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SQUEEZED? Russia and Illicit Financial Flows





Background

Pre- and post-Soviet money laundering has been a driver of the globalisation of Russian organised crime, formation of early capital and the oligarchy

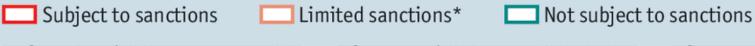
FDI flows in and out of Russia are anchored into 3-4 core offshore centres

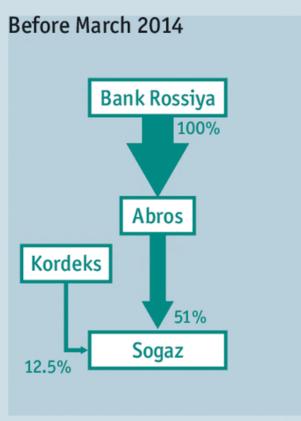
Post-2014, the offshore mode of Russian capital flows has helped the Russians avoid sanctions

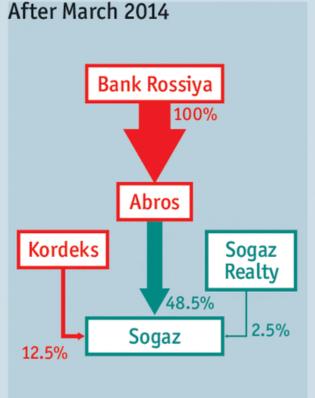
2018: Russia's richest men hold about 60% of Russia's GDP offshore (\$1 trillion)

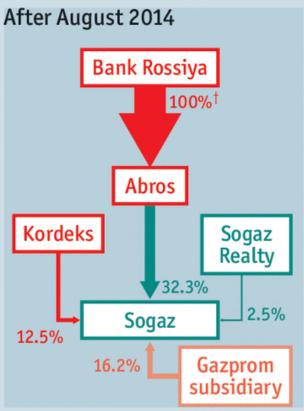


Changing hands









Economist.com

Source: The Economist

^{*}Restrictions on financing in Western capital markets †Later transferred to Abros

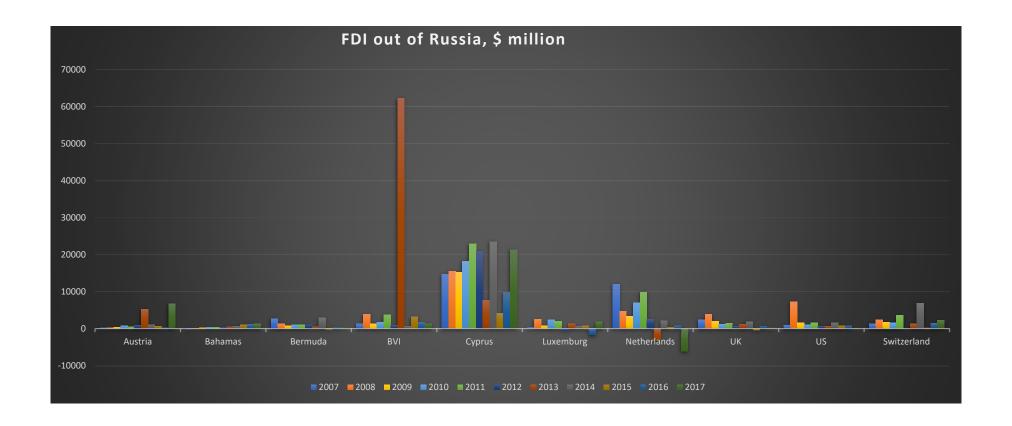
Cyprus: Russia's Real Financial Centre

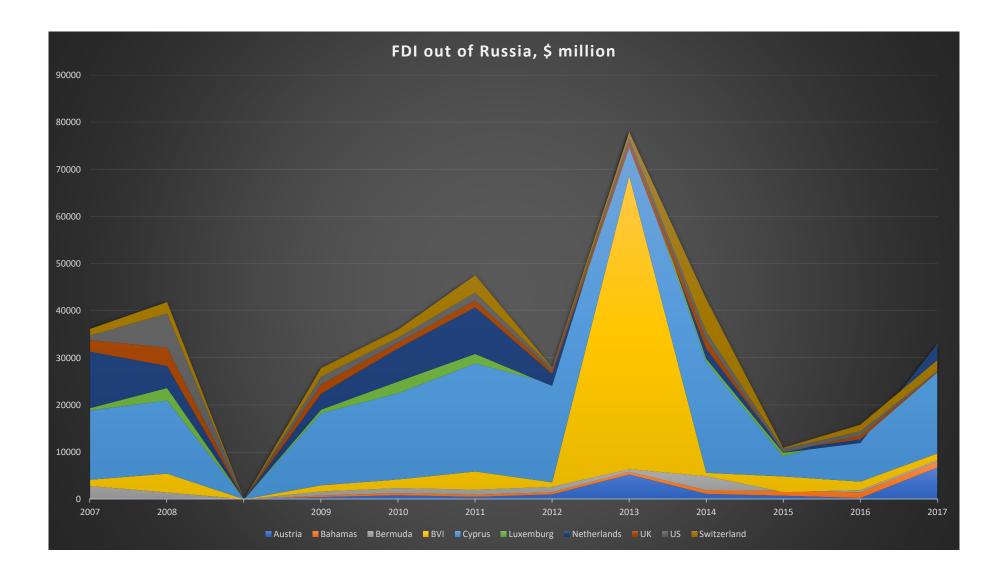


- 2014: 30% of FDI into Russia came from Cyprus
- 2017-2018: \$35.9bn flew from Russia into Cyprus
- Overall: \$177.4 bn of Russian money went into Cyprus

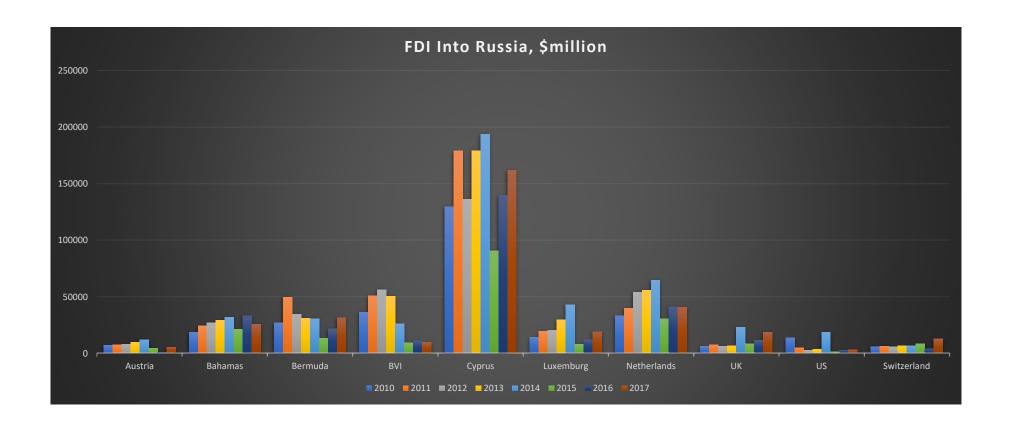
Kommersant

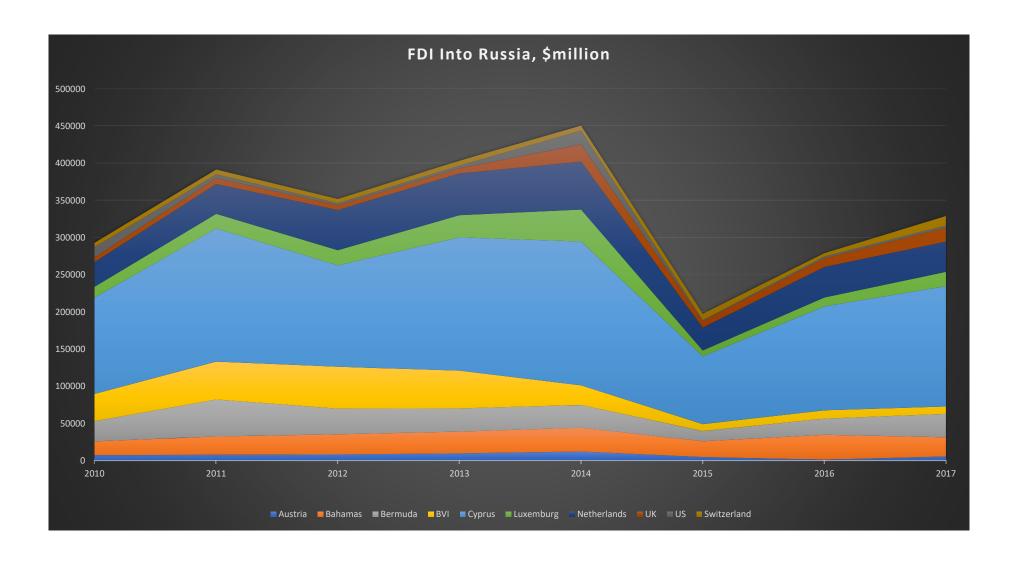
Data: Russian Central Bank, 2007-2017





Data: Russia Central Bank





Offshore for dummies: simple schemes

- 1. Move funds into say, Gibraltar or Malta. Get a bank account.
- 2. Moves the funds upwards into more secretive havens.
- 3. Repeat (2) continually until the money gets to final destination (e.g. London).

All bank accounts are in the name of an offshore company with nominal owners.

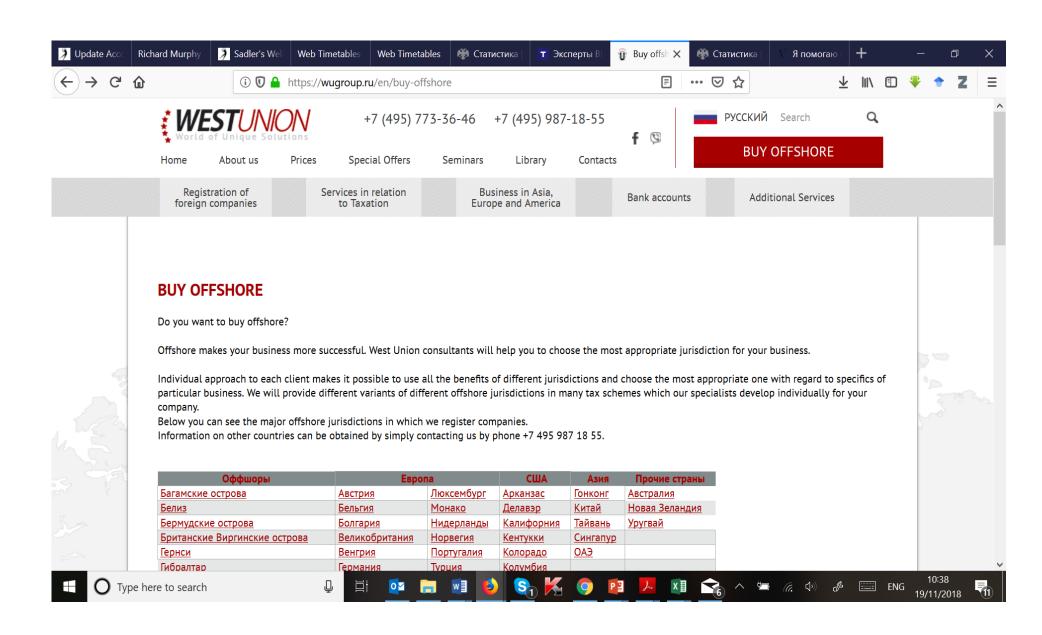
The scheme is not appropriate for civil servants, but totally ok for gangsters and entrepreneurs.

Alternatively, fake invoices

- A Russian company belongs to a Cyprus 'mother'.
- The Cyprus company gives its Russian 'daughter' a loan (or a right to use the brand name, licence, etc.).
- The Russian company sells products in the Russian market and earns revenue. Yet most part of this revenue goes to paying off the Cyrus mother (either as interest on the loan or as a fee for the title/right/royalty).
- As a result, the net profit of the Russian daughter is minimal, most of the sum goes to Cyprus.

Service providers

- Offshore companies have been a regular offering by specialised firms since the early 1990s to 2014.
- Business thrived in a lax regulatory environment internationally, and fed by (1) the demand of Russian clients to conceal the ownership of assets (rather than avoid taxation as such) as well as (2) use capital outside Russia.
- A typical example:



2014:

 Targeted international sanctions against Russian capital have coincided with the new global regulatory drive to tame illicit financial flows and regulate banks

• This has produced several changes within the industry of enablers:

Post-2014 / AML/ CRS:

- Extremely difficult for politically exposes persons to move money, unless you are a close friend of the president
- Standard offshore enablers have switched to more complex 'international financial planning': due diligence, taxation, assessment of risk, paperwork for compliance, etc.

Two current trends

(1) Corporatisation of corrupt wealth and (2) consolidation of enablers

• New forms of illicit finance: trusts and fund management

Always, the ultimate goal is access to a bank account in the West

By way of example,

• West Union can provide bank accounts in the following jurisdictions:

Austria ANGLO IRISH BANK (AUSTRIA) AG CREDIT SWISS DEUTSCHE BANK (AUSTRIA) AG Latvia Singapore EURAM BANK AG AIZKRAUKLES BANKA **UBS SINGAPORE** RAIFFEISEN BANK BALTIKUMS BANK VP BANK (SINGAPORE) VONTOBEL BANK NORVIK PAREX RIETUMU BANK USA Britain BANK OF AMERICA, CHARLOTTE, NC ACCESS BANK OF NEW YORK, NY CREDIT SUISSE (UK) LIMITED Lithuania BANK ONE NA, CHICAGO, IL EFG PRIVATE BANK **SNORAS BANK** HSBC VILNIUS BANK Switzerland AIG PRIVAT BANK AG Hong Kong Liechtenstein AKB PRIVATBANK ZURICH AG HSBC HONG KONG AP BANK STANDART CHARTERED BANK BANCA COMMERCIALE LUGANO HYPO INVESTMENT BANK BANK SCS ALLIANCE NEUE BANK LIECHTENSHTEIN BANQUE DE COMMERCE ET DE PLACEMENTS VP BANK (LIECHTENSHTEIN) Denmark CREDIT AGRICOLE JYSKE BANK CREDITE SUISSE NORDEA BANK DANMARK (UNI BANK) DRESDNER BANK (SWITZERLAND) AG Luxembourg EFG PRIVATE BANK SA DEXIA BANQUE INTERNATIONALE A LUXEMBOURG HSBC PRIVATE BANK (SUISSE) SA VP BANK (LUXEMBOURG) Cyprus UNION BANCAIRE PRIVEE ALPHA BANK LTD UNION BANK OF SWITZERLAND AVTOVAZBANK International Banking Unit VP BANK (SWITZERLAND) BANK OF CYPRUS LIMITED Seychelles EFG EUROBANK BARKLAY BANK FBME BANK LTD HELLENIC BANK, LTD Estonia MARFIN LAIKI POPULAR BANK PUBLIC CO LTD SAMPO BANK Saint Vincent and the Grenadines PROMSVYAZBANK TALLINA BUSINESS BANK LOYAL BANK China BANK OF CHINA

STANDARD CHARTERED BANK (HK) LTD.