

Financial Intelligence Agency of
the Turks and Caicos Islands

ANNUAL REPORT

2022/23





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Mission and Vision

Mission

To identify perpetrators of money laundering, terrorist financing and connected crimes through the receipt of suspicious activity reports and requests that are analysed for dissemination to relevant authorities for further investigation to reduce the harm that these activities can cause to our people, financial stability, and security.



Vision

That where it occurs, perpetrators of money laundering, terrorist financing and connected crimes are detected and brought to justice, ultimately becoming a deterrent to the commission of these offences in the Turks and Caicos Islands.

List of Abbreviations

AG	Attorney General	LEA	Law Enforcement Agency
AGC	Attorney General's Chambers	LGA	Local Government Agency
AML	Anti-Money Laundering	LLEA	Local Law Enforcement Agency
AMLC	Anti-Money Laundering Committee	MER	Mutual Evaluation Report
BNI	Bearer Negotiable Instruments	ML	Money Laundering
CFATF	Caribbean Financial Action Task Force	MLCO	Money Laundering Compliance Officer
CFT	Combating the Financing of Terrorism	MLRO	Money Laundering Reporting Officer
CO	Compliance Officer	MOU	Memorandum of Understanding
CSP	Company Service Provider	MSB	Money Services Business
DNFBPs	Designated Non-Financial Businesses and Professions	NIB	National Insurance Board
ESW	Egmont Secure Web	NPO	Non Profit Organisation
FATF	Financial Action Task Force	PB	Private Bank
FCU	Financial Crimes Unit	PEP	Politically Exposed Person
FIA	Financial Intelligence Agency	POCO	Proceeds of Crime Ordinance
FIAO	Financial Intelligence Agency Ordinance	PF	Proliferation Financing
FIs	Financial Institutions	RB	Retail Bank
FIU	Financial Intelligence Unit	RTCIPF	Royal Turks and Caicos Islands Police Force
FFIU	Foreign Financial Intelligence Unit	SAR	Suspicious Activity Report
FLEA	Foreign Law Enforcement Agency	STR	Suspicious Transaction Report
FSC	Financial Services Commission	TCI	Turks and Caicos Islands
FPO	Fire Prevention Officer	TF	Terrorist Financing
IC	Integrity Commission	VASP	Virtual Asset Service Provider
ICRG	International Cooperation Review Group	WGFI	Working Group on FATF Issues

Message from the Chairman of the Board of Directors



The Board of Directors has approved the Annual Report 2022 / 23 presented and prepared by Director

Baker and his team of professionals. The report describes in detail all the various activities of the FIA during this period. The report is publicly available on the FIA's website and the Board encourages people, especially those in the financial industry, to take an in-depth look into the workings of the FIA. The Board congratulates the FIA team for a job well done and their dedication throughout the year. Under the legislation the Board needs a minimum of four meetings per year. This Board has met six times to establish and update policies governing the FIA, conduct proper budget management and general oversight of the operation. I thank my fellow Board members for their time, dedication and valuable input during this past financial year. AML/

CFT outreach and awareness are an important part of the FIA's work as well as engaging with RTCIPF, FCU, IC and Immigration Department. All the work by the team and the Board is to combat crime and to preserve the good reputation of this jurisdiction. The FIA faces the 5th round of evaluation by the Financial Action Task Force commencing in 2024. The Board is confident that TCI will get a good result and that the FIA team is well prepared to meet future challenges. There will be staff changes at the team and Board level but we are all confident in meeting challenges both current and in the future. So once again I would like to offer my sincere thanks to the Board and the FIA team.

Anton J.B. Faessler, Chairman

Director's Message



Fiscal year 2022/23 saw a decline in suspicious activity reporting regarding suspected money laundering (ML)

and terrorist financing (TF) in the Turks and Caicos Islands (FY22/23 = 50), (FY 21/22 = 60). The reporting of suspicious activities is critical for the FIA to conduct its statutory functions and international obligations regarding the analysis of suspicious activities which support the detection, suppression and deterrence of ML/TF in the TCI and globally.

During the period under review the FIA embarked upon an ambitious outreach and awareness (O&A) program in which a new approach was adopted whereby O&A was focused and targeted to specific sectors rather than the previous generic approach to the delivery of such sessions where all sectors and reporting entities were captured in the same session. This was a continuation of the revamped O&A exercise adopted in 2021/22. As such the sessions focused on sensitisation and delivery of critical information regarding

AML/CFT relevant to the TCI and internationally. O&A sessions were also conducted for our law enforcement and key stakeholders. This is further discussed in the report.

The future

Looking forward, the TCI will be entering another critical phase in its AML/CFT evolution. The 5th round of Financial Action Task Force (FATF) mutual evaluations is expected to commence in 2024. The TCI is scheduled to be assessed by the Caribbean Financial Action Task Force (CFATF) against the revised FATF standards in 2028. This means that our 5-year data capture period will commence in 2023. Therefore, everything that we do from 2023 until our assessment will form part of the analysis to be conducted by assessors regarding the TCI's AML/CFT performance over that review period.

It is incumbent upon us all to put our best foot forward and demonstrate our commitment and effectiveness in managing our AML/CFT affairs to a globally acceptable standard.

Dwayne Baker CAMS, Director

Meet the Board of Directors

Anton J.B. Faessler, Chairman



Anton J. B. Faessler was born in Switzerland in August 1951 and started banking in 1968 with Bank Leu in Zurich with

subsequent postings in London, Nassau & Luxembourg. He moved to the TCI in 1981, became a naturalized British Citizen and obtained TCI Citizenship status. He started the Turks and Caicos Banking Company, from which he retired as its President in August 2016. He was Chairman of the Invest TCI Agency. Mr. Faessler was the initiator and founding member of TCI Bankers Association and served as President for 7 years. He also served as President of the Chamber of Commerce, Member of the Investment Committee of the National Insurance Board (NIB), Board member of the Financial Services Commission (FSC) among others. Currently he is also a non-executive Director of Caribbean Management Services. In addition to his Chairmanship of the FIA he has been appointed as Chairman of the National

Wealth Fund. He believes in giving back to the community and assists wherever possible with the development and growth of the Turks and Caicos Islands. He believes that with his extensive knowledge of international banking, global compliance developments and knowledge of the TCI economy he can effectively contribute at Board level in various sectors of the industry.

Grescelle Missick, Board Member



Grescelle, a highly motivated born and raised Turks and Caicos Islander, originates from the quaint and tranquil island of Salt Cay where she spent her early childhood years.

A 2001 graduate from the Helena Jones Robinson High School (Credits), Grescelle holds an Associate Degree in Computer Studies from the Turks and Caicos Islands Community College (2003), a Bachelor of Arts Degree in Accounting from Howard University, Washington DC, United States

Board of Directors (cont'd)

of America (USA) (2008) and a Master of Business Administration – Finance from the University of Leicester, Leicester United Kingdom (UK).

Grescelle has received significant training in financial services, with online and short courses in Anti-Money Laundering with the Financial Services Commission (2013), Foreign Account Tax Compliance Act/ Common Reporting Standard facilitated by Turks and Caicos Banking Co. and PricewaterhouseCoopers (2015), Anti-Money Laundering Current Issues, Fire Solution (2017), Anti-Money Laundering Policies and Procedures, Fire Solutions (2018) and, Anti-Money Laundering (AML) (Global), Anti-Bribery (2019), Anti-Corruption (Global) (2019), Preventing Financial Crime (Global) (2020), Information Security and Cyber Risk Awareness (Global) (2021), Anti-Money Laundering (AML) - Refresher (Global) (2021), Fraud Prevention (Global) (2021) from Thomson Reuters (online).

Grescelle's work experience spans 16 years in the financial industry of the Turks and Caicos Islands as Administrator, Auditor, Accountant and Banker. Some of her more prominent positions include, Office

Assistant and Auditor/Accountant, PricewaterhouseCoopers, Accountant, Financial Controller and her current role as Chief Financial Officer with Turks and Caicos Banking Company Ltd., one of the leading Financial Institutions in the Turks and Caicos Islands.

A born-again believer, Grescelle prides herself as a woman of faith with great character and integrity, with an everyday commitment to fulfilling her divine purpose and destiny.

She attributes her every success and advancement, to her hard work and dedication, the support of her family and the grace and favour of God.

As a civil citizen, Grescelle believes in the importance of service to one's country with dedication and loyalty expecting nothing but economic, social and sustainable advancement for country.

One of her mottos to live by is: Do Good and Good will always follow you.

Board of Directors (cont'd)

Hon. Rhondalee Brathwaite-Knowles, OBE, KC, Board Member



Rhondalee is a native of Grand Turk. Following graduation from the Turks and Caicos High School she

attained a Bachelor of Science degree in Government (with an emphasis on law) and History (Hons) from Liberty University in Virginia, USA; a Bachelor of Laws degree LLB (Hons) from the University of the West Indies, Cave Hill, Barbados and a Certificate of Legal Education from the Eugene Dupuch Law School, New Providence, Bahamas finishing second in her class.

Rhondalee was admitted to the Bar of the Turks and Caicos Islands in 2000 after a period of training as Crown Counsel, designate in the Attorney General's Chambers. She was then appointed Crown Counsel and would go on to become Senior Crown Counsel, Commercial/Civil in 2005 and Principal Crown Counsel, Commercial/Civil in 2006,

heading the Commercial/Civil division in the Attorney General's Chambers. On 1st April 2008 she proudly became the first Turks and Caicos Islander to be appointed Deputy Attorney General of the Turks and Caicos Islands. In 2013 Rhondalee was awarded an OBE (Officer of the Most Excellent Order of the British Empire) by Her Majesty Queen Elizabeth II in recognition of her services to the development and reform of the public service of the Turks and Caicos Islands. In February 2014, she was appointed the first Turks and Caicos Islander, youngest person and first woman to be the Attorney General of the Turks and Caicos Islands. On March 15th 2019, Rhondalee became the first female attorney to be admitted to the inner bar of the Turks and Caicos Islands as Her Majesty's Counsel (now King's Counsel). Rhondalee recently chaired the 2019 Constitution Review Committee.

Her practice includes: commercial work – including drafting development agreements, construction contracts, and procurement; civil litigation – including administrative law, constitutional law and elections law; international compliance – including extradition,

Board of Directors (cont'd)

mutual legal assistance, tax transparency and anti-money laundering and legislative drafting – including elections reform, public finance management reform, and public service reform.

Hon. Braithwaite Knowles is an ex officio Board Member of the FIA by virtue of her position as Chair of the Anti money Laundering Committee (AMLC) established under section 115 (2)a of the Proceeds of Crime Ordinance. She brings to bear on the work of the FIA, through the FIA Board, her expertise and weight of experience in law, AML/CFT/PF standards and the public sector.

Rhondalee is married to Gary and along with their son, Gary II, they live together happily in Grand Turk.

Eugene Otuonye, KC, Board Member



Eugene Otuonye, KC, is the Director of Public Prosecutions (DPP) of Turks and Caicos Islands (TCI). He is a Nigerian and Caribbean trained Attorney - at - Law with more than 35 years of extensive legal practice in the public and private sectors in Nigeria and across the Commonwealth Caribbean. He has been a King's Counsel since 2006. Prior to his current appointment as DPP of TCI in January 2019, Mr. Otuonye, served as the first substantive Director of the TCI Integrity Commission from July 2011 to 2018. Within this period, he also served as the Chairman of the regional anti-corruption body – the Commonwealth Caribbean Association of Integrity Commissions and Anti-Corruption Bodies from 2017 to 2018.

In the period between 2004 and July 2011, Mr. Otuonye served as the Deputy Attorney General of TCI; the

Board of Directors (cont'd)

Attorney General of Montserrat; the Chairman of the TCI Public Service Commission and a member of the Advisory Council during the UK's interim direct administration of the TCI.

Mr. Otuonye is a member of the TCI Bar Association, International Bar Association and a Fellow of the Society of Advanced Legal Studies, IALS, University of London, among other Bar and Professional Associations. He is married to Dr. (Mrs.) Vivian Otuonye, a Guidance Counsellor, and they have three adult male children.

Mr. Otuonye is an ex officio Board Member of the FIA by virtue of his position as the DPP. He brings to bear on the work of the FIA, through the FIA Board, his expertise and weight of experience in law, criminal prosecutions, protection of good governance, integrity in public life and compliance with international AML/CFT regimes, standards and benchmarks.

Trevor Botting, Board Member



Trevor Botting was appointed as the Commissioner of Police for the Royal Turks and Caicos Islands Police Force in July 2019. Prior to

his appointment, Commissioner Botting was the Deputy Commissioner for the Royal Turks and Caicos Islands Police Force, spending just over two years in this role.

In total, Commissioner Botting has over 40 years policing experience and has served as the Chief of Police for the British Overseas Territory of St Helena, Ascension, and Tristan Da Cunha for three and half years and as a Senior Police Officer with thirty years' service with Sussex Police Force in the United Kingdom.

Commissioner Botting has significant experience as a Strategic and Tactical Police Commander, his last role in the UK being focused on Crime and Operations, leading in all aspects of crime, operations, and response to calls from the community.

As the Commissioner for the Royal Turks and Caicos Islands Police Force, Commissioner Botting is leading organizational reform with the reintroduction of Community Policing coupled with significant staff

development with a focus on leadership and diversity.

Commissioner Botting has led the Force through a number of national crisis and disasters, including two hurricanes and most the COVID19 Pandemic.



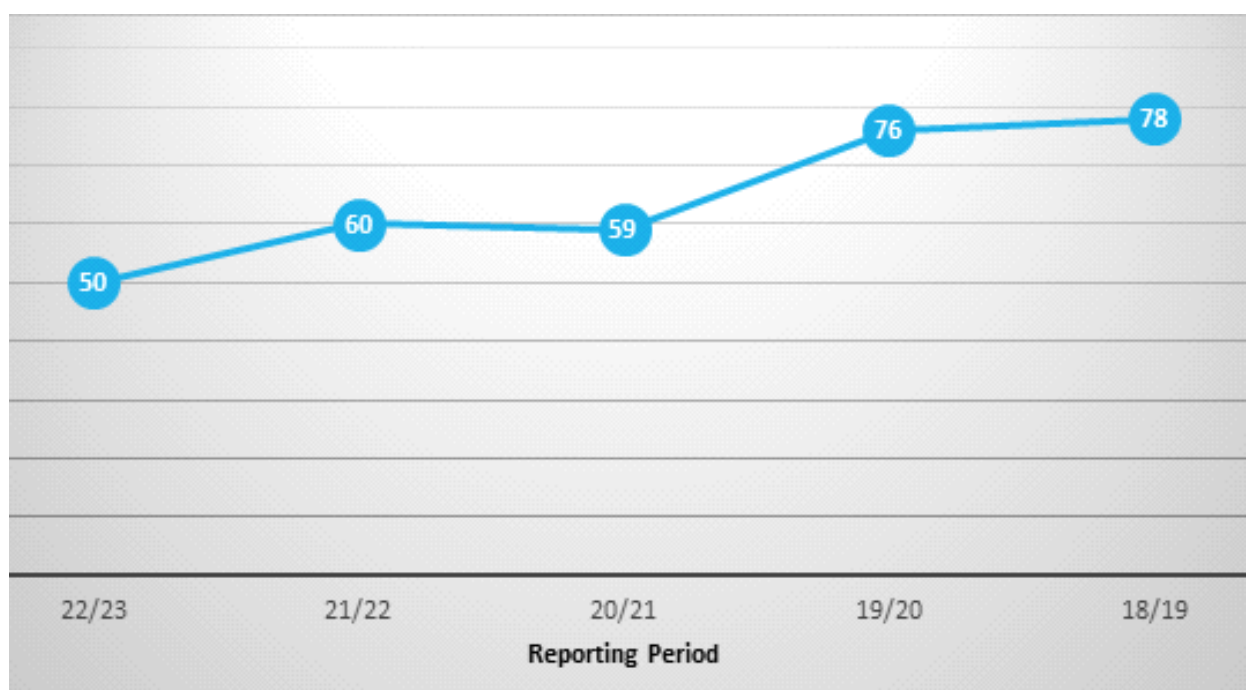
Suspicious Activity/ Suspicious Transaction Reports

This statistical report covers the fiscal year 2022/23 (FY22/23) which began 1st April 2022 and ended 31st March 2023.

During the period under review the FIA received a total of 50 SARs/STRs (See Chart 1). This represented a decrease of 10, or 17% of SARs/STRs when compared to the previous year FY21/22 (60 SARs/STRs) and a decrease of 9 or 15% when compared to FY20/21 (59 SARs/STRs); a decrease of 26 or 34% for FY19/20 (76 SARs/STRs) and a decrease of 28 or 36% as to FY18/19 (78 SARs/STRs).

Retail Banks (RBs) continued to be the main contributor of the SARs/STRs submitted (See Table 1). This followed a similar trend when compared to the previous year. RBs accounted for 32 or 64% of the submissions during the period. Money Services Businesses (MSBs) accounted for 1 or 2% and private banks (PBs) accounted for 4 or 8%. RBs, PBs and MSBs under the category of financial institutions accounted for 37 or 74% of the total SARs/STRs submitted during the period. This led to Financial Institutions (FIs) being the main reporting sector over

Chart 1 Total SARs/STRs received by Fiscal year since FY18/19 to FY22/23.



Source - FIA-TCI 2023

the period. The remainder of the SARs/STRs came from the Designated Non-Financial Businesses and Professions (DNFBPs) sector, namely Law Firms/Attorneys (5), Gaming establishments (5), while Real Estate Agencies/Agents and Trust Companies filed 1 SAR/STR each. Lastly, 1 SAR/STR was filed by a non-reporting entity. The Designated Non-Financial Businesses and Professions (DNFBPs) continued to submit less SAR/STR reports when compared to FIs (See Table 1). However, their total

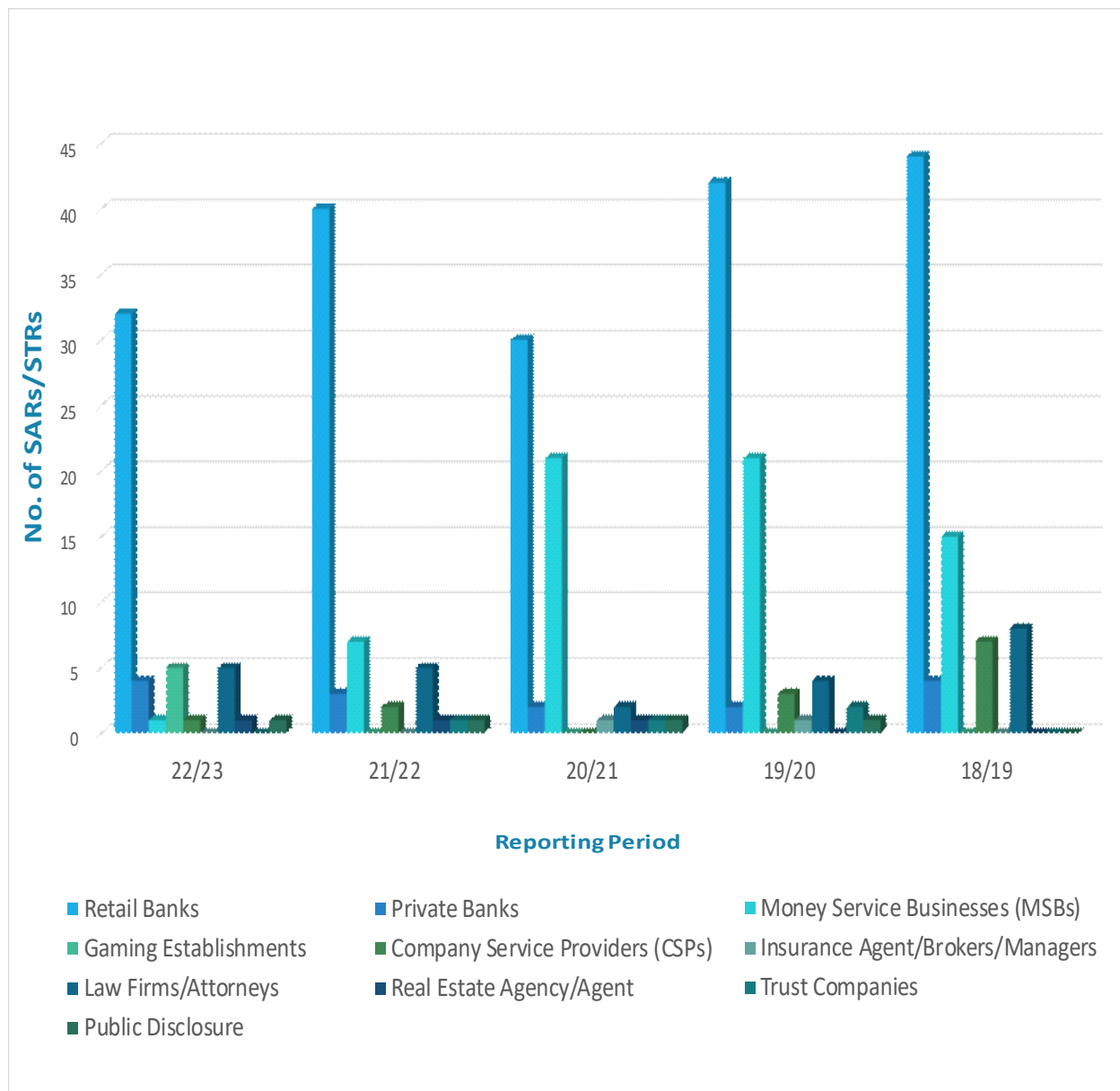
SAR/STR reporting numbers showed a slight increase across fiscals 20/21 to 22/23. The FIA commenced its 2023 AML/CFT Outreach and Awareness sessions in Q4 of FY22/23. The purpose of the sessions was to ensure that sectors with lower SAR/STR submissions were made aware of their role, responsibilities and requirements regarding the reporting of suspicious activities and transactions related to suspected money laundering, terrorist financing and connected crimes. Chart 2 shows a comparison of SARs/STRs

Table 1 - SARs/STRs received by Sector for the periods FY18/19 to FY22/23.

Reporting Entity/Sector	22/23	21/22	20/21	19/20	18/19
Financial Institutions	37	50	53	65	63
Money Services Businesses (MSBs)	1	7	21	21	15
Retail Banks	32	40	30	42	44
Private Banks	4	3	2	2	4
DNFBPs	12	9	5	10	15
Gaming Establishments	5	0	0	0	0
Company Service Providers (CSPs)	1	2	0	3	7
Insurance Agent/Brokers/Managers	0	0	1	1	0
Law Firms/Attorneys	5	5	2	4	8
Real Estate Agency/Agent	1	1	1	0	0
Trust Companies	0	1	1	2	0
Other	1	1	1	1	0
Public Disclosure	1	1	1	1	0
Grand Total	50	60	59	76	78

Source - FIA-TCI 2023

Chart 2 SARs/STRs reported by Reporting Entity Category from FY18/19 to FY22/23



Source - FIA-TCI 2023

disclosed to the FIA by category of reporting entity between the periods FY18/19 to FY22/23. As shown in Chart 2, during this reporting period, the Retail banks, Gaming establishments and Law

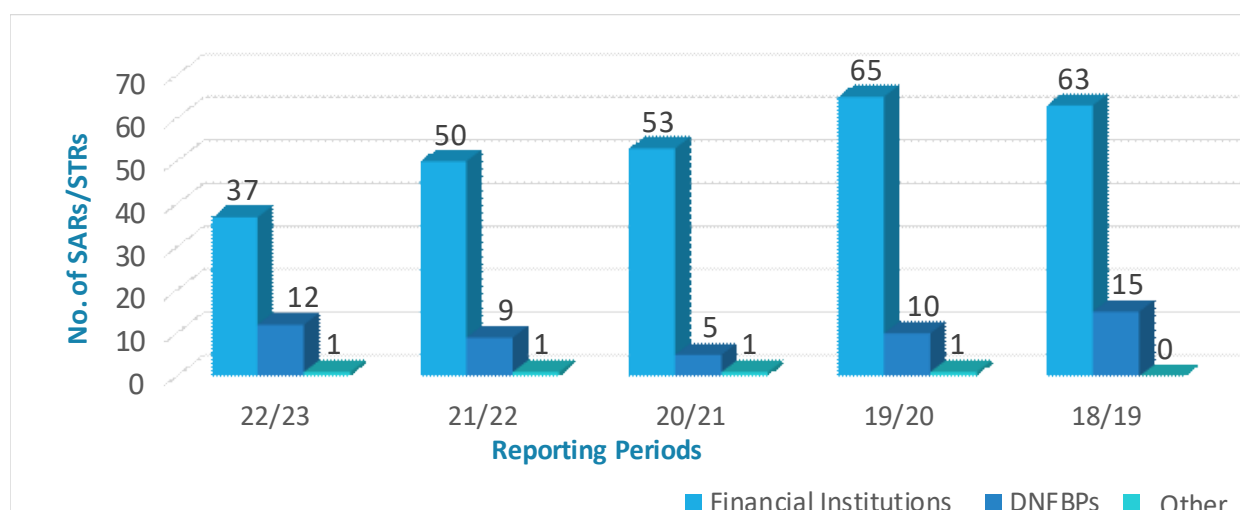
Firms/Attorneys accounted for the majority of submissions. Those categories submitted a combined total of 42 or 84% SARs/STRs during this reporting period.

FIIs and DNFBPs Yearly Comparison

FIs accounted for 37 or 74% of the SARs/STRs reported to the FIA during the period. From that number, RBs accounted for 32 or 64%, MSB's reported 1 or 2% and the remaining 4 or 8% of STRs came from PBs (See Chart 3). These figures represented a reduction by 13 or 26% in SARs/STRs reported from the previous fiscal year (FY21/22 FIs = 50 SARs/STRs) and a decrease of 16 or 30% when compared to FY20/21 (FY20/21 FIs = 53 SARs/STRs). Of note, during and prior to FY22/23, RBs were the highest contributors to SARs/STRs submitted within the Turks and Caicos Islands over the last five years from FY19/20 to present (FY22/23). DNFBPs accounted for 12 or 24% of the STRs/SARs reported to the FIA during the period

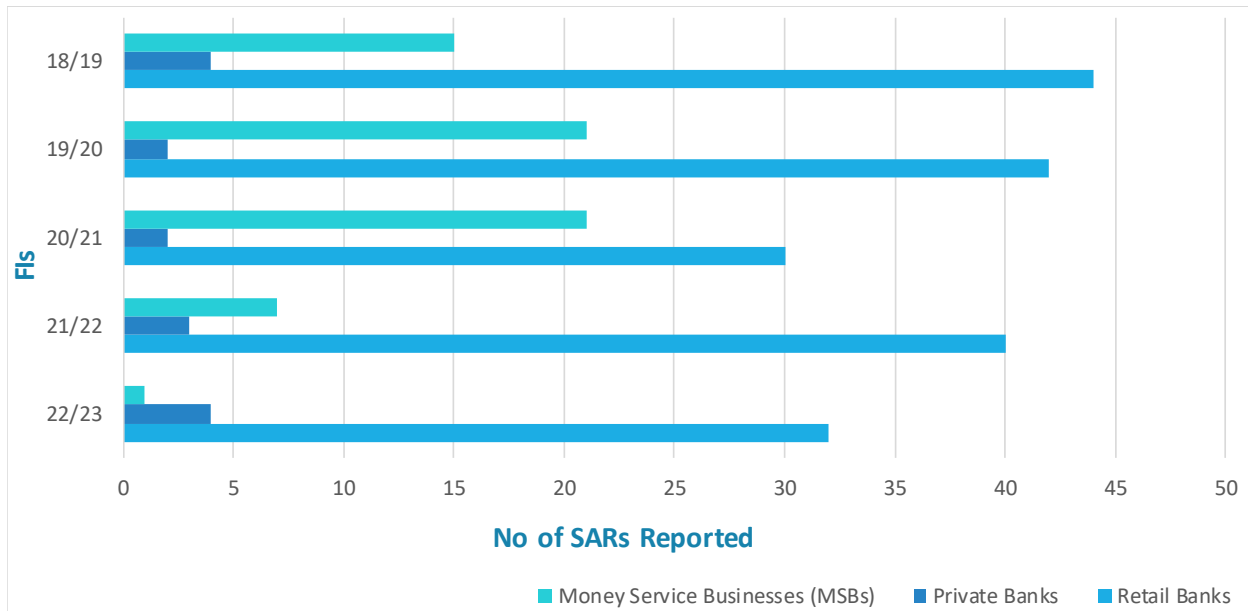
FY22/23. From that number, Gaming establishments accounted for 5 or 10%, Law Firms/Attorneys accounted for 5 or 10% and Company Service Providers and Real Estate Agency/Agents accounted for 1 each or 2% of the total SARs/STRs submitted for FY22/23. Submissions made by DNFBPs increased by 3 or 33% (FY22/23) when compared to FY21/22 (DNFBPs = 9 SARs/STRs). The increase continued when compared to SARs/STRs submitted in the fiscal years 20/21 which saw an increase by 7 or 140% (FY20/21=5 SARs/STRs). There was also an increase of 2 or 20% SARs/STRs when compared to 19/20 (FY20/21 DNFBPs = 10 SARs/STRs). A decrease was noted in FY 18/19 by 3 or 20% SARs/STRs (FY18/19 DNFBPs = 15 SARs/STRs).

Chart 3 - SARs/STRs submitted by sector from FY18/19 to FY22/23



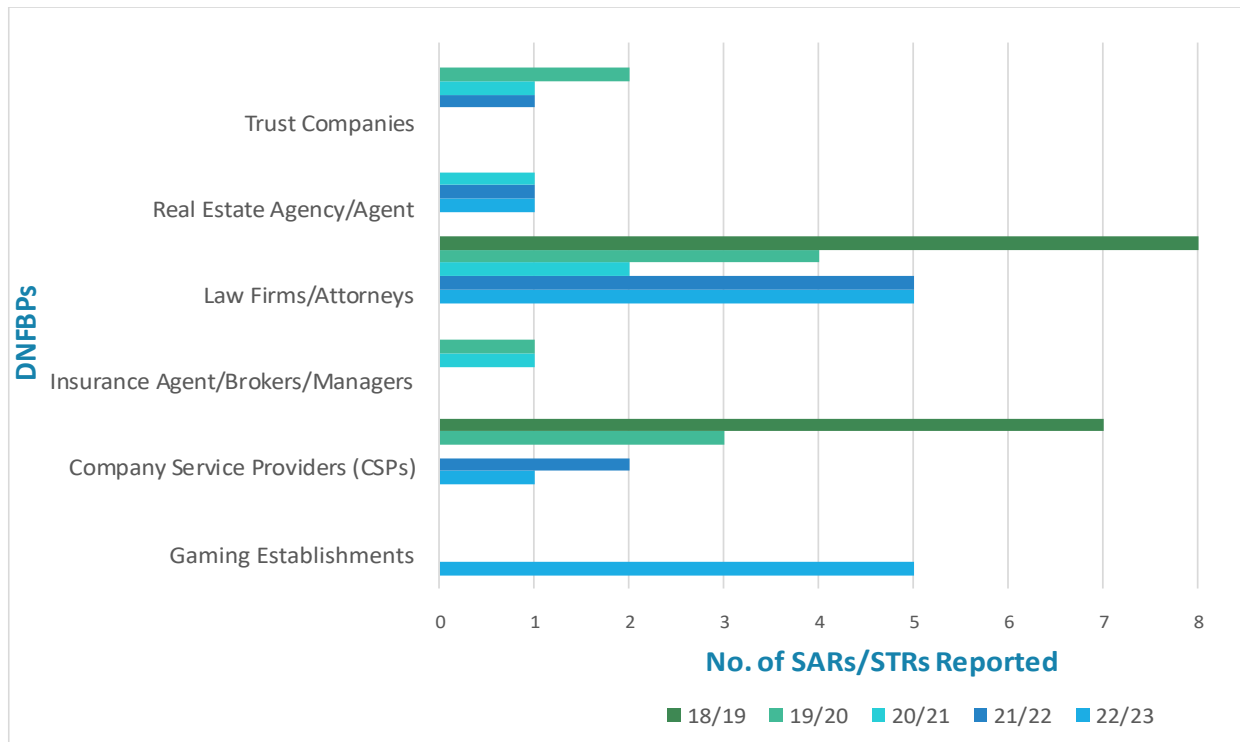
Source - FIA-TCI 2023

Chart 4 - SARs/STRs reported by FIs from FY18/19 to FY22/23



Source - FIA-TCI 2023

Chart 5 SARs/STRs reported to the FIA by DNFBPs from FY18/19 to FY22/23



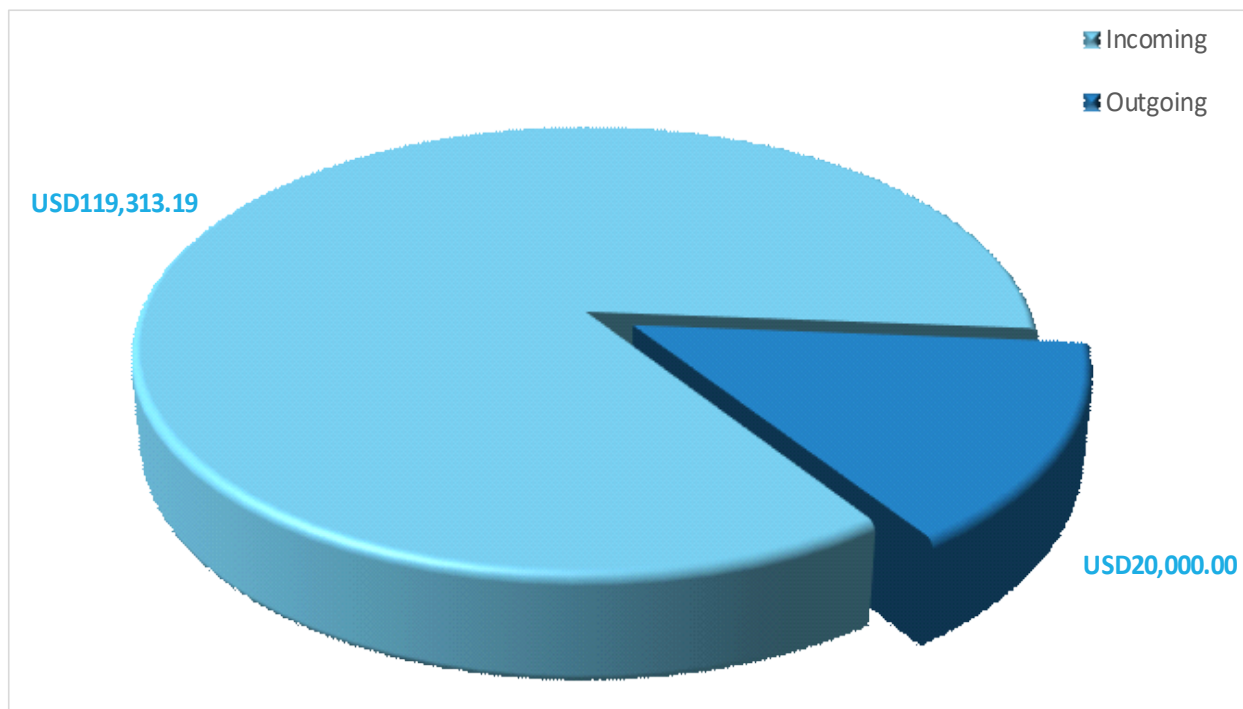
Source - FIA-TCI 2023

Customs Declarations

Recommendation 32 of the 40 Recommendations implemented by The Financial Action Task Force (FATF) – the global AML/CFT standard setting intergovernmental body, stipulates that countries implement measures for all persons to make declarations of currencies or Bearer Negotiable Instruments (BNIs) over a specified threshold amount. The collection and recording of customs declarations fulfils that component of FATF Recommendation 32. The sharing of the declarations with the FIA is tied to

Recommendation 29. It ensures that the FIA can access relevant AML/CFT related information which allows for the in-depth analysis and the ability to produce quality intelligence products. The threshold amount set by the TCIG for outward and inward declarations in the Turks and Caicos Islands is USD10,000.00. Since 2018, the FIA continued to receive reports of cash declarations which are analysed to determine whether persons found to be moving atypical volumes of cash may be involved in money laundering.

Chart 6 - Cash Declarations reported by Customs Department from 1st April 2022 to 31st March 2023



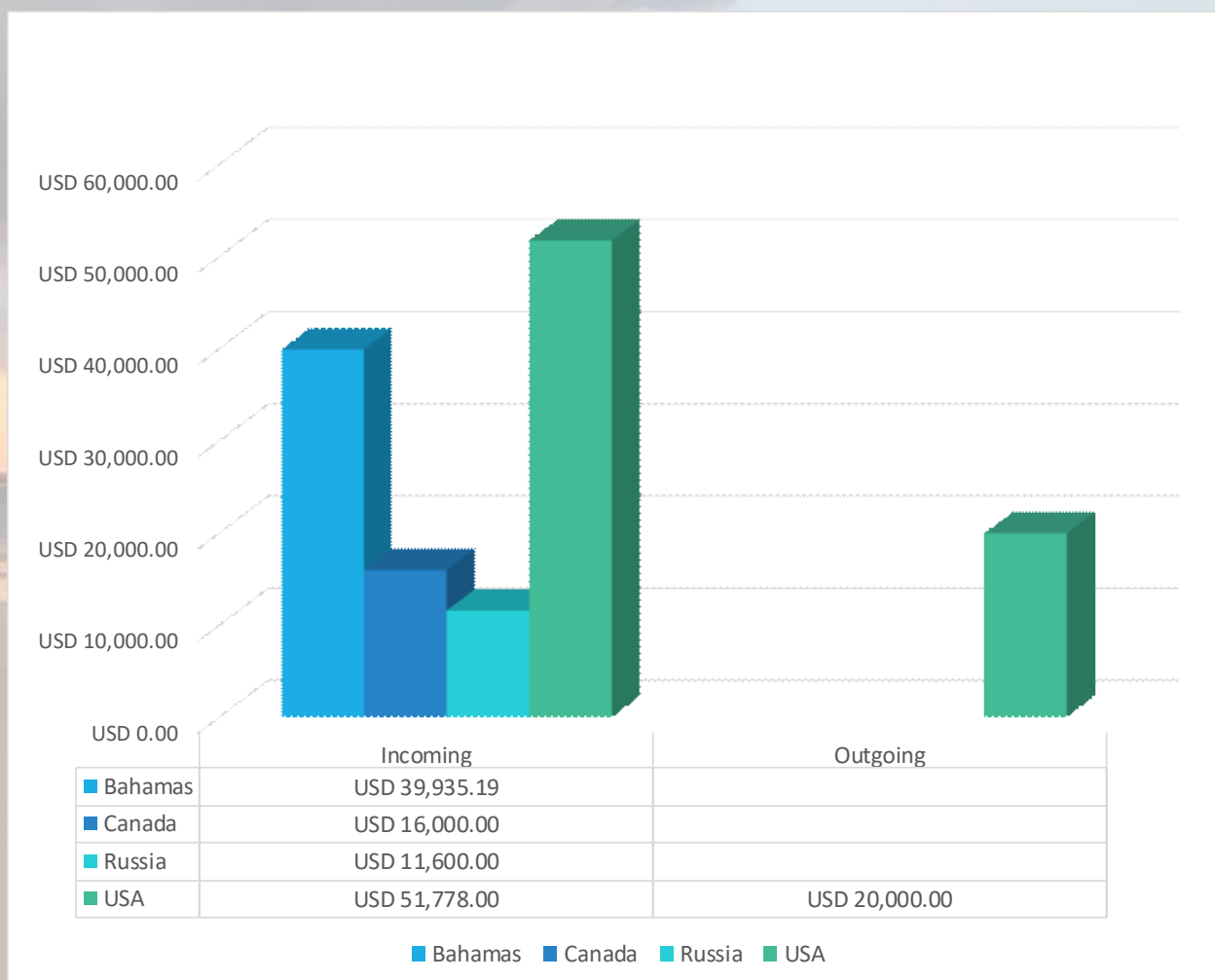
Source - FIA-TCI 2023

During FY22/23 the FIA received a total of 7 Cash Declarations from the Customs Department with a total value of USD139,313.19. Of the total number of cash declarations, 6 or 86% (USD119,313.19) of the value of all the cash declarations received represented incoming cash declarations and 1 or 14% (USD20,000.00) was an outgoing cash declaration (See Chart 6). Some of the countries from which incoming funds were

noted for this fiscal review period included The Bahamas, Canada, Russia, and the USA. (See Chart 7).

When individuals are reported to the FIA for the movement of atypical volumes of funds, the FIA conducts analysis and disseminates cooperative assistance/intelligence products to our law enforcement and FIA counterparts as required.

Chart 7 - Incoming and Outgoing Customs Declarations for FY22/23



Source - FIA-TCI 2023

Domestic and International Requests for Information (Incoming and Outgoing)

One of the critical functions of financial intelligence units is the dissemination of relevant AML/CFT information to both domestic and international counterparts. The sharing of such information can be done through requests or spontaneous disseminations to other FIUs through the secure web platform hosted by the EGMONT Group of FIUs. This secure communication method ensures that the relevant information is directly disseminated to foreign law enforcement agencies (FLEAs) in a secure manner and within the confines of country regulations.

Within the fiscal year 22/23, the FIA received a total of 32 requests for assistance from local government agencies (LGAs), local law enforcement agencies (LLEAs), and foreign financial intelligence units (FFIUs). These consisted of 27 or 84% local requests, as well as 5 or 16% incoming international requests received from international counterparts (FFIUs, FLEAs) (See Chart 8).

Regarding domestic requests, LEAs such as: the Immigration Department, the Integrity Commission, the Royal Turks and Caicos Islands Police Force

**Table 2 - Requests made to the FIA by jurisdiction and type of entity
FY18/19 to Y22/23**

Jurisdiction/Type of Entity	22/23	21/22	20/21	19/20	18/19
International	5	8	5	6	8
FFIUs	5	8	4	4	8
FLEAs	0	0	1	2	0
Domestic	27	36	21	48	22
LLEAs	26	36	20	43	16
LGAs	1	0	1	5	6
Total	32	44	26	54	30

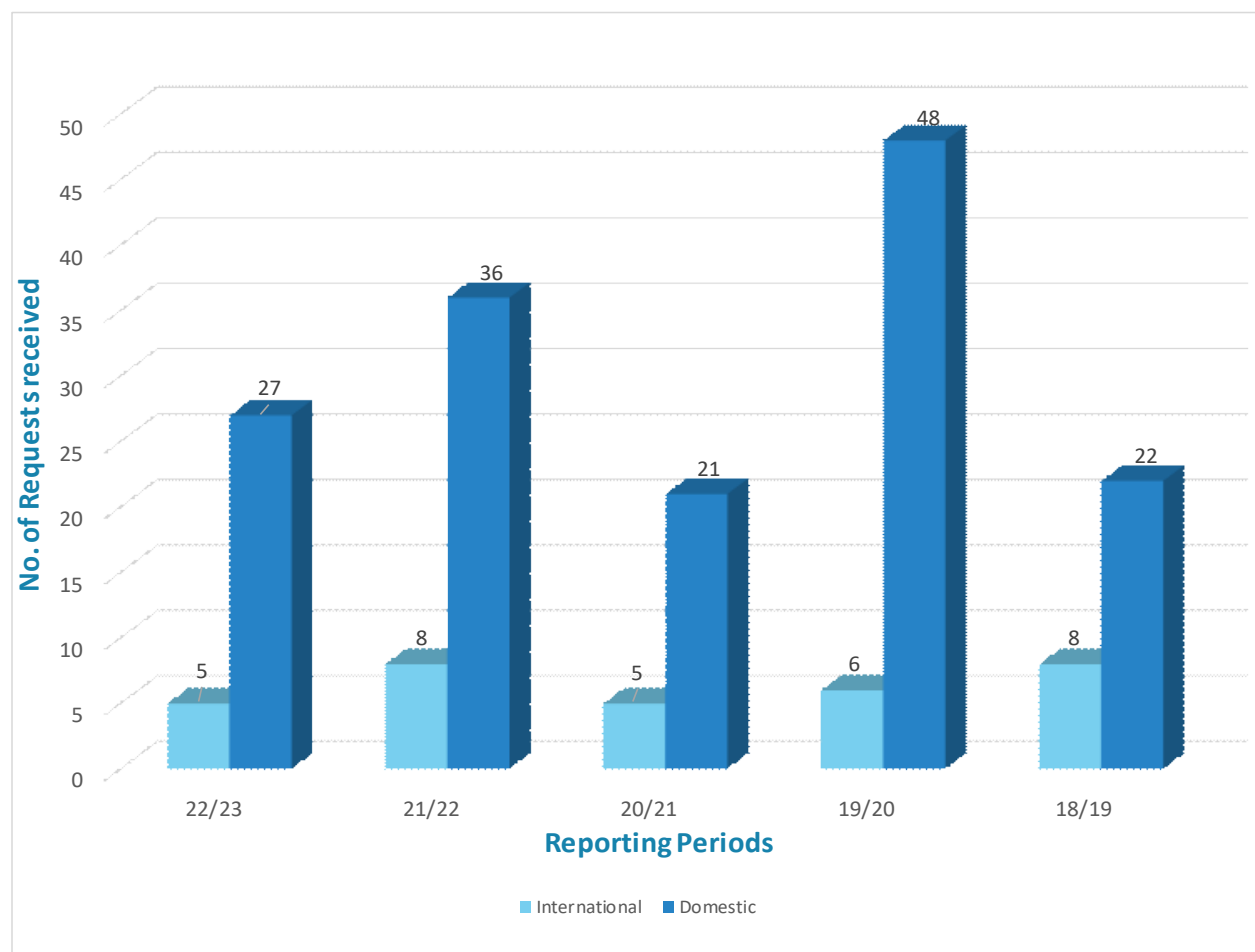
Source - FIA-TCI 2023

(RTCIPF) and the Financial Crimes Unit (FCU) sought assistance from the FIA.

The FIA also received international requests from Ukraine, the United States of America, Serbia, the United Kingdom, and Montenegro within the review period

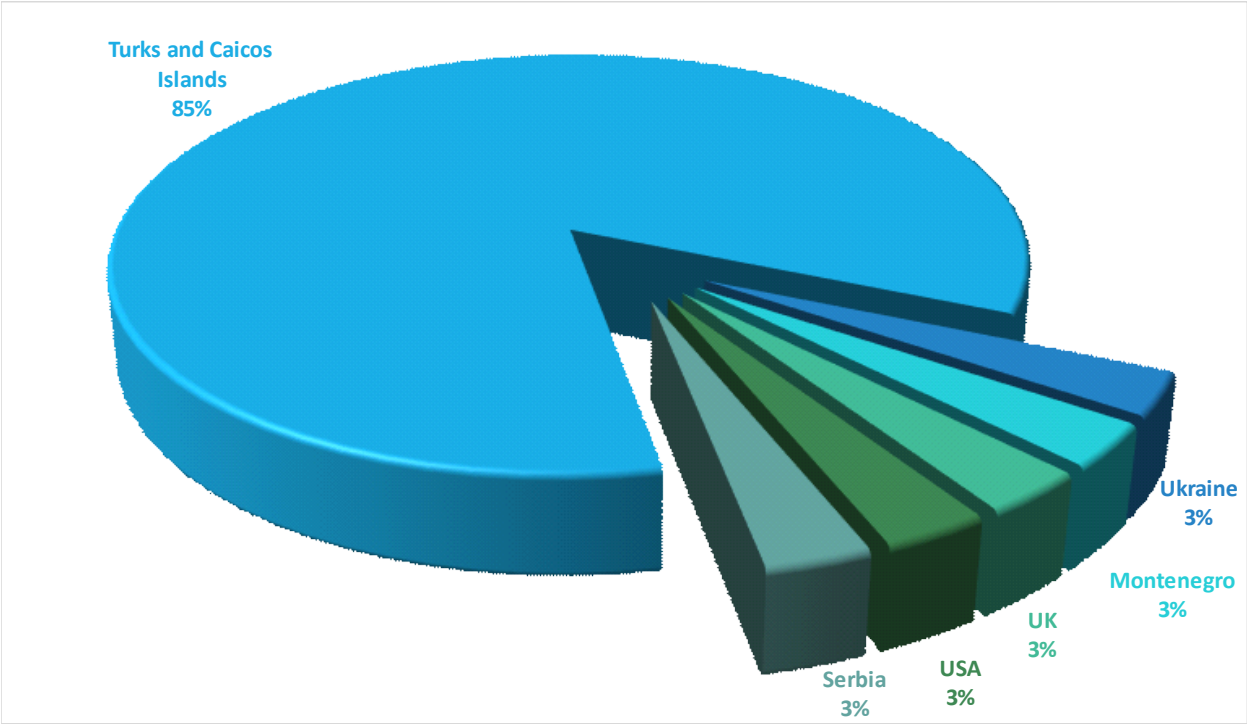
(See Chart 9). There was a decrease of 12 or 27% in the number of requests made to the FIA when compared to FY21/22 = 44 requests (36 Domestic and 8 International). There was an increase of 6 or 23% when compared to FY20/21 = 26 requests (21 Domestic and 5 International) (See Chart 10).

Chart 8 - Requests received from international and domestic counterparts FY18/19 to FY22/23



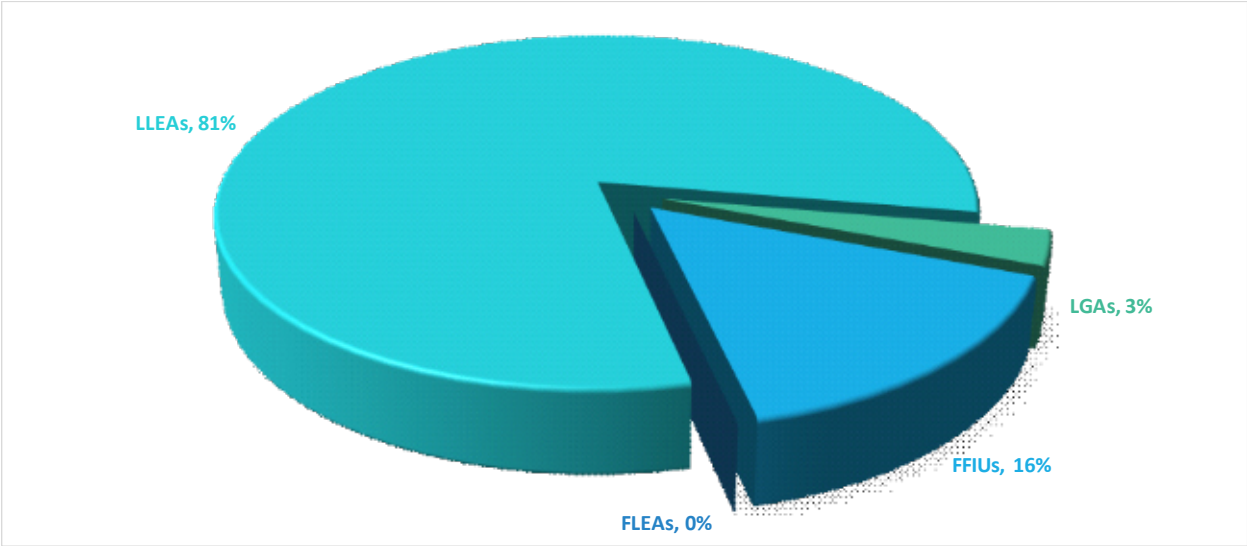
Source - FIA-TCI 2023

Chart 9 - International and local requests received by jurisdictions
1st April 2022 to 31st March 2023.



Source - FIA-TCI 2023

Chart 10 - Requests made to the FIA by LLEAs, LGAs, FFIUs and FLEAs



Source - FIA-TCI 2023

Total Requests made by the FIA for Information

During the FIA's analytical process, there is often a need to verify and corroborate information reported within SARs/STRs. This lends to the need to make requests of reporting entities, LGAs, LLEAs, FLEAs, and FFIUs for a wider scope of information either pertaining to the SAR/STR or other associated requests. Responses provided through these requests often include valuable and pertinent information which analysts utilize to execute the FIA's statutory requirements related to AML/CFT. The FIA reviews requested information which assists in the analytical process and the generation of reports in response to requests it receives. Included within categories of information often requested by the FIA are financial, administrative,

law enforcement data, migratory data, and any other information necessary to conduct analysis, produce intelligence reports and to facilitate decision making regarding disclosures that may reveal ML/TF offences.

Throughout FY22/23, the FIA made 624 requests for information under Section 31 of the Financial Intelligence Agency Ordinance (FIAO). Among these requests, 226 or 36% were SAR/STR related, 349 or 56% were initiated based on local law enforcement requests and 53 or 8% were generated from international requests.

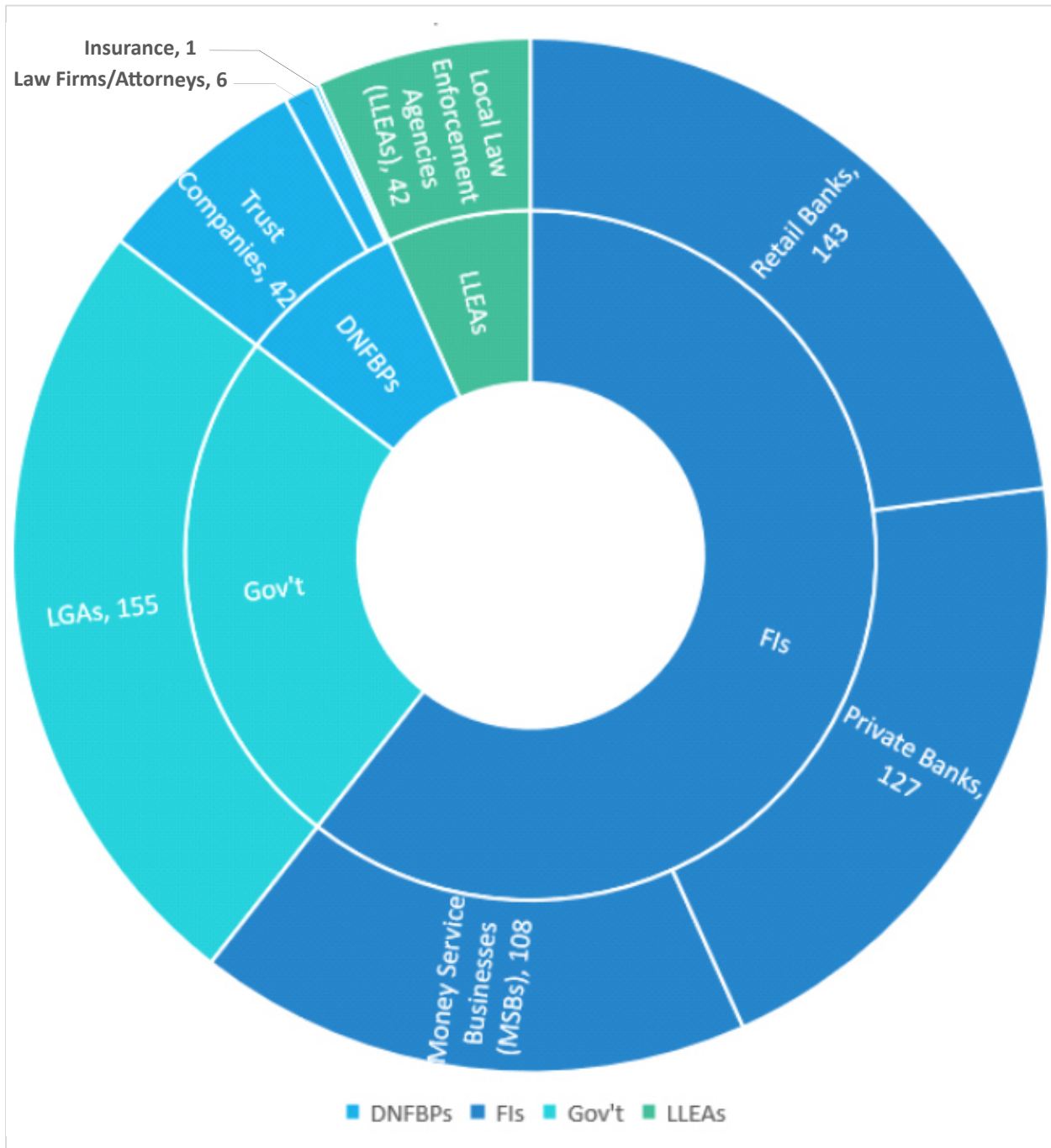
There was a decrease of 153 or 20% of total requests when compared to FY21/22 (777 requests) and an increase of 165 or 36% when compared to FY20/21 (459 requests) (See Chart 11).

**Table 3 - FIA Requests for Information to Reporting Entities and LLEAs
FY18/19 and FY22/23**

Type of Entity	22/23	21/22	20/21	19/20	18/19
Company Service Providers (CSPs)	0	0	0	5	4
Insurance Companies	1	1	1	0	0
Law Firms and Attorneys	6	5	3	1	5
LGAs	155	163	73	80	34
Local Law Enforcement Agencies (LLEAs)	42	46	29	16	19
Money Services Businesses (MSBs)	108	155	91	120	19
Other	0	0	0	0	0
Private Banks	127	152	54	33	4
Real Estate Agent/Broker/Agency	0	0	0	0	0
Retail Banks	143	208	171	217	157
Trust Companies	42	47	37	26	4
Total	624	777	459	498	246

Source - FIA-TCI 2023

**Chart 11 - Number of Requests made by the FIA to Reporting entities, LGAs and LLEAs
1st April 2022 to 31st March 2023.**



Source - FIA-TCI 2023

Requests made to Domestic & International Counterparts.

To enhance the quality of reports disseminated to FLEAs and LLEAs, the FIA obtains additional information from both international and domestic counterparts. Such information often enhances the quality of intelligence products. It is used to provide assistance to both local and domestic counterparts in progressing their analysis and investigations into suspected ML, TF and predicate crimes.

The FIA made a total of 201 requests to both international and domestic counterparts. Of these, 197 requests were made to domestic counterparts, LGAs and LLEAs. There were 4 requests

sent to international counterparts via the Egmont Secure Web (ESW) during the year under review. Such requests demonstrate international cooperation which assists LLEAs and FFIUs in the development and progression of AML/CFT related cases. A large portion of the domestic requests were made to the Financial Services Commission (FSC). This accounted for 45 or 23% of outgoing domestic requests, while the Land Registry followed closely with 40 or 20%. Additionally, requests to the Maritime Department amounted to 34 or 17%, while those to the Department of Motor Vehicles accounted for 36 or 18%. Information requested by the FIA was primarily related to details about

Table 4 - Requests made by the FIA to domestic counterparts from FY18/19 to FY22/23.

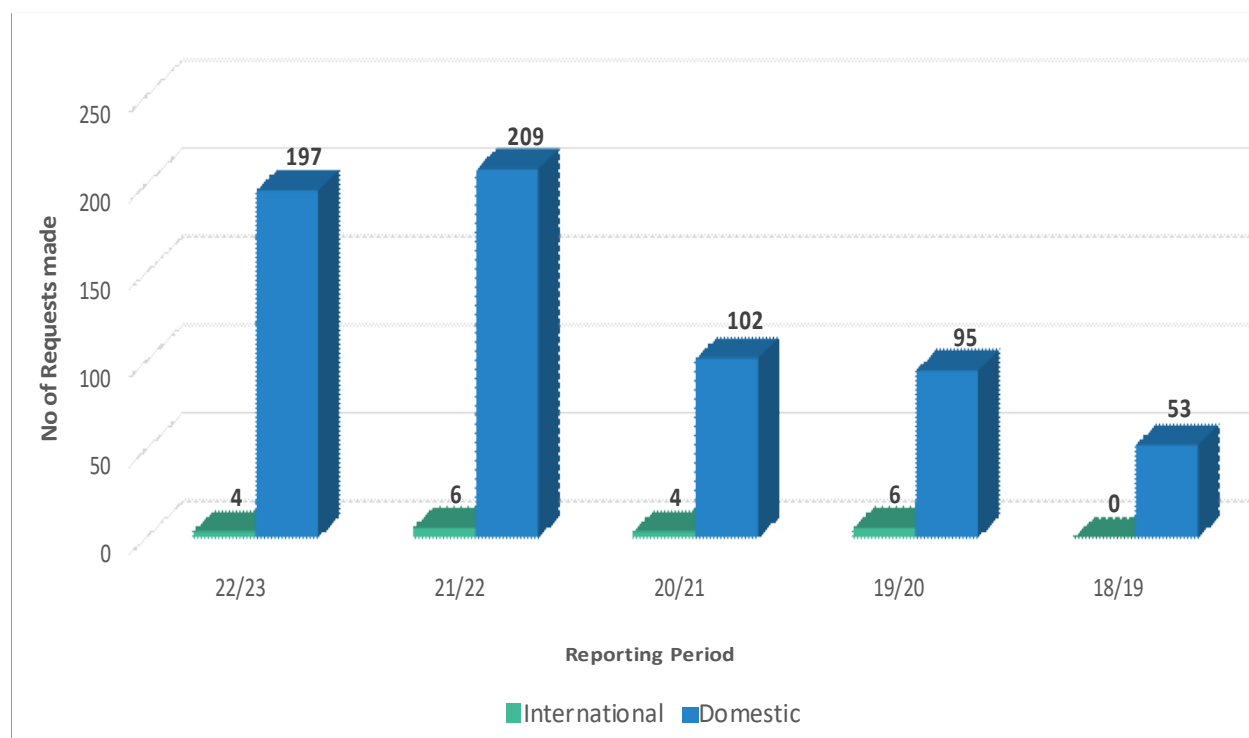
Jurisdiction/Type of Entity	22/23	21/22	20/21	19/20	18/19
International	4	6	4	6	0
FFIUs	4	6	4	2	0
FLEAs	0	0	0	4	0
Domestic	197	209	102	95	53
LLEAs	155	163	73	79	34
LGAs	42	46	29	16	19
Total	201	215	106	101	53

Source - FIA-TCI 2023

financial information, details of entities / companies, and asset tracing. The number of requests made by the FIA during the period under review decreased to 201 (4 international and 197 domestic) or 103% when compared to the previous period under review FY21/22=215 (6 international and 209 domestic). There was a significant increase of 95 or 90% when compared to the same period in FY20/21 = 106 (4 international and 102 domestic).

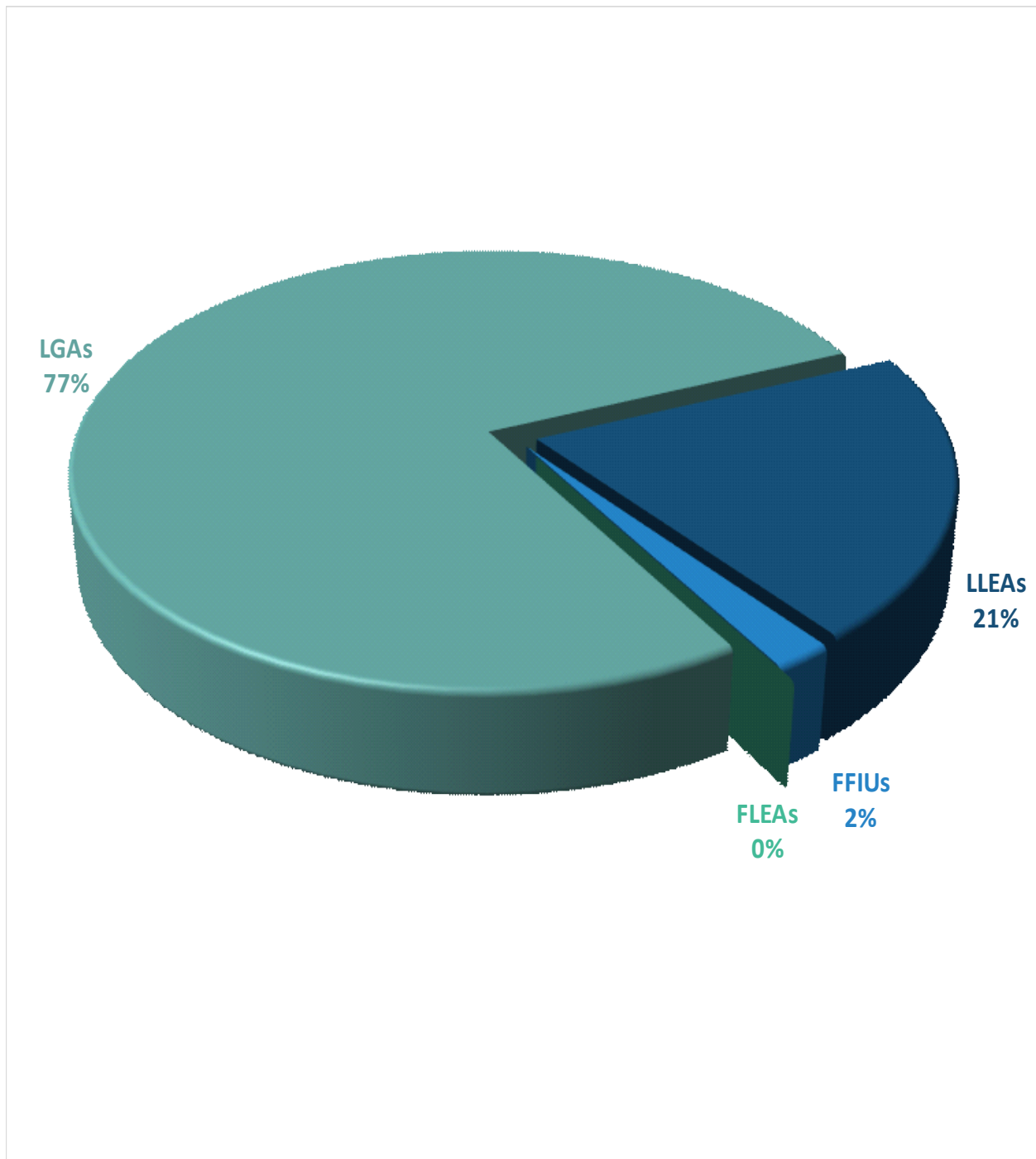
This slight decrease in outgoing requests within the fiscal review period occurred because of process streamlining within the analytical division. Analysts sought to request information solely from entities likely to provide the most relevant information, as well as disseminate overarching requests for all necessary information instead of multiple requests at different intervals. This allowed the FIA to capture more information from reporting entities within a shorter period.

Chart 12 - Requests made by the FIA to International and Domestic Counterparts from FY18/19 to FY22/23.



Source - FIA-TCI 2023

**Chart 13 - Requests made by the FIA to International and Domestic counterparts
from 1st April 2022 to 31st March 2023**



Source - FIA-TCI 2023



Disposition of SARs/STRs

During the period under review, the FIA received and acknowledged 50 SARs/STRs. For each, the details were reviewed, risk assessed, and the prevalent indicators and underlying activity examined and analysed. Seven (7) intelligence reports were produced from the SARs/STRs received. Those intelligence reports were disseminated to relevant law enforcement agencies to progress as potential investigations related to suspected money laundering. Other SARs/STRs remain under analysis as the FIA continues to request information to develop information disclosed within the SARs/STRs. Amongst the SARs/STRs, the most prevalent suspected areas of criminality observed were conflicting customer profiles and unverified sources of funds. Reports related to general suspicious activity, structuring, illicit drugs related proceeds and business email compromise were also observed.

Monetary Value of SARs/STRs

The 50 SARs/STRs received during the FY22/23 accounted for a total monetary value (attempted and actual) of USD62,733,103.59. This amount was inflated by 3 outlier reports, accounting for USD39,199,218.34 or 62% of all SAR/STR reports. One report valued at USD17,430,000.00 involved the proceeds of foreign criminal activity possibly linked to the purchase of TCI real estate. The second outlier was valued at USD11,769,218.34 and related to two sanctioned individuals. The third outlier concerned a report valued at USD10,000,000.00 which

involved the attempted wire transfer of unverified funds into a TCI business account suspected to represent the proceeds of crime.

The remaining 47 SARs/STRs accounted for a total approximate value of USD23,533,855.25 or 38% of all SARs/STRs. Conversely, among the 47, 8 SARs/STRs were reported solely based on prevalent indicators such as adverse media reporting, and the potential match of the subject's name on international sanctions lists. Those reports did not have any associated value stated within them.

Monetary Value of SARs/STRs (cont'd)

Excluding the inflated amounts within the outlier reports, Retail Banks, Private Banks and Attorneys/Law firms accounted for the highest values reported within SARs/STRs. The total monetary values of SARs/STRs reported by Retail Banks were USD16,116,142.35 or 68%, Private Banks reported values of USD4,689,747.90 or 20%, and Attorneys/Law firms reported

USD2,359,525.00 or 10% in SARs/STRs respectively (See Chart 14).

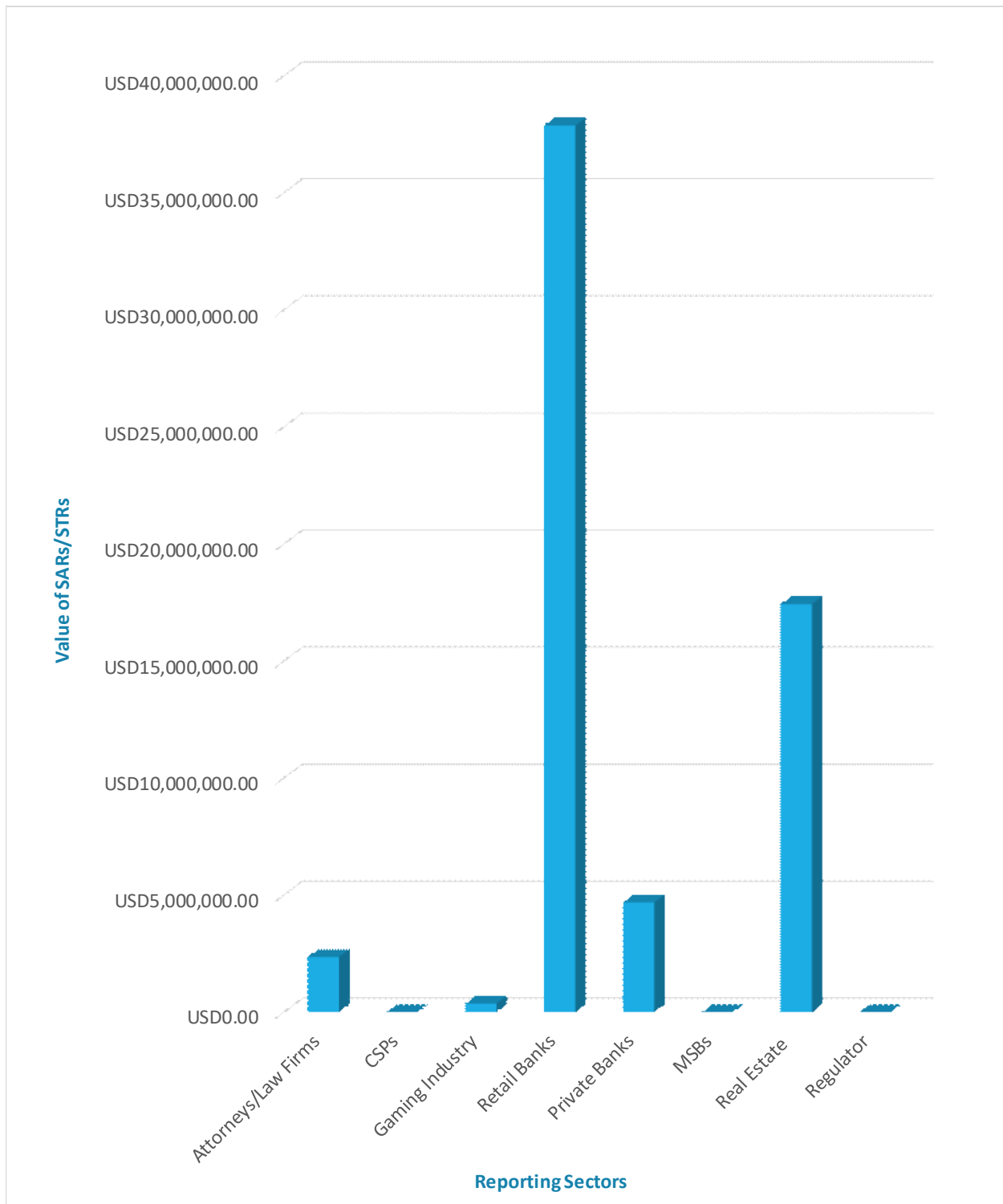
Prevalent indicators, with the highest values for FY22/23 were noted to be investment fraud (USD17,430,000.00), general suspicious activity (USD14,162,055.18), sanctions related activity (USD11,769,218.34) and inconsistent customer profile (USD7,222,253.55) (See Table 5).

Table 5 - Monetary Value of SARs/STRs by indicator for FY22/23

Prevalent Indicators	Total
Fraud - Investment Fraud	USD17,430,000.00
Suspicious Activity	USD14,162,055.18
Sanctions Related - Name Match, etc	USD11,769,218.34
Customer Profile	USD7,222,253.55
Pass Through / Tunnel Activity Acct Transactions	USD4,423,012.56
Cyber Related - Business Email Compromise/ System Compromise	USD2,515,075.00
Complex Ownership Structure	USD2,507,428.00
Unverified Source of Funds	USD2,076,477.90
Structuring	USD346,650.00
Theft Related Offences	USD107,934.38
Drug Trafficking / Illicit Drug Related Proceeds	USD80,307.00
Fraud - Cheque Fraud	USD64,831.68
Third Party Transactions	USD17,000.00
Adverse media reports	USD10,700.00
Cyber Related - Extortion	USD160.00
Grand Total	USD62,733,103.59

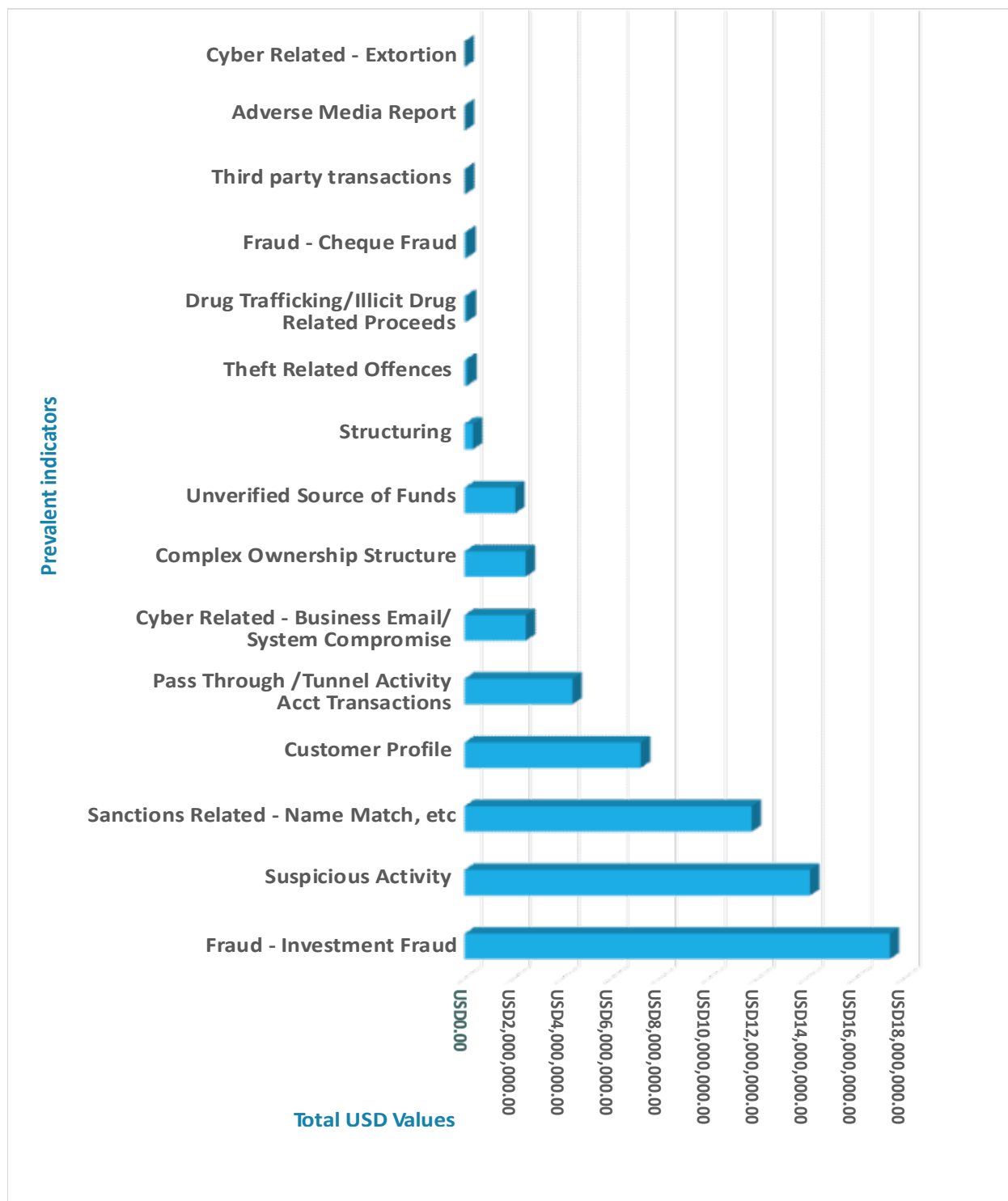
Source - FIA-TCI 2023

Chart 14 - Monetary Value of SARs/STRs reported by Sector from 1st April 2022 to 31st March 2023



Source - FIA-TCI 2023

Chart 15 - Monetary values associated to SARs/STRs submitted to the FIA by indicator from 1st April 2022 to 31st March 2023



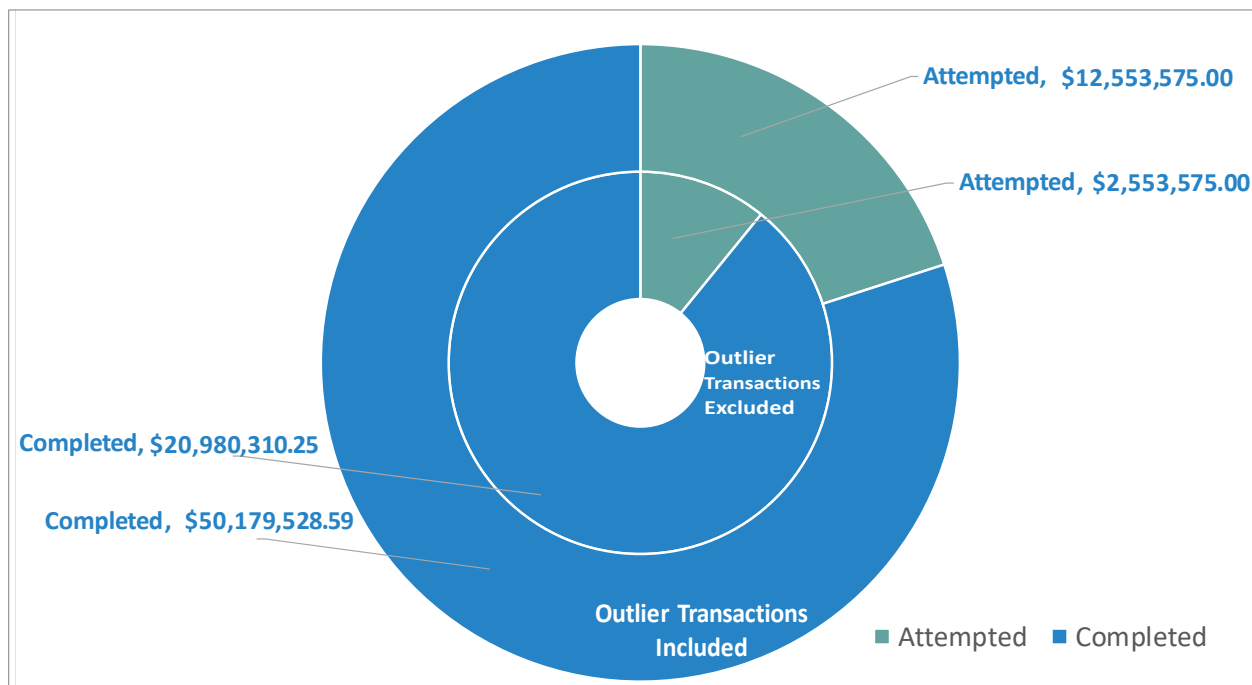
Source - FIA-TCI 2023

Attempted vs Completed SARs/STRs

Of the 50 SARs/STRs filed within the reporting period FY22/23, 41 SARs/STRs activities/transactions were reported as completed, and 9 included transactions denied/declined upon attempt. Minus the outliers, financial institutions and other reporting entities were able to deter USD2,553,575.00 or 11% of the total value of suspicious transactions while USD\$20,980,310.25 or 89% of the transactions were reported after completion (See Chart 16). This deterrence of suspicious financial activity was attributed to the

continued enforcement of compliance programs within FIs and DNFBPs. Such policies ensure a review of completed transactions and allow MLROs to identify, verify, corroborate and report suspicious transactions to the FIA within reasonable time frames. Further, reporting entities are encouraged to have well trained staff who are able to detect, deter, and deny any suspicious financial activity before completion based on any identifiable indicators of money laundering, financing of terrorism or proliferation financing often specific to their sector.

Chart 16 - Comparison of Attempted vs Completed SAR/STR values with outliers vs without outliers from 1st April 2022 to 31st March 2023



Source - FIA-TCI 2023

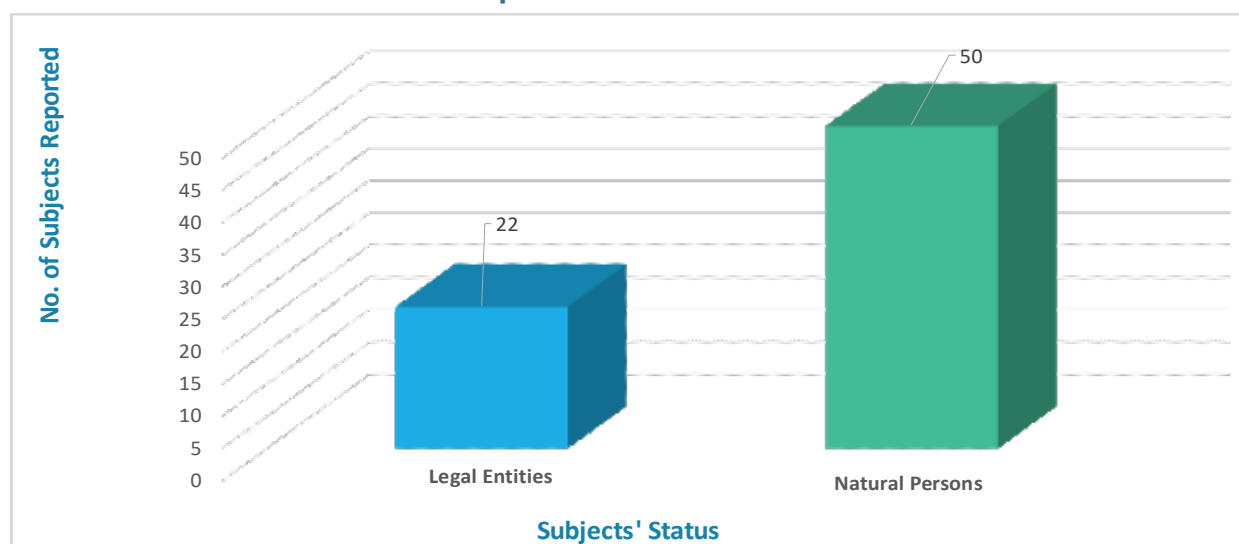


SARs/STRs by Subjects

Natural and Legal Persons

The FIA evaluates SARs/STRs to determine whether the entity reported within is a natural person or legal entity. This allows analysts to assess the true nature of their activity and the potential sources of the funds involved. Of the 50 SARs/STRs the FIA received during the period under review, 50 or 69% involved natural persons and the remaining 22 or 31% were legal entities (See Chart 17). Note that some SARs/STRs may have more than one legal entity or natural person connected to the same report.

Chart 17 - Natural Persons vs Legal Entities reported within SARs/STRs from 1st April 2022 to 31st March 2023.

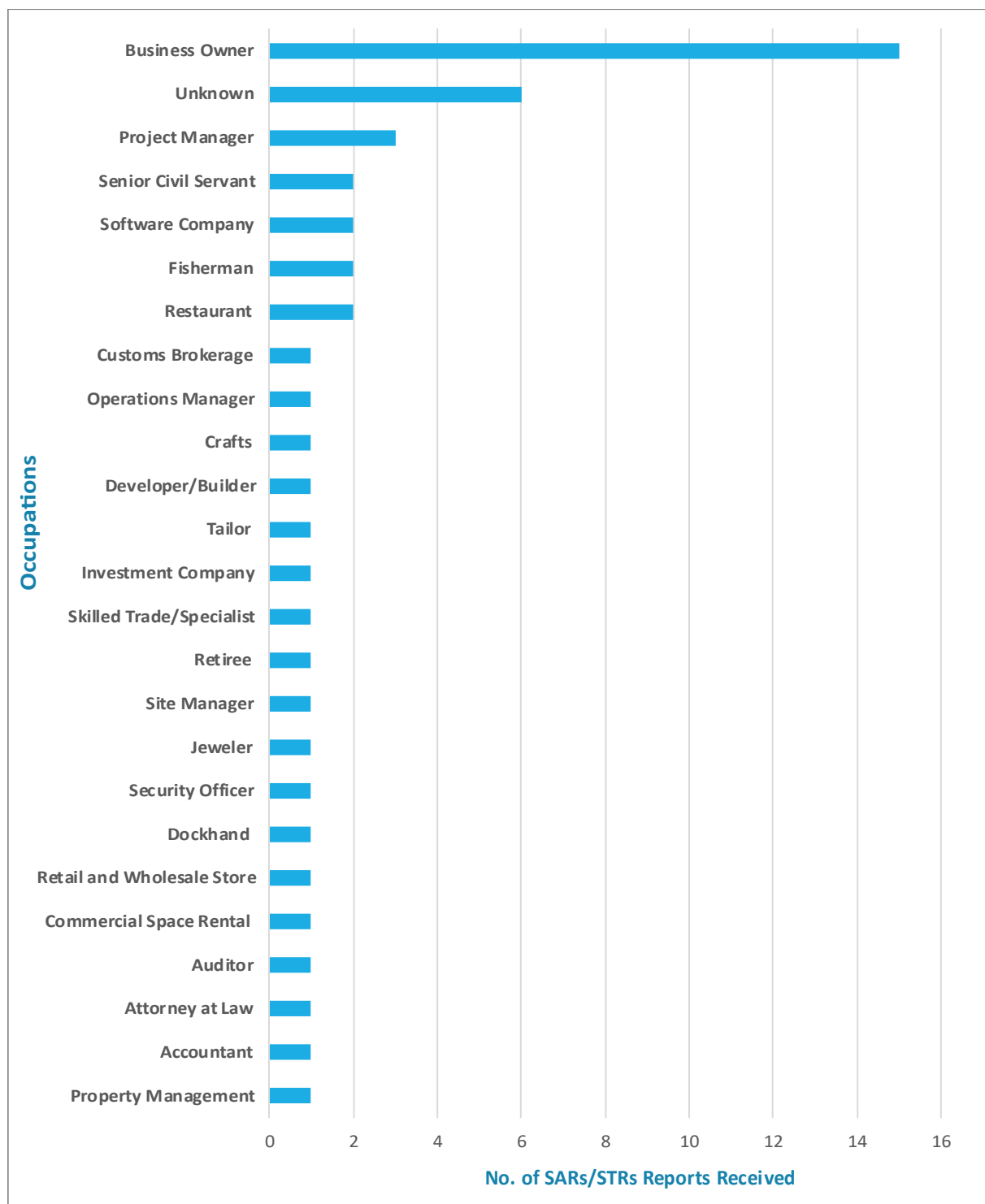


Source - FIA-TCI 2023

Occupation or Business Activity

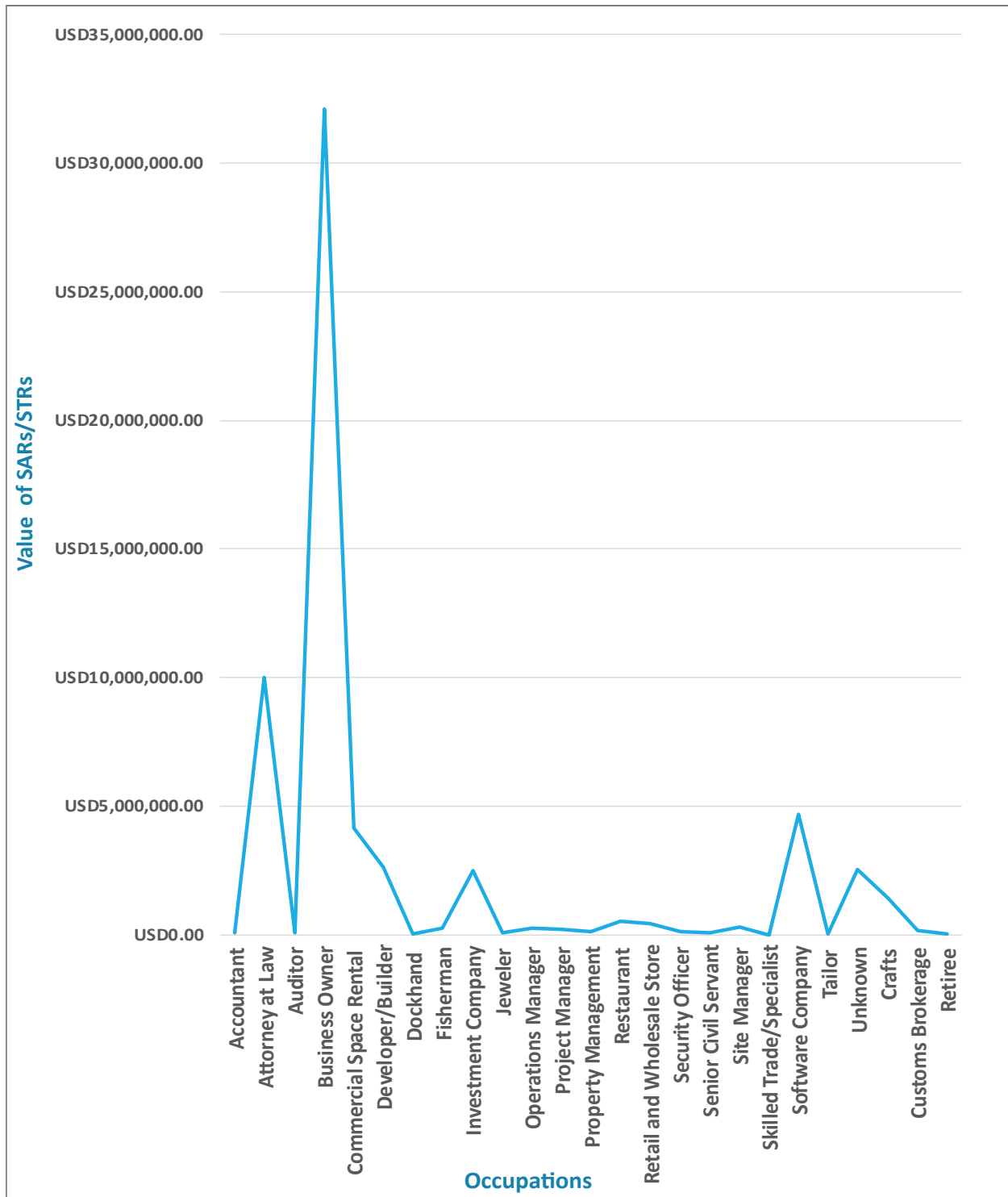
The occupations and business activities of entities reported within SARs/STRs were also examined. For FY22/23 the most prevalent occupation was noted as 'business owner,' which were present in 15 or 30% of the total submissions. Reports submitted involving persons of 'unknown' occupations or unknown nature of business activity (in the case of legal entities) within SARs/STRs accounted for 6 or 12%. Project manager accounted for 3 or 6%, civil servant, software company, fisherman and restaurant all accounted for 2 each or 4% (See Chart 18). The values of SARs/STRs reported by occupation are also illustrated in Chart 19.

Chart 18 - Reported occupations within SARs/STRs submitted from 1st April 2022 to 31st March 2023.



Source - FIA-TCI 2023

**Chart 19 - Value of SARs/STRs reported by occupations
from 1st April 2022 to 31st March 2023**



Source - FIA-TCI 2023

Nationality of Subjects in SARs/STRs

The nationalities (or operational jurisdictions in the case of legal entities) are reviewed within SARs/STRs to determine any existing patterns or trends of activity which provide a nexus to specific nations/countries. For FY22/23, the nationalities of 50 natural persons and 22 legal entities were reported of main subjects, however the nationality or operational jurisdictions of 3 entities (1 legal and 2 natural) could not be determined. Further, in FY22/23 the United States of America, Canada and

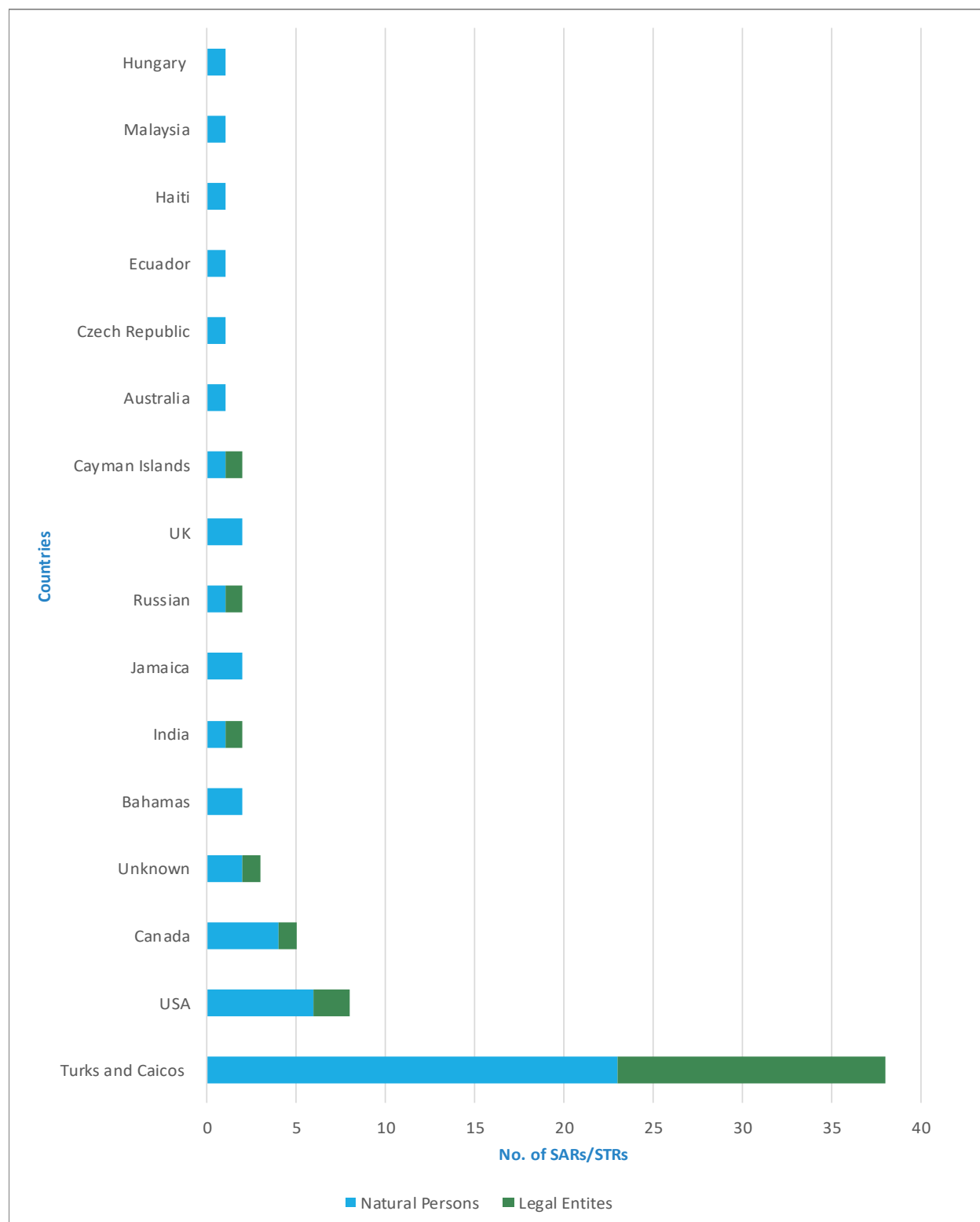
the Turks and Caicos Islands accounted for countries with the largest number of nationalities reported within SARs/STRs (See Chart 20). Nationalities reported from the United States of America totalled 8 or 11% (2 Legal and 6 natural persons), Canada totalled 5 or 7% (1 Legal and 4 natural persons), while the Turks and Caicos Islands reported 38 or 53% (15 Legal and 23 natural). Table 6 provides a detailed breakdown of the reported nationalities and the category of persons(legal/natural) for FY22/23.

Table 6 - Nationalities (Legal and Natural) reported within SARs/STRs from 1st April 2022 to 31st March 2023

Nationality/Location of Entity	Legal Persons	Natural Persons	Total
Turks and Caicos	23	15	38
USA	6	2	8
Canada	4	1	5
Unknown	2	1	3
Bahamas	2	0	2
India	1	1	2
Jamaica	2	0	2
Russian	1	1	2
UK	2	0	2
Cayman Islands	1	1	2
Australia	1	0	1
Czech Republic	1	0	1
Ecuador	1	0	1
Haiti	1	0	1
Malaysia	1	0	1
Hungary	1	0	1
Grand Total	50	22	72

Source - FIA-TCI 2023

**Chart 20 - Nationality of subjects related to SARs/STRs
from 1st April 2022 to 31st March 2023**



Source - FIA-TCI 2023

Reason for Reporting (Indicators)

Indicators by SARs/STRs Submitted

There are common indicators of financial crime, money laundering and terrorist financing activity which cause reporting entities to further scrutinise transactions. Such indicators observed by reporting entities within SARs/STRs for FY22/23 included customer profile reports and unverified source of funds, which

accounted for 21 or 42% and 6 or 12% of reports respectively (See Table 7).

Customer profile reports were largely submitted by retail banks upon discovery that the customer's financial profile failed to match their banking activity. Also, once a reporting entity was unable to clarify the true source of the funds, or the destination involved

Table 7- Prevalent Indicators observed within SARs/STRs from 1st April 2022 to 31st March 2023

Prevalent Indicators	SARs/STRs Submitted
Adverse Media Report	2
Complex Ownership Structure	1
Customer Profile	21
Cyber Related - Business Email/System Compromise	3
Cyber Related - Extortion	1
Drug Trafficking/Illicit Drug Related Proceeds	3
Fraud - Cheque Fraud	2
Fraud - Investment Fraud	1
Pass Through /Tunnel Activity Acct Transactions	1
Sanctions Related - Name Match, etc	1
Structuring	3
Suspicious Activity	3
Third party transactions	1
Unverified Source of Funds	6
Theft Related Offences	1
Grand Total	50

Source - FIA-TCI 2023

within the particular transaction(s), a SAR/STR was filed citing unverified source of funds.

Cyber related SARs/STRs for the review period largely involved cyber extortion and business email compromise cases.

SARs/STRs involving business email compromise, drug trafficking/illicit drug proceeds, structuring and general suspicious activity all accounted for 3 or 6% each.

Indicators by Monetary Values

For the reporting period, investment fraud related SARs/STRs was observed to be the prevalent indicator with the highest USD value (due to outlier reports). SARs/STRs involving investment

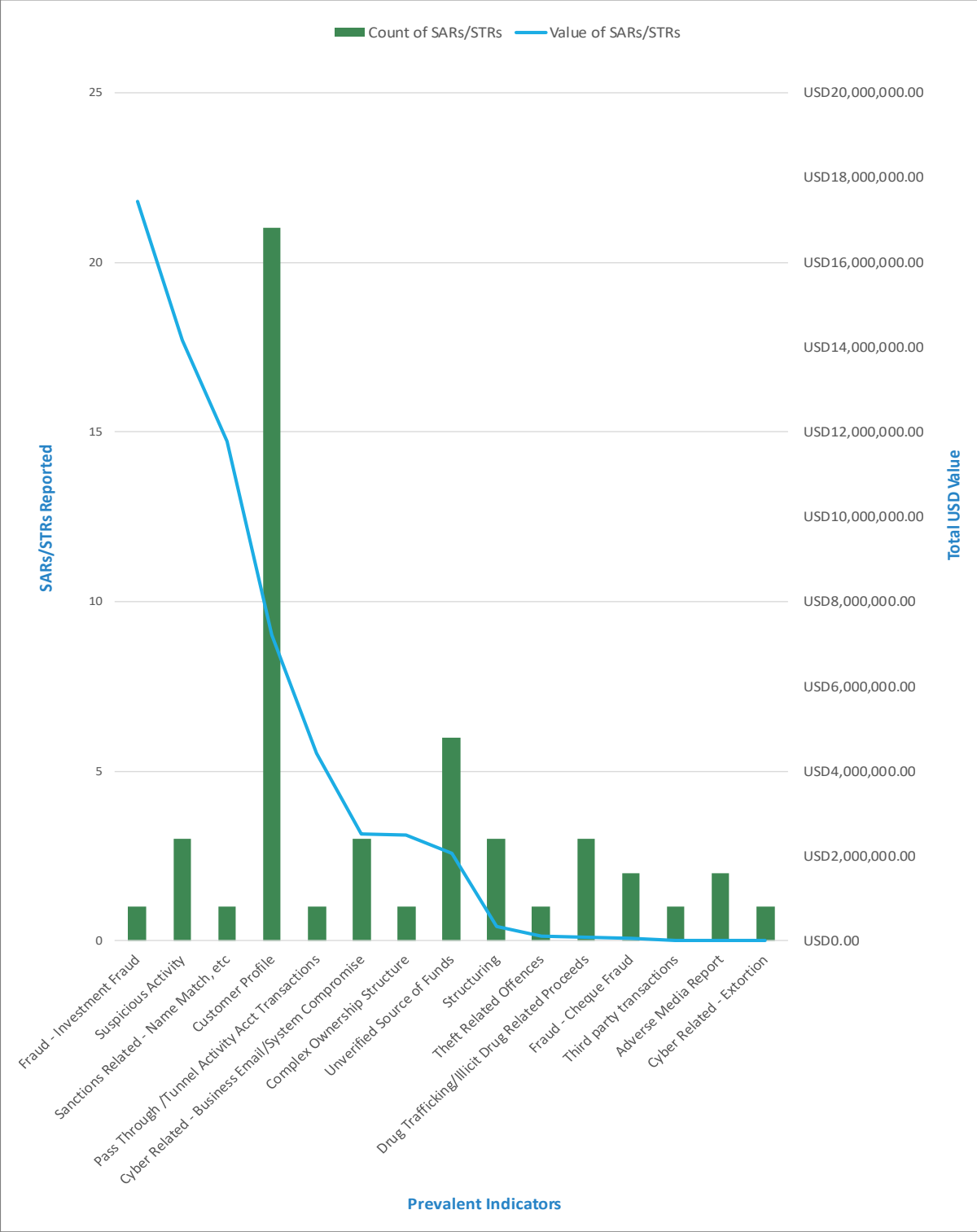
fraud reports accounted for USD17,430,000.00 or 28% of the total value of reports submitted for FY22/23.

Suspicious activity was noted as the second most prevalent indicator and totalled USD14,162,055.18 or 23%.

Due to the recent implementation of economic sanctions due to the Russia/Ukraine war, a SAR/STR was filed on individual whose name matched the UK sanctions lists published throughout the Turks and Caicos Islands. This sanction related report was valued at USD11,769,218.34.

See Chart 21 for a comparative view of the value of SARs/STRs submitted to that of the number of SARs/STRs reported for FY22/23.

Chart 21 - Prevalent indicators observed within SARS (associated USD values) for SARs/STRs reported from 1st April 2022 to 31st March 2023



Source - FIA-TCI 2023

Common Indicators Observed

Fraud - Investment Fraud

Investment fraud occurs when persons use fraudulent claims to solicit investments, acquire loans, or establish bank accounts. Before conducting investment activities reporting entities should confirm that proper due diligence and supporting documentation, and identification are verified. During the FY22/23 the FIA received one (1) SAR/STR on suspected investment fraud which amounted to approximately USD5,092,906.20. This report involved the proceeds of crime abroad possibly linked to TCI real estate.

Sanctions – Name Match

Financial sanctions are restrictive measures imposed on persons, entities, and bodies which curtail specific activities to exert pressure and influence on them. Restrictive measures include, but are not limited to, financial, trade, restrictions on travel or civil aviation related activity. During the FY22/23 the FIA received one (1) report of a suspected name match on a sanctions list with a total value of

USD11,769,218.34. The SAR/STR related to a business entity within the TCI, facilitating third party business transactions for an entity beneficially owned by two sanctioned individuals.

Suspicious Activity

This generally occurs when a reporting entity determined a customer's transaction or behaviour to be unusual when their normal transaction pattern changes. For example, a customer may conduct an unusually high number of withdrawals which is not consistent to their normal business or personal activity. The reporting entity may take precautions and file a SAR/STR with the FIA. During the FY22/23 the FIA received three (3) SARs/STRs which amounted to USD14,162,055.18, based on general suspicious activities. Two of these SARs/STRs related to atypical wire transfers and cheque deposits for which the sources of funds were questionable. While one involved two subjects attempting to engage in business with a local reporting entity while providing inconsistent information.

Unverified Source of Funds

Engaging in adequate customer due diligence to identify a client's source of funds is critical for reporting entities who need to perform verification exercises before conducting transactions. This is especially important in cases where transactions are unrelated or have a suspiciously high value or involve high risk individuals and jurisdictions. This process is essential to prevent transactions that may be linked to money laundering, proliferation financing or terrorist financing and other predicate offences.

For the reporting period the FIA received six (6) SARs/STRs from various reporting entities regarding unverified source of funds. The value of these SARs/STRs amounted to USD2,076,477.90. These cases included atypical cash deposits and wire transfers to the customers' accounts of which the source of these funds were unverified.

Adverse Media Report

Adverse media screening by reporting entities plays a major role in customer due diligence. Reporting entities are often alerted when their clients are

reported adversely within media reports through media screening systems. Additionally, during the initiation of banking relationships or during account reviews, they can also uncover negative open-source information. These can all trigger an examination of the customer's file. For example: In conducting due diligence on a customer, an article was found which alluded to the customer having drug charges, as such a SAR/STR was filed against the customer. During the FY22/23 the FIA received two (2) SARs/STRs from reporting entities with transactions amounting to USD10,700.00, which were submitted due to adverse media reports. The adverse media reports pertained to information on clients involved in laundering money which appeared to be the proceeds of illicit activities.

Structuring

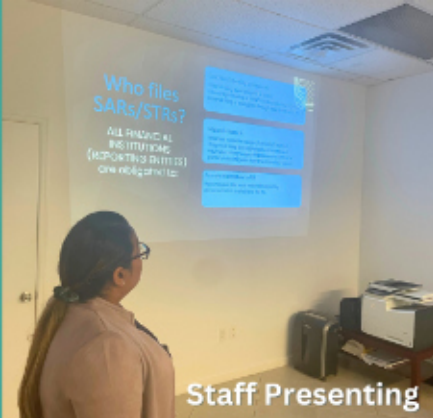
Structuring involves customers purposefully depositing funds below financial institutions' reporting thresholds in order to evade these requirements in order to remain concealed. This occurs when a large amount of funds is divided

into smaller amounts so that these transactions can remain undetected by reporting entities. An example of this is: A client gained USD150,000.00 through unlawful activities and tries to avoid the reporting threshold requirements by depositing smaller quantities into various branches of the same financial entity or other financial institutions in order to stay undetected and incorporate the funds into the financial system. In FY22/23, three (3) SARs/STRs amounting to USD346,650.00 relating to structuring were submitted to the FIA.

Customer Profile

Reporting entities are better able to identify suspicious transactions when a comprehensive customer profile is generated. A customer profile contains

significant client information relating to income, employment, address, nature of business, country of operation and expected cash flow. Example: A local restaurant making deposits to its business account in excess of USD350,000.00 over a short period of time. The owner of the restaurant does not generate sufficient funds as indicated by their normal business activities to substantiate this amount, which is inconsistent with their customer profile. During the FY22/23 the FIA received twenty-one (21) SARs/STRs related to transactions which were not in line with the customers' profiles and involved cash deposits being deposited into the customers' personal accounts that were not in line with their account profiles.



Staff Presenting



NPO Sector



Gaming Industry Sector



Financial Services Commission



Motor Vehicle Dealers Sector



High Value Dealers - Jewelers Sector



Director Baker Greetings



FSC Reps



Gaming Sector



Gaming Sector



NPO Sector

AML/CFT Outreach and Awareness 2023

Summary

On Monday 13th February 2023, the FIA conducted a second round of its AML/CFT Outreach and Awareness program. The aim of the sessions was for participants to gain an understanding of the role of the FIA, key players in the industry, suspicious activity reporting, AML/CFT concepts - terrorism and terrorism financing, proliferation financing, sanctions notices and reporting, and offences or penalties under the Proceeds of Crime (POCO) ordinance.

This second phase of the Outreach & Awareness program helped to remedy the feedback of “limited outreach and awareness” regarding AML/CFT highlighted

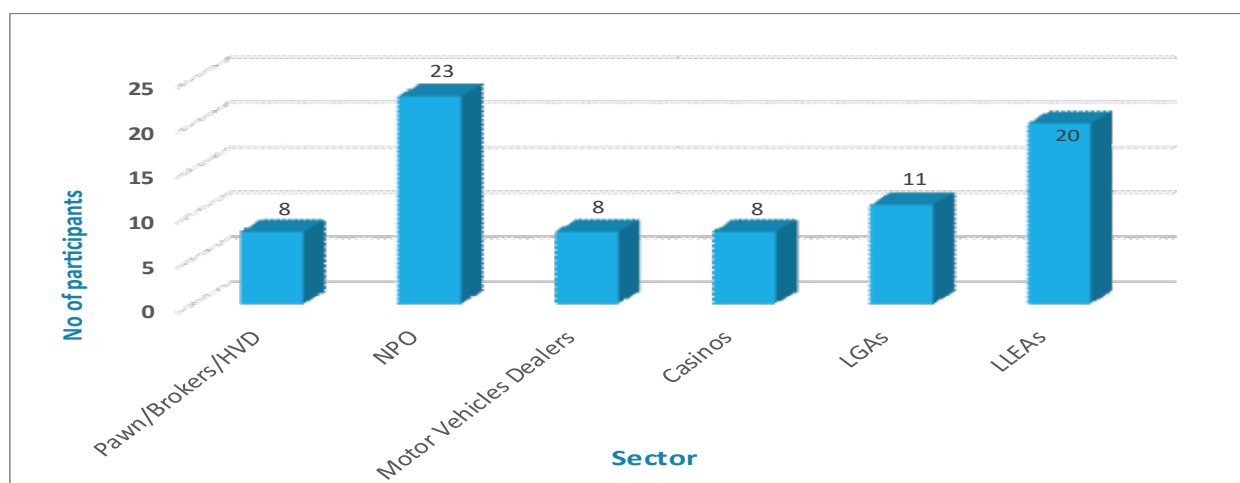
as a deficiency in the 2020 CFATF Mutual Evaluation Report (MER).

During the period February 13th to March 16th, 2023, the FIA’s team completed various categories of AML/CFT introductory and sector specific presentations. Brochures were also prepared and distributed to all participants and included four (4) sector specific brochures for Q4 of FY22/23 sessions.

Participation and Procedure

The February to March 2023 round of AML/CFT Outreach and Awareness was conducted by the FIA staff in collaboration with the Financial Services

**Chart 22 – Count of participants by Sector
1st April 2022 to 31st March 2023.**



Source - FIA-TCI 2022

Commission (FSC) and the Gaming Control Commission (GCC). Several AML/CFT sessions were conducted by FIA staff and two members of FSC, and during the sessions for the Gaming establishments, the GCC participated. This training was done in person and virtually.

Participants of this training included members of non-profit organizations, the gaming sector, jewellers, pawnbrokers and high value dealers, motor vehicle dealers, competent authorities, and members of the local law enforcement.

There were 78 participants involved in these sessions. Due to the large number of participants in some sectors, the FIA delivered multiple presentations to accommodate all participants. The sessions were conducted in the FIA's conference room.

Each session was approximately two hours which included a discussion segment to engage the participants to raise questions or seek clarification, on the information presented. All attendees of the sessions received a certificate of participation from the FIA as well as a copy of the presentation for their reference and review, and for the entities' inclusion in their internal training of staff. The sectors with the highest level of participants within the reporting period were the Non-Profit Organizations with 23 participants, the LLEAs with 20 participants, and the LGA's with 11 participants. The other 3 sectors had 8 participants each for the reporting period.

The Way Forward

Following the Outreach & Awareness sessions, the FIA has noted a slight increase in submissions from the DNFBP sector which has continued into the FY23/24 fiscal year. This is encouraging and has highlighted other sectors on which the FIA must place focus on for the upcoming FY23/24. Furthermore, based on demand and availability, the FIA will accommodate requests for additional one-on-one outreach and awareness sessions from reporting entities and/or competent authorities to continue sensitisation efforts in the upcoming fiscal year. The FIA will also review the quantity of SARs/STRs at the end of the FY23/24 submitted to the Agency with correlation to the completion of the outreach and awareness sessions.



FIA Activities

Table 8- Staff Training undertaken for FY22/23

Training Entity	Training Course
Office of the Attorney General and Deputy Director of FSC	Online training on Financial Sanctions Guidance.
World Bank	3-day virtual training on National ML/TF Risk Assessment (NRA).
ECOFEL E-Learning	Critical Thinking.
EGMONT Group	Virtual Assets E-Learning.
RUSI Training	Two-day conference – Proliferation Financing.
OFSI	Trust Services Sanction Training
COPOLAD	5-day virtual training – Open-source Intelligence.
CFATF/FAST	Mobilizing Anti-Money Laundering Actors in the fight against Modern Slavery – Webinar for the CFATF Region.

Source - FIA-TCI 2023

Staff Development and Training

In FY22/23 the staff participated in various in-person, online training courses and webinars. The FIA has developed a training program based on online and other physically available courses identified for future implementation to ensure that the Agency is enhanced through continuous training. Employees are also encouraged to seek out and take part in relevant training programmes to enhance their skillset once workload permits. It is also imperative that employees develop themselves professionally so that the quality of work produced by the agency is kept at a very high standard.

CFATF Heads of FIUs Forum

On Tuesday 14th March 2023 an FIA-TCI analyst attended the Heads of FIUs Forum, which was held virtually. The meeting discussed FIUs' independence and autonomy. There were contributions from various members, who raised issues surrounding FIU independence such as FIUs' budgets, operations, the need for sensitization, the need to address deficiencies, and the Egmont report on independence. This was followed by presentations from FIU Bahamas on physical and information security. After the presentation the COPOLAD training initiative for FIUs was discussed. Three

CARICOM member states volunteered to assist with the development of a syllabus of the training to tailor it for FIUs in the Caribbean. Further, the Chair stated that he has been in contact with FinCEN with regards to crypto/virtual assets training. He also reminded everyone of the “Mobilizing Anti-Money Laundering Actors in the Fight against Modern Slavery” webinar being held on Friday 17th March 2023 before bringing the meeting to a close.

BVI onsite assessment

During the period March 15th to April 3rd, 2023 the Director of the FIA, Mr. Dwayne Baker attended a BVI onsite assessment as part of the IMF delegation. The IMF is conducting the 4th Round Mutual Evaluation assessment of the BVI using the FATF standards.

FIA’s Collaboration with Law Enforcement Agencies

During the review period, the FIA continued meetings and collaboration with the FCU, the Integrity Commission and during this fiscal included the Immigration Division. The goal of these efforts is to focus primarily on the status

and outcomes of investigations in which the FIA provided intelligence reports as per requests and other intelligence reports disseminated. The meetings were geared towards obtaining feedback on the usefulness of the intelligence derived from the analysis of SARs/STRs. It is hoped that with a greater collaborative effort between our authorities there will be an increase in the measurable outcomes from these investigations thereby meeting the objectives of both agencies and enhancing effectiveness. These engagements continue to be useful in ensuring that dialogue is maintained between all stakeholders in order to ensure that the FIA’s work aligns with the needs of law enforcement regarding investigations and predicate crimes with links to ML and TF.

LinkedIn Page

The FIA launched its first social media page on the LinkedIn platform. The intention is that will utilize this platform to continuously share AML/CFT related information pertaining to the agency, the TCI and any other critical open-source information which should be shared to our relevant reporting entities.

Conclusion

Although suspicious activity reporting remains low in numbers, a slight increase in reports from the DNFBP sector has been noted. This is likely a direct result of the FIA's AML/CFT Outreach & Awareness sessions which included the DNFBP sector in both FY21/22 and FY22/23. This ongoing venture continues to enlighten reporting entities on their obligations to detect and deter suspicious financial activity, associated penalties for not filing SARs as stipulated by law and efforts to suppress money laundering activities within the TCL.

The FIA continues to engage with the RTCIPF- the FCU, IC and the Immigration Division, through report dissemination process streamlining, meetings and workshops as part of a collaboration process regarding the usefulness of the Agency's intelligence and the progression of ML/TF investigations.

Staff has resumed attendance at pertinent in person training courses and skills development conferences which continue to improve and strengthen their competence, ability and capacity.

The FIA continues to ensure its mandate to produce quality intelligence products and reports for use by competent authorities in the fight against Money Laundering, Terrorist Financing and the Proliferation of Weapons of Mass Destruction are met. The FIA also closely adheres to FATF's 40 Recommendations which provides guidance to all Financial Intelligence Units responsible for the receipt, analysis and dissemination of information to assist competent authorities in the global fight against money laundering, terrorist financing and proliferation financing ♦



Current FIA Board of Directors and the Director
(From Left): Director - Dwayne Baker, CAMS, Board Member
Chairman - Anton J. J. J. J.
Board Members - Grescelle Missick, Eugene Otuonye, K.C., Board

THE FINANCIAL INTELLIGENCE AGENCY of the Turks & Caicos Islands



Director of the Financial Intelligence Agency
Member - Hon. AG Rhondalee Braithwaite-Knowles, OBE, KC,
B. Faessler (Centre),
Board Member, (Missing) Trevor Botting, Commissioner of Police.



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