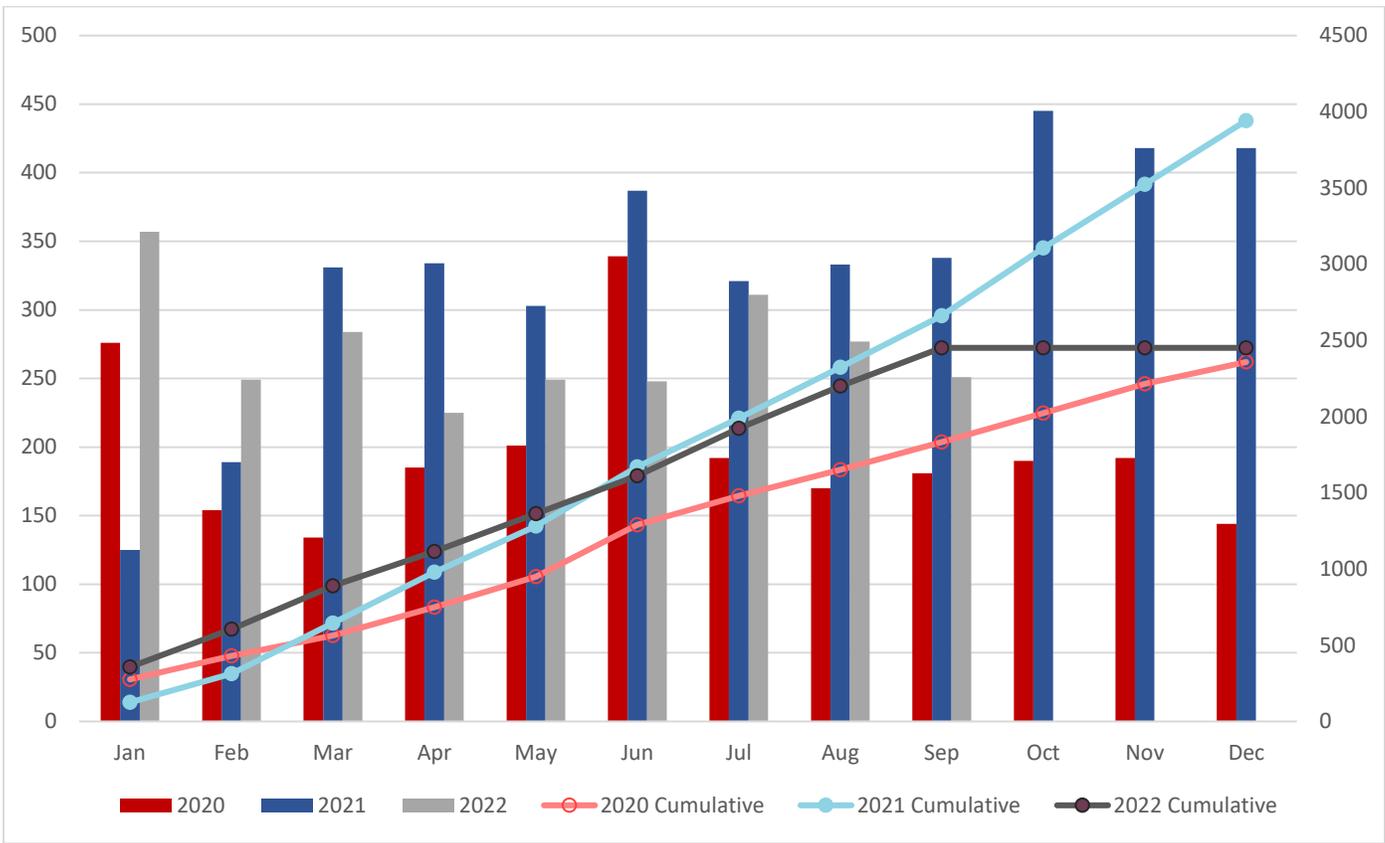
|	2020		2021		2022	
Month	Number	Cumulative	Number	Cumulative	Number	Cumulative
January	276	276	125	125	357	357
February	154	430	189	314	249	606
March	134	564	331	645	284	890
April	185	749	334	979	225	1,115
May	201	950	303	1,282	249	1,364
June	339	1,289	387	1,669	248	1,612
July	192	1,481	321	1,990	311	1,923
August	170	1,651	333	2,323	277	2,200
September	181	1,832	338	2,661	251	2,451
October	190	2,022	445	3,106		
November	192	2,214	418	3,524		
December	144	2,358	418	3,942		

GIBRALTAR RELATED SARS

There were 40 SARs (4.8%) reported in Q3 2022 where the suspected criminality occurred or had a Gibraltar nexus.

125 SARs (5.1%) received in the first three quarters of 2022 had a Gibraltar nexus. This compares to 77 SARs (2%) reported during the entire 2021 which had a Gibraltar nexus.

A detailed overview of the suspected criminalities per sector is included below for comparative purposes and to provide information as to the dominant sectors and suspected criminalities reported.

Suspected Criminality	Corruption	Fraud	Money Laundering	Tax Crimes	Total
Accountant, Auditor & Insolvency Practitioner	0	0	2	0	2
Bank	1	4	8	2	15
DLT Provider	0	0	1	0	1
Investment/Fund Manager	0	1	0	0	1
Legal Professionals & Notaries	0	0	4	0	4
Money Value Transfer Services	0	0	9	0	9
Online/e-Gaming	0	0	1	0	1
Real Estate and Letting Agents	0	0	1	1	2
TCSP's	0	0	4	1	5
Total	**1**	**5**	**30**	**4**	**40**
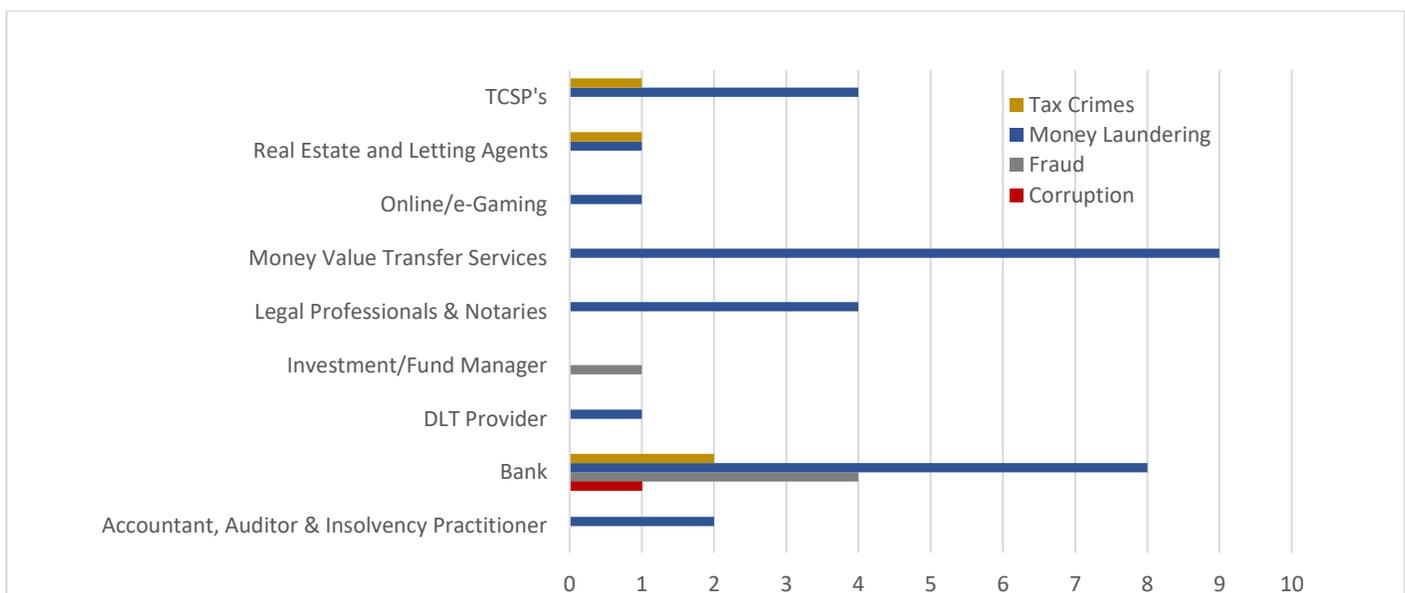
Findings by Reporting Sector

The following data shows the SARs submitted by reporting sectors. Gaming remains the top reporting sector with 82% of SARs submitted in Q3 2022. In Q3 one Gaming company submitted 517 SARs which represents 75% (Q2 70%) of all SARs submitted for the Gaming sector. This firm submitted 62% (Q2 58%) of all SARs for Q3.

In Q3, one DLT firm submitted 48 SARs which represents 56% (Q2 71%) of all DLT SARs submitted for the DLT sector.

73 reporting entities submitted SARs during the first three quarters of 2022. This represent an increase from 67 reporting entities which submitted SARs during the entire 2021.

The table below shows the number of reporting firms for each reporting sector which submitted a SAR in 2022.

Sector	Q1	Q2	Q3	2022
Accountant, Auditor & Insolvency Practitioner	3	1	2	5
Bank	8	8	9	10
DLT Provider	7	7	6	10
E-Money	0	1	0	1
Insurance	1	1	0	1
Investment/Fund Manager	0	2	1	2
Legal Professionals & Notaries	3	1	5	7
Money Services Business	0	1	0	1
Money Value Transfer Services	0	1	1	1
Online/e-Gaming	15	13	16	18
Real Estate and Letting Agents	2	0	1	2
TCSP's	7	7	8	15
Total	**46**	**43**	**49**	**73**

The graph and table below shows a comparison between Q3 for 2021 and Q2 and Q3 for 2022.

Sector	Q3 2021		Q2 2022		Q3 2022		2022	
	SARs	%	SARs	%	SARs	%	SARs	%
Accountant, Auditor & Insolvency Practitioner	1	0.10%	1	0.14%	2	0.24%	12	0.49%
Bank	34	3.43%	27	3.74%	37	4.41%	118	4.81%
DLT Provider	98	9.88%	69	9.56%	85	10.13%	222	9.06%
E-Money	17	1.71%	1	0.14%	0	0.00%	1	0.04%
Insurance	1	0.10%	1	0.14%	0	0.00%	2	0.08%
Investment/Fund Manager	2	0.20%	2	0.28%	1	0.12%	3	0.12%
Legal Professionals & Notaries	4	0.40%	1	0.14%	6	0.72%	10	0.41%
Money Services Business	0	0.00%	1	0.14%	0	0.00%	1	0.04%
Money Value Transfer Services	0	0.00%	13	1.80%	9	1.07%	22	0.90%
Online/e-Gaming	827	83.37%	592	81.99%	688	82.00%	2,014	82.17%
Pension	1	0.10%	0	0.00%	0	0.00%	0	0.00%
Real Estate and Letting Agents	0	0.00%	0	0.00%	2	0.24%	6	0.24%
Regulator	1	0.10%	1	0.14%	0	0.00%	6	0.24%
TCSP's	6	0.60%	13	1.80%	9	1.07%	34	1.39%
Total	**992**	**100.00%**	**722**	**100.00%**	**839**	**100.00%**	**2,451**	**100.00%**

The table below shows all sectors showing suspected criminality vs grounds for suspicion for Q3 in 2022.

Grounds	Corruption	Drugs Trafficking	Fraud	Money Laundering	Robbery/ Theft	Sanctions	Sexual Exploitation	Tax Crimes	Forgery	Total
Adverse Due Diligence	0	0	2	73	0	0	0	1	0	76
Adverse Open Source	0	0	3	223	0	0	0	1	0	227
Cash (deposits/withdrawals)	0	0	0	7	0	0	0	0	0	7
Exposure to Child Abuse material	0	0	0	0	0	0	3	0	0	3
Forged Documents	0	0	7	8	0	0	0	1	2	18
Fraud/ False Accounting/ Forgery	0	0	25	26	1	0	0	0	2	54
High Risk Country	0	0	0	6	0	0	0	0	0	6
Highly Transactional	0	0	0	4	0	0	0	0	0	4
Inadequate/failure to provide due diligence	1	0	2	259	0	0	0	1	0	263
Layering	0	0	0	13	0	0	0	0	0	13
LEA / DPA Request or Enquiry	0	0	2	43	0	0	0	0	0	45
Minimal or very low risk gambling activity	0	0	0	34	0	0	0	0	0	34
Payment to the dark web	0	7	33	7	0	0	3	0	0	50
Sanctions -Designated Person	0	0	0	0	0	1	0	0	0	1
Stolen Identity	0	0	3	9	0	0	0	0	3	15
Tax Evasion / Avoidance	0	0	0	17	0	0	0	3	0	20
Theft	0	0	0	1	0	0	0	0	0	1
Unusual Forex	0	0	0	1	0	0	0	1	0	2
Total	**1**	**7**	**77**	**731**	**1**	**1**	**6**	**8**	**7**	**839**

The following statistics cover the suspected criminality vs grounds for suspicion for Q3 in 2022 for reporting sectors, commensurate with the risks identified within the 2020 National Risk Assessment, in respect of:

Gaming

Grounds	Fraud	Money Laundering	Tax Crimes	Forgery	Total
Adverse Due Diligence	0	70	1	0	71
Adverse Open Source	2	217	0	0	219
Cash (deposits/withdrawals)	0	5	0	0	5
Forged Documents	3	8	0	2	13
Fraud/ False Accounting/ Forgery	3	15	0	1	19
Inadequate/failure to provide due diligence	1	246	0	0	247
Layering	0	12	0	0	12
LEA / DPA Request or Enquiry	1	41	0	0	42
Minimal or very low risk gambling activity	0	34	0	0	34
Stolen Identity	0	8	0	3	11
Tax Evasion / Avoidance	0	13	1	0	14
Theft	0	1	0	0	1
Total	**10**	**670**	**2**	**6**	**688**

DLT Sector

Grounds	Drugs Trafficking	Fraud	Money Laundering	Sexual Exploitation	Forgery	Total
Adverse Due Diligence	0	0	1	0	0	1
Adverse Open Source	0	0	1	0	0	1
Exposure to Child Abuse material	0	0	0	3	0	3
Fraud/ False Accounting/ Forgery	0	15	6	0	1	22
High Risk Country	0	0	2	0	0	2
Highly Transactional	0	0	1	0	0	1
Inadequate/failure to provide due diligence	0	0	3	0	0	3
Layering	0	0	1	0	0	1
LEA / DPA Request or Enquiry	0	1	0	0	0	1
Payment to the dark web	7	33	7	3	0	50
Total	**7**	**49**	**22**	**6**	**1**	**85**

TCSPs

Grounds	Money Laundering	Sanctions	Tax Crimes	Total
Adverse Due Diligence	1	0	0	1
Adverse Open Source	1	0	1	2
Inadequate/failure to provide due diligence	3	0	1	4
Sanctions -Designated Person	0	1	0	1
Tax Evasion / Avoidance	1	0	0	1
Total	**6**	**1**	**2**	**9**

Banks

Grounds	Corruption	Fraud	Money Laundering	Robbery/ Theft	Tax Crimes	Total
Adverse Due Diligence	0	1	0	0	0	1
Adverse Open Source	0	1	2	0	0	3
Cash (deposits/withdrawals)	0	0	2	0	0	2
Forged Documents	0	4	0	0	1	5
Fraud/ False Accounting/ Forgery	0	7	3	1	0	11
Highly Transactional	0	0	1	0	0	1
Inadequate/failure to provide due diligence	1	1	3	0	0	5
LEA / DPA Request or Enquiry	0	0	1	0	0	1
Stolen Identity	0	3	1	0	0	4
Tax Evasion / Avoidance	0	0	3	0	1	4
Total	**1**	**17**	**16**	**1**	**2**	**37**

Money Transfer Value Service

| Grounds	Money Laundering	Total
Adverse Due Diligence	1	1
Fraud/ False Accounting/ Forgery	1	1
High Risk Country	4	4
Highly Transactional	2	2
Unusual Forex	1	1
Total	**9**	**9**

Criminality vs Sector

The table below shows the criminality reported by different reporting sectors in Q3 2022.

Suspected Criminality	Accountant, Auditor & Insolvency Practitioner	Bank	DLT Provider	Investment/Fund Manager	Legal Professionals & Notaries	Money Value Transfer Services	Online/e-Gaming	Real Estate and Letting Agents	TCSP's	Total
Corruption	0	1	0	0	0	0	0	0	0	1
Drugs Trafficking	0	0	7	0	0	0	0	0	0	7
Forgery	0	0	1	0	0	0	6	0	0	7
Fraud	0	17	49	1	0	0	10	0	0	77
Money Laundering	2	16	22	0	5	9	670	1	6	731
Robbery/ Theft	0	1	0	0	0	0	0	0	0	1
Sanctions	0	0	0	0	0	0	0	0	1	1
Sexual Exploitation	0	0	6	0	0	0	0	0	0	6
Tax Crimes	0	2	0	0	1	0	2	1	2	8
Total	**2**	**37**	**85**	**1**	**6**	**9**	**688**	**2**	**9**	**839**

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 2022, and therefore continues to trend with the previous quarters, and previous years.

The graph and table below shows a comparison between Q3 for 2021 and Q2 and Q3 for 2022.
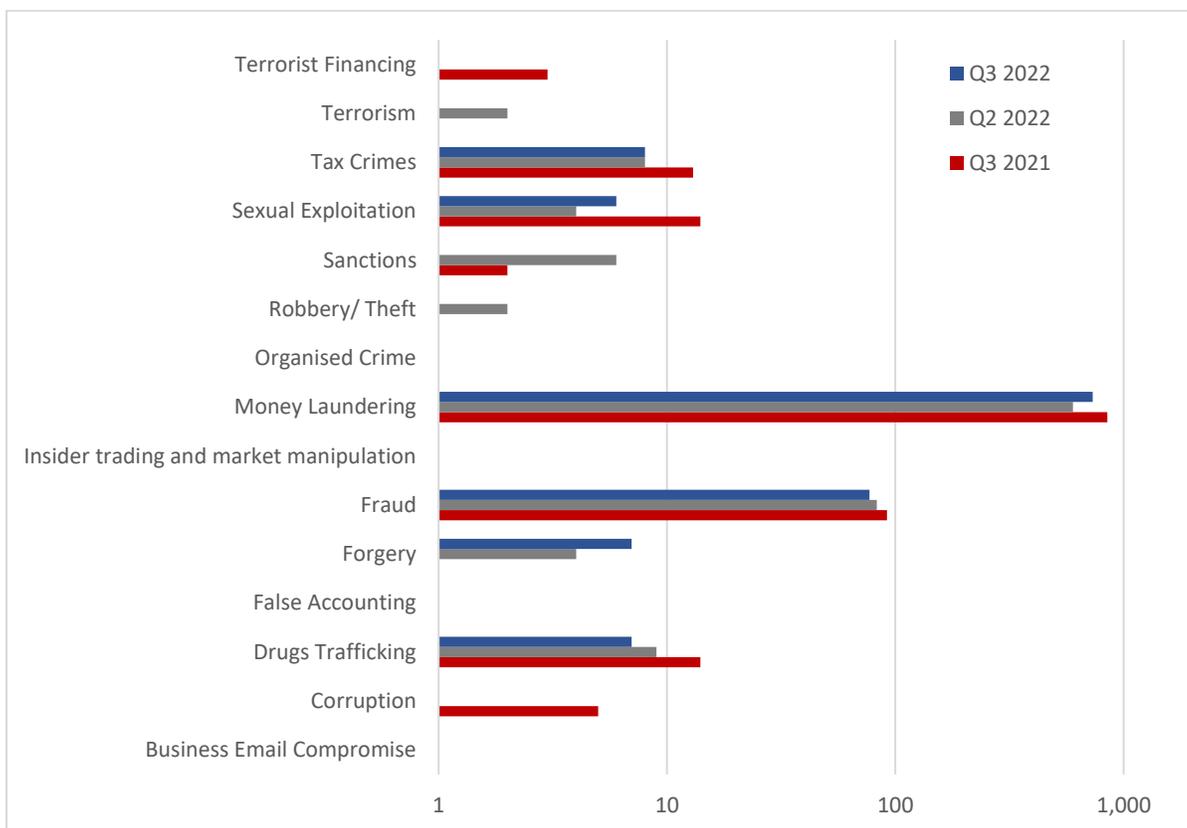
Suspected Criminality	Q3 2021		Q2 2022		Q3 2022		2022	
	SARs	%	SARs	%	SARs	%	SARs	%
Business Email Compromise	0	0.00%	1	0.14%	0	0.00%	1	0.04%
Corruption	5	0.50%	1	0.14%	1	0.12%	6	0.24%
Drugs Trafficking	14	1.41%	9	1.25%	7	0.83%	36	1.47%
False Accounting	0	0.00%	1	0.14%	0	0.00%	2	0.08%
Forgery	0	0.00%	4	0.55%	7	0.83%	12	0.49%
Fraud	92	9.27%	83	11.50%	77	9.18%	237	9.67%
Insider trading and market manipulation	0	0.00%	0	0.00%	0	0.00%	2	0.08%
Money Laundering	848	85.48%	600	83.10%	731	87.13%	2,080	84.86%
Organised Crime	1	0.10%	1	0.14%	0	0.00%	1	0.04%
Robbery/ Theft	0	0.00%	2	0.28%	1	0.12%	4	0.16%
Sanctions	2	0.20%	6	0.83%	1	0.12%	26	1.06%
Sexual Exploitation	14	1.41%	4	0.55%	6	0.72%	17	0.69%
Tax Crimes	13	1.31%	8	1.11%	8	0.95%	23	0.94%
Terrorism	0	0.00%	2	0.28%	0	0.00%	4	0.16%
Terrorist Financing	3	0.30%	0	0.00%	0	0.00%	0	0.00%
Total	**992**	**100.00%**	**722**	**100.00%**	**839**	**100.00%**	**2,451**	**100.00%**

Findings by Grounds for Suspicion

During the operational analysis of the SAR, the GFIU will record the principal grounds for suspicion. The GFIU's internal Themis system is designed to select one 'grounds for suspicion' category which provides a more comprehensive presentation of statistical data in line with international standards of recording data.

The graph and table below shows a comparison between Q3 for 2021 and Q2 and Q3 for 2022.
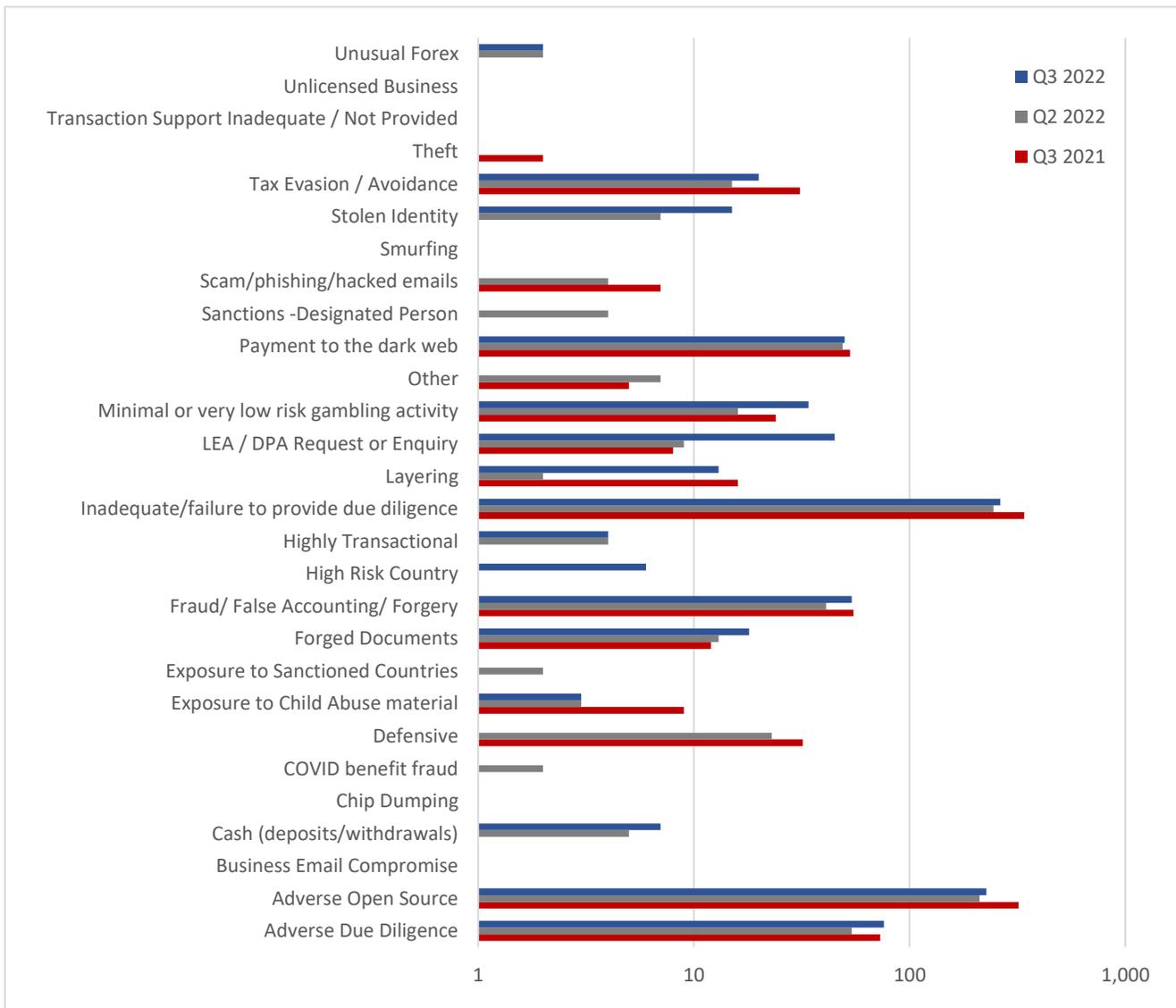
| Grounds for Suspicion	Q3 2021 SARs	%	Q2 2022 SARs	%	Q3 2022 SARs	%	2022 SARs	%
Adverse Due Diligence	73	7.36%	54	7.48%	76	9.06%	169	6.90%
Adverse Open Source	320	32.26%	211	29.22%	227	27.06%	680	27.74%
Business Email Compromise	0	0.00%	1	0.14%	0	0.00%	1	0.04%
Cash (deposits/withdrawals)	1	0.10%	5	0.69%	7	0.83%	18	0.73%
Chip Dumping	1	0.10%	0	0.00%	0	0.00%	5	0.20%
COVID benefit fraud	0	0.00%	2	0.28%	0	0.00%	3	0.12%
Defensive	32	3.23%	23	3.19%	0	0.00%	54	2.20%
Exposure to Child Abuse material	9	0.91%	3	0.42%	3	0.36%	10	0.41%
Exposure to Sanctioned Countries	1	0.10%	2	0.28%	0	0.00%	7	0.29%
Forged Documents	12	1.21%	13	1.80%	18	2.15%	40	1.63%
Fraud/ False Accounting/ Forgery	55	5.54%	41	5.68%	54	6.44%	122	4.98%
High Risk Country	0	0.00%	1	0.14%	6	0.72%	7	0.29%
Highly Transactional	0	0.00%	4	0.55%	4	0.48%	9	0.37%
Inadequate/failure to provide due diligence	340	34.27%	245	33.93%	263	31.35%	865	35.29%
Layering	16	1.61%	2	0.28%	13	1.55%	28	1.14%
LEA / DPA Request or Enquiry	8	0.81%	9	1.25%	45	5.36%	72	2.94%
Minimal or very low risk gambling activity	24	2.42%	16	2.22%	34	4.05%	64	2.61%
Other	5	0.50%	7	0.97%	0	0.00%	19	0.78%
Payment to the dark web	53	5.34%	49	6.79%	50	5.96%	148	6.04%
Sanctions -Designated Person	0	0.00%	4	0.55%	1	0.12%	20	0.82%
Scam/phishing/hacked emails	7	0.71%	4	0.55%	0	0.00%	9	0.37%
Smurfing	1	0.10%	0	0.00%	0	0.00%	0	0.00%
Stolen Identity	1	0.10%	7	0.97%	15	1.79%	27	1.10%
Tax Evasion / Avoidance	31	3.13%	15	2.08%	20	2.38%	58	2.37%
Theft	2	0.20%	0	0.00%	1	0.12%	2	0.08%
Transaction Support Inadequate / Not Provided	0	0.00%	1	0.14%	0	0.00%	8	0.33%
Unlicensed Business	0	0.00%	1	0.14%	0	0.00%	2	0.08%
Unusual Forex	0	0.00%	2	0.28%	2	0.24%	4	0.16%
Total	**992**	**100.00**	**722**	**100.00**	**839**	**100.00**	**2,451**	**100.00**

Findings of Defensive SARs

A defensive SAR arises where an activity or a transaction is deemed not suspicious upon further analysis by the GFIU. SARs are required to be filed when a transaction or an attempted transaction involve funds derived from any illegal activity, or when the transaction has no apparent lawful purpose.

It is important to note that the volume of additional workload created by these defensive SARs where no suspicious activity is contained within have a negative impact on the GFIU, and may even lead to a dilution on the value of SAR reporting as a whole.

Measures taken by GFIU to reduce the number of defensive SARs has been very successful showing a decrease over the last few years. This reduction can be said to have increased the quality of SARs submitted with actionable intelligence and may be attributed to the GFIU's feedback system and outreach program.

The graph and table below shows a comparison between Q3 for 2021 and Q2and Q3 for 2022.
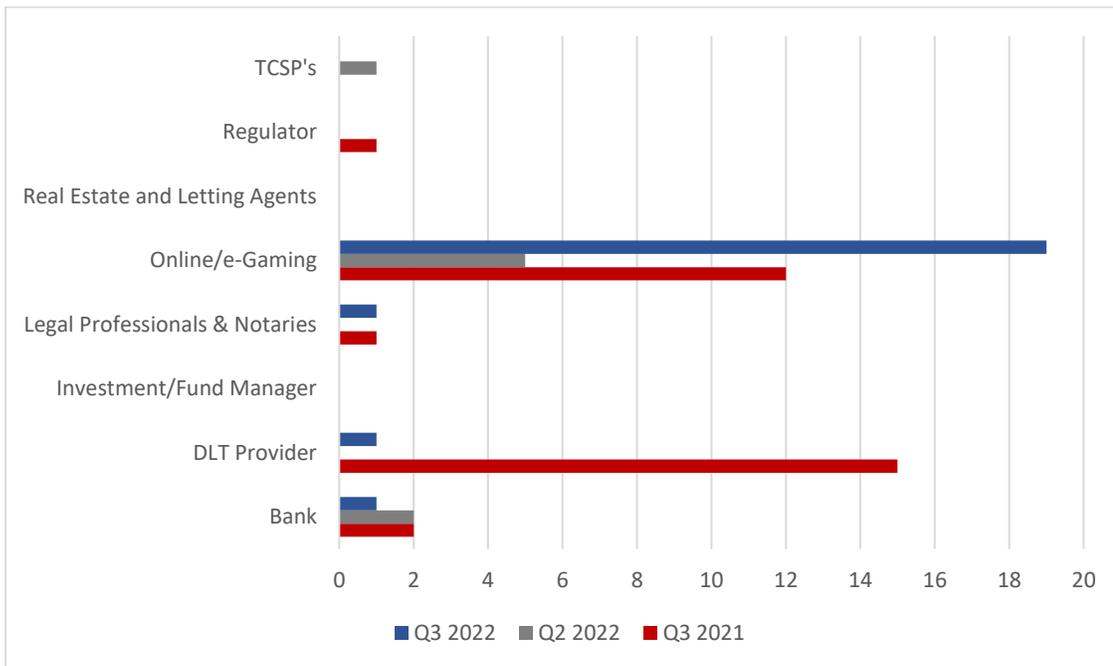
Sector	Q3 2021	Q2 2022	Q3 2022	2022
Bank	2	2	1	7
DLT Provider	15	0	1	3
Investment/Fund Manager	0	0	0	0
Legal Professionals & Notaries	1	0	1	2
Online/e-Gaming	12	5	19	37
Real Estate and Letting Agents	0	0	0	1
Regulator	1	0	0	1
TCSP's	0	1	0	2
Total	**31**	**8**	**22**	**53**

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

Note that Consents/ DAMLs received in Q3 2022, include some requests received for SARs submitted prior to Q3 2022.
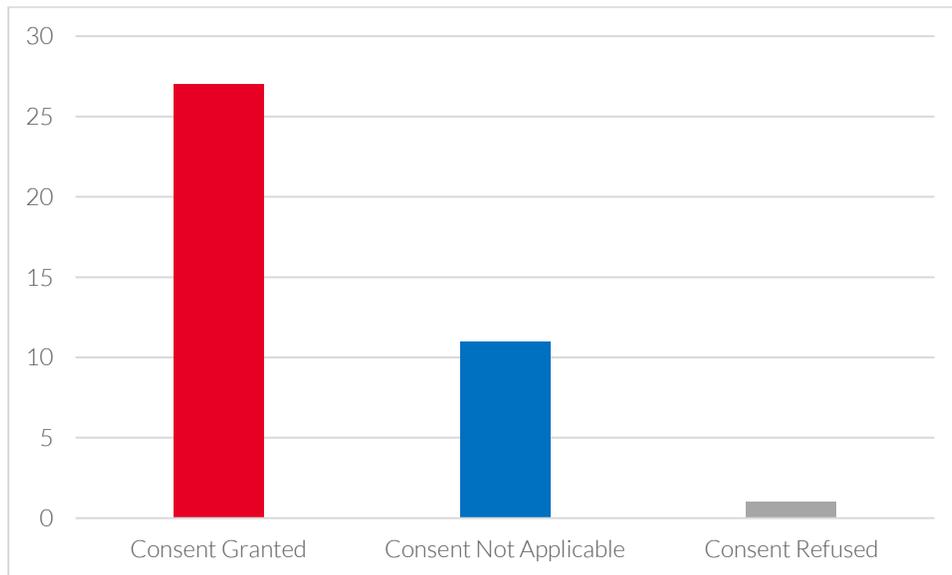
Status	Number
Consent Granted	27
Consent Not Applicable	11
Consent Refused	1
Total	**39**

Findings of PEPs

A **politically exposed person** (PEP) is defined in the Proceeds of Crime Act 2015 as a natural person who is or has been entrusted with prominent public functions. PEPs are a high-risk category for which reporting entities and are required to apply EDD measures. 1.2 % of SARs received in Q3 2022related to SARs for which PEPs were identified.

The graph and table below shows a comparison between Q3 for 2021 and Q2 and Q3 for 2022.
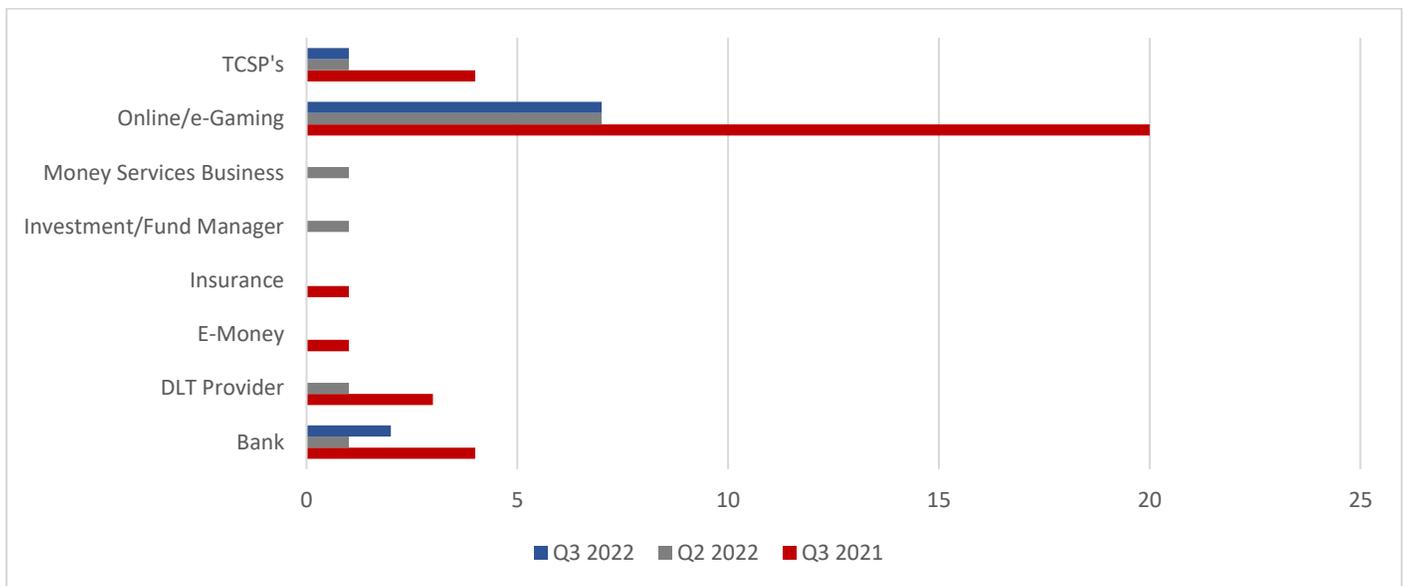
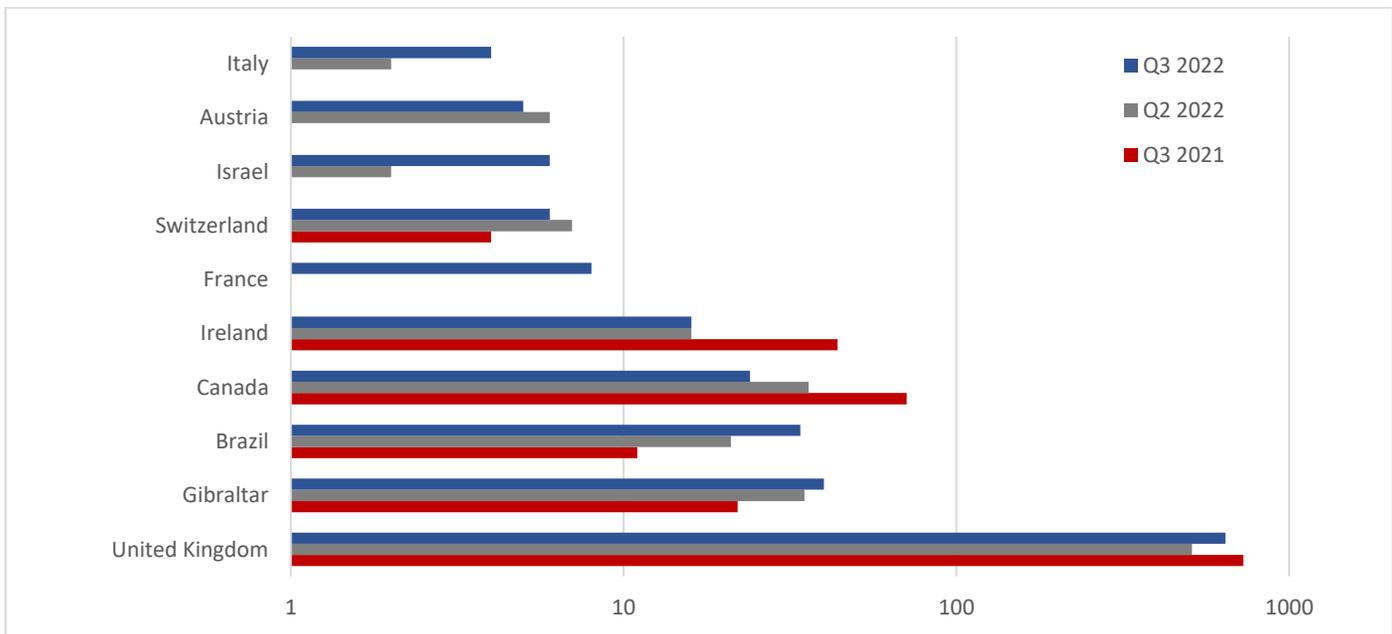| Sector	Q3 2021	Q2 2022	Q3 2022	2022
Bank	4	1	2	8
DLT Provider	3	1	0	7
E-Money	1	0	0	0
Insurance	1	0	0	0
Investment/Fund Manager	0	1	0	1
Money Services Business	0	1	0	1
Online/e-Gaming	20	7	7	25
TCSP's	4	1	1	6
Total	**33**	**12**	**10**	**59**

Findings of Countries Where Criminality Took Place

The suspected criminality of SARs disclosed was recorded alongside the country where the crime was deemed to have occurred. The top five countries for Q3 2022 where criminality occurred remain the same as in Q2 2022. The top 5 countries account for 90% of SARs received in Q3 2022.

For the top five countries, apart from Gibraltar, the majority of SARs reported related to the Gaming sector.

The graph and table below show the top 10 countries where the suspected criminality occurred.

Country	Q3 2021	Q2 2022	Q3 2022
United Kingdom	728	511	644
Gibraltar	22	35	40
Brazil	11	21	34
Canada	71	36	24
Ireland	44	16	16
France	1	1	8
Switzerland	4	7	6
Israel	0	2	6
Austria	1	6	5
Italy	1	2	4

The graph and table below show the top ten countries where the suspected criminality occurred, when the Gaming sector is excluded.
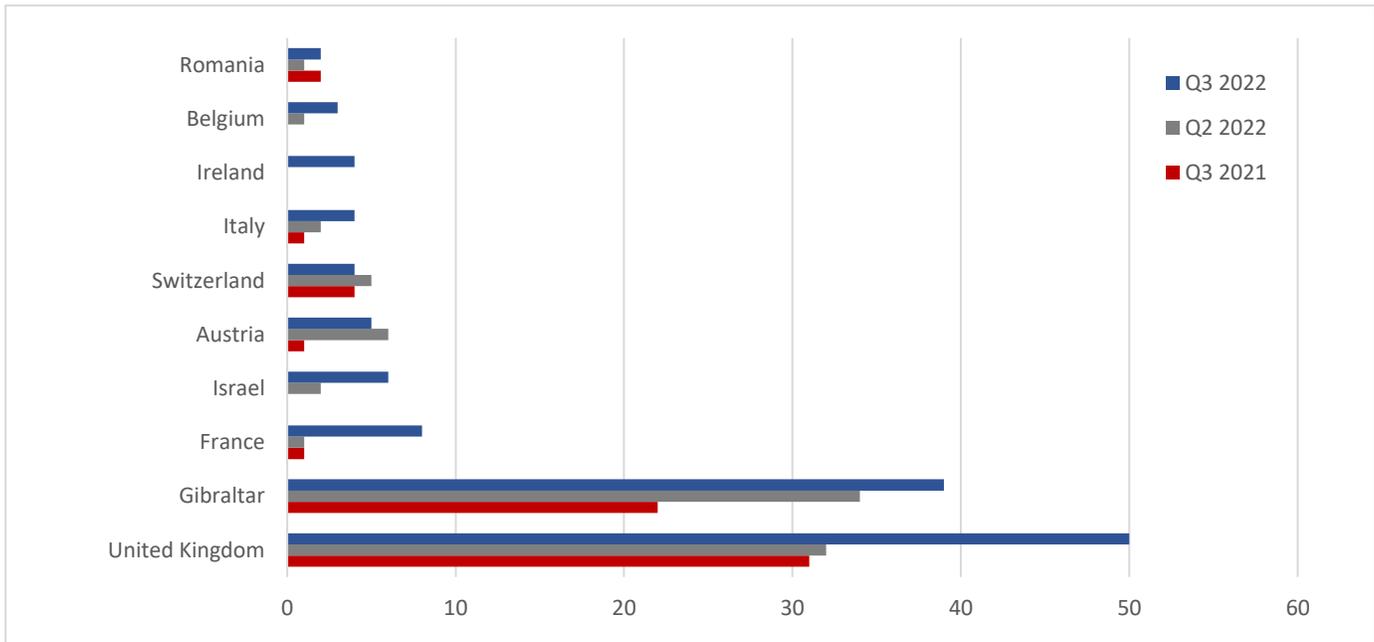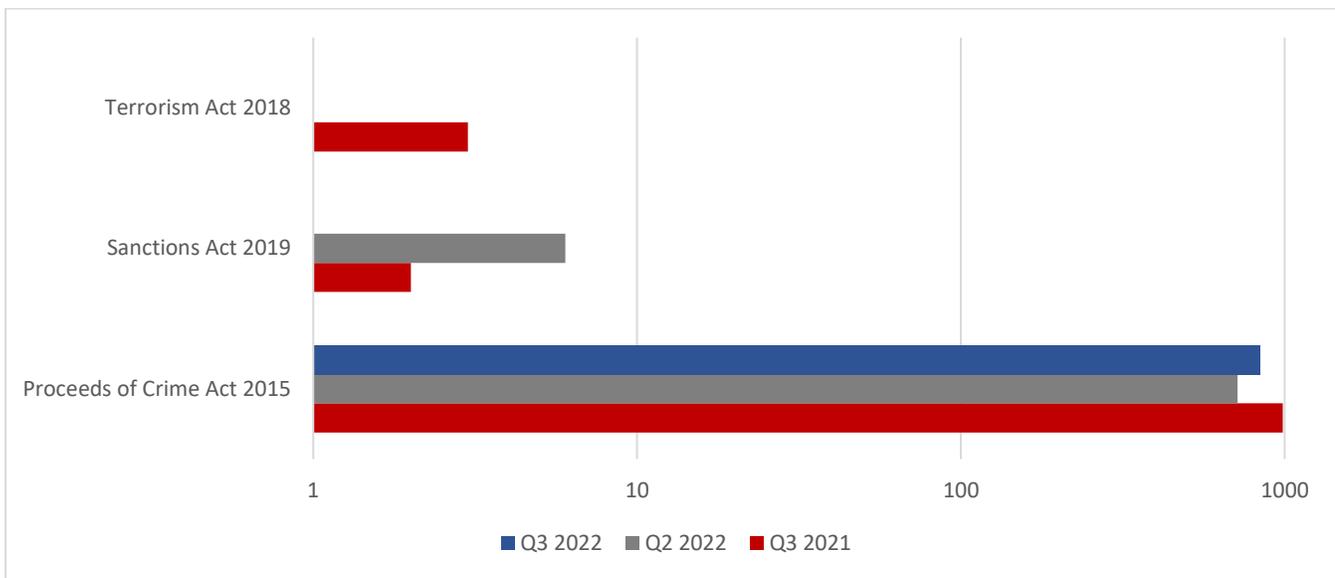

Country	Q3 2021	Q2 2022	Q3 2022
United Kingdom	31	32	50
Gibraltar	22	34	39
France	1	1	8
Israel	0	2	6
Austria	1	6	5
Switzerland	4	5	4
Italy	1	2	4
Ireland	0	0	4
Belgium	0	1	3
Romania	2	1	2

Submission of SARs by Legislation

The main legislation used to submit SARs is the Proceeds of Crime Act 2015.

The submissions under the Sanctions Act 2019 are mainly attributed to the UK and EU sanctions imposed on Russia.

The graph and table below shows a comparison between Q3 for 2021 and Q2 and Q3 for 2022.

Legislation	Q3 2021	Q2 2022	Q3 2022	2022
Proceeds of Crime Act 2015	987	716	838	2425
Sanctions Act 2019	2	6	1	25
Terrorism Act 2018	3	0	0	1
Total	**992**	**722**	**839**	**2451**

Outcomes

The outcome records what action if any the GFIU has undertaken in respect of a SAR. A large proportion of SARs were dual disclosed both to the GFIU and a foreign FIU. Although most of these SARs do not require any further action by the GFIU, the processing and analysis of each disclosure requires a balance of resources and prioritisation that allows for the effectiveness and efficiency of demand on the GFIU.

At the time of publishing this report, a number of SARs were being processed. These included a number for which further information had been requested.

The table below shows the outcomes per sector for Q3 in 2022.

Outcomes	Disclosure of no value	Intelligence disseminated	In Progress	No Action Taken / Dual Disclosed	No Action Taken / No Dissemination
Accountant, Auditor & Insolvency Practitioner	1	0	1	0	0
Bank	0	9	25	0	3
DLT Provider	1	42	29	0	13
Investment/Fund Manager	0	0	1	0	0
Legal Professionals & Notaries	0	2	4	0	0
Money Value Transfer Services	0	0	4	2	3
Online/e-Gaming	0	52	38	580	18
Real Estate and Letting Agents	0	0	2	0	0
TCSP's	0	0	7	0	2
Total	2	105	111	582	39

Findings of the 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 four 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.

The feedback provided in a quarter will also include feedback of SARs submitted prior to that quarter which had not previously received feedback.

98% of the SARs to which feedback was provided in Q3 2022 met standards.

The table provides the number of SARs per sector and whether they met standards, for feedback provided in Q2 2023.

Sector	Below Standard	Met Standard	Total
Accountant, Auditor & Insolvency Practitioner	1	0	1
Bank	0	12	12
DLT Provider	1	58	59
Legal Professionals & Notaries	0	2	2
Money Value Transfer Services	0	5	5
Online/e-Gaming	10	640	650
Real Estate and Letting Agents	1	0	1
TCSP's	0	2	2
Total	**13**	**719**	**732**

Gibraltar Financial Intelligence Unit

HM Government of Gibraltar