



# Workshop: Practical Applications

These case studies are for illustration purposes only.

Paul Saliba

Intelligence Analysis



# Overview

- Case Study 1 – TBML in EU's Grain Market
- Case Study 2 – TBML in the Global Textiles Market



# Case Study 1: Malta Grain Ltd – Part I

*5 minutes*

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A preliminary analysis was triggered by a Maltese credit institution, Bank plc, after it detected a significant decline in the business operations of one of its clients, Agri Malta Ltd.

The client under analysis is considered as a key player in one of Europe's largest retail commodity markets, specialising in the importing and exporting and local sales of grains.

Q: With reference to the provided high-level summary of the business operations, do you observe any red flags?  
Is there a suspected predicate offence that you can earmark at this stage of the analysis?



# Case Study 1: Malta Grain Ltd – Part I (Cont.)

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Bank plc requested information regarding the payments made to AsianGrain Ltd and Consult Ltd, but the representative was hesitant to provide details and was unable to present any supporting documentation for the transfers. Additionally, when asked about the notable changes in the company's cash operations, the representative claimed the withdrawals were linked to an agreement with a local intermediary, which offered preferential rates for cash payments. Bank plc flagged these activities as potentially indicative of money laundering and reported them to the FIAU, in compliance with its AML obligations.



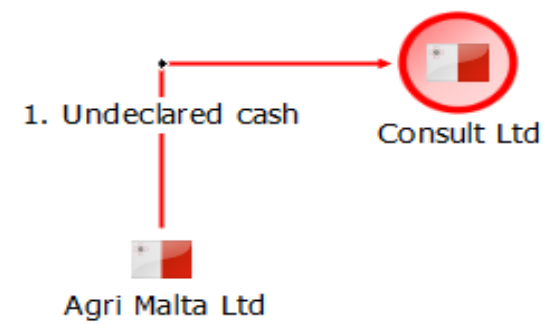
# Case Study 1: Malta Grain Ltd – Part II A

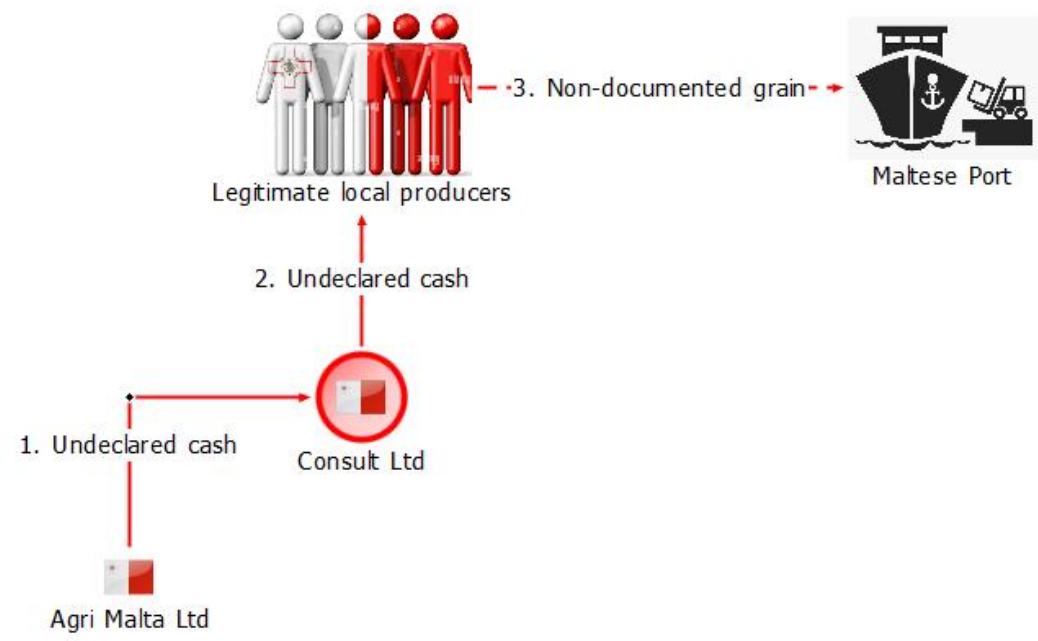
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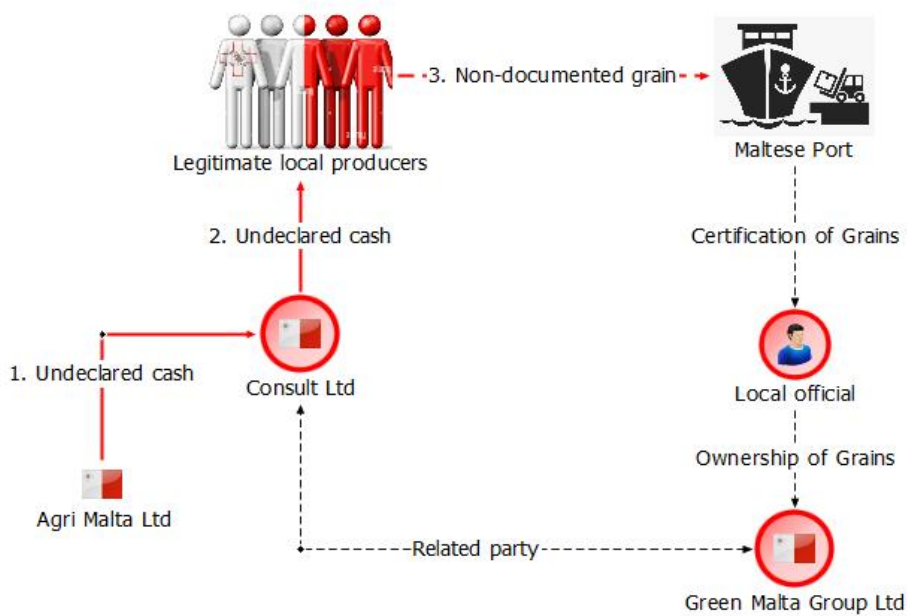
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→ A money-laundering network was identified whereby the below key players and process were identified:

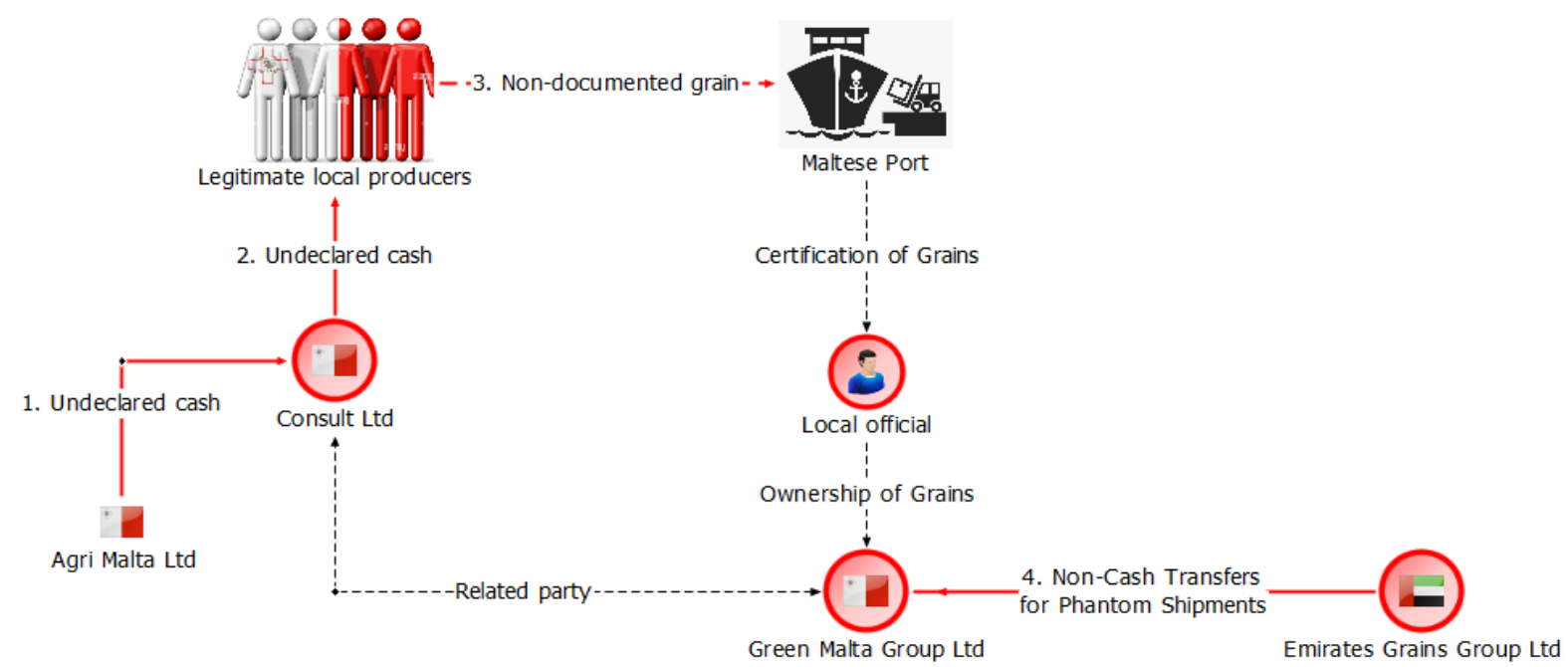
- It has emerged that Consult Ltd is part of an Organised Criminal Group ('OCG') and featured as a counterpart of two international companies operating in Malta, both of which had been under scrutiny in past analysis. These companies were suspected of conducting complex trade operations that involved unclear business practices. Their dealings raised questions due to the use of suspicious contracts and invoicing that didn't seem to align with standard trade activities.
- Similarly, Consult Ltd began showing signs of similar behaviour. As from 2022 it worked closely with Agri Malta Ltd, receiving both cash (mostly) and non-cash transfers from the company.
- Consult Ltd used these funds (mostly paid in cash) to purchase non-documented grain from legitimate local producers. Once purchased, personnel from the same OCG handled the movements and logistics of the grain and it was stored at Maltese seaports, making it harder to trace its origins.
- In the background, an official, who is a close associate of one of the prominent members of the OCG played a key role by certifying this undocumented grain, giving it the appearance of legitimacy. The certified grain then passed into the hands of Green Malta Group Ltd, a company that is related to Consult Ltd and which operated under the guise of legitimate trade but seemed to serve a different purpose.
- Green Malta Group Ltd sold the grain to a UAE-based entity, Emirates Grains Group Ltd, owned by one of the members of the OCG, at a very low price using official contracts and invoices. Yet, curiously, the grain never left the port, suggesting a different arrangement behind the scenes.
- The story continued as Emirates Grains Group Ltd managed to sell the grain, this time involving its transportation from Malta to various legitimate European companies. Payments for these transactions were routed through Swiss bank accounts and eventually passed on to AsianGrain Ltd, a company acting as a grain supplier. This complex series of transactions appeared to create a continuous flow of funds and goods, while the actual movement of grain and money raised further questions about the true nature of the business operations.

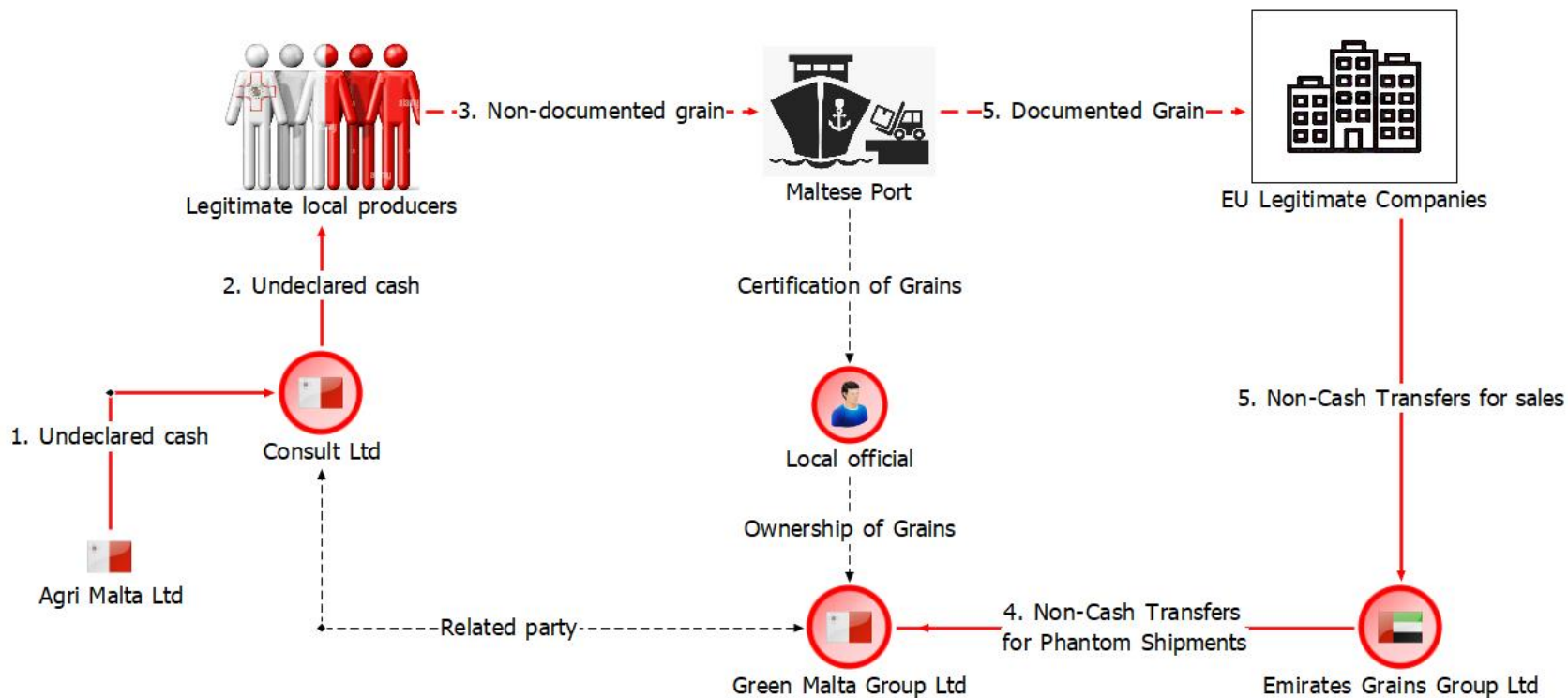


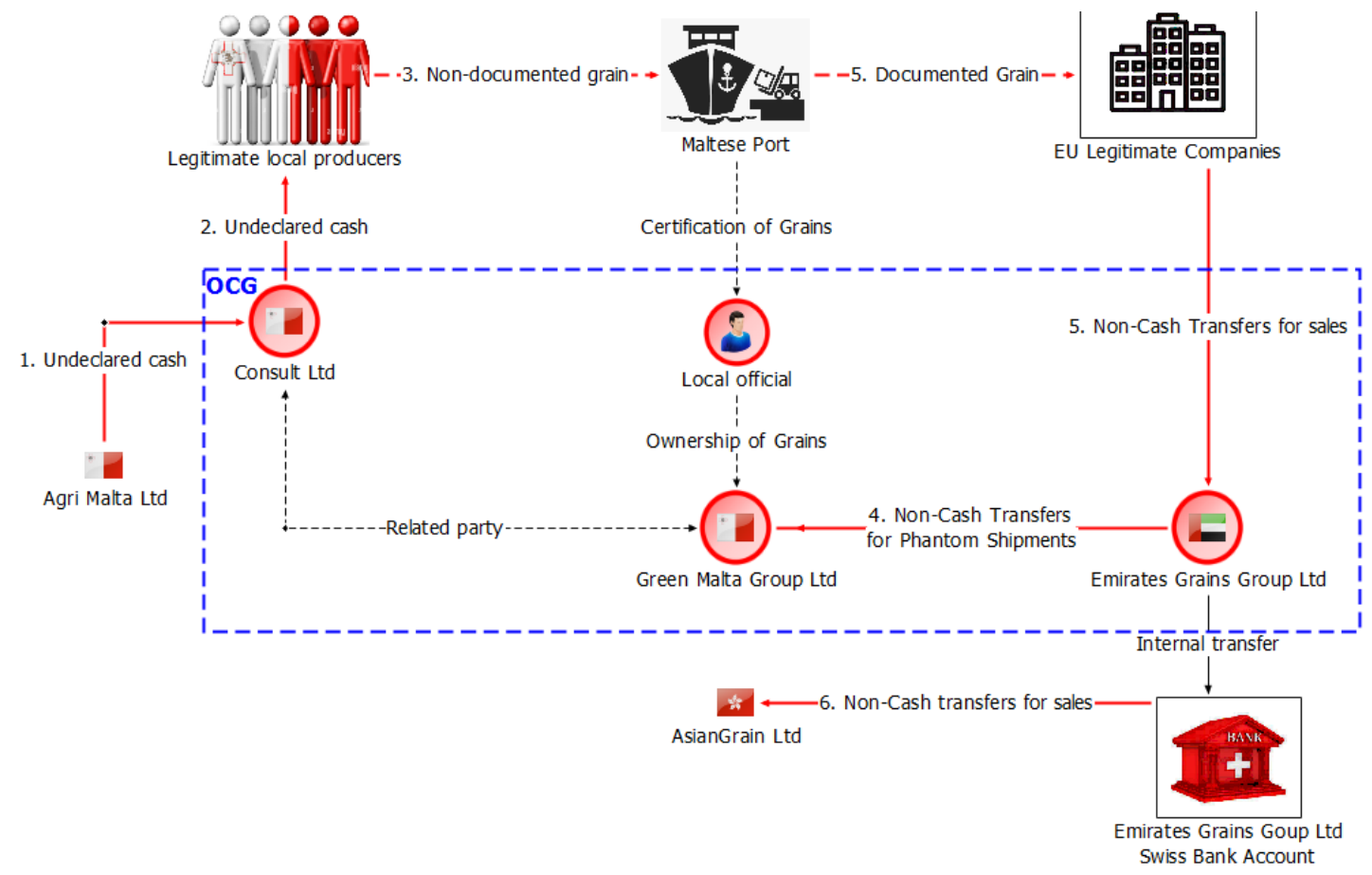














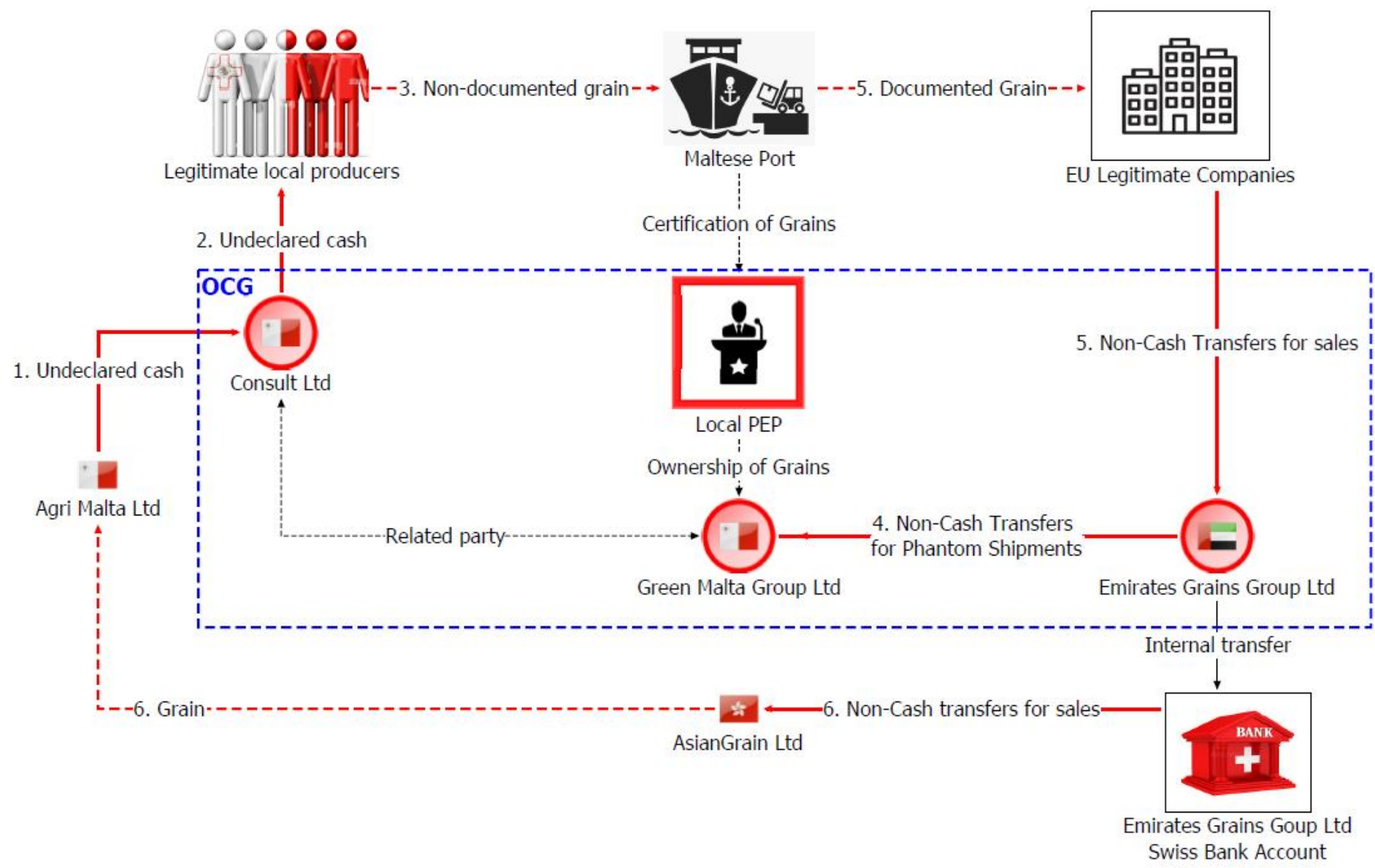
# Case Study 1: Malta Grain Ltd – Part II B

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*5 minutes*

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# Thank you for listening!

paul.saliba@fiaumalta.org