Guess who?

You're working with 3 different clients. New information will be revealed in rounds. Each round gives you more insight into what's happening. Your job is to guess who may be involved in money laundering.

Anne

Scenario 8

Jason

Scenario 6

David

Scenario 9

Round 1

Anne

Scenario 8

You're approached by a buyer interested in purchasing a mid-range residential investment property.

The enquiry comes not directly from the buyer, but from an accountant acting on their behalf. The accountant explains that their client is looking to acquire property as part of a broader investment strategy.

They are professional, well-spoken, and provide all communication in a structured and organised way.

They mention the property will likely be purchased through a trust or company structure, which they say is standard for their client.

Jason

Scenario 6

You're working in a suburban office when you're contacted by a buyer named Jason, who is looking to purchase an investment property.

He explains he's been looking at properties across a few different suburbs and is mainly focused on houses with larger blocks and some separation from neighbouring properties.

At the inspection, Jason is friendly but fairly focused. He spends more time walking around the outside of the property than inside, paying particular attention to:

- garages and sheds
- side access
- fencing and privacy.

He doesn't ask many questions about the interior or finishes.

David

Scenario 9

You receive an enquiry about a property from a lawyer acting on behalf of a client.

The lawyer explains that their client is looking to purchase an investment property and prefers to have all dealings handled through them.

The communication is professional, structured, and efficient. The lawyer provides clear instructions and appears experienced in managing property transactions.

You're told the client is time-poor and prefers not to be directly involved unless absolutely necessary.

Round 2

Anne

Scenario 8

As discussions progress, the accountant continues to handle most of the communication.

They provide instructions on:

- how the offer should be structured
- the name of the entity to be used on the contract
- how correspondence should be directed.

You ask if you can speak directly with the buyer, but the accountant responds:

"I handle everything on their behalf—it's easier that way."

They assure you the structure is standard and there's nothing unusual about it.

Jason

Scenario 6

After the inspection, Jason follows up quickly and expresses interest in making an offer.

He asks a few specific questions:

- whether the neighbours are close by
- how often the property has been vacant
- whether there have been any issues with council or complaints.

He also asks if you have similar properties coming up in nearby suburbs.

The offer itself is fairly standard and within market expectations.

David

Scenario 9

As discussions progress, the lawyer continues to manage all aspects of the transaction, they:

- submit the offer
- negotiate terms
- handle documentation.

When you suggest a quick call with the buyer to confirm a few details, the lawyer responds:

"That won't be necessary—I've got full authority to act on their behalf."

The offer itself is reasonable and within market expectations, and the deal begins moving forward.

Round 3

Anne

Scenario 8

As you prepare the contract, the purchasing structure becomes more complex.

- The buyer is listed as a trust, with a company acting as trustee.
- The names involved are unfamiliar and don’t clearly link to the individual behind the purchase.

When you ask who ultimately controls the entity, the answer is vague:

“It’s part of a broader structure for asset management.”

At the same time:

- the accountant remains the primary point of contact
- the actual buyer isn't directly involved in discussions
- documentation is provided, but it doesn’t give a clear picture of the ultimate owner.

Jason

Scenario 6

As you continue working with Jason, a few additional details emerge, he:

- mentions he’s also looking at other properties in nearby areas
- seems particularly interested in properties with similar characteristics

When discussing his plans, he keeps things vague:

“Just looking to make the most of the space.”

You also notice that:

- he’s less interested in rental returns or resale value
- his focus remains on the physical attributes of the property.

David

Scenario 9

As you move closer to contract:

- the lawyer provides instructions on how funds will be handled
- there are references to multiple accounts being involved in the transaction
- some payments are expected to be made via different entities.

When you ask for clarification, the responses are technically correct but remain high-level:

“It’s part of the client’s broader financial arrangements.”

You still haven’t had any direct contact with the buyer.

Round 4

Anne

Scenario 8

As the transaction moves forward:

- the structure appears layered and unnecessarily complex for the type of purchase
- there is no clear explanation of who ultimately controls the asset
- the accountant continues to act as a gatekeeper, limiting direct access to the buyer
- some of the documentation feels generic or templated, without clear connection to the individual behind the transaction.

While everything appears compliant on the surface, you realise you don't have a clear understanding of:

- who the real buyer is
- who is controlling the transaction
- why this level of complexity is needed.

Jason

Scenario 6

As the deal progresses:

- Jason confirms he is actively pursuing multiple property purchases at the same time
- he continues asking about privacy, access, and separation from neighbours
- his explanations about how the properties will be used remain unclear
- there's no clear investment strategy or commercial rationale being discussed.

While each individual property purchase looks normal on its own, the pattern of behaviour across multiple properties starts to feel unusual.

David

Scenario 9

As the transaction progresses:

- the lawyer remains the sole point of contact
- you're unable to clearly identify or speak with the actual buyer
- the structure for handling funds appears more complex than necessary
- there is mention of different accounts and entities being used, without a simple explanation
- the lawyer appears to be managing not just the legal process, but also how money is being moved.

While everything appears professional on the surface, you realise you don't have a clear understanding of:

- who you're really dealing with
- how the funds are being structured
- why a relatively simple transaction requires this level of intermediation.

Case study

Scenario 8 - Front companies, trusts and complex structures

Background

In one investigation, a suspect was involved in fraud and corruption, using a business structure to generate income they shouldn't have legally been receiving due to a professional conflict of interest.

To conceal this activity, the suspect set up a front company—a welding business—but deliberately stayed off all official records.

Instead:

- A qualified accountant with no criminal history was installed as the legal face of the company.
- The accountant created both real and false invoices to make the business appear legitimate.
- Cash was regularly withdrawn from the business and passed back to the suspect.

This allowed the suspect to:

- earn income without being formally linked to the business
- disguise those earnings as legitimate commercial activity
- avoid scrutiny and regulatory oversight.

How real estate was used

The suspect then used property to further conceal and move those funds:

- real estate was purchased in the names of family members
- assets were held through trust structures that weren't legitimate
- cash was used to fund property improvements, increasing the value of the asset
- money was moved through multiple accounts to distance it from its source.

From the outside, everything looked legitimate:

- there was a registered business
- a qualified professional was involved
- there were invoices and documentation
- property was being bought and improved.

But in reality:

- the business was being used to mask illicit income
- the structures were designed to hide the true controller
- property was used to store and legitimise those funds.

Outcome

- The activity was uncovered as part of a broader corruption investigation.
- The individuals involved were linked to fraud and money laundering offences.
- The case exposed the misuse of professional services, company structures, and property.

Case study

Scenario 6 - Property used to facilitate criminal activity

Background

In one investigation, law enforcement uncovered a large-scale cannabis operation worth approximately $10 million.

The individuals involved:

- purchased multiple residential properties
- selected properties that suited their needs
- used those properties to grow and cultivate cannabis plants.

From the outside, each property transaction appeared legitimate. But in reality the:

- properties were being used to facilitate criminal activity
- income generated was used to purchase additional properties
- network expanded across multiple locations, including interstate and overseas.

How it was detected

The investigation began when AUSTRAC identified unusual financial activity, including:

- large cash deposits
- high-value international transfers
- transactions inconsistent with the individual's stated employment

Authorities also identified:

- multiple individuals linked to the same addresses
- patterns of property ownership across different locations
- this combination of indicators helped build a picture of how the properties were being used.

Outcome

- Multiple properties were restrained.
- Over 1,500 cannabis plants were seized.
- Assets worth approximately $10 million were confiscated.
- Individuals were charged with drug trafficking and dealing with proceeds of crime.

Case study

Scenario 9 - Use of professional facilitators / gatekeepers

Background

In one major investigation, a criminal network involved in the production and sale of amphetamines laundered approximately $5 million in proceeds of crime.

A key part of the scheme involved the use of professional facilitators—specifically accountants acting as gatekeepers.

What was the criminal activity?

The group was:

- manufacturing and distributing large quantities of illicit drugs
- generating significant amounts of cash from criminal activity.

They then needed a way to:

- move that money through the system
- make it appear legitimate
- use it to acquire assets like real estate.

How the gatekeepers were used

The accountants were engaged to help "manage" the funds—but in reality, they received large amounts of cash from the criminal network.

They also deposited funds into multiple accounts, including:

- their own business accounts
- trust accounts
- accounts of associated individuals and entities
- used cheques and transfers to move money between accounts
- helped create structures to allow funds to be used for property purchases.

In some cases, they even:

- recommended ways to structure transactions to avoid detection
- helped distance the criminals from the money by acting as an intermediary.

Role of real estate

The laundered funds were ultimately used to:

- purchase high-value assets, including property
- move money into forms that appeared legitimate.

Outcome

- The operation was uncovered by law enforcement.
- Millions of dollars in illicit funds were traced.
- The case exposed how professional facilitators can be used to enable money laundering.