



# 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



30 odd months, the team has delivered no less than a hundred activities, all without ever giving in to ease while respecting our trademark; adaptability, attention to detail and unwavering commitment.

A quick calculation makes it .an average of a little more than 3 activities per month... with each activity taking about 5 weeks to complete.

I deliberately pointed out in our last newsletter, issue N°13, that we favoured a one-to-one approach at the national level, with a more constrained staff except with the FRC of Kenya, which I'll come back to later below. With a larger number of participants, countries, and institutions we kept the link virtual.

We also did not neglect our Gold certified experts and Trainers in Financial Investigations, all hard trained by Adan, Henri, Steeve, Amr, Oxana, Muluken, Neil, Alan, Tim, Terry, Yoon, Martens, Simon, Mathew, Esmeralda, Kamlesh, Guillermo, Lukas, Professors Passas, Phineas, Jonyo; Judges Kossy Bor, Jacinta Oduor, Kimaru, and so many others who will spotlight on this final conference day. May they all be thanked for their loyalty, pugnacity, commitment, and especially their kindness that allowed many to make enriched progress in their respective fields.

I cannot ignore two major events that also crowned the end of our project's journey. First of all, I would like to mention the monumental training program set up by the FRC of Kenya for the benefit of all compliance officers and MLROs of Kenya which reached more than 3,000 people throughout Kenya!

A special insert will be dedicated to this colossal effort both during the final conference and, above all, towards the conference of the Heads of FIUs. On the latter, I must bow to the colossal initiative launched by the CEO of the RCF of Kenya, Mr. Maika Saitoti, which was masterfully led on the ground by Director Shem Gowi with whom we travelled to the major Kenyan cities together!

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### In This Issue



**FIU HEADS MEETING**  
The importance of detecting and disrupting Illicit Financial Flows generated by criminals and their networks through effective financial intelligence and analysis.



**YEMEN TRAINING**  
Training of 50 Yemenis from the Financial Intelligence Unit, Central Bank of Yemen, the judiciary, law enforcement agencies, Customs Authority and other regulatory bodies.



Je le soulignais à dessein dans notre dernière livrée N°13, nous avons privilégié une approche en one-to-one au niveau national, avec des effectifs plus contraints (sauf avec la FRC du Kenya mais j'y reviens plus bas) pour garder le lien en virtuel - donc avec un nombre plus important - de participants ; de pays ; et d'institutions.

Nous ne négligeons pas non plus nos Gold certified experts et nos Formateurs en Investigations financières, durement formés par Adan, Henri, Steeve, Amr, Oxana, Muluken, Neil, Alan, Tim, Terry, Yoon, Marteens, Simon, Matheew, Esmeralda, Kamlesh, Guillermo, Lukas, les Professeurs Passas, Phineas, Jonyo; Mesdames et Messieurs les Juges Kossy Bor, Jacinta Oduor, Kimaru, et tant d'autres qui seront à l'honneur en cette journée de conférence finale.

Qu'ils soient tous remerciés pour leur loyauté, leur pugnacité, pour leur engagement, et surtout leur gentillesse qui a permis à beaucoup, de faire des progrès enrichissants dans leurs domaines respectifs.

Je ne saurais passer sous silence deux événements majeurs qui ont également couronné la fin de parcours de notre projet.

Tout d'abord je voudrais citer le monumental programme de formation mis en place par la FRC du Kenya au profit de tous les Compliance Officers et MLRO du Kenya qui a touché plus de 3.000 personnes sur tout le Kenya !!!! Un encart spécial sera consacré à cet effort colossal lors de la conférence finale mais aussi et surtout à la conférence des Heads of FIUs, et là, je dois m'incliner devant cette initiative colossale lancé par le DG de la FRC du Kenya, M Maika Saitoti et emmenée de main de maître sur le terrain par le directeur Shem Gowi avec qui nous avons parcouru toutes les grandes villes du Kenya !

Enfin, il faut citer cette colossale initiative également, du DPP Noordin Haji, de rassembler toutes les institutions en charge de la lutte AML CFT au Kenya de manière à établir des Guidelines Inter Agences grâce à une Task Force des représentants de chaque institution qui s'est rassemblée régulièrement depuis plus de 4 mois.

Cela a débouché sur un travail remarquable qui là aussi, sera dévoilé lors de la conférence finale.

Un beau feu d'artifice en perspective, réussi et apprécié grâce à votre engagement à vous tous qui avez cru en notre équipe, en leur foi et en leur engagement à votre service !

Finally, I must mention another colossal initiative involving the DPP Noordin Haji, who brought together all the institutions in charge of the AML CFT fight in Kenya to establish Inter-Agency Guidelines thanks to a Task Force of representatives within each institution that met regularly over 4 months. This initiative resulted in momentous work that will be unveiled at the final conference.

This was a stunning firework display in perspective, all successful and well-appreciated with thanks to all of you who believed in our team through your commitment to their faith and devotion to your service!

**Nous y voilà !**

Voilà notre conférence finale ainsi que les conférences des Heads of FIU et Heads of Immigration comme annoncées depuis quelques mois.

Nous sommes donc dans la dernière ligne droite, celle qui va mener à la fin de la durée de vie de ce projet et annoncer la suite...on y reviendra lors de ces rassemblements du 25 au 27 avril.

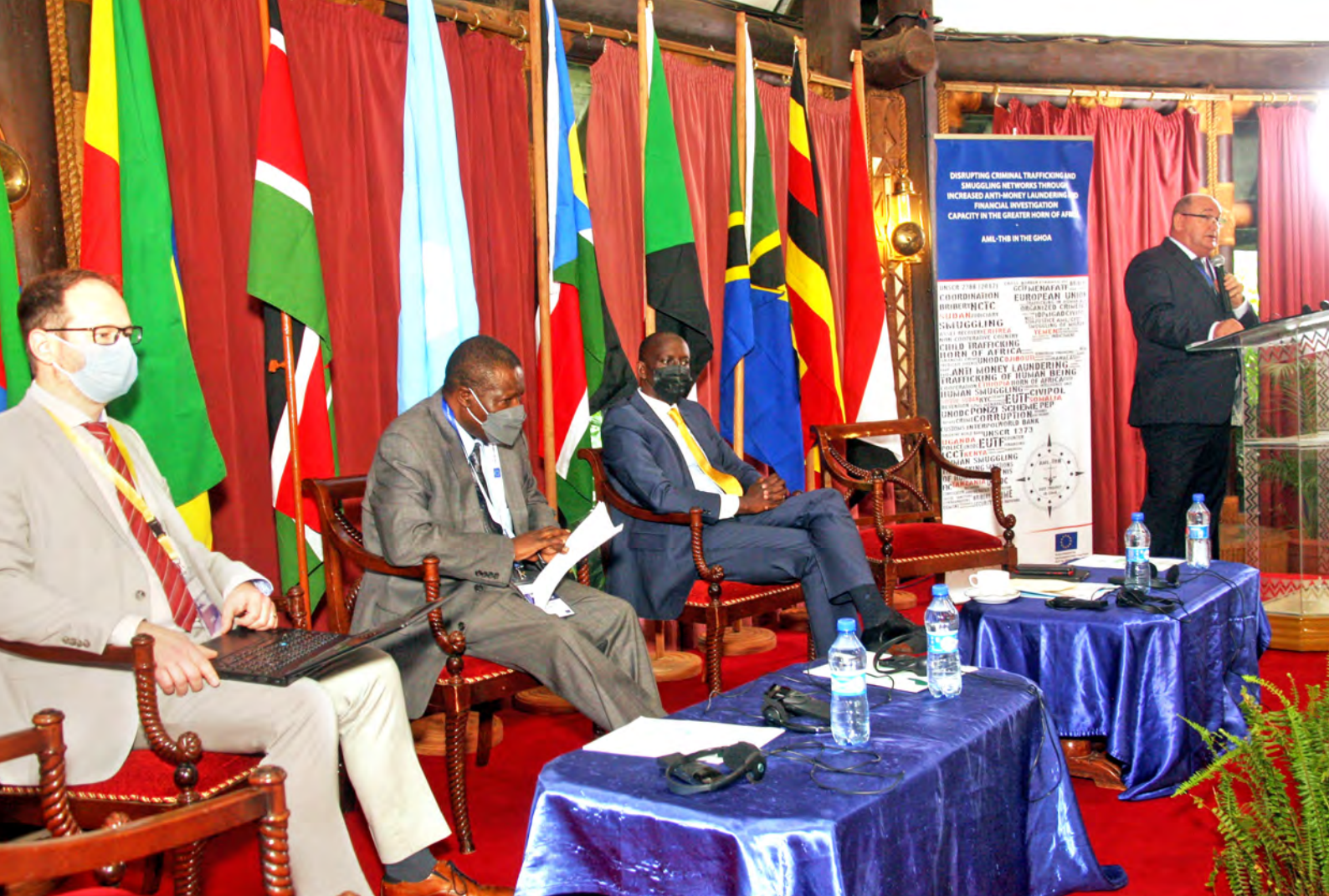
Au sommaire de cette édition N°14, encore un menu de choix avec des articles de qualité relatant nos dernières activités dont le nombre a considérablement augmenté au cours de ces derniers mois.

C'est une statistique sur laquelle on reviendra, mais en l'espace de quelques 30 mois, l'équipe a délivré pas moins d'une centaine d'activités, le tout sans jamais céder à la facilité, et en respectant notre marque de fabrique ; adaptabilité, souci du détail et engagement sans faille !

Un rapide calcul nous indique que cela fait une moyenne d'un peu plus de 3 activités par mois...sachant que chaque activité fait 5 semaines....



Frédéric Bayard, Project Director



Project Director, Frédéric Bayard, addressing the Heads of Immigration Services of the Greater Horn and Southern African Countries.

## Synopsis:

### MEETING OF THE HEADS OF IMMIGRATION SERVICES OF THE GREATER HORN AND SOUTHERN AFRICAN (GHaSA) COUNTRIES

29 – 30 November 2021, Nairobi, KENYA | **First Meeting** |

**Alma Wanyama**

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

The Heads of Immigration Services of the Greater Horn and Southern African Countries meeting was designed for heads of immigration Services who are key players in the fight against human trafficking and smuggling of immigrants. The forum provided a platform for the heads to exchange on ways to disrupt criminal trafficking and smuggling networks.

#### INTRODUCTION

The fight against money laundering, terrorism financing, human trafficking and migrant smuggling, and other related crimes requires effective cooperation and coordination including information exchange, experience sharing, joint planning and operations, mutual legal assistance, and other forms. The criminal threats are inherently cross-border that necessitate a regional approach that in return needs regional mutual understanding among all stakeholders.

The Heads of Immigration Services of the Greater Horn and Southern African Countries meeting was designed for heads of immigration Services who are key players in the fight against human trafficking and smuggling of immigrants. The forum provided a platform for the heads to exchange on ways to disrupt criminal trafficking and smuggling networks through increased Anti Money Laundering and financial investigation capacity in the

Greater Horn of Africa as well as interact with the project on what has been done and discuss how to further this cooperation to attain the desired results. The meeting was attended by heads of immigration including the heads of delegation from; The Union of Comoros, Republic of Kenya, Republic of Madagascar, Republic of Malawi, Republic of Mauritius, Republic of Seychelles, Republic of South Sudan, Republic of Sudan, Federal Republic of Somalia, United Republic of Tanzania, Republic of Uganda and Republic of Yemen. Mozambique was absent with apologies.

#### OBJECTIVES AND ORGANISATION

The overall objective of the meeting was to facilitate regional cooperation and coordination, strengthen experience sharing, promote mutual understanding of FATF effectiveness standards and the limitations as well as ML/FT risks and challenges in the region. The meeting provided a platform to reflect on the achievements of the Project and discuss future areas of technical support.



Participants listen to an online speaker during the high level session.

During the meeting, the HoIMs were expected to:

- Discuss selected thematic areas about Effective Border Security and Counter TOC/CT, Role of Immigration in TOC/CT and Informal migration and Opportunistic criminals and Corruption;
- Deliberate on joint sessions with the Heads of Immigration Departments on areas of common interest to address TOC, terrorism, ML/FT and related crimes: responses, challenges and the way forward to address the threats;
- Discuss and outline a way forward on priority capacity-building support areas the region needs to strengthen national AML/CFT/NPF systems, deter TOC and illicit financial flows; and
- Share or sign a memorandum of understanding or have bilateral discussions among the HoIMs.

## DELIBERATIONS

The Heads of Immigration Services Meeting was officially opened by the Project Director, Mr. Frederic Bayard, who thanked all the Heads of immigration present for attending the meeting. He explained to them what the project had been able to do and what the project plans to undertake in the future. The Director acknowledged that the pandemic limited the project from having heads of immigration meetings sooner and was grateful that it was eventually happening. Mr. Frederic called Alma Wanyama, the Senior Technical Advisor with the project, to address the Members. Alma gave a brief of what the project had done and the pieces of training that have been delivered to immigration officers in the region as well as upcoming training. Alma urged the Members to engage freely in the meeting with each other and with the project team present in the room. Alma gave the floor back to Mr. Frederic who welcomed the Director-General of Immigration Services Kenya Mr. Alexander Imbenzi Muteshi to give his opening remarks.

Mr. Muteshi welcomed his colleagues and thanked them for responding positively to the invitation and attending the meeting. Mr. Muteshi highlighted the success he has experienced with the project, including having his officers trained as well as having a financial investigation training curriculum developed by his officers and the Project. He urged his colleagues to embrace the project because the benefits of such partnership are beneficial as he has experienced firsthand. He explained to them how his officers have benefitted from the project and the positive impact it had made on his office in terms of service delivery. He declared the meeting officially open. The Members proceeded to engage the project team the outcomes of which are annexed hereto.

On the second day of the meeting, the Heads of Immigration were exposed to presentations by Leonard Onyonyi, a peace

and security expert from East Africa Community (EAC), on the Human Trafficking threat in the EAC Region and the Interventions done by EAC to mitigate the vice.

Mr. Steve Ferrer, who is an AML-THB Expert, did a presentation on alternative sources of human trafficking/SoM Information, The Financing of Human Trafficking/Smuggling of Migrants, and Identifying Human Trafficking/Smuggling of Migrants networks from financial investigations. Both presentations were well received with the members making positive comments on the same. The Members acknowledged that they were not very aware of the link between finances and human trafficking nor did they comprehend the power of financial investigations. They appreciated the speakers and the project for bringing this to their attention and saw the importance of such training being rolled out to their officers.

## OUTCOMES OF THE MEETING:

Members were able to come out with meeting outcomes and a way forward and adopted the outcomes by signing the declaration binding the Project to undertake the programs. This document is annexed.

Bilateral talks were held between different countries and members appreciated it since they were able to iron out any outstanding issues between their respective countries.

The meeting was highly successful and the heads of immigration agreed to have bi-annual meetings with the follow-up meeting in Kenya during the closing of the project and the next meeting after that in Seychelles. Additionally, the heads of immigration requested for the projects to evaluate its activities within the GHoA to extend its stay since the onset of the global pandemic had disrupted some pieces of training that had been previously organized.

## SUMMARY

The meeting brought together global, regional and national agencies as well as development partners and other capacity-building projects operating in the region. Joint meetings between FIUs and Immigration services have opened an opportunity to establish formal and informal collaborations in the AML/CFT area to strengthen sharing of information and joint efforts in countering Illicit Financial Flows and criminal threats, bringing perpetrators to justice through effective investigation. The meeting recommended the establishment of FIU – Immigration cooperation and promoting/supporting it in regional and global domains. This was endorsed during the joint meeting of the heads of FIUs and heads of Immigration Services as exhibited in the respective statements. The meeting also encouraged all partners to ensure complementarity among projects. The next HoFIUs meeting is scheduled for 25<sup>th</sup> – 26<sup>th</sup> April 2022 in Nairobi, Kenya.



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## Synopsis:

### MEETING OF THE HEADS OF FIUs OF THE GREATER HORN AND SOUTHERN AFRICAN (GHaSA) COUNTRIES

29 – 30 November 2021, Nairobi, KENYA | [Second Meeting](#) |

*Tuemay Aregawi*

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

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One of the objectives of the EU-funded AML/THB Greater Horn of Africa (GHOA) Project is to improve cross-border cooperation in order to enhance information and experience sharing on financial investigations and strengthen mutual understanding of threats and responses among Financial Intelligence Units.

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#### INTRODUCTION

Effective cooperation and coordination at the national and international levels are essential to effectively counter-terrorism and transnational organised crimes (TOC). The FATF, in its Recommendation 40 and Immediate Outcome 2, encourages Financial Intelligence Units (FIUs) to cooperate and coordinate their response.

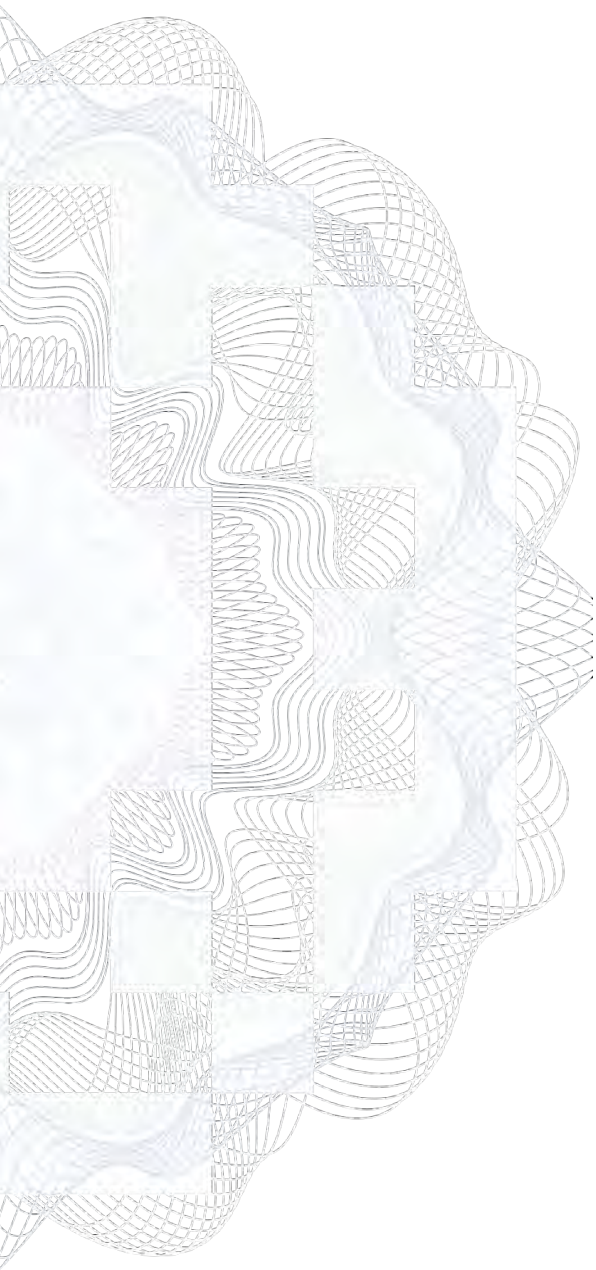
One of the objectives of the EU-funded AML/THB Greater Horn of Africa (GHOA) Project<sup>1</sup> is to improve cross-border cooperation to enhance information and experience sharing on financial investigations and strengthen mutual understanding of threats and responses among FIUs. The AML/THB Project in collaboration with the host FIU, the Financial Reporting Centre (FRC) of Kenya, facilitated a “Meeting of the Heads of FIUs of the GHaSA region” on 29<sup>th</sup> – 30<sup>th</sup> November 2021 in Nairobi, Kenya on a hybrid platform. The meeting was held in parallel with the Meeting of Heads of Immigration Services with joint opening and closing sessions.

#### OBJECTIVES AND ORGANISATION

1. European Union 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 to as “AML/THB Project”) that went operational in July 2019

The meeting aimed at reinforcing regional cooperation and coordination among FIUs of the region. The meeting also facilitated the first joint meeting between the heads of FIUs and Heads of Immigration Services of the region to enhance cooperation in fighting TOC. The meeting was anticipated to enhance shared understanding of existing and emerging criminal threats and the importance of detecting and disrupting Illicit Financial Flows generated by criminals and their networks through effective financial intelligence and analysis. The Heads of the FIUs were also expected to jointly agree on and issue a statement of the outcome of the meeting.

The meeting was designed, 1) to bring global and regional actors to share their initiatives and good practices, 2) to share perspectives on existing, evolving and emerging transnational criminal challenges to strengthen shared understanding to better foster cooperation and coordination on tackling Illicit Financial Flows generated from criminal activities, and 3) to facilitate both global and regional organisations to share their perspectives on the importance of effective AML/CFT measures and effective financial investigation and asset confiscation mechanisms.



## DELIBERATIONS

The meeting was opened with keynote speeches and remarks from Mr. Sebastian Sperber on behalf of the Deputy CEO of CIVIPOL; H.E. Ambassador Henriette Geiger, EU Head of Delegation to Kenya; Mr. Saitoti Maika, Director General of Kenya FRC and Mr. Alexander Muteshi, Director General of Kenya Immigration Department who officially opened the meeting on behalf of the Government of Kenya. Ms. Any Correia-Freitas, European Commission representative; Mr. Thibault Van Damme, EU INTPA representative and Mr. Frédéric Bayard, Project Director conveyed their remarks about the relevance and accomplishments of the Project.

From the global aspect, INTERPOL HQs<sup>2</sup> shared their initiatives, good practices and perspectives on the effective application of AML/CFT measures and financial investigation to counter criminal threats including Interpol's:

- Initiatives on counter-terrorist financing (CTF):
- Financial crime initiatives: FIU Connectivity, Financial Criminal Analysis File, Stop Payment Mechanisms, and I Check-It for the financial services that allow access to countries and institutions to access Interpol's data intended to support the effective collection of financial intelligence for investigations to enhance countries' ability in combating financial crimes; and
- The different Interpol notices and databases, and work on specific typologies

The Egmont Group<sup>3</sup> addressed the meeting by sharing the necessity of effective cooperation and coordination in line with existing international tools including the UN Conventions against TOC and Corruption, FATF standards, and the Egmont Group's platform. As Director of South African Financial Intelligence Centre, Adv. Khanyile shared national good practices on public-private partnerships and multi-agency approaches being implemented.

Practical experiences and initiatives from the United States<sup>4</sup> were also shared in the meeting covering domestic and international cooperation focusing on criminal prosecution, asset recovery

and repatriation of stolen assets that can benefit the countries of the region including the Kleptocracy initiative, and the FBI International Corruption Unit and other investigative resources. The EU's Global Facility on AML/CFT<sup>5</sup> also shared the project's key features, working modalities, the scope of engagements and achievements, and results among other points.

From regional perspectives, Eastern and Southern Africa AML Group (ESAAMLG)<sup>6</sup> and Interpol's East Africa Regional Bureau<sup>7</sup> shared their insights about the AML/CFT state of play and emerging threats in the region respectively. ESAAMLG briefed about criminal threats, state of play of FATF compliance, challenges in implementing FATF standards and the role of ESAAMLG in the region. Interpol regional bureau also presented on regional crime threat, Interpol's regional and international capabilities and initiatives, and EAPCCO's activities in tackling cross-border crimes. In a separate session, ESAAMLG presented important highlights on the role of emerging technologies as enablers and associated risks in the fight against money laundering, terrorist financing, and other crimes covering mobile/internet money, virtual assets, and any of their applications. The AML/CFT Project<sup>8</sup> also shared presentations on cooperation and coordination, public-private partnership initiatives and multiagency approach including suggestions on forging FIU-Immigration cooperation supported by indicative areas and guiding points similar to Customs-FIU cooperation jointly initiated by Egmont Group and World Customs Organisation (WCO).

## OUTCOMES OF THE MEETING:

After two days of deliberations, the meeting delivered the following outcomes:

1. Issued meeting outcome statement on the common understanding of criminal threats, addressing emerging technologies, establishing cooperation between FIU and Immigration departments, the importance of an effective multiagency approach, and continuity of capacity-building support by the EU AML/THB Project and other partners;
2. Global and regional initiatives, good practices and experiences were shared and discussed;

2. Mr. Hyung Keun YOON and Mr. Ian Pemberton from the INTERPOL HQs

3. Adv Xolisile Khanyile, Egmont Group Vice-Chair and Director FIC SA and

4. Jody Young, Resident Legal Advisor, USDOJ, Nairobi

5. David Hotte, Team Leader, Global Facility

6. Muluken Y Dubale, Senior Legal Expert, ESAAMLG

7. Sosthenes Makuri, Interpol-EAC

8. Tuemay Aregawi, Senior Technical Advisor

3. Agreed on the importance of financial intelligence, financial investigation, and asset recovery in tackling TOC and illicit financial flows;
4. Facilitated bilateral and peer-to-peer meetings among FIUs, between FIUs and Immigration services and with partners;
5. Two FIUs shared a draft Memorandum of Understandings for their respective review to sign during the next meeting.

perpetrators to justice through effective investigation. The meeting recommended the establishment of FIU – Immigration cooperation and promoted/supported its presence in regional and global domains. This was endorsed during the joint meeting of the heads of FIUs and heads of Immigration Services as exhibited in the respective statements. The meeting also encouraged all partners to ensure complementarity among projects. The next HoFIUs meeting is scheduled for 25<sup>th</sup> – 26<sup>th</sup> April 2022 in Nairobi, Kenya.

## SUMMARY

The meeting has brought together global, regional and national agencies as well as development partners and other capacity-building projects operating in the region. Joint meetings between FIUs and Immigration services have opened an opportunity to establish formal and informal collaborations in the AML/CFT area to strengthen sharing of information and joint efforts in countering Illicit Financial Flows and criminal threats, bringing



Alexander Muteshi



Sebastian Sperber



DPP Representative



Saitoti Ole Maika



Tuemay Aregawi



AML-THB Senior Technical Advisor, Alma Wanyama, is all ears.



Photo Courtesy | Freepix

## Synopsis:

### MEETING OF THE HEADS OF FIUS OF THE GREATER HORN AND SOUTHERN AFRICAN (GHaSA) COUNTRIES

01 - 02 December 2021, Nairobi, KENYA

*Tuemay Aregawi*

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

The Conference aimed at facilitating experiences sharing among the various global and regional inter-governmental organisations, national FIUs and Immigration Services on initiatives and good practices, and to promote cooperation against transnational criminal threats and illicit financial flows.

#### PROJECT OBJECTIVE 3

##### ...OF AML/THB

THB Project aims to improve coordination between national agencies, cross-border cooperation and inclusion of national agencies in international networks and best practices. This objective further thrives to:

- Support countries to benefit from the membership of their financial intelligence units (FIUs) in regional and international platforms
- Enhance information sharing between FIUs and other relevant agencies
- Strengthen mutual learning from experiences and good practices within the region, and
- Facilitate harmonization of policies and legislations, and standardization of information exchange systems

#### INTRODUCTION

The fight against money laundering (ML), financing of terrorism (FT), trafficking of human beings (THB) and smuggling of migrants (SoM), and other transnational organised crimes requires effective cooperation and coordination including information exchange, experience sharing, joint planning and operations, mutual legal assistance and other methods. The criminal threats are inherently cross-border and multi-actor requiring a regional approach that in return needs regional mutual understanding among all stakeholders.

Specifically, objective 3 of the EU-funded AML/THB Project<sup>1</sup> aims to improve coordination between national agencies, cross-border cooperation and inclusion of national agencies in international networks and best practices. This objective further thrives to:

- Support countries to benefit from the membership of their financial intelligence units (FIUs) in regional and international platforms
- Enhance information sharing between FIUs and other relevant agencies

- Strengthen mutual learning from experiences and good practices within the region, and
- Facilitate harmonization of policies and legislations, and standardization of information exchange systems

The AML-THB project organized “a Conference of Intergovernmental Organisations and National Authorities” held on 1<sup>st</sup> – 2<sup>nd</sup> December 2021 in Nairobi, Kenya on a hybrid platform. The conference<sup>2</sup> brought together relevant regional and international intergovernmental organisations, Financial Intelligence Units, Immigration and border security agencies and other actors involved in the region.

#### OBJECTIVES AND ORGANISATION

The Conference aimed at facilitating experiences sharing among the various global and regional inter-governmental organisations, national FIUs and Immigration Services on initiatives and good practices, and to promote cooperation against transnational criminal threats and illicit financial flows. The Confer-

1. European Union 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 to as “AML/THB Project”) that went operational in July 2019

2. The Conference was preceded by parallel meetings of Heads of FIUs and Heads of Immigration Services in which some intergovernmental bodies attended.



The AML/THB Project Team and management presented the goals, activities, accomplishments and success stories in the implementation of the project, which included; benefits, info sharing, mutual learning and harmonized policies & legislation.



ence provided an opportunity for participants to exchange views on bilateral and multilateral interests among the delegations on how to better use and get access to existing initiatives, services and platforms. Interpol HQs, Egmont Centre of FIU Excellence and Leadership (ECOFEL), African Union's African Centre for the Study and Research on Terrorism (ACSRT/CAERT), Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG), Inter-Governmental Authority on Development (IGAD), Interpol East Africa Regional Bureau, Asset Recovery Interagency Network – Eastern Africa (ARIN-EA), national delegations from FIUs and Immigration Services, representatives of the European Commission and other EU-funded Projects attended and contributed at the Conference.

### DELIBERATIONS

The meeting was opened with opening remarks from Mr. Noordin Haj, Director of the Directorate of Public Prosecutions (DPP) of Kenya, delivered by his representative Madam Jacinta Nyambosi, Acting Deputy Director of the Department of Offences Against the Person (OAP). The deputy CEO of CIVIPOL rendered his opening remark via Mr. Sebastian Sperber, Head of Security Sector Reform and Migration with CIVIPOL.

### STATE OF AFFAIRS OF THE PROJECT:

The AML/THB Project Team and management presented the goals, activities, accomplishments and success stories in the implementation of the project. The presentation covers the following points about the Project:

- Support countries to benefit from the membership of their financial intelligence units (FIUs) in regional and international platforms

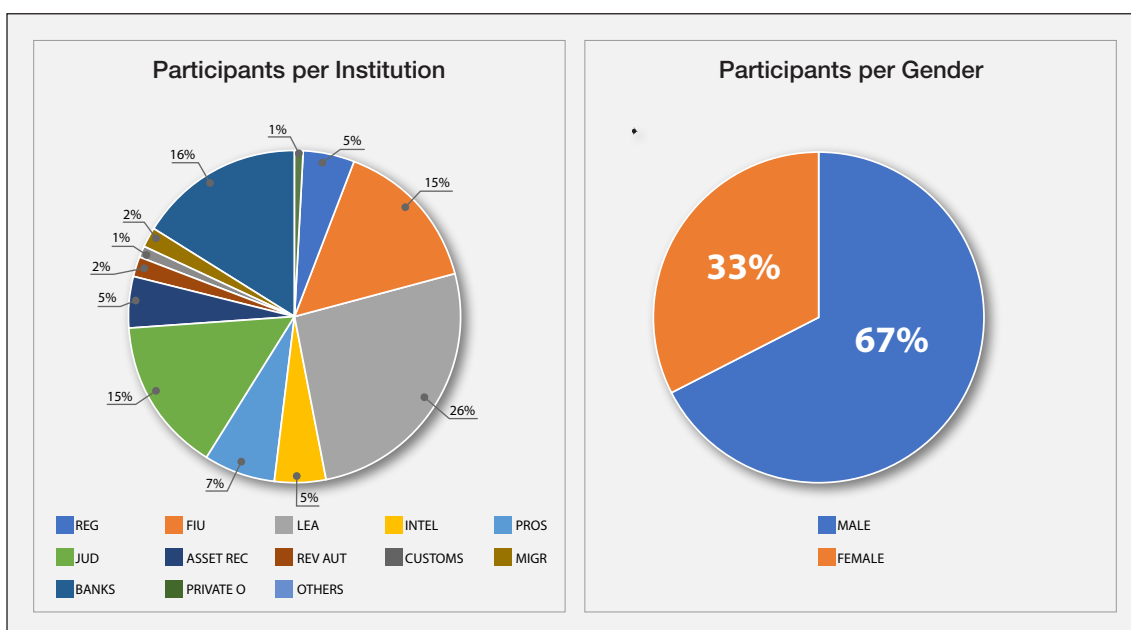
- Enhance information sharing between FIUs and other relevant agencies
- Strengthen mutual learning from experiences and good practices within the region, and
- Facilitate harmonization of policies and legislations, and standardization of information exchange systems
- Challenges and the way forward

European Commission's International Partnership for Africa (INTPA) representative, Mr. Thibault Van Damme and European Commission representative, Ms. Any Correia-Freitas, shared their perspectives about the goal of the project in supporting capacity-building efforts of the region, achievements made so far, and potential future engagements in the areas of fighting transnational organised crime (TOC), illicit financial flows (IFFs), corruption, terrorism and other criminal threats.

### EMERGING THREATS, RESPONSES AND CHALLENGES/GAPS:

From a global perspective, representing Interpol HQs, Mr. Hyung Keun YOON, a Criminal Intelligence Officer with the Financial Crime Unit, spoke on regional THB/SoM trends and Interpol's response including Interpol's strategies and action streams, terrorism-THB/SoM links, Regional THB/SoM trends, 'Interpol's tools and initiatives.

From the African context, Cybercrime expert, Mr. Ameer DAHMANI of the African Centre for Studies and Research on Terrorism (ACSRT), discussed ACSRT's role and efforts in countering terrorism and violent extremism, the context in Africa and active terrorist actors, African counter-terrorism instruments, regional and international initiatives in Africa, and challenges in fighting terrorism and violent extremism in Africa.



Commander Abebe Muluneh, Director of IGAD Security Sector Programme (ISSP), discussed the context in the IGAD region including ISSP's mandate and functions, details of emerging, evolving and existing transnational security threats in the IGAD region that include terrorism, violent extremism, organised crime and maritime piracy. Abebe also discussed ISSP's responses, challenges faced and the way forward in addressing these criminal threats.

### ROLE OF EFFECTIVE AML/CFT MEASURES AND FINANCIAL INTELLIGENCE/INVESTIGATION TO ADDRESS TOC

Ms. Silvina Rivarola, Egmont Centre of FIU Excellence and Leadership (ECOFEL) Programme Manager, delivered her presentation covering ECOFEL and its eLearning platforms, FIU and law enforcement cooperation, how to effectively detect and counter money laundering, countering terrorism financing, financial flows of online child sexual exploitation, FIU communication strategy and ECOFEL's initiatives in capacity building assistance and support.

ESAAMLG Secretariat's law enforcement expert, Christopher Likomwa, spoke about ESAAMLG's second round of mutual evaluation of member countries of which the outcome ineffectiveness is still low while technical compliance was found to be largely compliant concerning law enforcement and investigative authorities. He also outlined some recommendations about the role of law enforcement and investigation authorities to address emerging TOCs through the use of effective AML/CFT measures and financial investigation.

Lilian W Kafiti, President of ARIN-EA, also discussed the extent and impacts of TOCs and the effective use of FIUs, financial investigation and asset recovery agencies in addressing criminal threats. Lilian stressed the effective use of financial intelligence and investigation on its worth towards effective confiscation of illicit proceeds of criminals. She also pressed on the significance of cooperation and coordination at national, regional and international dimensions to address TOC.

Munira Ali, General Secretary of ARIN-EA, who signed the Memorandum of Understanding (MoU) with Frédéric Bayard, Director of the AML/THB Project, spoke about the achievements of ARIN-EA in confiscating assets, while she

also stressed more should be done given the extent of TOC and corruption and their proceeds. Munira also stressed the importance of financial investigation, asset confiscation and cooperation, and information sharing in the fight against corruption and TOC that generate a huge amount of illicit financial flows (IFFs) from the region. Both Mrs. Ali and Mr. Bayard expressed their agreement and looked forward to working closely in fighting TOCs, corruption and IFFs in the region.

### SUMMARY AND CLOSING

Tuemay Aregawi highlighted the summary of the two days conference stressing the importance of effective AML/CFT measures, financial investigations and asset confiscation as well as strengthening cooperation and coordination in addressing the evolving and emerging criminal threats. Finally, Mr. Bayard and Mr. Sperber closed the conference appreciating the participants, speakers, organisers and donor for realising the success of the event.

### OUTCOMES OF THE MEETING:

After two days of deliberations, the meeting delivered the following outcomes:

1. Global and regional initiatives, good practices and experiences had been shared and discussed;
2. Importance of financial measures including financial intelligence, financial investigation and asset recovery had been taken on;
3. Bilateral and peer-to-peer meetings were facilitated among FIUs, between FIUs and Immigration services and with partners;
4. MoU between the AML/THB Project and ARIN-EA signed

The Project will convene a final conference on 27<sup>th</sup> April 2022 in Nairobi, Kenya in a hybrid format.

*The meeting was generously funded by the EU under its EUTF framework, now referred to as EU INTPA implemented by the AML-THB Project of the CIVIPOL.*



Scenic working break at the high level training.



Photo Courtesy | Freepix

## Synopsis:

### REGIONAL TRAINING WORKSHOP ON CRYPTOCURRENCY, CRIMINAL FINANCING AND ANTI-MONEY LAUNDERING MEASURES: **ADVANCED COURSE**

06 – 10 December 2021, Online

*Tuemay Aregawi*

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

**INTRODUCTION TO THE DARKNET:** This session introduced the basics of how the internet worked and the different layers of web structures – surface web, deep web and dark web. Why and how the darknet is abused for criminal purposes and safer techniques of surfing the dark web for law enforcement were discussed.

#### BACKGROUND

The Greater Horn and Southern Africa (GHaSA) region is beset with complex and multiple transnational criminal threats including terrorism and serious organized crimes. The growing nexus between terrorism and transnational organized crime (TOC) and the use of emerging technologies have complicated security challenges. The different forms of TOC in the region are generating a significant amount of proceeds to be laundered and enter the legitimate economy and/or possibly used to finance other crimes. Addressing criminal assets through effective anti-money laundering (AML) measures, financial investigation and asset confiscation are essential in the fight against crime and criminality.

In this regard, 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)<sup>1</sup>. The project aims to strengthen national anti-money laundering and counter illicit financial flows capacity, increase understanding of the THB/SoM criminal networks and their illicit financial flows; and enhance coordination of agencies.

The FATF reported that virtual assets have been misused by criminals<sup>2</sup> while relevant authorities and the private sector lack the necessary knowledge on how cryptocurrencies operate and the skills of detecting, disrupting, tracing, analysing, investigating suspicious transactions and confiscating illicit assets.

The Project successfully carried out a foundational regional training on “Cryptocurrencies and Anti-Money Laundering Measures” that focused on the basic un-

derstanding of cryptocurrency, relevant international frameworks, basic bitcoin operations, THB/SoM and cryptocurrency risks held on the 20<sup>th</sup> – 24<sup>th</sup> September 2021 virtually. To equip trainees with more technical knowledge and skills on cryptocurrency operations, the project implemented an advanced course titled “Cryptocurrency, Criminal Financing and Anti-Money Laundering Measures” for those who attended the foundational training held on 06<sup>th</sup> – 10<sup>th</sup> December 2021.

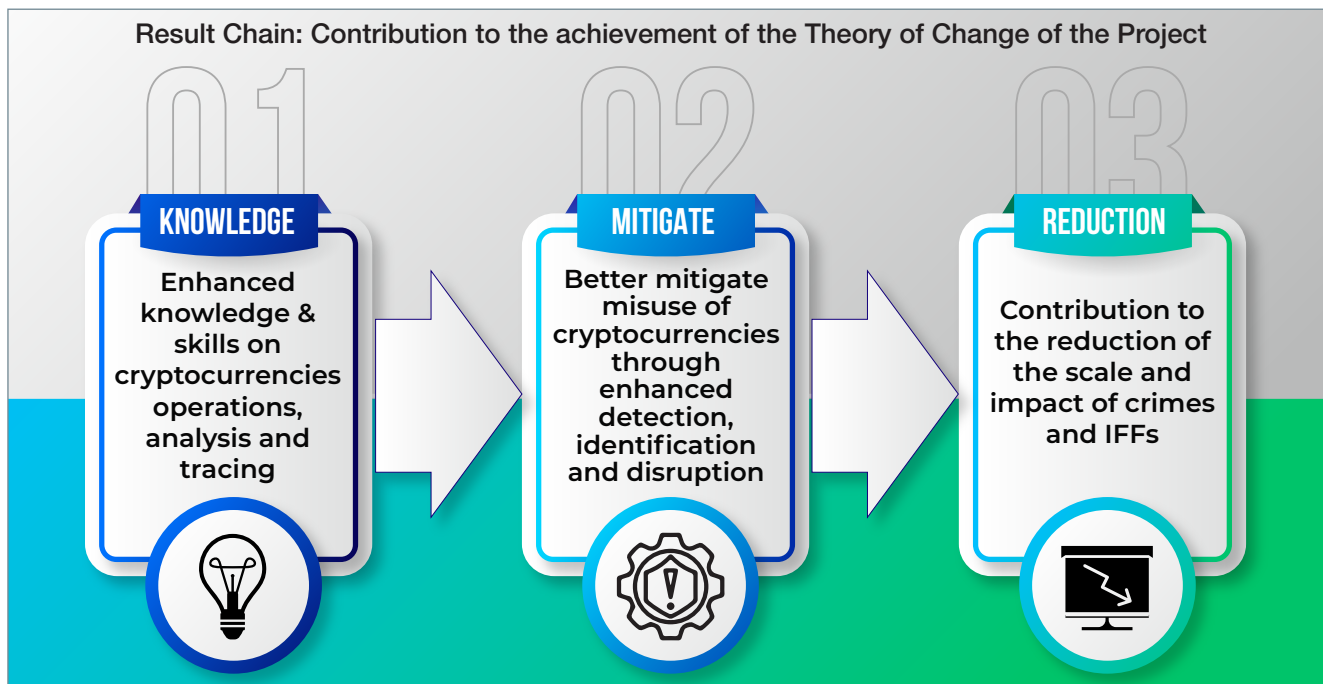
#### OBJECTIVES AND RESULTS OF THE TRAINING

The overall objective of the training was to reinforce the knowledge and skills of LEAs, FIUs and regulatory bodies about cryptocurrency and the risks of ML/TF to better detect, analyse and investigate suspicious transactions and other illicit activities related to virtual assets.

1. For further reference: [https://ec.europa.eu/trustfundforafrica/sites/default/files/105\\_euf-hoa-reg-62-disrupting\\_trafficking\\_networks\\_i6efiqv.pdf](https://ec.europa.eu/trustfundforafrica/sites/default/files/105_euf-hoa-reg-62-disrupting_trafficking_networks_i6efiqv.pdf)

2. FATF (2020), Money Laundering and Terrorist Financing Red Flag Indicators Associated with Virtual Assets, [www.fatf-gafi.org/publications/fatfrecommendations/documents/Virtual-Assets-Red-Flag-Indicators.html](http://www.fatf-gafi.org/publications/fatfrecommendations/documents/Virtual-Assets-Red-Flag-Indicators.html)

## Result Chain: Contribution to the achievement of the Theory of Change of the Project



### DELIBERATION OF THE TRAINING

The training was facilitated virtually via Zoom Cloud Meeting. The training brought together 45 trainees (out of the 57 who participated in the foundational course) from 13 countries<sup>3</sup> drawn from FIUs, LEAs, prosecutors, asset recovery and intelligence analysts. Dr. Amr Rashid, Mr. Artem Semko and Mr. Muluken Yirga Dubale, who are senior experts in the field, facilitated and delivered the training. This training was much practice-oriented supported by live demonstrations, practical exercises whereby each trainee had operated cryptocurrency operations and darknet exploration.

### MAIN TOPICS COVERED DURING TRAINING:

The trainer revised key concepts, terms and operations of cryptocurrency supported by active discussions. Trainees were engaged in answering and/or asking questions on the main areas covered during the previous course.

#### Introduction to Darknet:

This session introduced the basics of how the internet worked and the different layers of web structures – surface web, deep web and dark web. Why and how the darknet is abused for criminal purposes and safer techniques of surfing the dark web for law enforcement were discussed. The trainer also went through live demonstrations on how to explore the darknet with the necessary safety. The session also covered the different criminal activities taking place on the darknet.

#### Tracing, freezing and Confiscation of Bitcoin:

During this training, emphasis was given to practical skills on how to trace, analyse, profile and freeze/confiscate illicit transactions of Bitcoins using live demonstrations, individual

exercises based on the personal Bitcoin free accounts given by Crystal Blockchain company (for training purposes), and group assignments. Each trainee was given a free account so that each participant would be able to exercise the operation, transaction and monitoring of movement of funds using Bitcoins. Mr. Artem Semko of Crystal Blockchains presented an overview of how Bitcoin operates supported by live demonstrations and case exercises.

Amr also discussed more analytical, tracing and disrupting tools to deal with suspicious or illicit Bitcoin transactions supported by live demonstrations, individual and group exercises. The exercises and demonstrations covered details of Bitcoin operations from creating own Wallet, transacting funds, controlling accounts, finding exchangers and ATMs and use of analytical/tracing software. Amr used his access accounts to demonstrate the cases. The demonstrations assisted trainees in better understanding the immensely technical training that is generally complex when covered on a virtual platform. The session, to a great extent, covered the profiling of Bitcoin transactions using available software.

#### FATF requirements and Standards on Virtual Assets

This session covered the standards and requirements of the FATF which is set out for virtual assets (VA) and virtual asset service providers (VASPs) in its recommendations, explanatory notes, methodology, guidelines and red flag indicators. The session, facilitated by Muluken Yirga, was instrumental in bringing all the requirements and standards on VA and VASPs in an integrated manner to the benefit of compliance supervisors, analysts and investigators.

As part of this session, an Interactive discussion was been carried out about what it takes to regulate or ban cryptocurrencies. Trainees

*During this training, emphasis was given to practical skills on how to trace, analyse, profile and freeze/confiscate illicit transactions of Bitcoins using live demonstrations, individual exercises based on the personal Bitcoin free accounts given by Crystal Blockchain company (for training purposes), and group assignments. Each trainee was given a free account so that each participant would be able to exercise the operation, transaction and monitoring of movement of funds using Bitcoins.*

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

identified actions or measures important for consideration by the relevant institutions (Supervisory authorities, LEAs, FIU, Banks, VASPS banks, judiciary):

- Legislation: required laws (new or amendments)
- Resources: systems and technology
- Skills and training
- Effectiveness tests

### POST-TRAINING EVALUATION: IMMEDIATE RESULTS ACHIEVED AND FEEDBACK

Formal feedback collected through a post-training survey revealed that the training was well rated as represented in the table below.

### LESSONS LEARNT

The Trainees are enthusiastic and interested in the subject although they felt that the subject matter was too technical and complex to cover via virtual training. It is observed that these trainees were found to be the most active in using their WhatsApp group to share experiences and resources related to cryptocurrency. In this training, it was observed that:

- The majority of trainees felt they now had an intermediate level of knowledge (63%) and advanced (7%) compared to 100% beginners before the training;
- Participants from different jurisdictions have a different level of understanding of the subject matter that perhaps reflect the discrepancies in access to digital awareness; and

- Time was limited to cover all the topics in-depth and facilitate practical discussions on a virtual platform.

### THE WAY FORWARD

Trainees and trainers suggested the following points as a way forward:

- Organise more training in a physical setting focusing on practical skills and techniques of tracing, analysis, investigation and confiscation of virtual assets;
- Train a pool of regional experts through training of trainers to build sustainable capacity;
- Organize a regional conference on virtual assets for senior officials and experts to sensitise about international standards, trends, risks and required measures to comply with international standards; and
- Establish a regional information sharing and learning platform so that participants and relevant officers can continuously develop their skills given the context is dynamic.

As the Project was winding to a close, this suggestion could be considered as a key capacity-building component in an upcoming project or phase as transnational organised criminals are likely to abuse emerging technologies to transact their illicit assets.

No	KRA	Value	Score	Result
1	No. of participants	57	45 (14 or 31.11% Female and 31 or 68.69% Male) – <b>78.95%</b>	>100%
2	Participants' feedback	75≥ High	Overall assessment: <b>100% ≥ High</b>	100%
			Relevance/importance: <b>100% Yes</b>	
			Objective achieved: <b>93.80% fully achieved</b>	
			Value addition in knowledge & skills: <b>93.80% Yes</b>	
			Quality of delivery/presentations: <b>96.90% ≥ High</b>	
			Approach/Method - interactivity: <b>83.90% ≥ 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 Summary	2	Produced and shared	100%
7	Informal network created	N/A	A functional WhatsApp group created	Done



Photo Courtesy | Freepix

## Synopsis:

### TRAINING FOR YEMEN COMPLIANCE OFFICERS AND FINANCIAL ANALYSTS

07 - 09 December 2021, Online

10 - 12 January 2022, Cairo, EGYPT

*Tuemay Aregawi*

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

the AML/THB Project in collaboration with the Egyptian Money Laundering and Terrorist Financing Combating Unit (EMLCU) organized a two-level training. Level 1 was a foundational course delivered online, while a more advanced level 2 was delivered in person on-site in Cairo, Egypt, inside the premises of the EMLCU.

#### BACKGROUND

The Financial Action Task Force (FATF) identified Yemen as the jurisdiction with strategic deficiencies since February 2010<sup>1</sup>. The European Union (EU) also identified Yemen as being among those jurisdictions that “pose significant threats to the financial system of the Union<sup>2</sup>” Yemen is accordingly subjected to increased monitoring and review, despite this, it has made substantial progress in improving its AML/CFT system. The European Union included Yemen in the 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 the AML/THB Project). Between Oct 2019 and November 2021, the Project delivered training on different topics to more than 50 Yemenis from the Financial Intelligence Unit, Central Bank of Yemen, the judiciary, law enforcement agencies, Customs Authority and other regulatory bodies.

The Aden-based Central Bank of Yemen (CBY) and Yemeni Financial Intelligence

Unit (YFIU) requested the AML/THB Project for tailored training support. In this regard, the AML/THB Project in collaboration with the Egyptian Money Laundering and Terrorist Financing Combating Unit (EMLCU) organized a two-level training. Level 1 was a foundational course delivered virtually on 7<sup>th</sup> – 9<sup>th</sup> December 2021 and a more advanced level 2 was delivered in person on-site in Cairo, Egypt inside the premises of the EMLCU on 10<sup>th</sup> – 12<sup>th</sup> January 2022.

#### OBJECTIVES AND RESULTS OF THE TRAINING

The objective of the intervention was to strengthen the capacity of YFIU and CBY to better supervise, detect, disrupt, report, analyse and dispatch suspicious transactions or activities in compliance with international standards and requirements. These pieces of training along with other capacity-building interventions are expected to enable YFIU to improve its analytical effectiveness and enhance the CBY's practical capacity to undertake effective supervision and compliance actions.

#### ORGANISATION AND DELIBERATION OF THE TRAINING

Level 1 focused on basic concepts while level 2 was more technical which included visiting the Egyptian FIU to learn from actual practices that provided an opportunity to gain more functional experiences for the Yemenis. The trainers were from the EMLCU with high-level experience. The training was delivered in the Arabic language.

#### Main topics Covered during Training:

##### A. Level 1 Training – Virtual:

The meeting was opened jointly by Mr. Frederic Bayard, AML/THB Project Director, Mr. Hussein Al Mehdhar, D/Governor of CBY for Banking supervision sector, Mr. Basem Dabwan, President of YFIU, and Philippe Cormier, Gulf Regional Counsellor of the European Union Delegation.

#### Presentations and Discussions Covered:

1. Overview of Money Laundering and terrorism financing: This discussed the concept of money laundering and

1. <https://www.fatf-gafi.org/publications/high-risk-and-other-monitored-jurisdictions/documents/increased-monitoring-june-2021.html>

2. [https://ec.europa.eu/info/business-economy-euro/banking-and-finance/financial-supervision-and-risk-management/anti-money-laundering-and-counteracting-financing-terrorism/eu-policy-high-risk-third-countries\\_en](https://ec.europa.eu/info/business-economy-euro/banking-and-finance/financial-supervision-and-risk-management/anti-money-laundering-and-counteracting-financing-terrorism/eu-policy-high-risk-third-countries_en)

terrorism financing including definitions, process, risks, impacts and methods used;

2. The function of the FIU: Discussed the core business of an FIU with a special focus on operational analysis including the intelligence cycle, data collection, sources of information, adding value to information, and how to better write and present reports to stakeholders;
3. Overview of international standards: This session discussed the key FATF standards to enhance the understanding of the requirements of compliance to the international system focused on the mutual evaluation process and on how to build an effective AML/ CFT/ NPF system and the risk of non-compliance;
4. The role of supervisory and regulatory authorities: Presentations and discussions included risk-based supervision as per the FATF requirements, proper tests to prevent criminals from misusing the financial sector in ML/ TF activities, and sectoral risk assessment.
5. Targeted financial sanctions and international sanctions: Discussed the basic understanding and the obligations under the FATF recommendations 6 and 7 and immediate outcomes 10 and 11 to implement the sanctions regime.

At the level 1 training, participants gained a holistic overview of the AML/CFT/NPF regime based on the international standards and Egypt's experiences. However, it was apparent that the trainees still needed more in-depth training on each aspect of the regime. In this regard, more advanced training was organised face-to-face on-site in Cairo as detailed below.

## B. Level 2 Training - Face-to-Face, Cairo:

The training was opened with keynote speeches and opening remarks from the deputy executive director of the Egyptian FIU and the Minister Plenipotentiary of the Yemeni embassy in Cairo.

## Presentations and Discussions Covered:

1. Overview of AML/CFT Obligations: Discussed the importance of AML/CFT controls to guarantee proper implementation of the customer due diligence, enhanced due diligence, record keeping, dealing with high-risk financial profiles and reporting - STRs/CTRs and other reports.
2. Common methods used in Money laundering and terrorism financing:
  - o Concealment of Beneficial ownership: Discussed understanding of the Ultimate Beneficiary Ownership (UBO), best practices to identify and verify the real owners of legal persons and legal arrangements, and challenges associated with practical applications;
  - o Trade-based money laundering/terrorist financing (TBML/TBTF): This session covered the basic concepts and common techniques used by TBML/TF including over-invoicing, under-invoicing, multiple invoicing, phantom shipment;
  - o Hawala and money transfer: This session highlighted the vulnerabilities and risks of money laundering and terrorism financing posed by informal money remittance, Hawala and other similar service providers, common methods used to launder proceeds and finance terrorism; and
  - o Use of new technologies in ML/TF: This session covered the overall vulnerabilities and risks in the misuse of new technologies and techniques used in the misuse of mobile payments, internet banking, and virtual assets.
3. Overview of AML/CFT compliance supervision measures/methods: This session included financial supervision approaches, licensing and/or registration, onsite supervision, offsite supervision, remedial actions of supervisory authorities, and challenges in applying the AML/CFT tools.
4. National risk assessment according to international stan-

## Level 1 Meeting:

No	KRA	Value	Score	Result
1	No. of participants	30	33 (5 or <b>15.15 % Female</b> & 28 or <b>84.85% Male</b> )	>100%
2	Participants' feedback	75≥ High	Overall assessment: <b>88.30% ≥ High</b>	100%
			Relevance/importance: <b>87.50% Yes</b>	
			Objective achieved: <b>93.80% fully achieved</b>	
			Value addition in knowledge & skills: <b>100% Yes</b>	
			Quality of delivery/presentations: <b>88.40% ≥ High</b>	
			Approach/Method - interactivity: <b>76.50% ≥ High</b>	
Contribution to professional improvement: <b>88.40% Yes</b>				
3	documents shared	N/A	Presentations, simulation exercises, guidelines, reading materials, resourceful website links shared	100%
4	Activity report	1	Produced	100%
5	Newsletter Synopsis	1	Produced	100%
6	Brief Web Summary	1	Produced	100%



Munira Ali & Frédéric Bayard exchanging MoUs.

dards (Immediate Outcome 1): This session focused on methods of assessing ML/TF/PF risks and co-ordinates domestically to put in place actions to mitigate these risks.

5. Operational analysis: Discussed a wide variety of financial intelligence analysis techniques and tools used to produce actionable financial intelligence supported by a practical exercise
6. Strategic analysis: This session discussed strategic analysis of products and benefits. During this session, a detailed discussion focused on the Egyptian FIU model, as per participants' request, to explore different departments, mandates, analytical tools used, powers and relationships with other stakeholders.
7. International cooperation and best practices: This session explored mechanisms and modalities of international cooperation and how to better benefit from Information

exchange on the international level according to FATF standards (Immediate Outcome 2).

The training was finally closed by remarks and messages from H.E. Judge Ahmed Said, Head of the Egyptian FIU, H.E. Ambassador Christian Berger, Ambassador of the EU to the League of Arab Nations and Head of the EU delegation to Egypt, and Mr. Federico Argentino, representing the AML-THB project. Speakers stressed the importance of fighting organized crime and financial crime with a commitment to support countries in the region.

#### 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 tables below summarise the achievements of each training.

#### LESSONS LEARNT AND WAY FORWARD

It was found that such tailored interventions that fit the specific national context are more productive in terms of delivering focused training which is a reflection of the specific needs of a given country. Training in their language was also helpful in terms of a better understanding of the subject. Bringing both the CBY and the YFIU was also a very good opportunity to enhance a common understanding of the risks of ML/TF, improve clarity on the mandates of each institution and to further facilitate cooperation.

Content-wise, trainees strongly requested more practical and technical pieces of training on how to undertake field supervision, detection and analysis of suspicious transactions as well as specialised training on financial analysis, financial investigation, virtual currency, trade-based money laundering and asset recovery.

#### Level 2 Meeting:

No	KRA	Value	Score	Result
1	No. of participants	15	15 (2 or 13.33 % Female & 13 or 86.67% Male))	100%
2	Participants' feedback	75≥ High	Overall assessment: <b>100% ≥ High</b>	100%
			Relevance/importance: <b>100% Yes</b>	
			Objective achieved: <b>100% fully achieved</b>	
			Value addition in knowledge & skills: <b>80% Yes</b>	
			Quality of delivery/presentations: <b>100% ≥ High</b>	
Approach/Method - interactivity: <b>90% ≥ High</b>				
Contribution to professional improvement: <b>88.90% Yes</b>				
3	documents shared	N/A	Presentations, simulation exercises, guidelines, reading materials, resourceful website links shared	100%
4	Activity report	1	Produced	100%
5	Newsletter Synopsis	1	Produced	100%
6	Brief Web Summary	1	Produced	100%



## SNAPSHOTS: A photo splash from the high profile meetings



An applause for the AML-THB project team.



Closing ceremony.



Dinner after the high profile meeting.



Alma speaks during the Heads of Immigration meeting.



Some dancing with the traditional artists from Mombasa, KENYA.



This project is funded by the European Union



The Heads Of Immigration



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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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