

Simon Lord

Curriculum Vitae

Professional experience

The following précis of my relevant experience highlights examples of my involvement in all aspects of financial investigations and exposure to different money laundering typologies, fraud, drug trafficking and the analysis and understanding of criminal financing relevant to the field of my expert experience.

Core Skills

- Over 30 years of experience in investigating serious & complex crime with the last 15 years dedicated to understanding and addressing money laundering
- Formal training and extensive experience in Financial Investigation, Money Laundering, Confiscation, Enhanced Financial Investigation Skills and Cash Seizure Investigations
- Experienced presenter and trainer on anti-money laundering (“AML”) & money laundering risk to United Kingdom and international law enforcement colleagues and the private sector
- Experienced court witness

Areas of Relevant Expertise

- The criminal abuse of Informal Value Transfer Systems (IVTS)
- The use of cash in the criminal economy (including cash couriers, cash smuggling, and seizures inland, at borders and those related to overseas activity)
- The criminal exploitation of Money Service Businesses (MSBs) for money laundering purposes,
- The use of international jurisdictions for money laundering purposes
- Trade Based Money Laundering (TBML)

Current role – NCA Intelligence Hub – October 2013 to date

I am a Senior Officer of the National Crime Agency (NCA) and I work within the National Assessments Centre in the NCA’s Intelligence Hub, where my duties include gaining a thorough understanding of the extent of the threat that money laundering poses to the UK, and drafting intelligence assessments on current money laundering typologies. In particular, in 2019 I drafted the NCA Assessment entitled ‘Ethnic Chinese Money

Laundering in the UK' and the document entitled 'Chinese Underground Banking and Daigou', both of which have been widely circulated within the UK.

I am also currently engaged in a project to enhance the UK's collaboration with the authorities in the Gulf States in order to improve our joint response to money laundering and terrorism financing.

Prior to this, I worked within the NCA's Economic Crime Command, where I led a small team of officers responsible for the delivery and co-ordination of judicial and non-judicial interventions across the UK law enforcement community against criminal groups involved in cash based, non-cash based and trade based money laundering.

In addition, I am the deputy co-ordinator of the NCA's Expert Laundering Evidence cadre, in which capacity I provide expert level technical support to various specialist UK and overseas bodies concerned with money laundering matters. (see page 8).

Previous Law Enforcement Experience

I transferred into the NCA from the Serious Organised Crime Agency (SOCA) in October 2013. I joined SOCA on its inception in April 2006 from HM Revenue & Customs (HMRC) Law Enforcement Investigation.

My work in SOCA involved the investigation of complex money laundering offences, including the criminal abuse of IVTS and TBML, and the receipt, analysis, development and dissemination of intelligence relating to a variety of money laundering techniques to SOCA, other UK Law Enforcement Agencies and international partners. In the course of my duties I gained significant experience and understanding of a range of money laundering methods.

In addition, I led or was involved in a number of projects with the objective of developing a comprehensive understanding of the various aspects of the money laundering threat in the UK, including working closely with HMRC, the Financial Conduct Authority, HM Treasury and police forces to tackle the criminal exploitation of the MSB Sector by a combination of education, information sharing and traditional law enforcement techniques (Project QUAVER).

I joined the HM Customs & Excise (HMCE) criminal investigation specialism in April 1990 and, from that date to my transfer to SOCA, I was continuously involved in the investigation of serious and complex money laundering, VAT carousel fraud, drug trafficking, cigarette smuggling and excise and import duty evasion offences. I was the lead officer and disclosure officer on a number of these cases and so was involved in every aspect of criminal investigations, including covert surveillance, arrests and interviews of suspects, searches, and the preparation and delivery of evidence in court.

I transferred into a dedicated Financial Crime team in HMCE in 2004 and between 2004 and 2008 I received formal training in Financial Investigation, Money Laundering, Confiscation, Enhanced Financial Investigation Skills and Cash Seizure Investigations. During this period I conducted a number of money laundering and cash seizure & forfeiture investigations involving a range of money laundering typologies, including the use of structures set up to facilitate VAT carousel fraud to launder funds on behalf of other criminal groups.

Engagement with International Partners on Money Laundering Issues

During my time working for HMCE/HMRC and SOCA/NCA I have worked closely with law enforcement agencies from several countries, including the United States of America (USA), the United Arab Emirates (UAE), Australia, Canada, New Zealand, Turkey, India, Israel, Sweden, Belgium and the Netherlands, in respect of the exchange of information and criminal investigations into money laundering, drug trafficking and fiscal and non-fiscal fraud offences.

Support to the Financial Action Task Force (FATF)

Between November 2013 and October 2015 I co-chaired a FATF typology working group examining money laundering through physical transportation of cash across international borders. I chaired, and delivered presentations to, meetings of the Typology Working Group in Doha, Qatar in December 2013 and December 2014, before more than 100 delegates from over 20 countries including the USA, Russia, The Lebanon, the UAE, Saudi Arabia, Bangladesh, Morocco and numerous European Union countries. I was the author of the final typology report, 'Money Laundering Through the Physical Transportation of Cash' which was published on the FATF website in October 2015. My involvement in this project gave me first-hand experience of the criminal and legitimate usage of cash around the world and how it is moved across international borders.

Between October 2012 and October 2013, I was one of the UK representatives in the FATF typology working group studying the role of Hawala and Other Similar Service Providers in money laundering and terrorist financing. In November 2012, I delivered presentations on money laundering techniques, MSBs, the UK regulatory regime and Project Quaver to delegates from the USA, The Netherlands, Germany, Denmark, Norway, Pakistan, China, South Africa and Liberia at the joint FATF/GIABA typology working group meeting in Dakar, Senegal. I was actively involved in the drafting, editing and proof reading of the final typology report, 'Hawala and Other Similar Service Providers in Money Laundering and Terrorist Financing' which was published on the FATF website in October 2013. Through my involvement in this project I gained an extensive knowledge of how informal value transfer systems work across the globe.

One of the contributors to the discussions in respect of this paper that took place in Dakar was the then-head of the Anti-Money Laundering Bureau of the People's Bank of China, who delivered a presentation on Chinese Underground Banking and money laundering through illegal money transfer businesses, which are referred to in China as 'Underground Money Shops'. I was able to discuss the subject with him at length during that meeting.

Support to the Government of Pakistan

Between 2014 and 2015 I was involved in a joint project between the NCA, the Foreign and Commonwealth Office (FCO) and the Department for International Development (DFID), working in collaboration with the Pakistani authorities, which aimed to assist Pakistan to enhance its Anti-Money Laundering and Counter Terrorism Financing capabilities. In September 2014 I travelled to Islamabad and Karachi and met senior staff from the State Bank, law enforcement and government ministries to discuss with them the most prevalent money laundering techniques they encountered, and ways in which the UK could provide assistance in these matters.

I am a regular contributor to the work of the Five Eyes Law enforcement Group (FELEG) on money laundering matters, particularly in the field of IVTS and Chinese Underground Banking.

Training design and delivery

I regularly design and deliver knowledge based presentations in respect of money laundering typologies including Informal Value Transfer Systems, Trade Based Money Laundering, cash smuggling, the UK anti-money laundering regulatory regime and criminal exploitation of MSBs to various national and international audiences. These have included;

- The November 2019 Law Society Anti-Money Laundering conference (at which I presented on the subject of the threat to the UK from ethnic Chinese money laundering)
- The Federal Bureau of Investigations (FBI) Advanced Money Laundering Conferences held in San Diego, California in March 2016, Orlando, Florida in April 2017 and Nashville, Tennessee in May 2018
- The 2017 conference on Anti-Money Laundering & Countering the Financing of Terrorism, organised by The New Zealand FIU & the Association of Certified Anti Money Laundering Specialists (ACAMS), held in Wellington, New Zealand in September 2017
- An EU/Turkey conference on efficiency in Anti-Money Laundering and Counter Terrorism Financing, in Ankara, Turkey in December 2016
- A joint UK & UAE Financial Crime Conference held in Abu Dhabi in September 2016
- A Money Laundering Conference for law enforcement and the Private Sector held at the New Zealand Police College in February 2016
- A money laundering conference hosted by the Australian Criminal Intelligence Commission in Canberra in January 2016
- Various UK Police Forces
- The Association of UK Payment Institutions
- The International Association of Money Transfer Networks
- The Association of Foreign Banks
- The Anti-Money Laundering Professionals Forum
- The Institute of Money Laundering Prevention Officers
- HMRC MSB trade forums
- Face to face meetings with senior management and compliance staff within retail banks and other major financial institutions, including major MSBs
- Training courses for NCA overseas liaison officers and operational staff
- An Analytical Exchange and Information workshop in respect of counter terrorist financing and anti-money laundering techniques, held between UK officials and

staff from the US Financial Crimes Enforcement Network (FinCEN) and FBI, The Pakistan Police, Federal Investigation Agency, Financial Monitoring Unit and State Bank of Pakistan, held at the US Embassy in London in January 2013.

In 2018 I was involved in the design and delivery of a series of training courses to the police and other bodies in the UAE to upskill them in the detection and investigation of money laundering offences commonly encountered in the UAE, including the criminal abuse of IVTS, criminal abuse of MSBs, trade based money laundering and the use of complex corporate structures. I visited the UAE in May 2018 and conducted a training needs analysis, during which I interviewed various public officials including senior police officers, prosecutors and the head of the Financial Intelligence Department, and delivered one of the training courses in Dubai in December 2018.

Expert Evidence

I have been a member of NCA/SOCA's Expert Laundering Evidence (ELE) peer review group since mid-2011. Between 18th and 22nd March 2013 I completed the ELE training course, facilitated by SOCA and the National Policing Improvement Agency, at the National College of Policing at Bramshill in Hampshire, with colleagues from SOCA, HMRC, UK Police Forces, the Australian Federal Police and the Dutch National Crime Squad (DNR). During this course I delivered one of the training sessions (in respect of the UK anti-money laundering regulatory regime and its application to MSBs).

As previously stated, I am now the deputy co-ordinator of the ELE cadre and, with a colleague, delivered the ELE training courses between 22nd February and 4th March 2016, 27th February and 10th March 2017, 5th to 16th March 2018 and 4th – 15th March 2019, which provided training to colleagues from various UK law enforcement bodies and officers from the Australian Federal Police, The Royal Canadian Mounted Police, New Zealand Police, the FBI, US Homeland Security Investigations and An Garda Siochana.

I have reviewed, participated with, assisted and supported numerous expert witness statements submitted by other expert witnesses in the ELE cadre. This intrinsic involvement has further developed my understanding and knowledge of this subject area. In addition, I have provided advice to numerous NCA, HMRC and police case teams in respect of which lines of enquiry to follow when dealing, for example, with an MSB that they have encountered in a criminal investigation. The assistance I have provided has included

advising on, and participating in searches of premises, and assisting with 'under caution' interviews of case suspects.

I have provided oral and written expert evidence to the courts in respect of criminal and civil cases involving complex money laundering typologies, including criminal exploitation of MSBs, informal value transfer systems and trade based money laundering, on many occasions between 2013 and the present day. I have provided expert evidence on cases undertaken by the authorities in Switzerland and Canada in addition to the UK.

To support my work as an expert witness I have studied numerous additional resources, such as published academic papers and authoritative reports published by other government agencies and Non-Governmental Organisations.

Other relevant skills

On many occasions throughout my career I have given evidence at the Crown court in support of criminal investigations, and in Magistrates court on many more occasions in the course of confiscation and cash seizure matters and when applying for court orders and warrants. During a number of these hearings I have been specifically required to assist the court and to explain complex and technical matters relating to the particular evidence.