

TERRORISM PREVENTION ACT (TPA), REGULATIONS & AMENDMENTS

PRESENTATION TO REGISTERED PUBLIC
ACCOUNTANTS

PURPOSE OF ACT

- Ensure Jamaica's conformity with international obligations.....: s. 2(2)
 - UN Resolutions (eg ISIL (Da-esh) and Al-Qaida- 1267)
 - International conventions e.g. Tokyo, Hague & Montreal
 - FATF Recommendations

LEGISLATION

1. Terrorism Prevention Act (2005)
2. Terrorism Prevention (Amendment) Act 2011, 2013 & 2019
3. The Terrorism Prevention (Reporting Entities) Regulations 2010 & 2019
4. The Terrorism Prevention (Designated Reporting Entity)(Public Accountants) Order, 2017

WHAT IS TERRORISM

Terrorist group

Terrorist activities

Terrorism offences

WHAT IS A TERRORIST GROUP

- (a) an entity that has, as one of its purposes or activities, facilitating or carrying out any **terrorist activity**; or
- (b) a listed entity –by the United Nations
- (All associates of these entities are included)

TERRORIST ACTIVITIES (eg)

- **Where a person, Unlawfully and intentionally:-**
 - seize or exercise control over a ship by the use of threat, force, violence or any other form of intimidation
 - deliver, place, discharge or detonate an explosive or other lethal device in, into or against any public place, State or government facility, public transportation system or infrastructure facility
 - injure, kidnap or otherwise attack any internationally protected person;(Head of State, A Foreign Minister)

TERRORIST ACTIVITIES

- **AND**, that the act or omission is committed
 - for a political, religious or ideological purpose,
- **WITH** the objective or intention of-
 - (a) intimidating the public, or a segment of the public, with regard to its security, including its economic security;
 - (b) compelling a person, a government or a domestic or an international organization to do or to refrain from doing any act,

911 Twin Tower attack -CNN



TERRORISM OFFENCES

- WHETHER the person, government or organization, is inside or outside of Jamaica, that person
- commits an offence if the act or omission intentionally-causes-
- (i) death; or
- (ii) serious bodily harm, to a person; or
- (iii) endangers a person's life, or the health or safety of the public or any segment of the public; or
- (iv) causes substantial property damage, whether to public or private property,

Money Laundering vs Terrorism Financing

Money laundering is a process used by criminals to make their illegal funds appear legitimate while terrorist financing consists of raising funds to sustain terrorist activities eg. basic technical needs, the costs of ideological practices

- Money laundering is the result of almost all profitable crimes.- purpose wealth accumulation
- Its purpose is to finance terrorist acts- the purpose is purely ideological.

MAIN ENTITIES

- The Director of Public Prosecutions (DPP) s. 14
- The Designated Authority (Chief Technical Director)-
FID s. 15(1) -17
- The Competent Authority s. 18(5)
- The Relevant Authority- The FID or DPP

OFFICE OF THE DPP

- Proceedings in respect of a terrorism offence or an offence under
- section 13-failure to report terrorism offence,
- Section 15- Prosecutions. or
- Section 16 -duty of entities to report
- *shall not be instituted without the consent of the Director of Public Prosecutions.*

OFFICE OF THE DPP

- The Director of Public Prosecutions shall apply to a Judge of the Supreme Court, in Chambers, for an **order** for
 - 1) (a) an entity is included on a list of entities designated as terrorist entities by the *United Nations Security Council*; or
 - 2) the DPP has reasonable grounds to believe that the entity has knowingly;

OFFICE OF THE DPP

- (i) committed or participated in the commission of a terrorism offence(s.3-4); or
- (ii) act on behalf of, at the direction of, or in association with a listed group or
- (iii)not being an individual is owned or controlled by directly or indirectly by a listed entity.

OFFICE OF THE DPP

- Where such an order is made by the judge, the following entities shall cause the order to be published on their public websites within **twenty-four hours** after the order is made:
 - (a) The Ministry responsible for foreign affairs
 - (b) every competent authority
 - (c) The designated authority.

FORMAL ORDER-Add an Entity



FORMAL ORDER

IN THE SUPREME COURT OF JUDICATURE OF JAMAICA

CLAIM NO. SU 2021 CV 0229 02



IN THE MATTER of an application under sections 14 (1)(a) and 6(1) of the Terrorism Prevention Act.

AND

IN THE MATTER of an application by the Director of Public Prosecutions for an Order in accordance with sections 14(1) and 6(1) of the Terrorism Prevention Act to declare a listed entity as a designated terrorist entity in keeping with a decision of the United Nations Security Council and to immediately prohibit any dealings with any properties owned or controlled by the said listed entity.

AND

IN THE MATTER of an application by the Director of Public Prosecutions for an Order to designate the individual named 1. MOHAMMAD 2. ALI 3. AL HABBO as listed designated terrorist entity under the Terrorism Prevention Act in keeping with the decision of the United Nations Security Council pursuant to resolutions 1267 (1999), 1969 (2011) and 2253 (2015) and to immediately prohibit any dealing with their assets, directly or indirectly.

BETWEEN THE DIRECTOR OF PUBLIC PROSECUTIONS
AND MOHAMMAD ALI AL HABBO

APPLICANT
DEFENDANT

IN CHAMBERS #
BEFORE THE HONOURABLE

THIS 18th DAY OF JUNE, 2021.

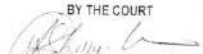
UPON THE EX-PARTE NOTICE OF APPLICATION FOR COURT ORDERS filed by the Director of Public Prosecutions and dated 16th June, 2021 and coming up for hearing this day and upon hearing Counsel for the Applicant as instructed by the Office of the Director of Public Prosecutions:

IT IS HEREBY ORDERED THAT:

- In accordance with section 14 (4) of the Terrorism Prevention Act, the following entities, designated as terrorist entities by the United Nations Security Council and who were added to the United Nations Sanctions List as communicated via UN document reference number SCA/2/21 (10) dated June 19 2010, is hereby declared as listed entities for the purposes of the Terrorism Prevention Act.
 - Name: 1: MOHAMMAD 2: ALI 3: AL HABBO
- In accordance with section 6(1) of the Terrorism Prevention Act, no person in Jamaica and no Jamaican outside Jamaica shall knowingly:
 - deal directly or indirectly in or with any property that is owned or controlled by or on behalf of the above-mentioned listed entities.
 - enter into or facilitate, directly or indirectly, any transactions in respect of property that is owned or controlled by on behalf of the above-mentioned listed entities.
 - provide any financial or related services in respect of that property that is owned or controlled by on behalf of the above-mentioned listed entities
 - convert any property owned or controlled by or on behalf of the below mentioned entities or take any steps to conceal or disguise that the property is owned or controlled by or behalf of the above-mentioned listed entities.

FORMAL ORDER-Add an Entity

- 3 This Order remains in effect except or until an Order is made the Court for any exemptions in accordance to section 14 (B) and 14 (C) of the Terrorism Prevention Act or is otherwise revoked or modified.
- 4 The Applicant's attorney is to prepare, file and serve a copy of the Order along with a copy of document dated 17th June 2021, reference SCA/2/21 (10), issued by the United Nations Security Council Sanctions List Committee on all relevant authority and financial institutions.

BY THE COURT

JUDGE OF THE SUPREME COURT

EXTRACTED by THE DIRECTOR OF PUBLIC PROSECUTIONS whose address for service is Public Buildings (West), King Street in the city and parish of Kingston, telephone number (876) 522-6321-5, fax (876) 522-4318.

Formal Order- Remove an Entity



FORMAL ORDER

IN THE SUPREME COURT OF JUDICATURE OF JAMAICA
CLAIM NO. SU 2021 CV 03818



IN THE MATTER of an application under section 14(9)(b)(i) of the Terrorism Prevention Act

AND

IN THE MATTER of an application by the Director of Public Prosecutions for an Order in accordance with section 14(10)(a) of the **Terrorism Prevention Act** to remove a listed entity designated as a terrorist entity under the **Terrorism Prevention Act** in keeping with a decision of the United Nations Security Council

AND

IN THE MATTER of an application by the Director of Public Prosecutions for an Order to remove:
QDI.253 Name: 1: KHALIFA 2: MUHAMMAD 3: TURKI 4: AL-SUBAIY as a listed designated terrorist entity in keeping with the decision of the United Nations Security Council pursuant to resolutions 1267 (1999), 1989 (2011) and 2253 (2015) concerning ISIL (Da'esh), Al-Qaida and associated individuals, groups, undertakings and entities

BETWEEN THE DIRECTOR OF PUBLIC PROSECUTIONS APPLICANT
AND KHALIFA MUHAMMAD TURKI AL-SUBAIY DEFENDANT


IN CHAMBERS # 2021
BEFORE THE HONOURABLE MR JUSTICE L. Pusey

THIS 8th DAY OF SEPTEMBER 2021,

UPON THE EX-PARTE NOTICE OF APPLICATION FOR COURT ORDERS filed by the Director of Public Prosecutions and dated 8th September, 2021 and coming up for hearing this day and upon hearing Counsel for the Applicant, as instructed by the Office of the Director of Public Prosecutions,

IT IS HEREBY ORDERED THAT:

- In accordance with section 14 (10) (a) of the Terrorism Prevention Act,
 - The below mentioned listed entities, which were removed from the United Nations Sanctions List as per UN document SCA/2/21 (14) dated September 6, 2021, are hereby removed as listed entities under the Terrorism Prevention Act.
 - All Orders previously issued by this Court in respect of the below mentioned listed entities shall cease to apply to said entities as of September 8, 2021.
 - This Order relates to the following entity whose details are contained in UN document SCA/2/21 (14) dated September 6, 2021: **QDI.253 Name: 1: KHALIFA 2: MUHAMMAD 3: TURKI 4: AL-SUBAIY**
- The Applicant's attorney is to prepare, file and serve a copy of this Order along with a copy of UN document SCA/2/21 (14) dated September 6, 2021, issued by the United Nations Security Council Sanctions List Committee on all relevant authority and financial institutions.

BY THE COURT

JUDGE OF THE SUPREME COURT

IMPLEMENTATION WITHOUT DELAY

- Notification will be given via the goAML message board
- Email contact to the reporting entity
- Implications
 - No further dealings with that entity
 - Make a report to the Designated Authority as soon as is reasonably practicable but within 15 days.

Relevant Authority(DPP or/& FID)

- Sections- 19,21,28,29,31,34,35,36,40,42,43,44
- Regulatory controls
- Obtain Search Warrants
- Restraint and Forfeiture Orders
- Other court orders

DESIGNATION ORDERS



THE
JAMAICA GAZETTE
SUPPLEMENT

PROCLAMATIONS, RULES AND REGULATIONS

8721

Vol. CXL WEDNESDAY, NOVEMBER 29, 2017 No. 84C

No. 184E

PUBLIC BUSINESS

Extract from the Minutes of the meeting of the Honourable Senate held on the 13th day of October, 2017:

The Minister of Foreign Affairs and Foreign Trade and Leader of Government Business, having obtained suspension of the Standing Orders, further moved:

THE TERRORISM PREVENTION ACT

THE TERRORISM PREVENTION (DESIGNATED REPORTING ENTITY)
(PUBLIC ACCOUNTANTS) ORDER, RESOLUTION, 2017

WHEREAS section 15 of the Terrorism Prevention Act (hereinafter referred to as "the Act") imposes reporting duties on certain specified entities:

AND WHEREAS section 15(2) of the Act provides that the Minister may designate any entity as an entity to which the provisions of section 15 of the Act shall apply:

AND WHEREAS section 15(2) of the Act provides for the aforementioned designation to be made by order subject to affirmative resolution:

8721 PROCLAMATIONS, RULES AND REGULATIONS [NOV. 29, 2017]

AND WHEREAS on the 9th day of June, 2017, the Minister made the Terrorism Prevention (Designated Reporting Entity) (Public Accountants) Order, 2017:

NOW, THEREFORE, BE IT RESOLVED by this Honourable House as follows:—

1. This Resolution may be cited as the Terrorism Prevention (Designated Reporting Entity) (Public Accountants) Order, Resolution, 2017.

2. The Terrorism Prevention (Designated Reporting Entity) (Public Accountants) Order, 2017, which was laid on the Table of the Senate on the 16th day of June, 2017, is hereby affirmed.

Seconded by: Senator Matthew Samuda.

Agreed to.

I certify that the above is a true extract from the Minutes.

HEATHER E. COOKE, CO. JR., (MRS.)
Clerk to the Houses.

No. 184F

PUBLIC BUSINESS

Extract from the Minutes of the meeting of the Honourable House of Representatives held on the 29th day of November, 2017:

The Minister of Justice moved:

THE TERRORISM PREVENTION ACT

THE TERRORISM PREVENTION (DESIGNATED REPORTING ENTITY)
(PUBLIC ACCOUNTANTS) ORDER, RESOLUTION, 2017

WHEREAS section 15 of the Terrorism Prevention Act (hereinafter referred to as "the Act") imposes reporting duties on certain specified entities:

AND WHEREAS section 15(2) of the Act provides that the Minister may designate any entity as an entity to which the provisions of section 15 of the Act shall apply:

AND WHEREAS section 15(2) of the Act provides for the aforementioned designation to be made by order subject to affirmative resolution:

AND WHEREAS on the 9th day of June, 2017, the Minister made the Terrorism Prevention (Designated Reporting Entity) (Public Accountants) Order, 2017:

NOW, THEREFORE, BE IT RESOLVED by this Honourable House as follows:—

1. This Resolution may be cited as the Terrorism Prevention (Designated Reporting Entity) (Public Accountants) Order, Resolution, 2017.

DESIGNATION ORDERS

Nov. 29, 2017] PROCLAMATIONS, RULES AND REGULATIONS 8721

2. The Terrorism Prevention (Designated Reporting Entity)(Public Accountants) Order, 2017, which was laid on the Table of the House on the 13th day of June, 2017, is hereby affirmed.

Mr. Mark Golding also spoke on the motion.

Seconded by: Mr. Alando Terrelange.

Agreed to.

I certify that the above is a true extract from the Minutes.

HEATHER E. COOKS, CL, JR. (MRS.)
Clerk to the House.

THE TERRORISM PREVENTION ACT

THE TERRORISM PREVENTION (DESIGNATED REPORTING ENTITY) (PUBLIC ACCOUNTANTS) ORDER, 2017

In exercise of the powers conferred upon the Minister by section 15(2) of the Terrorism Prevention Act, and every other power hereunto enabling, the following Order is hereby made:—

1. This Order may be cited as the Terrorism Prevention (Designated Reporting Entity) (Public Accountants) Order, 2017.

2. With effect from the commencement date of this Order, any person to whom paragraph 3 applies is hereby designated as a reporting entity for the purposes of section 15 of the Act.

3. This paragraph applies to any person registered as a public accountant under the Public Accountancy Act, and who carries out any of the following activities on behalf of any client—

- (a) purchasing or selling real estate;
- (b) managing money, securities or other assets;
- (c) managing bank accounts or savings accounts of any kind, or securities accounts;
- (d) organizing contributions for the creation, operation or management of companies;
- (e) creating, operating or managing a legal person or legal arrangement (such as a trust or settlement); or
- (f) purchasing or selling a business entity.

8721 PROCLAMATIONS, RULES AND REGULATIONS [Nov. 29, 2017

4. For the purposes of—

- (a) paragraph 2, the commencement date is the day falling six months after the date on which this Order is affirmed by resolution pursuant to section 15(2) of the Act;
- (b) paragraph 3, "securities" has the meaning assigned to it under the Securities Act.

Dated this 9th day of June, 2017.

KAMINA JOHNSON SMITH
Minister of Foreign Affairs and Foreign Trade.

ROLE OF THE COMPETENT AUTHORITY

- Monitor compliance of regulated entities
- Carry out or direct inspections and verification procedures
- Issue directions-detection, prevention, reduce risk of terrorism financing
- Take copies of documents
- Share information with other competent authorities, DA, etc
- Continually assess the risk of each entity
- Maintain statistical records for the purpose of measuring the overall effectiveness of the measures

ROLE OF THE COMPETENT AUTHORITY

- **Section 18(4)** - The entity shall consult with the competent authority for the purpose of carrying out its obligations under this section.

Section 18(5) – In subsection (4), “competent authority” means the Minister responsible for finance or such other persons as he may specify in writing for the purposes of this section. *The Public Accountancy Board (June 17, 2017)*

ROLE OF THE DESIGNATED AUTHORITY

Section 15-18

- Receive, analyse, investigate, disseminate-reports from the **Regulated Entities** (Financial Institutions and Designated Non-Financial Institutions)
- Publish UN Sanction List on website
- Functions of the Relevant Authority

RESPONSIBILITY OF THE REGISTRANT

- 1) No person in Jamaica and no Jamaican outside Jamaica shall **knowingly-**
 - (a) deal directly or indirectly in or with any property that is owned or controlled by or on behalf of a terrorist group;
 - (b) enter into or facilitate, directly or indirectly, any transaction in respect of property referred to in paragraph (a);

RESPONSIBILITY OF THE REGISTRANT

- (c) provide any financial or other related services in respect of that property to, for the benefit of or at the direction of, a terrorist group; or
- (d) convert any such property or take any steps to conceal or disguise that the property is owned or controlled by or on behalf of a terrorist group.

REGULATORY CONTROLS

- 1. Establish Policies and Procedures.** section 18(1) – Every entity shall establish and implement such programmes, policies, procedures and controls as may be necessary for the purpose of enabling it to fulfil its duties under sections 15 and 16.
- 2. Designate one of its Officers (Nominated Officer)** who perform management functions to ensure implementation of the policies and procedures.

REGULATORY CONTROLS

3. Training programmes. The establishment of programmes for training of employees on a continuing basis and for instructing employees as to their responsibilities in respect of the provisions of this Act
4. Record keeping
5. Establishment of procedures to ensure high standards of integrity of employees;
 - (b) the development of a system to evaluate the personal employment and financial history of those employees

REPORTING REQUIREMENTS

- **section 15(2)** TPA states that the following entities shall determine on a continuing basis whether they are in possession or control of property owned or controlled by or on behalf of a listed entity-
 - (a) foreign companies in respect of their business in Jamaica relating to banking, securities, insurance, investment advice and trusts;
 - (b) financial institutions;
 - (c) any entity designated by the Minister, by order subject to affirmative resolution, as an entity to which the provisions of this section shall apply.

REPORTING REQUIREMENTS

REQUIREMENT TO FILE REPORTS

1. Terrorism Prevention (Designated Reporting Entity) (Public Accountants) Order 2017
2. Section 15(3) – Listed Entity Report
3. Section 16 – Suspicious Transaction Report

REPORTING REQUIREMENTS

LISTED ENTITY REPORT

- All Registrants required to file as per the Designated Reporting Entity(Public Accountant) Order 2017
- Based on the order published by DPP- (TPA FORMAL ORDER)
- Submitted to Designated Authority
- Requirement to file every 4 months or on request of the Designated Authority
- File whether or not any property exists

T P A - F O R M

Form 1 (Regulation 17 (1))

THE TERRORISM PREVENTION ACT
The Terrorism Prevention (Reporting Entities) Regulations 2010
 Report under Section 15 - Possession or Control of Property Owned or Controlled by or on behalf of a Listed Entity
EXCEPT AS PROVIDED IN SECTION 15 OF THE ACT, IT IS AN OFFENCE TO DISCLOSE THIS REPORT TO ANYONE (INCLUDING THE CUSTOMER)

To: The Designated Authority
 Chief Technical Director
 Financial Investigation Division
 1 Shalimar Avenue, Kingston 3

PART A	GENERAL INFORMATION	Report Number:	20180924FD0001
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1. Type of Report

Initial Report Report in response to request made by designated authority on

Report for Period of four calendar months: May 1 to August 31 Special Report

2. Reporting Entity

Name of reporting entity Financial Investigations Division	Postal address of reporting entity 1 Shalimar Ave, Kingston 3	Address for service of documents 1 Shalimar Ave, Kingston 3
Telephone Number (876) 928-5141	Fax/telex Number (876) 928-1883	E-mail Address
Name of Chief Executive Officer Robin Sykes	Telephone Number (876) 928-5141	Name of person making report (Declarant) Susan Watson Bonner
		Telephone Number (876) 928-5141

3. Type of Entity

Foreign company engaged in the business of :-
 Banking Securities Insurance
 Investment advice Trust Other

Financial Institution :-
 Bank Building Society Money Transfer & Remittance Agents
 Licensee (Financial Institution) Credit Union Licensed Operator of Exchange Bureaus
 Other

Dealer (Securities) Investment Adviser (Securities)

Entity designated by the Minister Insurance Company

Other

PART B	DETERMINATION
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In respect of the above mentioned reporting period it is determined that **Financial Investigations Division**

IS NOT in possession or control of property owned or controlled by or on behalf of a listed entity.

IS in possession or control of property owned or controlled by or on behalf of a listed entity, the particulars of which are set out in Part C.

REASON FOR DETERMINATION

[We have searched the UN Listed Entities list and found that we are NOT in possession of anyone or their properties associated with the list.](#)

Report Number: 20180924FD0001

PART C	PARTICULARS OF LISTED ENTITY			
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Complete if entity is an individual

First Name	Last Name	Other Name (s)	Gender <input type="checkbox"/> Male <input type="checkbox"/> Female
Date of Birth	Place of Birth	Registration Number or (TRN)	Issuing Country
Address		Identification Credential [Select ID Credential]	Issued By
Nationality (ics)		Occupation	Employer
Telephone Number (s) Work Home Cell Other			

Complete if entity is a group, trust, partnership or fund or an unincorporated association or organization

Name

Registration Number	Country of Incorporation	Date of Incorporation	Address
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Director / Principal Officer

Name	Occupation	Address
<input type="checkbox"/> Add another <input type="checkbox"/> Remove		

List Entity / Person with share holding of 10% or more

Name of Share Holder	Occupation	Address	Percentage Holding
<input type="checkbox"/> Add another <input type="checkbox"/> Remove			

2. Property Information

Type of Property For multiple properties re-select property type
[Select Property Type Here]

3. Account Information (Complete where property involves an account) Account Number

Account Holder's Name	Branch	Type of Account	Account Status <input type="checkbox"/> Active <input type="checkbox"/> Inactive <input type="checkbox"/> Closed
Date Opened	Date Closed (if applicable)	<input type="checkbox"/> Add another Account <input type="checkbox"/> Remove this Account	

4. Transaction Information (Complete in respect of each transaction involving the property)

Date of Transaction	Date of Posting	Description of Transaction
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Person conducting transaction in the capacity of Principal Agent Other Institutions Other Persons

Individual's first name or Organization's Name	Last Name	Other Name (s)
Address		Identification Credential [Select ID Credential]
Date of Birth	Registration Number or (TRN)	Issued By
<input type="checkbox"/> Add another Transaction <input type="checkbox"/> Remove this Transaction		

Name of Compliance Officer: Susan Watson Bonner Telephone # (876) 928-5141

Signature: _____ Date 24/09/2018



TPA REPORTING REQUIREMENTS

SUBMITTING LISTED ENTITY REPORTS TO THE FID

Submission Period

PERIOD	SUBMISSION DATE
January - April	May 31
May - August	September 30
September - December	January 30

TPA REPORTING REQUIREMENTS

SUSPICIOUS TRANSACTION REPORT

- **Report all transactions**, whether completed or not, which the entity suspects or has reasonable cause to suspect;
 - a) Involve property connected with, or intended to be used in carrying out a terrorism offence; or
 - b) Involve, or are for the benefit of any listed entity or terrorist group.

As soon as is reasonably practicable but within 15 days

TPA REPORTING REQUIREMENTS

COMPLEX UNUSUAL TRANSACTIONS (16(2))

- **Make and retain for not less than 7 years, a record of all**
 - a) complex, unusual or large business transactions ; **and**
 - a) unusual patterns of transactions whether completed or not, which appear to be inconsistent with the normal transactions of the customer.

SUSPICIOUS TRANSACTION REPORT

Section 6A(1)-Entities shall establish a risk profile of;

- All business relationships or one off transactions to determine which are high-risked, may include:
 - PEPS (*Head of state, MP, Minister of Gov, PS/CTD, member of judiciary, official member of a political party, military person above captain*)
 - Person not ordinarily resident in Jamaica
 - A trustee
 - A company with nominee shares

PROTECTION AGAINST PROSECUTION

- **Section 16(7)** – Where a report is made in accordance with subsection **(3)** or **(3A)**, the entity concerned, its directors and employees shall be exempt from-

(a) any liability to prosecution

(b) any criminal, civil or administrative liability.

Acts done in good faith

TTR/STR reports 2018-2021

Report Indicators	Report Count	Sum of Transactional Amount J\$
Unauthorized Third Party Transfers	12	1,769,000.00
Fraud	7	3,676,242.57
Forgery & Fraud	3	561,100.00
Activity does not match client profile, Breach of Cash Limit (POCA Sec101A) & Use of family members and third parties	1	21,879,391.20
Activity does not match client profile & Manually identified	1	2,565,203.49
Adverse reports on local press, Activity does not match client profile & Breach of Cash Limit (POCA Sec101A)	1	1,801,000.00
Money Laundering	1	5,400,000.00
Breach of Cash Limit (POCA Sec101A) & In-branch/Teller identified	1	1,245,000.00
Activity does not match client profile	1	1,961,654.99
Adverse reports - international, Adverse reports on local press & Fraud	1	17,936,487.46
Grand Total	29	58,795,079.71

PENALTIES

- **Non-reporting /reporting anomalies in stds./overseas**
 - Individuals- (max) \$3m or 36 mths imprisonment or both (parish court)
 - Body corporate- fine of not exceeding \$5m
 - CIRCUIT COURT
 - fine or imprisonment not exceeding twenty years
 - Body Corporate- a fine
- **Tipping-off**
 - Individual- \$2m or 2 yrs imprisonment or both
 - Body corporate- fine of \$6m

SOURCES OF INFORMATION

- United Nations- Consolidated United Nations Security Council Sanction List <https://scsanctions.un.org>
- Financial investigations Division-<https://fid.gov.jm>
- Ministry of Foreign Affairs & Foreign Trade-
<http://https://mfaft.gov.jm/jm/wp-content/uploads/2019/03/Sanctions-Listing>
- Public Accountancy Board -www.reb.gov.jm

THE CARIBBEAN CONNECTIONS

- **Sheikh Abdullah El-Faisal (Trevor William Forrest)**
- **Jamaican Muslim Cleric.** Was arrested, Sept 2017, completed deportation proceedings and extradited to the USA in August 2020. The US government alleged that he has been involved in international terrorism since his return to Jamaica (2010)
- **According to the New York Daily News, El Faisal was arrested after a sting operation over several months carried out by an undercover New York Police Department officer.**
- The officer reportedly communicated with Al Faisal by e-mail, text and video chat.
- **According to the Manhattan District Attorney, El Faisal offered to help the officer travel to the Middle East and join fighters with the Islamic State group, also known as ISIS.**

THE CARIBBEAN CONNECTIONS

El-Faisal facing life in US prison after extradition



THE CARIBBEAN CONNECTIONS

- London Shoe Bomber- **Richard Colvin Reid 3rd generation Jamaican , British national.** On flight from Paris to Miami and attempted to detonate bomb hidden in the heel of his shoe, while over the Atlantic- Dec. 2001 . (100 yrs in prison)
- ISIS Foreign Fighters from Trinidad & Tobago- included 2 individuals as Listed entity.
- Stephen Fray- Montego Bay-Fray was convicted in the Western Regional Gun Court in 2009 on charges of illegal possession of a firearm, shooting with intent, robbery with aggravation, assault at common law and breaches of the Airport Act-

THE CARIBBEAN CONNECTIONS

- Mohamed & Lee Boyd Malvo for their role in the sniper attacks in the USA against innocent civilians.
- *Result-intimidating the public,*
- *or a segment of the public, with*
- *regard to its security, including*
- *its economic security*
- ‘



THE CARIBBEAN CONNECTIONS

- the D.C. snipers terrorized the area in 2002'
- Mohamed was executed (Nov 10, 2009), Lee Boyd remains in prison



THANK YOU

QUESTIONS ???