



# DISRUPTING CRIMINAL TRAFFICKING AND SMUGGLING NETWORKS THROUGH INCREASED ANTI-MONEY LAUNDERING AND FINANCIAL INVESTIGATION CAPACITY IN THE GREATER HORN OF AFRICA

(AML-THB in the GHOA)

[www.aml-thb.eu](http://www.aml-thb.eu)



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## AML-THB NEWSLETTER

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### MESSAGE FROM THE PROJECT DIRECTOR



and Regional Organizations and, importantly as centre stage, our annual Steering Committee.

This was a unique opportunity for both the authorities of the European Union and the Director Generals of the Regional Institutions to not only exchange views on the fight against Money Laundering, Illicit Financial Flows from Trafficking in Human Being but also hearing views from the trans-regional organised crime (TOC).

This choice is not innocuous; it is of course in line with our DNA, but above all, it is in line with the logic of the FATF President, Dr Markus, and his organization, who has included illicit financial flows from the major transnational crimes in the priorities of his mandate.

Eventually, the conference, by bringing together intergovernmental organisations of the region, has been a formidable forum for cross-cutting exchanges, peer-to-peer exchanges, a great moment of professional conviviality where new criminal trends and best practices to foster the most appropriate countermeasures.

‘Two years already...!’ that is what we said a few months ago in the last newsletter, but this time it’s a question of reviewing. Thanks to the conferences organized and what we have done in the region with you, and above all, thanks to you.

With a pace of at least three (3) activities per month, the best corroboration to the dynamism of this project has been the famed week of 29<sup>th</sup> November to 3<sup>rd</sup> December where we managed four (4) activities within the same week. This can give you an idea of the commitment of our small team which I salute in passing for its fantastic work of proximity, support and accompaniment to the operational units.

Yes, it is a job of proximity and it is also one of the trademarks of our project: a candid will with unequivocal support from the Institutions that the project genuinely needs - and to which we have been accountable during this crucial week, but also and above all, an action targeted on the operational and technical staff, with national trainers that we have meticulously trained and the best regional

#### This is a special edition!

I am delighted to present you with the latest issue of our newsletter which, as usual, will disclose what we have been doing lately and, above all, it will reveal, gradually, the benchmarking we are in the process of calibrating with the various partner institutions and units, between now and the end of the project.

This is a special edition in the sense that it follows our annual Steering Committee held on 29<sup>th</sup> November to 3<sup>rd</sup> December; it has been a key and dense week, because we have organised not less than four (4) activities within the same week! These activities have included a conference for the Heads of FIUs, a conference for the Heads of Immigration, a conference with the Intergovernmental

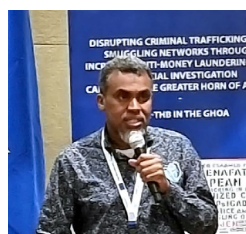
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#### In This Issue



#### NATIONAL TRAINING

The Role of Financial Institutions in Detecting, Identifying and Disrupting Illicit Financial Flows of Trafficking of Human Beings and Migrant Smuggling In Sudan



#### KENYA NATIONAL TRAINING

Enhancing Terrorism Investigation and Countering the Financing of Terrorism for the Law Enforcement Agencies; Office of the Directorate of Public Prosecution (ODPP), Anti Terror Police Unit (APTU), Joint Counter Terrorism Analysis Center (JCTAC) and Asset Recovery Agency (ARA)



experts, all supported by our international experts in the different fields of competence required.

This approach is a priority for us, because if the treaties, conventions, laws and regulations are an essential prerequisite, it is the human being who is at the center of it all, not the machine or the printed narrative. It is these officials that are making the AML-CFT machine work, using printed work to complete the arrest of criminals and de facto, contribute to the stability of their country. They are all our top-priority.

As usual, I wish you a good read because you will be in good company and we will share a lot of interesting moments with you!

**C'est une édition un peu spéciale !**

Je suis ravi de vous présenter la dernière livrée de notre Newsletter qui comme d'habitude, va vous raconter ce que nous avons fait récemment et surtout, vous dévoiler petit à petit le benchmarking que nous sommes en train de calibrer avec les différentes institutions et unités partenaires d'ici la fin du projet.

C'est une édition un peu spéciale, dans le sens où elle fait suite à notre Steering Committee annuel, qui a eu lieu du 29 novembre au 3 décembre, et cela a été une semaine clé, très dense, car nous avons organisé pas moins de 4 activités dans la même semaine !

Une conférence pour les Heads of FIUs, une conférence pour les Heads of Immigration, une conférence avec les Organisations Intergouvernementales et Régionales et bien sûr, au beau milieu, notre Comité de Pilotage annuel.

Cela a été une occasion absolument unique pour les autorités de l'Union Européenne et les Directeurs Généraux des Institutions ré-

gionales d'échanger en matière de lutte contre le blanchiment d'argent, de flux financiers provenant de la THB mais aussi du crime organisé transrégional.

Ce choix n'était pas innocent ; il s'inscrit bien sûr dans notre ADN, mais aussi et surtout, il s'inscrit dans la logique du Président du FATF et de son organisation qui a inscrit les flux financiers illicites provenant de la criminalité transnationale dans les priorités de son mandat.

Enfin, la conférence rassemblant les organisations intergouvernementales de la Région a été également un formidable forum permettant des échanges transverses, des échanges peer to peer, un formidable moment de convivialité professionnelle où les nouvelles tendances criminelles, les meilleures pratiques et les contremesures les plus adaptées ont été évoquées.

Deux années déjà, c'est ce que nous disions il y a quelques mois lors de la dernière newsletter, mais cette fois il est question de passer en revue, grâce aux conférences organisées, ce que nous avons fait dans la région, avec vous, grâce à vous et surtout, pour vous.

Avec un rythme de 3 activités au minimum par mois, la meilleure preuve du dynamisme de ce projet a été cette fameuse semaine du 29 novembre au 3 décembre ou nous avons pu gérer 4 activités la même semaine, ce qui vous donne une idée du rythme d'engagement de notre petite équipe que je salue au passage pour son fantastique travail de proximité, de soutien et d'accompagnement aux unités opérationnelles.

Oui, c'est un travail de proximité et c'est aussi une des marques de fabrique de notre projet : Une volonté et un soutien sans équivoque de la part des Institutions dont le projet a besoin bien sûr – et à qui nous avons pu rendre des comptes pendant cette semaine cruciale – mais aussi et surtout, une action ciblée sur les personnels opérationnels et techniques, avec des formateurs nationaux que nous avons formés et des experts régionaux du plus haut niveau, le tout soutenu par nos experts internationaux dans les différents champs de compétence nécessaires.

C'est cette approche qui est prioritaire pour nous, car si les textes, les Lois et les règlements sont un prérequis indispensable, c'est l'être humain qui est au centre de tout cela, pas la machine ni les textes, et ce sont ces agents officiels qui font fonctionner la machine, utilisent les textes et précèdent à l'arrestation des criminels et de facto, concourent à la stabilité de leur pays. Ils sont notre priorité absolue.

Comme d'habitude, je vous souhaite une bonne lecture car vous serez en bonne compagnie et nous allons partager avec vous des tas de choses intéressantes !



**Frédéric Bayard**  
Project Director



## NATIONAL TRAINING: THE ROLE OF FINANCIAL INSTITUTIONS IN DETECTING, IDENTIFYING AND DISRUPTING ILLICIT FINANCIAL FLOWS OF TRAFFICKING OF HUMAN BEINGS AND MIGRANT SMUGGLING IN SUDAN

06 – 10 June 2021, Online

*Tuemay Aregawi*

*Senior Technical Advisor to the AML-THB Project and coordinator of the training*

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Sudan has become a hub of migrant smuggling in the region, notably as a main source, transit and destination to some extent. Sudan is primarily a transit point for migrants from Ethiopia, Eritrea and Somalia destined for Europe via the Mediterranean Sea.

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### BACKGROUND

The Greater Horn of Africa (GHOA) region is a source, transit and destination of existing, evolving and emerging multiple transnational criminal threats including trafficking and smuggling of human beings, drugs, small arms and light weapons (SALW), and other illicit goods; financial crimes such as corruption, tax evasion and illicit financial flows; money laundering (ML); and active terrorism, violent extremism and financing of terrorism (FT) among others. The growing nexus between terrorism and transnational organized crime (TOC) has complicated the security challenges of countries in the region, including Sudan. Disrupting the flow of criminal and terrorist assets through effective anti-money launder-

ing (AML) and counter financing of terrorism (CFT) measures are instrumental in the fight against crimes.

In this regard, the EU has launched a project on “Disrupting criminal trafficking and smuggling networks through increased Anti-Money Laundering and financial investigation capacity in the Greater Horn of Africa” (referred hereafter as AML/THB project). The project aims to strengthen national anti-money laundering and counter illicit financial flow capacity, increase understanding of the criminal networks and their flow of illicit finance; and enhance coordination of agencies, among others. The AML/THB project has been engaged in designing and delivering capacity building activities since its kickoff in November 2019.



Sudan has become a hub of migrant smuggling in the region, notably as a main source, transit and destination to some extent<sup>1</sup>. Sudan is primarily a transit point for migrants from Ethiopia, Eritrea and Somalia destined for Europe via the Mediterranean Sea. It is reported that in 2018 more than 2000 Sudanese nationals and over 4000 Eritreans transited via Sudan crossing the Central Mediterranean Sea to Europe.<sup>2</sup> The 2016 IGAD/Sahan report<sup>3</sup> revealed that THB/SoM criminal networks were operating from within Sudan and regionally coordinating human smuggling and trafficking from the GHOA to Libya and also facilitating financial operations. Illicit financial flow from THB/SoM criminals and their networks is likely to happen in Sudan because of the presence of regional criminal networks operating from Sudan. Some cases investigated by the Sudanese police showed that payments by traffickers and smugglers were facilitated in Sudan including through locals and foreign criminal syndicates.

The fight against transnational organized crime including THB/SoM and money laundering requires effective engagement of the financial services and other relevant stakeholders. Operational cooperation and coordination between the different public and private institutions is essential to successfully fight human trafficking, migrant smuggling and protecting the integrity of the financial system. Understanding and disrupting the criminal financial flow through effective AML measures and financial investigations is vital to disrupting the criminal networks and their financial flow. The financial institutions are instrumental in this regard in:

- Detecting, identifying, reporting and disrupting suspicious activities;
- Generating vital information from their vast data that can produce actionable intelligence, in fact observing all necessary legal provisions;
- Providing evidentiary materials as may be required by the court of justice or other legally authorized agencies; AND
- Tracing and freezing proceeds of crime as instructed/demanded by law.

Therefore, sensitizing financial services on the threats and vulnerabilities and building their capacities of detecting and identifying suspicious transactions is of paramount value to strengthen the national AML/CFT system. It is also necessary to enhance common understanding and trust among the banks as reporting entities and holders of key information; the supervisory/regulatory bodies and relevant competent authorities. This training is expected to contribute to and realise the above-mentioned roles of the financial institutions in combating THB/SoM through effective AML measures.

To this end, the AML/THB project organized this training workshop on “the Role of Financial Institutions in Detecting, Identifying and disrupting Illicit Financial Flows of Trafficking of Human Beings (THB) and Smuggling of Migrants (SoM) in Sudan” was successfully held

online on 06<sup>th</sup> – 10<sup>th</sup> June, 2021. The training was organized in collaboration with the Sudanese Financial Information Unit (SFIU).

## OBJECTIVES AND RESULTS OF THE TRAINING

The overall objective of the training webinar was to sensitise attendees on the role of financial institutions and to reinforce their capabilities in detecting, identifying and disrupting illicit financial flows of THB/SoM criminal networks through effective AML measures. At the end of the webinar, participants were expected to:

- discuss international and national AML/CFT framework and counter measures against the risks of money laundering of THB/SoM proceeds;
- better appreciate the role of financial institutions in detecting and disrupting financial flows from THB/SoM criminal networks;
- identify the red flag indicators of ML/TF risks stemming from THB/SoM illicit proceeds;
- better understand THB and SoM, the modus operandi of the criminal networks and their financial flow nationally and regionally;
- better recognise the need for public-private-partnership (PPP) in practicing effective AML/CFT regime in in detecting, identifying and disrupting financial flows and operations of THB/SOM; AND
- be exposed to and share good practices from the participating financial institutions.

Through the above stated results at individual level, the training webinar, together with other interventions of the project, are expected to contribute to the Banks to be able to:

- Improve detection, identification, analysis and disruption of suspicious transactions in general and in particular related THB/SoM illicit financial flows;
- Disseminate quality suspicious activity reports (STRs) adequately to the SFIU for further action needed to disrupt operations, and investigate and prosecute identified suspects;
- Better cooperate with SFIU, law enforcement and regulatory bodies on AML actions strictly adhering to relevant laws and protection of the rights of clients.

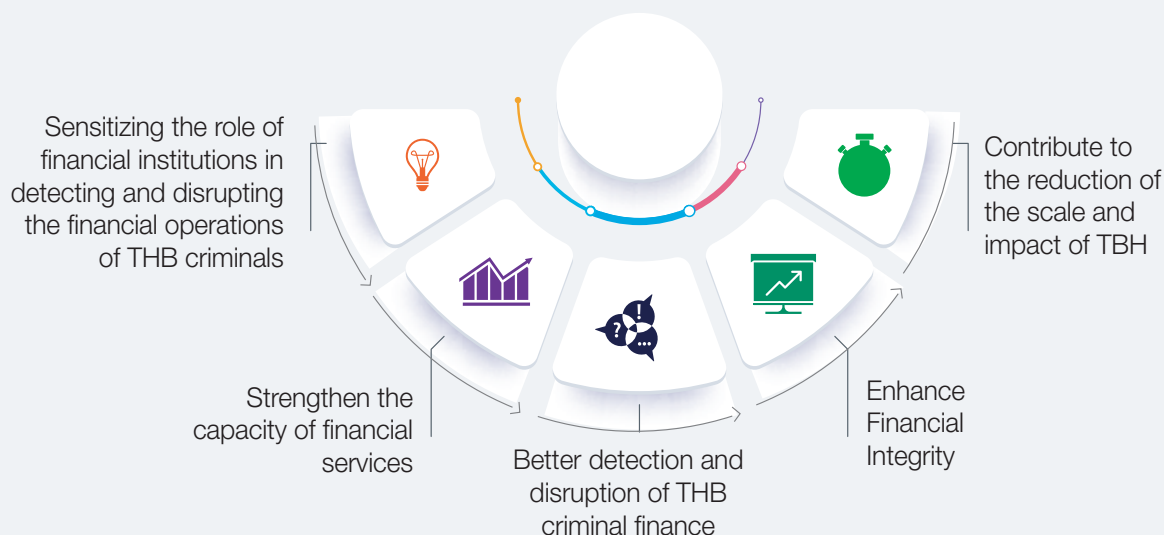
The training provided an opportunity for participants to share good practices/experiences and challenges among themselves and with the regulatory bodies of the CBoS, SFIU and the National Committee on Counter THB/SoM. It will further enhance collaboration in the detection, identification and disruption of THB/SoM criminal networks and flow of their finances, which will intensify the fight against money laundering, and human trafficking/smuggling.

1 Mohamed Daghar (2019) Human trafficking: Is Sudan committed to fighting human trafficking?, ENACT, <https://enactafrica.org/enact-observer/is-sudan-committed-to-fighting-human-trafficking>

2 Mohamed Daghar (2019) see footnote 1

3 IGAD/Sahan (2016) Human Trafficking and Smuggling on the Horn of Africa-Central Mediterranean Route, [https://igad.int/attachments/1284\\_IJSP%20Sahan%20HST%20Report%20%2018ijl2016%20FINAL%20FINAL.pdf](https://igad.int/attachments/1284_IJSP%20Sahan%20HST%20Report%20%2018ijl2016%20FINAL%20FINAL.pdf)

## Summary of the result chain of the training Workshop



### DELIBERATION OF THE TRAINING

Training<sup>1</sup> was organized and administered via online via Zoom Cloud Meeting application. The training brought together 48 Sudanese compliance officials drawn from 38 banks, 4 exchange and/or money transfer companies, SFIU, Police, Central Bank of Sudan, judiciary and National Committee on Counter Human Trafficking and Migrant Smuggling. The project team leader, Mr. Frederick Bayard, addressed the opening session and welcomed and appreciated all for joining the training. Mr. Khalid Elamin, Director General of SFIU, delivered opening remarks and officially opened the training. ROCK representative, Mr. Guy Fourmage, also attended the opening session.

#### The main topics of the training included the following:

- The International and Sudanese national AML/CFT regime that discussed the FATF standards, national legislative, institutional and operational frameworks in line with regional and international standards;
- The Role of banks in the AML/CFT Regime in general and in detecting, identifying, disrupting and reporting suspicious activities and transactions with a special attention to THB/ SoM related illicit financial flows. The requirements set by the CBoS were discussed in detail whereby the compliance officers raised questions and issues that was responded to by the CBoS representatives;
- Concepts of THB/SoM and the countermeasures in Sudan that covered the definitions, elements and characteristics of THB/SoM, and the national legislation (including the Proceeds of Crime and Money Laundering Act) and frameworks set to address the challenges along with international standards;
- THB/ SoM criminal networks and their financial flows in Sudan that particularly discussed the scale, patterns and trends of the criminal threats and the major routes and the criminal networks involved;
- Detecting, Identifying, reporting and disrupting illicit financial flows of THB/ SoM outlining some practical methods and means. The participants outlined a list of money laundering red flags from THB/SoM proceeds that is expected to serve as initial indicators to the compliance officers who attended the training;
- The role of supervisory/regulatory bodies that outlined the mandate of the CBoS, reporting requirements, standards, challenges and the way forward;
- Quality and Standards of STRS/CTRs that discussed the mandate of the SFIU, operational practices, statistics of received, analysed and dispatched STRs, qualities and limitations and suggested recommendations to improve the quality of reports;
- Public Private Partnerships that highlighted the existing frameworks/Practices and the challenges and opportunities in fighting THB/SoM through disrupting financial operations of the criminals and their networks; AND
- Case study on THB/SoM related financial flows and typolo-

<sup>1</sup> Trainers and speakers involved in the training are Zahir Awadalla, Ahmed Saeed, Mahmoud Sulman, Sara Enour, Siham Mohamed, Hafiz Said and Tuemay Aregawi.

gy's report of MENAFATF were also shared and briefly discussed on how it affects the financial institutions.

The training involved presentations, open discussions, a group exercise, and practical case studies. Participants were engaged in intensive discussions which promoted common understanding, sense of teamwork amongst the reporting entities and the regulatory/supervisory and law enforcement bodies and devise a way forward on how to implement effective AML interventions to identify and disrupt the flow of trafficking/smuggling finances. Participants of the training provided recommendations that are summarized as follows:

- Provide further training on similar topics but also including crypto currency, mobile money and hawala systems;
- Strengthen cooperation, information sharing, feedback and

updates among the chain of the AML/CFT system;

- Establishing a regular platform, forum or system for compliance managers for sharing of information amongst the financial institutions and with supervisory bodies;
- Improving operating procedures, formats and standards of reporting STRs/CTRs; AND
- Strengthening of engagement with the CBoS and SFIU to be enhanced as they would add value to understanding procedures, trends and typologies for the reporting entities.

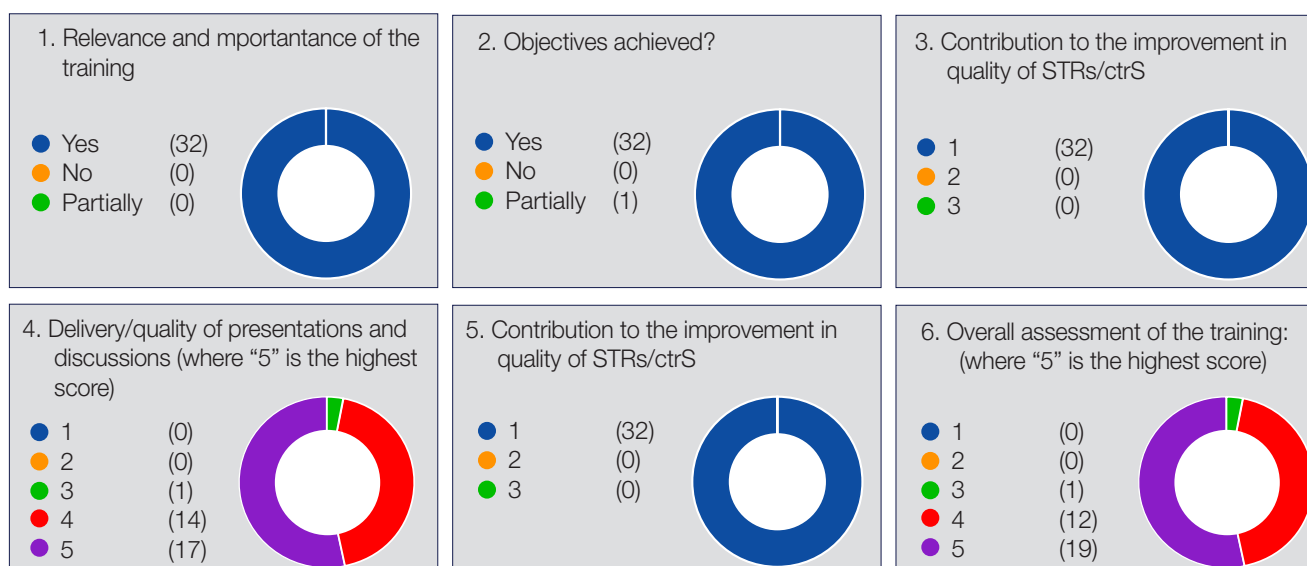
The Project Team Leader gave a closing statement in which he appreciated the participation of the trainees and the efforts from the trainers. He once again expressed his gratitude to the CBoS and SFIU for their support and to the EU for funding the training.

### Post-Training Evaluation: Immediate Results Achieved and Feedback

The training achieved its immediate results (outputs) in line with the key result indicators outlined in the Concept Note based on the DOA of the Project. The table below summarises the achievements.

No	KRA	Value	Score	Result
1	No. of participants	40	48 (20 or 41.67% Female & 28 or 58.33% Male)	>100%
2	Participants feedback	75 ≥ High	Overall assessment: <b>90.00% ≥ High</b>	100%
			Relevance/importance: <b>100% Yes</b>	
			Objective achieved: <b>100% fully achieved</b>	
			Quality of delivery/presentations: <b>92.50% ≥ High</b>	
			Value addition in knowledge & skills: <b>95.10% Yes</b>	
			Approach/Method - interactivity: <b>85.00% ≥ High</b>	
			Contribution to professional improvement: <b>100% Yes</b>	
			Contribution to the overall improvement of disseminating quality and adequate STRs: <b>92.50% Yes</b>	
Contribution to improvement in cooperation & information exchange of your institution with SFIU, LEA: <b>95% Yes</b>				
3	documents shared	N/A	Presentations, exercises, case studies, reports reading materials, resourceful website links shared	100%
4	Activity report	1	Produced	100%
5	Summary report	1	Produced	100%

Feedback given by 32 of the total 37 participants confirmed this training was one of the highly rated activities. Charts excerpted from the post-training survey are appended below.



# SYNOPSIS

## OPERATIONAL FINANCIAL ANALYSIS AND RISK ASSESSMENT: ADVANCED COURSE

05 - 09 July 2021, Online

*Tuemay Aregawi*

*Senior Technical Advisor to the AML-THB Project and coordinator of the training*

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Effective financial analysis and investigation are vital tools in producing actionable intelligence to identify and disrupt criminal networks and their financial operations, and also as source of evidence to effectively prosecute perpetrators.

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### BACKGROUND

The Greater Horn and Southern Africa (GHaSA) region is faced with serious organized crime and terrorism. In response, the European Union has launched a project on disrupting criminal trafficking and smuggling networks through increased anti-money laundering and financial investigation capacity in the Greater Horn of Africa (referred hereafter as AML/THB project). The project aims to strengthen national anti-money laundering and counter illicit financial flow capacity, increase understanding of the criminal networks and their flow of illicit finance and enhance coordination of agencies, among others. The AML/THB project has been engaged in designing and delivering capacity building activities since November, 2019 in continuation of the previous EU AML/CFT Project.

Effective anti-money laundering (AML) measures are necessary instruments to deny criminals from savouring their ill-gotten profits. Effective financial analysis and investigation are vital tools in producing actionable intelligence to identify and disrupt criminal networks and their financial operations, and also as source of evidence to effectively prosecute perpetrators. Financial Intelligence Units (FIUs) and law enforcement agencies (LEAs) are required to have the necessary capabilities, which include skills, tools and systems, to manage financial intelligence analysis such as planning, collection, analysis, evaluation and dissemination, then further follow up and support the process of investigation. Financial analysis provides key analytical products that contribute to risk assessment as a guide to strategic and operational interventions. The Financial Action Task Force (FATF) Recommendation 29 and immediate outcome 6 set, among others, that financial analysis and dissemination is a defining role of FIUs and contributes to LEA's effective investigations and prosecutions. Particularly operational analysis is a central function of a FIU and an imperative element of financial investigations for LEAs.

The project has already trained 54 financial analysts and managers drawn from 14 countries of the GHoA and eastern and southern Africa and ESAAMLG in two rounds of training. Financial analysts and investigators should acquire advanced knowledge and skills in operational analysis, which has an essential role to improve operational effectiveness. Participants of previous trainings and trainers highly recommended the need for a separate training on operational analysis. In this regard, the Project organized a regional advanced training course on operational financial analysis held on 05<sup>th</sup> – 09<sup>th</sup> July 2021 on a virtual platform in which 36 financial analysts and investigators drawn from 13 countries<sup>1</sup>, (FIUs, LEAs and intelligence) and the ESAAMLG Secretariat have attended.

### OBJECTIVES AND RESULTS OF THE TRAINING

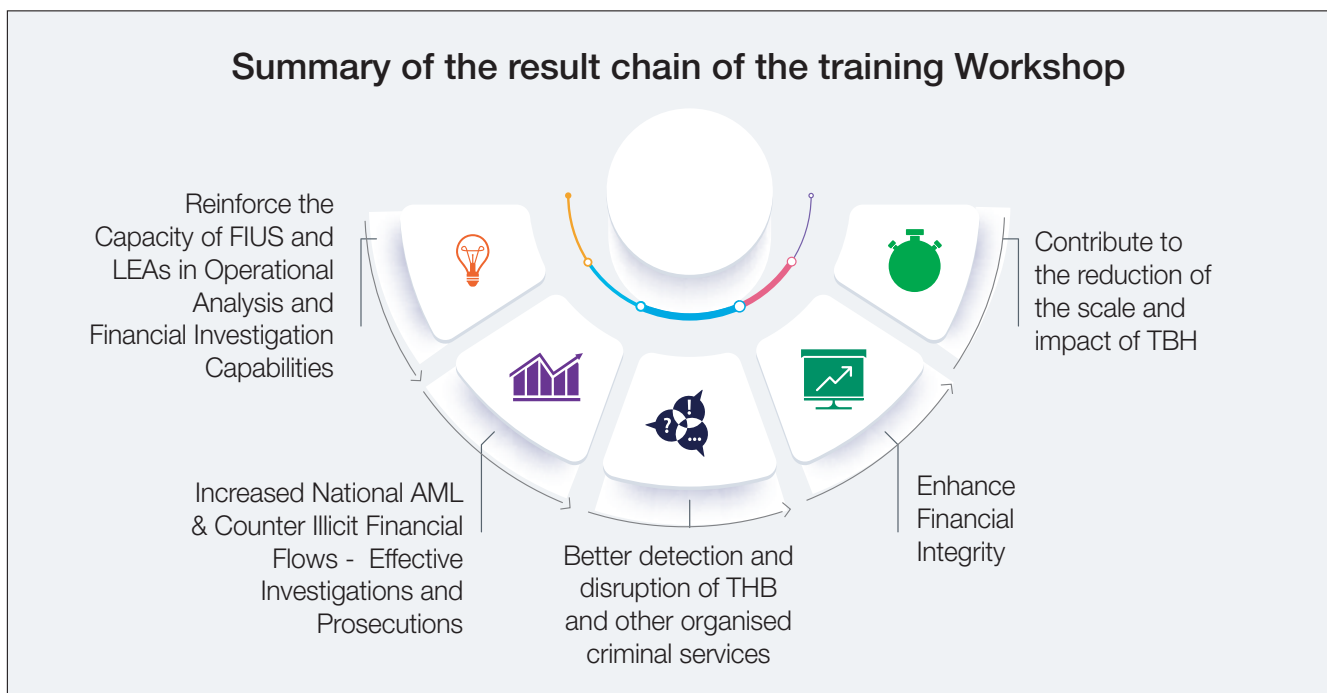
The training aimed to reinforce the capacity of FIUs and LEAs in operational analysis and financial investigation capabilities contributing to the enhancement of their AML/CFT effectiveness. Participants in this training were expected to:

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1. Comoros, Djibouti, Ethiopia, Kenya, Madagascar, Mauritius, Mozambique, Seychelles, Somalia, Sudan, Tanzania, Uganda & Yemen

- Describe the process of intelligence cycle and undertake the functions carried out in each step;
- Better understand and exercise various methods/ techniques of operational/tactical financial analysis;
- Assess the risk of STRs and to undertake an analysis of STRs;
- Appreciate the different open and closed sources of information;
- Develop information collection plan;
- Be able to collect, evaluate and analyze information;
- Browse and collect information from internet sources (dark, deep or surface webs);
- Prepare, review and disseminate STRs reports for further action, and
- Describe ML/TF risks of THB/SoM proceeds and associated red flag indicators

As can be seen from the infograph below, the training contributes to the achievement of the result chain of the Project.



### DELIBERATION OF THE TRAINING

The training was facilitated online via Zoom Cloud Meeting. Senior trainers from the region and Europe along with the AML/THB Project experts facilitated and delivered the training. The Project Director, Mr. Frédéric Bayard, opened the training where he highlighted about the scale of criminal profits from transnational organized crime (ToC) and THB/SoM in particular and stressed about the importance of financial analysis to detect and disrupt illicit financial flows and laundering of crime proceeds. Tuemay Aregawi, the Senior Technical Advisor with the AML/THB Project and coordinator of the training, briefed about the the scale and impact of transnational organised crime (TOC) in the region. Tuemay stressed that the primary goal of organised criminals is financial gain and therefore the significance of addressing crimes through effective AML measures is paramount.

Table (on the right): Participant List

Participants				
NO	Country	Female	Male	Total
1	Djibouti	0	1	1
2	Ethiopia	0	2	2
3	Kenya	5	3	8
4	Somalia	1	4	5
5	Sudan	1	1	2
6	Tanzania	0	1	1
7	Uganda	0	2	2
8	Yemen	0	4	4
9	Comoros	0	4	4
10	Madagascar	0	2	2
11	Mauritius	1	0	1
12	Mozambique	0	2	2
13	Seychelles	1	0	1
14	ESAAMLG Sec		1	1
<b>Total</b>		<b>9</b>	<b>27</b>	<b>36</b>
		25%	75%	100%





Photo Courtesy | Freepix

## MAIN TOPICS COVERED

- **Information, Intelligence and Process of Intelligence Analysis:** The session briefly highlighted the key concepts of intelligence. Topics covered included the role of FIUs in financial intelligence analysis; definitions of key terms in intelligence analysis; and intelligence cycle that discussed the process in line with the roles of analysts and investigators as well as reflections on related FATF standards, guidelines and good practices. The session also discussed the three types of analysis used; tactical, operational and strategic and their interlinkages.
- **STRS/CTRs Risk Assessment:** This session covered the methods, mechanisms and best practices of assessing STR/CTRs risks and how to prioritise them based on the assessment of likelihoods and impacts and other indicators. The trainees carried out an exercise that assisted them to determine the risk of a given case STR/CTR using the 5x5 matrix box.
- **Information Collection and Sources of Information:** This session outlined the importance of developing a Financial Collection Strategy, and a Financial Information Collection Plan. It highlighted sources of information, from open source (including surface, deep and dark webs) and closed sources and how such information can be obtained. The concept of developing a Financial Profile was also discussed. Different digital media types and digital forensics were discussed to guide the trainees how to extract value out of information. Trainees were reminded to take maximum caution while surfing deep and dark webs as criminals also prowl in search of a prey.
- **Information Evaluation:** This session discussed and exercised methods of evaluating sources of information to analyse and assess reliability of the source and accuracy of information in order to produce quality intelligence products.
- **Techniques and Methods of Analysis:** This session covered the various techniques and methods of analysis including network analysis, pattern analysis, financial/business profiling using various tools including Excel. Demonstrations on how to use the different methods and tools were practiced using a case study and other examples.
- **Reporting and Dissemination:** This session discussed the methods and techniques of disseminating intelligence to the relevant authorities in a secure manner following legal requirements and protocols in relation to information-safeguarding and protection to avoid tipping-off or leakage of information. Mechanisms for checking the quality of intelligence products must be in place before dissemination. The practice and challenges of receiving and providing feedback on the intelligence result and chain of information flow & feedback was strongly emphasised. Models of best practice were shared.
- **Case Study Assignment:** A scenario case study was prepared and exercised to enhance active “learning by doing”. Supporting documents that would be used for the duration of the workshop were presented to the trainees. An assignment was set for the trainees to do after the training session. During the breakout sessions they reviewed the case scenario and the STR information identifying “lines of enquiry”, determining sources of information, developing a financial investigation strategy, information collection plan and suspect profile. The case study-based exercise also assisted trainees to practically exercise some techniques of analysis and introduced the concept of visualising financial information, using various tools/resources, in order to better “tell the story” of the financial evidence. The case study exercise was administered for each session.

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 The project has already trained 54 financial analysts and managers drawn from 14 countries of the GHoA and eastern and southern Africa and ESAAMLG in two rounds of training.



## SUMMARY AND CLOSING

The training involved presentations, Q&A sessions, open discussions, and case-based exercises. The training, despite being virtual, was actively engaging. Important reference documents and websites were shared with the trainees for further reference and continued learning. The Project Director closed the programme with a closing remark where he outlined the importance of operational analysis and information sharing to effectively detect, identify and disrupt illicit financial flows and money laundering. He finally acknowledged the trainees and their institutions, trainers, members of the Project Team and the donor, the EU. Participants and trainers outlined some recommendations on future engagements as summarized below:

- Organise more practice-oriented training face-to-face, where Covid19 safety protocols permit, to enhance a deeper technical understanding and work out practical techniques.
- Organise comprehensive training on THB/SoM to help better understand the subject and the financial flows; and
- Preparing and administering quick online quizzes in the beginning and end of the training to evaluate/determine the effectiveness of the training in addition to collecting pre and post training responses through questionnaires.

## POST TRAINING EVALUATION: IMMEDIATE RESULTS ACHIEVED AND FEEDBACK

Feedback collected through the post-training survey revealed that the training was a success in terms of achieving its objectives, value addition, quality of delivery and its contribution to professional improvements. The training achieved its immediate results (outputs) in line with the deliverables and key result indicators of the training outlined in the Concept Note based on the DOA of the Project. The table below summarises the achievements and feedback from the participants.

No	KRA	Value	Score	Result
1	No. of participants	40	36 (9 or 25 % Female & 27 or 75% Male)	100%
2	Participants' feedback	75≥ High	Overall assessment: <b>84.20% ≥ High</b>	100%
			Relevance/importance: <b>100% Yes</b>	
			Objective achieved: <b>100% fully achieved</b>	
			Value addition in knowledge & skills: <b>100% Yes</b>	
			Quality of delivery/presentations: <b>89.50% ≥ High</b>	
			Approach/Method - interactivity: <b>82.30% ≥ High</b>	
3	documents shared	N/A	Presentations, exercises, case studies, reports reading materials, resourceful website links shared	100%
4	Activity report	1	Produced	100%
5	Summary report	1	Produced	100%
6	Synopsis/Web Sum	2	Produced and shared	100%
7	STRs follow up	N/A	N/A	N/A



## Synopsis:

# INTERNATIONAL SEMINAR ON HAWALA MECHANISMS' EFFECTIVE AML MEASURES: DETECTING AND DISRUPTING ILLICIT FINANCIAL FLOWS OF TRAFFICKING IN HUMAN BEINGS AND SMUGGLING OF MIGRANTS

26 - 30 July 2021, Online

*Tuemay Aregawi*

*Senior Technical Advisor to the AML-THB Project and coordinator of the training*

Hawala may mean the movement of money within, or outside a given country, or the service providers (the companies and their systems/mechanism) that are often informally operating independently in parallel to or in cooperation with or through regular banks depending on legislations and policies of national jurisdictions.

## BACKGROUND

### HORN OF AFRICA AND SOUTHERN AFRICA

The Greater Horn and Southern Africa (GHaSA) region is a source, transit and destination of existing, evolving and emerging multiple transnational criminal threats. The region is faced with different forms of serious criminal threats including:

- trafficking and smuggling of human beings, drugs, small arms and light weapons (SALW), and other illicit goods;
- financial crimes such as corruption, tax evasion and illicit financial flows;
- environmental crime such as animal poaching, illegal logging and illegal fishing;
- money laundering (ML) among many others; AND
- active terrorism, violent extremism and financing of terrorism (FT).



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The growing nexus between terrorism and transnational organized crime (TOC) has complicated the security challenges. The European Union, therefore, has launched a project on disrupting criminal trafficking and smuggling networks through increased anti-money laundering and financial investigation capacity in the Greater Horn of Africa (referred hereafter as AML/THB project). The project aims to strengthen national anti-money laundering and counter illicit financial flow capacity, increase understanding of the criminal networks and their flow of illicit finance and enhancing coordination of agencies. The Project emphasises, among others, on depriving criminals from benefiting off the proceeds of crime through effective anti-money laundering (AML) measures and countering illicit financial flows.

The movement of finance across the world has been eased by the development and accessibility of information technology as well as globalization of trade and financial markets. This trend has stimulated hawala money transfer services that are fast and easily accessible compared to the traditional banking system generating enormous financial flows. Hawala may mean the movement of money within, or outside a given country, or the service providers (the companies and their systems/mechanism) that are often informally operating independently in parallel to or in cooperation with or through regular banks depending on legislations and policies of national jurisdictions.

Hawala money transfer services play a significant role in foreign currency gains that contribute to the economic development of countries. Hawalas facilitate financial flows in support of livelihood mechanisms in poor countries. According to the World Bank Report<sup>1</sup>, Sub-Saharan Africa is estimated to receive about US\$48 billion from remittance via formal money transfer services including money transferred through hawala mechanisms.

The wide range of services, money remittance and transfer systems can offer, coupled with the fast/easy transfer and often cheaper makes hawala mechanism likely to offer immense opportunities for criminals to launder their proceeds unless effective compliance control mechanisms are set in place. In Hawalas, money laundering can happen at all the stages of placing, layering and integration. The FATF<sup>2</sup> reported that money laundering from trafficking/smuggling in human beings in money transfer services is prevalent.

FATF, in its Recommendation 14, stipulated that money and value transfer service providers should be “licensed or registered, and subject to effective systems for monitoring and ensuring compliance with the relevant measures.” This means, countries should implement effective AML/CFT measures as necessary tools to safeguard hawalas and other informal money transfer mechanisms that further deprive criminals of their criminal profits. Illicit financial flows from THB/SoM have been identified in many countries of the region. However, knowledge about operations of the Hawalas and the associated vulnerabilities is not in commensurate with the risks posed by the hawala mechanisms.

In this regard, the Project organized an “International Seminar on Hawala Mechanisms’ Effective AML Measures: Detecting and Disrupting Illicit Financial Flows of Trafficking in Human Beings and Smuggling of Migrants” held on 26<sup>th</sup> – 30<sup>th</sup> July, 2021 on a virtual platform.

## OBJECTIVES AND RESULTS OF THE TRAINING

The overall objective of the seminar was to strengthen the knowledge of law enforcement and regulatory/supervisory agencies about the risks of money laundering in Hawala Mechanisms in general and in THB/SoM related financial flows in particular. In summary, the seminar was expected to:

- Strengthen the awareness and understanding of the FIUs and LEAs about the vulnerabilities and risks of money laundering and illicit financial flows in the hawala mechanisms;
- Improve quality of hawala-related suspicious transactions analysis and investigation;
- Better exchange information and partnerships with the hawala service providers and among FIUs, LEAs and regulatory bodies.

## DELIBERATION OF THE TRAINING

The training was facilitated online via Zoom Cloud Meeting. Senior trainers from the region and Europe along with the AML/THB Project experts facilitated and delivered the training. The Proj-

INTERNATIONAL SEMINAR ON HAWALA MECHANISMS				
Participants				
NO	Country	Female	Male	Total
1	Djibouti	1	1	2
2	Eritrea	2	6	8
3	Ethiopia		2	2
4	Kenya	5	12	17
5	Somalia	1	11	12
6	Tanzania	1		1
7	Uganda		3	3
8	Yemen		4	4
9	Comoros	1	4	5
10	Madagascar	2	5	7
11	Mozambique		3	3
Total		13	51	64
		20.31%	79.69%	100%

Table 1: Participant List:

ect Director, Mr. Frédéric Bayard, opened the training in which he highlighted the importance of addressing illicit financial flows and proceeds of crime to counter Transnational Organised Crime (TOC). Tuemay Aregawi, the Senior Technical Advisor with the AML/THB Project and coordinator of the training, briefed about the scale and impact of transnational organised crime (TOC) in the region and the significance of addressing crimes through effective AML measures. The Seminar brought together 64 participants from FIUs, LEAs and regulatory bodies of eastern and southern Africa countries<sup>3</sup>.

## TRAINING DELIVERY:

### Day 1: Session 1 - Introduction

The project team leader, Mr. Frederick Bayard, addressed the opening session welcoming and appreciating all for joining the training. Mr. Bayard briefed all on the objectives and scope of the Project content-wise and the number of the beneficiaries. He highlighted about terrorism financing, illicit financial flows and the scale of criminal profits from transnational organized and THB/SoM in particular. Mr. Bayard also stressed about the importance of financial analysis to detect and disrupt illicit financial flows and laundering of crime proceeds. He encouraged the participants to fully learn from the seminar and share their practical experiences and good practices in dealing with illicit financial flows via hawala and money transfer systems. Mr. Bayard expressed his thanks to the EU for funding the Project and all others who contributed to the training, which included the trainers, heads of the national institutions, the Central Bank of Kenya that hosted the Project office, the interpreters and the Project Team. Finally, he officially opened the training.

Tuemay Aregawi, the technical advisor of the Project and coordinator of the training, briefed on the scale and impact of transnational organised crime (TOC) in the region. He stressed that the

1. World Bank. 2020. COVID-19 Crisis Through a Migration Lens. Migration and Development Brief, no. 32; World Bank, <https://openknowledge.worldbank.org/handle/10986/33634>

2. FATF, 2010, Money Laundering through Money Remittance and Currency Exchange Providers, [https://www.fatf-gafi.org/fr/publications/methodesettendances/documents/moneylaunderingthroughmoneyremittanceandcurrencyexchangeproviders.html?hl=10&b=0&s=desc:fatf\\_releasedate](https://www.fatf-gafi.org/fr/publications/methodesettendances/documents/moneylaunderingthroughmoneyremittanceandcurrencyexchangeproviders.html?hl=10&b=0&s=desc:fatf_releasedate).

3. GHOA Countries: Djibouti, Eritrea, Ethiopia, Kenya, Somalia, South Sudan, Sudan, Tanzania, Uganda & Yemen/ESA Countries: Comoros, Madagascar, Malawi, Mauritius, Mozambique, Seychelles



FATF, in its Recommendation 14, stipulated that money and value transfer service providers should be “licensed or registered, and subject to effective systems for monitoring and ensuring compliance with the relevant measures.” This means, countries should implement effective AML/CFT measures as necessary tools to safeguard hawalas and other informal money transfer mechanisms that further deprive criminals of their criminal profits.



primary goal of organised criminals is financial gain and therefore the significance of addressing crimes through effective AML measures is paramount. Tuemay also highlighted the main purpose and the scope of the Project. Finally he presented the rationale, objectives, contents, expected results, agenda and approaches of the training.

### Session 2 - International AML/CFT Standards and Hawala Services

This session was covered in two sub-topics. The first sub-topic, international AML/CFT frameworks, focused on international and regional AML/CFT standards and frameworks including the following key points:

- Concepts, definitions, process, stages, and AML/CFT mechanisms;
- History, evolution and development of the AML/CFT frameworks;
- International AML/CFT standards and institutional frameworks;
- Future trends and emerging issues in global AML/CFT.

The second sub-topic on hawala mechanisms, cash-based economy and AML/CFT discussed:

- Global illicit and informal financial flows and trade/commercial flows and the prevalent challenges of the current global AML/CFT regime to address risks and vulnerabilities in hawalas;
- Definitions, evolutions, types, range, main features and mechanics of value and money transfer system (VMTS) including hawala;
- Misconceptions about hawala systems that either create loose regulation or attract negatively;
- Methods of hawalas in transacting finance or other values supported by examples and models;
- Cash-intensive economy definition, characteristics, vulnerabilities and challenges in AML/CFT;
- Economic and financial importance of hawala and money transfer services.

### Session 3 – Introduction to THB/SoM

This session covers THB and SoM conceptual frameworks, the criminal networks and their financial flows. The session focussed on:

- definitions, concepts, definitions, elements, processes, differences THB and SoM from

international and national legal perspectives;

- The nexus between terrorism and THB/SoM supported by practical case cases in the region and beyond;
- trafficking/smuggling source countries, commonly used transit routes and destinations within and out of the GHoA;
- profiles and financial transactions of the criminal groups/syndicates, their networks and the common means of their financial flows.

### Session 4 - Vulnerabilities and Risks of Hawalas:

This session outlined the importance of Hawala in supporting livelihoods and even state economies, while it is also exposed to risks of ML/TF and illicit financial flows. The Hawala system is also subjected to law enforcement and regulatory measures that threaten their operations including those operating in the region. The following points were discussed in detail:

- Hawala and cryptocurrencies;
- Hawala and TF;
- Indicators and red flags of IFTS and criminal abuses;
- Practical and real cases of abuse of hawala – mis-invoicing of export, TF, abuse of foreign currency;
- Balancing crime control and facilitating money transfer to consumers;
- Recommendations to mitigate the vulnerabilities and risks of hawalas.

Under this session, good practices from Somalia and the Somali hawalla and remittance companies were been presented by Abdisalam Ali and Micin Ali.

### Session 5: AML/CFT Compliance Mechanisms in Hawala and MTS:

A number of topics were discussed in this session including:

- Mandatory legislative and regulatory instruments including detail directives and regulations on licencing and operational procedures;
- Know your customer: identification and verification procedures and tools;
- Record keeping, registration and maintenance of records;
- Customer due diligence;

- Reporting STRs and CTRs to competent authorities;
- Internal controlling mechanisms.

### Session 6 – Cooperation and Information Sharing

Under this topic, the key points on partnership, multiagency and knowledge/information sharing were discussed. Trainers also facilitated a breakaway group exercise to identify prevalent challenges and gaps in information sharing and the actions required from hawala and MTS, regulatory/supervisory bodies and LEAs. Trainees outlined the limitations and corresponding suggested solutions that were discussed in a plenary session.

### Summary and Closing

Finally, the training coordinator summarized what was covered during the one-week training, the key messages, and the way forward. The Project Manager, Federico Argentino, delivered the

closing remarks whereby he outlined about the importance of operational analysis and information sharing to effectively detect, identify and disrupt illicit financial flows and money laundering. He acknowledged the trainees and their institutions, trainers, members of the Project Team and the donor, the EU.

### Post-Training Evaluation: Immediate Results Achieved and Feedback

Feedback collected through the post-training survey revealed that the seminar achieved its objectives, added value, contributed to professional improvements and the quality was high. The seminar achieved its immediate results (outputs) in line with the deliverables and key result indicators of the training outlined in the Concept Note based on the DOA of the Project. The table below summarises the achievements and feedback from the participants.

No	KRA	Value	Score	Result
1	No. of participants	40	64 (13 or 20.31 % Female & 51 or 79.69% Male)	100%
2	Participants' feedback	75≥ High	Overall assessment: <b>93.90% ≥ High</b>	100%
			Relevance/importance: <b>100% Yes</b>	
			Objective achieved: <b>97% fully achieved</b>	
			Value addition in knowledge & skills: <b>100% Yes</b>	
			Quality of delivery/presentations: <b>97% ≥ High</b>	
			Approach/Method - interactivity: <b>97% ≥ High</b>	
			Contribution to professional improvement: <b>93.90% Yes</b>	
3	documents shared	N/A	Presentations, exercises, case studies, reports reading materials, resourceful website links shared	100%
4	Activity report	1	Produced	100%
5	Summary report	1	Produced	100%
6	Synopsis & Web Summary	2	Produced and shared	100%
7	Created Informal group/network	N/A	WhatsApp Group created	100%



Participants holding a three judge bench 'moot court'.

## SYNOPSIS

### **KENYA NATIONAL TRAINING: ENHANCING TERRORISM INVESTIGATION AND COUNTERING THE FINANCING OF TERRORISM FOR THE LAW ENFORCEMENT AGENCIES; OFFICE OF THE DIRECTORATE OF PUBLIC PROSECUTION (ODPP), ANTI TERROR POLICE UNIT (ATPU), JOINT COUNTER TERRORISM ANALYSIS CENTER (JCTAC) AND ASSET RECOVERY AGENCY (ARA)**

**19TH-21ST JANUARY 2021, 9TH-11TH MARCH 2021 AND 14TH-17TH JUNE 2021**

*Alma Wanyama*

*Senior Technical Advisor to the AML-THB Project and training coordinator*

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The traffickers continue to take advantage of the disparity between low wages and lack of employment opportunities in some areas and the seemingly abundant jobs and high wages in other areas to lure and exploit their victims.

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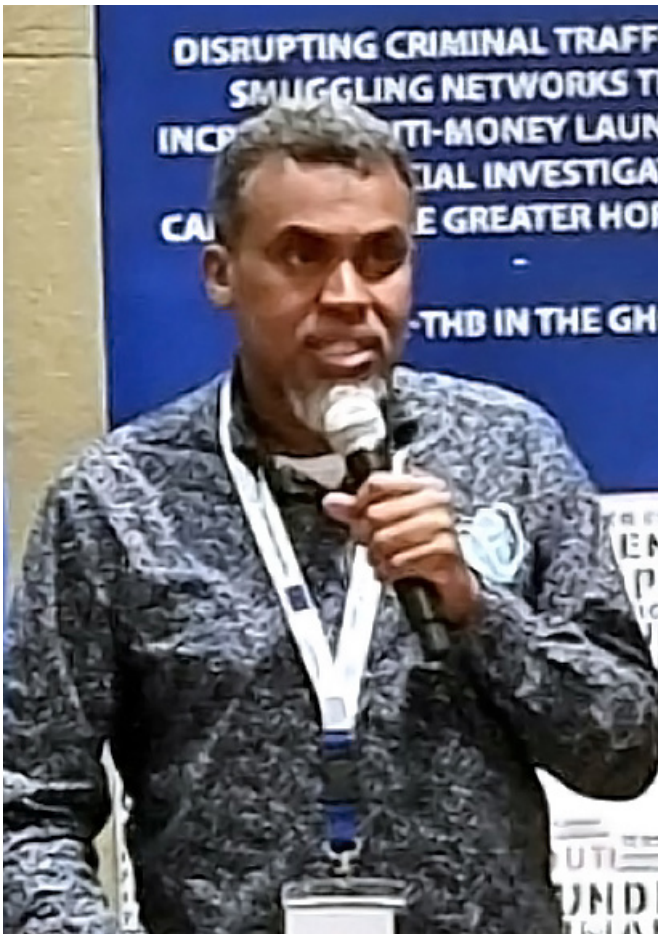
Traffickers are estimated to exploit 40.3 million victims annually in various forms of profit pursuit. The lucrative nature of their crimes has enabled criminal networks conduct operations in a covert manner with the intention of evading detection by law enforcement agencies in efforts to maintain and enhance their financial status quo.

### **BACKGROUND**

Human trafficking, like other criminal enterprises, results in financial benefit for those involved. Every year human traffickers generate billions of dollars in profits by victimizing millions of people around the world. Traffickers are estimated to exploit 40.3 million victims annually in various forms of profit pursuit. The lucrative nature of their crimes has enabled criminal networks conduct operations in a covert manner with the intention of evading detection by law enforcement agencies in efforts to maintain and enhance their financial status quo. The traffickers continue to take advantage of the disparity between low wages and lack of employment opportunities in some areas and the seemingly abundant jobs and high wages in other areas to lure and exploit their victims. As a result, financial investigation has become key in the fight against money laundering, trafficking in human beings and smuggling of migrants, in order to bring the criminals to justice as well as unearthing their networks which assists in appropriate criminal profiling. It is increasingly paramount for law enforcement agencies to understand their role in financial investigation, as well as the roles of other relevant national stakeholders during the financial investigations.

The AML/THB project in collaboration with the Judicial Training Institute (JTI) of Kenya, the Office of the Directorate of Public Prosecution (ODPP) and Anti-terror Police Unit (ATPU),





Noordin Haji, Director office of the Director of Public Prosecutions, addresses the participants.



Frédéric Bayard, AML-THB Project Director addresses the participants.

organized a national training workshop for Judges and Magistrates. The Judges training was held on 2<sup>nd</sup> to 5<sup>th</sup> February, 2021 at the Vipingo Ridge Golf Resort, Mombasa, Kenya, while the Magistrates training was held on diverse dates between 8<sup>th</sup> and 13<sup>th</sup> February, 2021 at the Great Rift Valley Lodge, Naivasha, Kenya. This training workshop was designed for the Judiciary adjudicating terrorism and human trafficking cases.

Following the feedback from the members of the judiciary and our conclusions, assessments and findings, it was deemed necessary by the project training team - in close coordination with LEA, ODPP and Judiciary trainers to complete the training cycle by appropriately communicating to the aforementioned agencies. This led to the AML-THB Project organizing this National Training on Enhancing Terrorism Investigation and Countering the Financing of Terrorism for The Law Enforcement Agencies; Office of The Directorate of Public Prosecution (ODPP), Anti-Terror Police Unit (ATPU), Joint Counter Terrorism Analysis Center (JCTAC) And Asset Recovery Agency (ARA). The National forum aimed to train fifty (50) officers from the Judiciary, ODPP, JCTAC, ATPU, and ARA. The sessions were facilitated by the National Experts who facilitated the Judiciary training, and for effective coordination and delivery, additional National Experts from the Judiciary and ARA.

### OBJECTIVES AND RESULTS OF THE TRAINING

The National training aimed to enlighten the ODPP, ATPU, JCTAC, and ARA on how to properly investigate terrorism and terrorism financing. This was done by highlighting the feedback from the Judicial officers on how investigators and prosecutors could better enhance their duties while investigating and prosecuting terrorism and terrorism financing cases guided by the judicial officers who were be present. The specific objectives of the Forum were to:

1. Promote better understanding of Terrorism and Financing of Terrorism (AML-CFT);
2. Better understand financial investigation and the role of the financial sector in investigating terrorism cases;
3. Better understand the Role of the Investigators, Prosecutors and Judiciary in Terrorism cases and in AML-CFT;
4. Outline the Role of the court in the multi-agency set up in the fight against terrorism;
5. Understand the Judicial expectations of admissible evidence/financial evidence in terrorism cases;
6. Better understand the Role of the Prosecution services



in terrorism cases and the legal framework on terrorism cases in Kenya;

7. Promote better understanding on the role of the Anti-Terror Police Unit (ATPU) and case management;
8. Outline the Importance of effective collaboration with Asset Recovery Agency of Kenya (ARA);
9. Promote better understanding and importance of effective multi agency collaboration;
10. Explore practical cases and exchange experiences and good practices learning practical lessons.

To achieve these objectives, the workshop involved the following thematic areas:

ing cases - Part debrief of Case set;

16. The Role of the Financing Reporting Center (FRC) in terrorism and terrorism financing cases – Part debrief of Case set;
17. Converting Intelligence into Evidence in Terrorism and Terrorism Financing Cases – Part debrief of Case set;
18. The role of Asset Recovery Agency (ARA) in Terrorism and Terrorism Financing Cases – Part debrief of Case set;
19. Management of Counter Terrorism Cases, conclusion and summary of the Case Study;
20. Debrief by the Judiciary on the Summary on the Full Debrief of the Case Study.

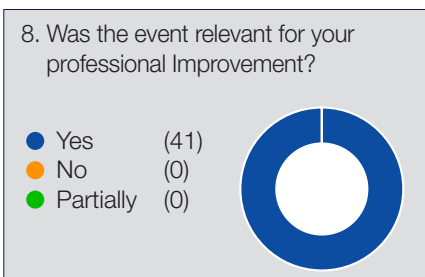
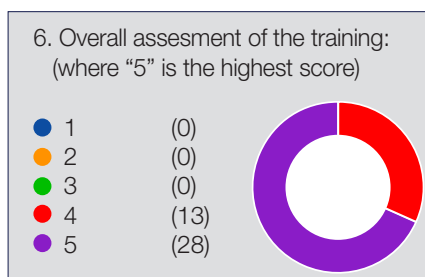
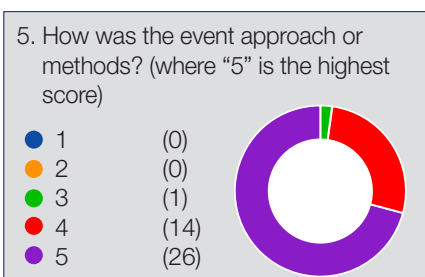
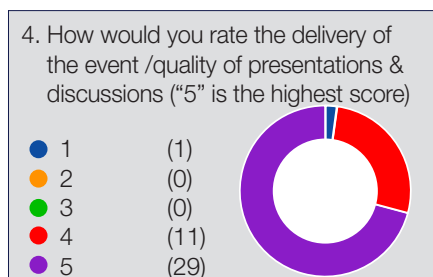
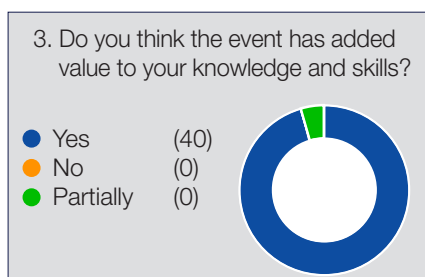
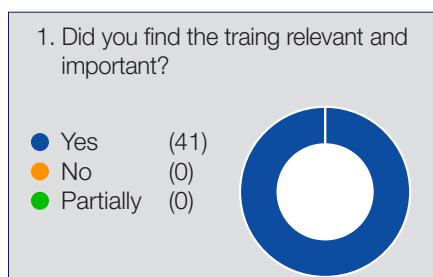
### Introduction and Overview of Contemporary Terrorism;

11. Case Study Scenario setting on terrorism and terrorism financing;
12. The Role of Joint Counter Terrorism Analysis center – debrief of Case set;
13. The Role of Anti-Terror Police Unit on terrorism and terrorism financing cases – Part debrief of Case set;
14. The Role of Prosecutors in terrorism and terrorism financing cases - Part debrief of Case set;
15. The Role of the court in terrorism and terrorism financ-

### TRAINING DELIVERY

The Forum was a three and half -day physical training in Mombasa, Kenya and included participation from the Judiciary, ODPP, ATPU, JCTAC and ARA, facilitated by National Experts. The Forum deployed Scenario based case study, structured presentations, Q&A sessions and discussions as well as an open plenary session and a mock trial. The workshop, to the extent possible, facilitated and supported informal inter-experts networking among interested participants. The forum deployed and encouraged open but also critical discussions facilitating mutual learning while observing Chatham House rules of engagement.

## Post-training evaluation and feedback



#### Experts who facilitated the sessions:

- Hon Justice Luka Kimaru, Kenya Judiciary
- Hon Justice James Wakiaga, Kenya Judiciary
- Hon Justice, Grace Ngenye, Kenya Judiciary
- Doctor Rosalind Nyawira, National Counter Terrorism Center (NCTC)
- Shem Gowi, Financial Reporting Center (FRC)
- Nicholas Kimanthi, Anti-Terror Police Unit (ATPU)
- Jennifer Gitiru, Asset Recovery Agency (ARA)
- Eddie Kadebe, Office of the Director of Public Prosecutions (ODPP)
- Allan Karisa, National Counter Terrorism Center (NCTC)

SNAPSHOTS: The National Forum Training at Vipingo Ridge Golf Resort Resort, Mombasa



Participants at the national forum training held at Vipingo Ridge Golf Resort, Mombasa, Kenya.



Participants at the training seminar.



Col. Alice Mate, director Asset Recovery Agency, Jody Young, CT Legal Advisor USDOJ-OPDAT and Frédéric Bayard, AML-THB Project Director, keenly following the proceedings.



Participants learning with all Covid-19 protocols observed.



Participants listen keenly to the the three judge bench at the 'moot court'.





The greyscale shot of the trees in the african savanna plains during sunset | Photo Courtesy | Freepix



**CONTACTS**

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The AML-THB PROJECT welcomes authors who would like to feature their articles in the newsletter in the relevant fields of AML-CFT/THB to write to [info@aml-thb.eu](mailto:info@aml-thb.eu)

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