



FINANCIAL
INTELLIGENCE
UNIT OF ARUBA

NEWSFLASH

Professional Money Launderers

Stay observant, Gatekeepers!

A Guide to Identifying Potential Professional Money Launderers

March 27, 2025

Professional Money Launderers

Stay observant, Gatekeepers!

Professional Money Launderers (PMLs) play a crucial role for criminals, often operating on an international scale. Unlike criminals who launder their own illicit proceeds, PMLs act as specialized service providers, offering expertise in obtaining required licenses and permits while using their citizenship or residency status to facilitate money laundering activities. Their ability to exploit financial and non-financial sectors makes them a significant risk to gatekeepers, such as lawyers, trust service providers, notaries, accountants, and financial institutions—who may unknowingly enable their operations.

How Do PMLs Operate?

PMLs use complex schemes to disguise illicit funds, including:

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- **Corporate Structures** – Establishing shell companies and trusts to create layers of transactions.
- **Trade-Based Laundering** – Using fake invoices, over- or under-invoicing goods to move money across borders.
- **Real Estate** – Purchasing high-value properties, cars, jewelry, or artwork to integrate illicit funds into the economy.



Red Flags for Gatekeepers

Gatekeepers and other service providers play a vital role in detecting and reporting suspicious activities. Be alert to these red flags:

Unexplained Use of Third Parties – Clients using intermediaries without clear justification.

Complex & Unusual Structures – Overly complicated company setups with no legitimate business purpose.

Persistence on urgency and accelerating processes – The client may repeatedly contact the gatekeeper, pushing for faster processing, even outside normal business hours.

Discrepancies in Business Activities – Clients claiming to be in one industry but does not have the needed funds nor the legitimate, traditional financing from a renounced financial institution.

Reluctance to Provide Information – Clients avoiding transparency regarding source of funds or ownership.

Overuse of Cash Transactions – Large or structured cash deposits inconsistent with the business profile.

Exceptional knowledge about the legal system and policies – Large or structured cash deposits inconsistent with the business profile.

Involvement in various sectors – the client is involved in a wide range of industries or sectors without a clear reason or logical connection between them.

Call for the Gatekeepers and other service providers

By staying vigilant and applying risk-based due diligence, gatekeepers can **prevent** PMLs from exploiting legal and financial systems.

If something doesn't add up...**ask, verify, and report to FIU-Aruba.**

FIU-Aruba is always available for discussions on this matter!