

FIFTH ROUND MUTUAL EVALUATION THINK LIKE A PROSECUTOR

Intervention Objectives:

- Clear understanding of objectives, process, and requirements
- Strengthened national capacity

- Success through Unity of Focus and Unity of Purpose
- Technology Driven National Framework

Session No	Session Date	Session Topics	Avoiding the FATF Grey List A Practical Guide	Session Outcomes + Plus Many More!
1	Monday Oct 6 th	Risk and Context in a Rapidly Changing Global Environment.	Call to Action Safeguarding long term peace, security and economic prosperity	 End to all Negative Listings Outreach Africa -New trajectory on economic opportunities Towards A New World Order-BRICS, Global South AES, Sovereignty, Self-Determination, Equality - FATF Future Role?

LEADERSHIP FROM
THE FRONT

11 IMMEDIATE
OUTCOMES

Session	Session Date	Session Topics	Avoiding the FATF Grey List	Session Outcomes + Plus Many More!
No			A Practical Guide	
2	Monday Oct 13 th	Fourth Round Hurdles. Can They Be Overcome	Far reaching Impact of Negative Listings Grey listing is not an option. Technology is the key	 Four Rounds of Mutual Evaluations/Follow up Reporting Two/Three appearances on FATF grey list and other negative lists. Why? Efforts to resolve the Derisking/Loss of Correspondent Banking Relationships Crisis Is this the New Normal
		Preparing For the Fifth Round	Change Your Mindset and Change the World	 Confidence in our own homegrown capacity Earliest Detailed Preparation Is Key Strong Prosecutorial evidence-based mindset Real Time Demonstration of Effective Compliance
3	Monday Oct 20 th	IO1 Risk, Policy and Coordination	Coordinate policies to combat ML/TF/PF risks	 Cabinet approved AML/CFT/CPF strategy with measurable goals Draft legislative package targeting critical gaps from MERs/FURs Minutes of NAMLC and interagency meetings National, Regional, Sectoral, Enterprise Risk Assessments and updates Public/Private sector collaboration records/workshops





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	Monday Oct 20 th	IO2 International Cooperation	Global collaboration fights crime by sharing intelligence and seizing assets.	 Effective cooperation with foreign counterparts Fast-tracked responses to foreign requests Signed MOUs with FIUs in the US, UK and CARICOM Statistics on MLA requests processed sent/received, response times, with jurisdictions on ML/TF/PF Joint investigations successful extraditions/prosecutions from cooperation. CARICOM IMPACS joint operation reports on inter-agency collaboration
4	Monday Oct 27 th	IO3 Supervision of Financial Institutions and DNFBPs	Risk-based AML/CFT supervision ensures compliance and accountability.	 Central Bank/FIU Policy Papers, Annual Reports, inspection reports (e.g., # of Banks/Cambios audited yearly). Outreach programmes, schedules and reports to Reporting Entities Enforcement actions (fines, license revocations for non-compliance). Risk-based supervision manuals used by regulators. Training logs for supervisory staff. Ongoing or prosecuted cases and sentencing including seized assets with input from supervisory authorities

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	Monday Oct 27 th	IO4 Preventive Measures by Financial Institutions and DNFBPs	Financial institutions and DNFBPs enforce risk-based AML/CFT prevention and reporting	 Outreach initiatives to the DNFBP sectors ensure transparency Audit reports on DNFBP compliance and enforcement actions Training courses and certificates for Designated Non-Financial Businesses & Professions (DNFBPs) Sample CDD files from banks, casinos, and real estate firms STRs filed by non-bank sectors (e.g., # of reports from realtors/lawyers). STRs and compliance measures which facilitate prosecutable cases.
5	Monday Nov 3 rd	IO5 Legal Persons and Arrangements	Prevent misuse of legal entities by ensuring transparent ownership	 Company Register of basic shareholders information and beneficial/nominee ownership Details UpToDate, accurate and easily accessible Public BO registry with verified data (audit 20% annually). Blockchain registry (immutable filings, fines for errors).
6	Monday Nov 10 th	IO6 Use of Financial Intelligence	Financial intelligence drives effective AML/CFT investigations and disruption.	 FIU annual reports (statistics on STRs analyzed, cases referred). FIU-Police Joint Analytics Team (5 embedded officers). Cooperation metrics (e.g., # of intelligence packages sent to police). Monthly FIU-police briefings .and case studies analysis DPP hotline for expedited ML charge approvals

LEADERSHIP FROM
THE FRONT



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	Monday Nov 10 th	IO7 Money Laundering Investigations and Prosecution	Investigate, prosecute, and sanction money laundering effectively.	 ML Cases prioritized (target: 12-month trial duration) Specialized ML Units e.g., Financial Investigations Branch case logs Specialized Financial Crimes Court with 3 High Court judges assigned exclusively to financial crimes. Train prosecutors to tie ML charges to predicate crimes (drugs, fraud, corruption Use preliminary hearings to dismiss weak cases early (avoid backlog) or dispense with the process altogether
7	Monday Nov 17 th	IO8 Confiscation	Seize and confiscate criminal proceeds to disrupt illicit networks.	 Strengthening capacity with training to seize and confiscate criminal proceeds Asset Recovery Agency with Efficient Asset Management department Effective collaboration between police, customs, FIU, DPP, Courts Asset Recovery Fund –30% of confiscated assets reinvested in enforcement Non - conviction based forfeiture law-civil standard of proof
8	Monday Nov 24 th	IO9 Terrorist Financing Investigations and Prosecutions	Investigate, prosecute, and sanction TF effectively	 Amend Anti-Terrorism Act- Explicitly criminalize standalone TF not just group linked Reasonable suspicion standard- UK NGO/Charity Monitoring- Audit 50 High Risk Groups annually Mandate FIU reporting for foreign donations TF Task Force –FIU, CTU, Central Bank

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	Monday Nov 24 th	IO10 Terrorist Financing Preventive Measures and Financial Sanctions	Block TF and protect nonprofits from abuse	 Enforce UN sanctions swiftly 24/7 Sanctions hotline for Financial Institutions/Regulated Entities Frozen Assets Reports Monthly update reports to and from Regulated Entities
9	Monday Dec 1 st	IO11 Proliferation Financing Financial Sanctions	Block WMD financing with sanctions and asset freeze	 Cabinet Strategy/Allocation of resources Proliferation Financing Risk Assessment Statements by Director of Customs Training on dual use goods and dual use technology Interception reports



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11 IMMEDIATE OUTCOMES