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## **Abstract**

This study aims to recognize the procedures adopted by banks in Gaza Strip to supervise and attack money laundering operations, Which included (investigating the client, internal supervising, equipments of laundering money which consist of the committee and the administrative units, commitment with laws and international legislations and Palestinian Monetary Authority instructions, training employees, clarity of directions).

The researcher used the descriptive method and the comprehensive survey to collect data to meet the research objectives.

The study includes the top level of management in the different main offices and branches of banks working in the Gaza strip represented by the general directors / deputy of the director , head of the branch, head of department ,division chief ,the auditor.

The researcher used the questionnaires to collect data from the origin recourses, distributed 170 questionnaires and received 119 about 70%.

The study concluded that there is a commitment in banks in Gaza Strip refusing opening an account for a client or any banking deals without interpolation him very well and the banks apply the precautionary procedures in order to forbidden money laundering also the study includes that there is a reduction in the training program balance concerning money laundering.

The research summaries the most important recommendations, such as enforcing the procedures of identifying the client nevertheless the value of the operation, never hindrance the work because of requiring precaution, and also improve the cooperation between Palestinian Monetary Authority and banks in order to identify the forbidden operations and try to depth the international cooperation, the study also recommends to give a care by establish a procedures guide by the bank in order to confront money laundering operations.

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<sup>1</sup> تم إحالة أشهر قادة المافيا (آل كابون) سنة 1931 إلى المحاكمة بتهمة التهرب الضريبي ( حيث يعتبرها القانون الأمريكي من عمليات غسيل الأموال)، كما ركزت المحكمة على دور المحاسب والمصرفي ( ميرلانسكي) لإيجاده وسائل لإخفاء الأموال ( عرب، 2000).  
<sup>2</sup> كلفت الولايات المتحدة لجنة من وزارة الخزانة الأمريكية للبحث وحصر الأموال ، ودعت بعدها العالم إلى عدم الاعتراف بالأموال المنهوبة وطالبت بإعادتها إلى أصحابها الشرعيين(الفاعوري وقطبشات،2002).

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<sup>1</sup> الأموال القذرة : هو مصطلح يطلق على الأموال المغسولة والناجئة من أعمال و نشاطات غير شرعية.

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<sup>1</sup> مدير الإخطار: مسئول من الإدارة العليا في المصرف و معين بشكل أساسي لغايات إخطار الوحدة عن العمليات المشتببه بها (تعليمات المصرف المركزي الأردني، 2006).

<sup>2</sup> وحدة التحقيق: هي وحدة في المصرف تختص بالتحقق من تطبيق الإجراءات والقوانين والأنظمة (تعليمات مصرف لبنان المركزي، 2001).

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**:Reliability**

**:Split-Half Coefficient** -

(Spearman-Brown Coefficient)

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**:Cronbach's Alpha** -

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23.5	28	
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0.000	10.113	13	78.66		<b>4</b>
0.000	24.778	4	90.08		<b>5</b>
0.000	15.560	11	80.34		<b>6</b>
0.000	13.170	12	79.50		<b>7</b>

	←				
0.000	21.906	3	90.42		<b>8</b>
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0.000	6.491	15	71.93		<b>10</b>
0.000	5.958	16	71.60		<b>11</b>
0.000	6.162	17	70.59		<b>12</b>
0.000	23.720	7	86.72		<b>13</b>
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0.000	22.781	4	86.89		1
0.000	19.849	1	91.09		2
0.000	6.547	5	86.89		3
0.000	10.113	6	86.05		4
0.000	24.778	8	85.21		5
0.000	15.560	14	75.63		6
0.000	13.170	12	78.66		7
0.000	21.906	9	83.70		8
0.000	12.088	2	88.24		9
0.000	6.491	10	82.86		10
0.000	5.958	7	85.71		11
0.000	6.162	3	87.39		12
0.000	23.720	13	76.30		13
0.000	29.031	11	82.18		14
0.000	17.820		84.06	جميع الفقرات	

1.98

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		(	)	
		"	(8)	
%83.70	"			
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	t				
0.000	26.849	1	88.24		<b>1</b>
0.000	14.259	9	81.68		<b>2</b>
0.000	11.614	11	79.50		<b>3</b>
0.000	25.474	8	82.69		<b>4</b>
0.000	12.281	15	77.48		<b>5</b>
0.000	22.487	2	87.23		<b>6</b>
0.000	13.563	10	81.51		<b>7</b>
0.000	18.004	7	84.37		<b>8</b>
0.000	9.336	13	78.32		<b>9</b>
0.000	17.677	5	85.71		<b>10</b>

	±				
0.000	20.424	4	86.05		<b>11</b>
0.000	20.920	3	87.23		<b>12</b>
0.000	8.431	16	76.13	/	<b>13</b>
0.000	18.634	6	84.54	/	<b>1-14</b>
0.000	11.279	14	77.82	/	<b>2-14</b>
0.000	9.177	12	78.98		<b>1-15</b>
0.000	7.083	17	72.94		<b>2-15</b>
0.000	22.091		81.79	جميع الفقرات	

1.98

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		"	(11)
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			%84.37
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		%82.69	"
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0.000	7.477	10	69.92	.( fatf)	1
0.000	7.802	9	72.10	.	2
0.000	16.734	6	80.17	.	3
0.000	19.002	3	85.71	.	4
0.000	13.278	7	80.17	.	5
0.000	21.302	2	86.39	.	6
0.000	26.753	1	88.07	.	7
0.000	17.489	4	83.36	)	8
0.000	14.425	5	80.50	.(	9

	t				
0.000	12.814	8	79.33	( )	10
0.000	21.813		80.57		
			1.98	0.05	(118)
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%86.39 "

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0.000	10.007	10	74.96		<b>1</b>
0.000	13.547	4	79.66		<b>2</b>
0.000	7.634	11	74.45		<b>3</b>
0.000	8.157	9	75.29		<b>4</b>
0.000	5.119	15	69.92		<b>5</b>
0.000	8.778	6	76.97		<b>6</b>
0.003	3.013	17	65.71		<b>7</b>
0.000	6.005	13	71.43		<b>8</b>
0.000	4.119	16	68.07		<b>9</b>
0.022	2.328	18	64.71		<b>10</b>
0.000	6.874	12	71.76		<b>11</b>
0.000	17.333	1	83.87	)	<b>1-12</b>
0.000	16.797	2	82.52		<b>2-12</b>
0.000	12.133	3	80.17		<b>3-12</b>
0.000	10.215	5	77.98		<b>4-12</b>
0.000	8.566	7	76.13		<b>5-12</b>
0.000	8.175	8	75.63		<b>6-12</b>
0.000	5.046	14	70.42		<b>7-12</b>
0.000	12.723		74.43		

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0.000	5.158	7	69.92		<b>1</b>
0.000	9.424	3	74.96		<b>2</b>
0.000	5.063	8	69.58		<b>3</b>
0.000	6.378	6	70.08		<b>4</b>
0.000	10.803	2	78.82		<b>5</b>
0.000	6.186	4	71.93		<b>6</b>

0.242	1.177	9	62.35		7
0.000	5.234	5	70.59		8
0.000	14.337	1	81.18		1-9
0.358	0.923	10	62.35		2-9
0.000	7.560	0.000	71.18		

1.98      0.05      (118)      t

"      (1-9)  
 %81.18      "  
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%62.35

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t

7.560

t

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(15-5)

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% 79.39

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21.582

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	t			
0.000	24.464	82.55		
0.000	25.897	84.06		
0.000	22.091	81.79		
0.000	21.813	80.57		
0.000	12.723	74.43		
0.000	7.560	71.18		
0.000	21.582	79.39		

1.98

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16-)

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18-)

0.000                      0.926                      0.174                      (5  
0.05

(18-5)

0.926			
0.000			
119			
0.174	117	0.05	r

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19-)

0.000                      0.831                      0.174                      (5)  
0.05

(19-5)

	0.831		
	0.000		
	119		
0.174	117	0.05	r

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20-)

0.000                      0.824                      0.174                      (5)  
0.05

(20-5)

	0.824		
	0.000		
	119		
0.174	117	0.05	r

21-)

0.000                      0.836                      0.174                      (5)

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0.836			
0.000			
119			
0.174	117	0.05	r

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(22-5)

1.590                      f                      "

2.68                      f                      1.604 1.323 2.609 1.798

0.05 (115 3 )

0.05 0.192 0.270 0.055 0.152 0.196

3.369 " " f (22-5 )

0.05 (115 3 ) 2.68 f

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f 2.799 f

0.05 0.043 2.68

-30 30 )

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(22-5)

-40 40 -30 30 )

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	"F"				مصدر التباين	المجالات
0.196	1.590	0.396	3	1.188		
		0.249	115	28.641		
			118	29.829		
0.152	1.798	0.452	3	1.357		
		0.252	115	28.939		
			118	30.296		
0.055	2.609	0.725	3	2.176		
		0.278	115	31.969		
			118	34.145		
0.270	1.323	0.347	3	1.041		
		0.262	115	30.182		
			118	31.223		
0.021	3.369	1.215	3	3.646		
		0.361	115	41.483		
			118	45.130		
0.192	1.604	1.027	3	3.082		
		0.640	115	73.646		
			118	76.728		
0.043	2.799	0.643	3	1.929		
		0.230	115	26.412		
			118	28.341		

2.68

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"115 3"

F

(23-5)

	"	"	"	"	"
f					
3.07	f		3.451	3.715	4.471
		0.05	(116 2)		
(23-5)		0.05	0.035	0.027	0.013
f					
	f		f		
			f	2.753	
			0.05		0.068

(دبلوم، بكالوريوس، دراسات عليا)

(23-5)

متغير المؤهل العلمي (دبلوم، بكالوريوس، دراسات عليا)

	"f"				مصدر التباين	المجالات
0.013	4.471	1.067	2	2.135		
		0.239	116	27.695		
			118	29.829		
0.027	3.715	0.912	2	1.824		
		0.245	116	28.472		
			118	30.296		
0.035	3.451	0.959	2	1.917		
		0.278	116	32.227		
			118	37.145		
0.375	0.989	0.262	2	0.524		
		0.265	116	30.699		
			118	31.223		
0.191	1.679	0.635	2	1.270		
		0.378	116	43.860		
			118	45.130		
0.542	0.616	0.403	2	0.807		
		0.654	116	75.921		
			118	76.728		
0.068	2.753	0.642	2	1.284		
		0.233	116	27.057		
			118	28.341		

3.07

0.05

"116 2"

F

(24-5)  
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f ( 2.589 2.215 2.290 1.700  
2.68 f 0.05 (115 3)  
(24-5) 0.05 0.056 0.090 0.082 0.171

" " " "  
f 0.05  
2.68 f 3.169  
0.05 0.027  
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	ف				مصدر التباين	المجالات
0.171	1.700	0.422	3	1.267		
		0.248	115	28.562		
			118	29.829		
0.082	2.290	0.569	3	1.708		
		0.249	115	28.588		
			118	30.296		
0.090	2.215	0.622	3	1.865		
		0.281	115	32.279		
			118	34.145		
0.046	2.751	0.697	3	2.91		
		0.253	115	29.132		
			118	31.223		
0.056	2.589	0.952	3	2.855		
		0.368	115	42.274		

			118	45.130		
0.042	2.831	1.759	3	5.276		
		0.621	115	71.452		
			118	76.728		
0.027	3.169	0.721	3	2.164		
		0.228	115	26.177		
			118	28.341		
			<b>2.68</b>	<b>0.05</b>	<b>"115 3"</b>	<b>F</b>

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	"F"				مصدر التباين	المجالات
0.251	1.363	0.340	4	1.362		
		0.250	114	28.467		
			118	29.829		
0.075	2.186	0.540	4	2.158		
		0.247	114	28.137		
			118	30.296		
0.129	1.825	0.514	4	2.055		
		0.281	114	32.090		
			118	34.145		
0.071	2.219	0.564	4	2.255		
		0.254	114	28.968		
			118	31.223		
0.089	2.070	0.764	4	3.056		
		0.369	114	42.073		
			118	45.130		

0.087	2.085	1.308	4	5.232		
		0.627	114	71.497		
			118	76.728		
0.061	2.321	0.534	4	2.135		
		0.230	114	26.207		
			118	28.341		

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(أقل من 5 سنوات، 5- أقل من 10 سنوات 10- أقل من 15

سنة، 15 سنة فأكثر)

(26-5)

(أقل من 5 سنوات، 5- أقل من 10 سنوات

10- أقل من 15 سنة، 15 سنة فأكثر)

	"f"				مصدر التباين	المجالات
0.133	1.903	0.470	3	1.411		
		0.247	115	28.418		
			118	29.829		
0.467	0.855	0.220	3	0.661		
		0.258	115	29.635		
			118	30.296		
0.167	1.718	0.488	3	1.465		
		0.284	115	32.680		
			118	34.145		
0.261	1.352	0.355	3	1.064		

		0.262	115	30.159		
			118	31.223		
0.043	2.812	1.028	3	3.084		
		0.366	115	42.046		
			118	45.130		
0.120	1.983	1.258	3	3.774		
		0.634	115	72.954		
			118	76.728		
0.108	2.071	0.484	3	1.452		
		0.234	115	26.889		
			118	28.341		

**2.68**

**0.05**

**"115 3"**

**F**



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<http://www.alarabiya.net/Articles/2005/04/10/12043.htm>

" ( ) .2  
( )"( )  
<http://www.ulum.nl/b14.htm> : 2007/5 2005 24

)" : " .3  
: 2007/5 2007 ( ) ( )  
<http://www.banquecentrale.gov.sy/Archive/archive-ar/archive2007/news6%20-2/news-ar/news10-ar.htm>

)" ( - - ) " ( ) .4  
- ) ( )  
: 2007/6 ,2005 ( :  
<http://www.minshawi.com/other/bugamy.pdf>

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<http://www.minshawi.com/other/jerf.pdf>

" ( ) ( ) .6  
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<http://www.minshawi.com/other/jerf.pdf> : 2007/6

- 3 " ( ) .7
- .2005
- )(" " .8
- (2007/5/10 9
- : 2007
- <http://www.alquds.com/inside.php?opt=7&id=42494>
- " ( ) .9
- 146 " : " .10
- .2001
- " ( ) .11
- )(" "
- : 2007/6 ,2005 ( : -
- <http://www.minshawi.com/other/bugamy.pdf>
- .2003 " " ( ) .12
- 2001 ( )" " .13
- <http://www.majlesalommah.net/run.asp?id=771> : 2007/8
- " " ( ) .14
- .2001 146
- " .15
- .2005 2 " "
- .2000 " " .16
- " .17
- .2004 2 26 "
- )" " .18
- ) (
- : 2007/6 ,2005 ( :
- <http://www.minshawi.com/other/jerf.pdf>

- 2006 /12 ( )" " .19  
<http://www.kuwaite.com/ab7ath/show.php?ba7thid=28> : 2007/5
- )" " ( ) .20  
: 2007/5 (   
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الرجاء وضع إشارة ( √ ) مقابل العبارة التي تنطبق عليك:

.1 :

أقل من 30 سنة ( ) 30- أقل من 40 ( ) 40- أقل من 50 ( ) 50 سنة فأكثر ( ) .

.2 :

ثانوية عامة فأقل ( ) دبلوم ( ) بكالوريوس ( ) دراسات عليا ( ) .

.3 :

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.4 :

مراقب ( ) رئيس قسم ( ) مدير دائرة ( ) مدير فرع ( ) مدير عام ( ) .

.5 :

أقل من 5 سنوات ( ) 5- أقل من 10 سنوات ( ) 10- أقل من 15 سنة ( ) 15 سنة فأكثر ( ) .

.6 :

الرقابة الداخلية ( ) الخزينة ( ) الحوالات ( ) التسهيلات ( ) الودائع ( )

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0.049	0.362		1
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0.010	0.464		3
0.011	0.458		4
0.001	0.556		5
0.010	0.464		6
0.015	0.439		7
0.010	0.464		8
0.001	0.560		9
0.046	0.367		10
0.015	0.440		11
0.029	0.400		12
0.002	0.543		13
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0.016	0.437		1
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0.017	0.431		3
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0.002	0.549		7
0.000	0.670		8
0.000	0.606		9
0.002	0.550		10
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0.015	0.439		7
0.013	0.447		8
0.000	0.646		9
0.000	0.629		10
0.002	0.549		11
0.000	0.747		12
0.001	0.591	/	13
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0.000	0.630		4
0.010	0.461		5
0.009	0.472		6
0.001	0.568		7
0.000	0.750		8
0.000	0.766		9
0.000	0.705		10
0.000	0.693		11
0.016	0.435	)	1-12
0.000	0.659		2-12
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0.026	0.406		4-12
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0.000	0.777		5
0.000	0.865		6
0.000	0.723		7
0.000	0.839		8
0.000	0.797		1-9
0.001	0.560		2-9
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0.000	0.786		
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0.000	0.8597	0.7540		
0.000	0.8737	0.7758		
0.000	0.8295	0.7087		
0.000	0.8540	0.7452		

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