



# goAML & The Regulatory Framework for AML/CFT/CFP

**FINANCIAL INVESTIGATIONS DIVISION**

**Date: November 2021**


# OBJECTIVES

- Overview of FID & AML/CFT/PFT Statues
- Money Laundering vs. Terrorist Financing
- Proliferation Financing
- The Regulated Sector & Their Responsibility
- Compliance Culture or Face the Penalties
- Jamaica's Focus & Overview of the National Risk Assessments



# Overview of FID

<https://www.fid.gov.jm/>



The screenshot shows the homepage of the Financial Investigations Division (FID). At the top left is the FID logo, a circular emblem with 'FINANCIAL INVESTIGATIONS DIVISION' and 'FID' in the center. To its right is the text 'Financial Investigations Division'. A search bar with a 'Search' button is located in the top right corner. Below the logo and text is a navigation menu with links: HOME, ABOUT US, PUBLICATIONS, LEGAL MATTERS, RESOURCES, CONTACT US, and NEWS AND RELEASES. The main banner features a large magnifying glass over a dollar sign, with the text 'THE FID IN ACTION Protecting Financial Integrity'. Below the banner are three smaller images: a person in a high-visibility vest, a car, and a person looking at a document. At the bottom are three buttons: 'go AML Access FID Online Portal', 'Legislation', and 'Advisories'.

**FINANCIAL INVESTIGATIONS DIVISION**  
**FID**

Financial Investigations Division

Search... Search

A division of the Ministry of Finance & the Public Service

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**THE FID IN ACTION**  
Protecting Financial Integrity

25 | 26 | 27 | 28

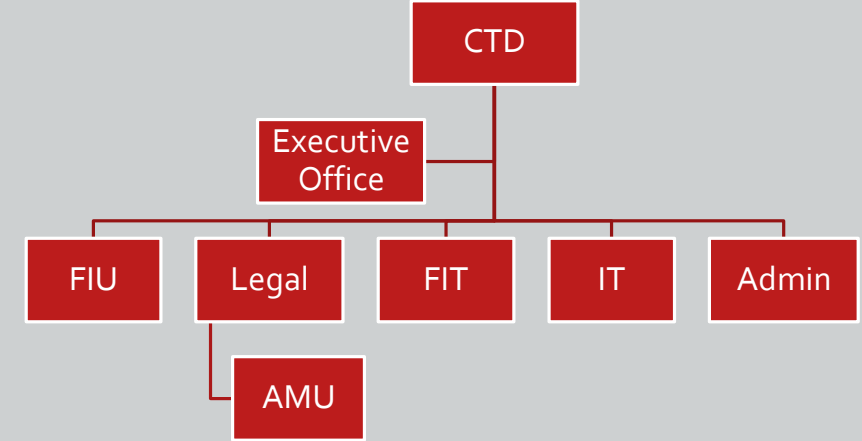
go **AML**  
Access FID Online Portal

Legislation

Advisories

# The Financial Investigations Division

- Established in December 2002
- The Designated Authority, which ultimately refers to the Chief Technical Director of the FID
- Governed by;
  - 1. Financial Investigations Division Act (2010)**
    - Amended 2013
  - 2. The Proceeds of Crime Act (2007)**
    - Amended 2013, 2016 & **2019**
  - 3. The Proceeds of Crime (Money Laundering Prevention) Regulations (2007)**
    - Amended 2013 & **2019**
  - 4. Terrorism Prevention Act (2005)**
    - Amended 2011, 2013 & **2019**
  - 5. Terrorism Prevention (Reporting Entities) Regulations, 2010**
    - Amended **2019**
  - 6. United Nations Security Council Resolutions Implementation Act (2013)**  
**Amended 2019**



FIU

- Receives, processes, analyses, and disseminates financial information/ intelligence
- Statistical, tactical & strategic analyses

FIT

- Criminal Investigations
- Civil Investigations

Legal

- Bring civil matters to court for adjudication
- Provide advice on criminal matters

AMU

- Manages restrained and forfeited assets




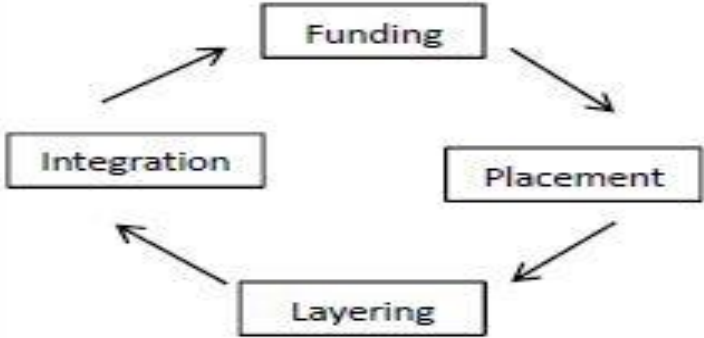
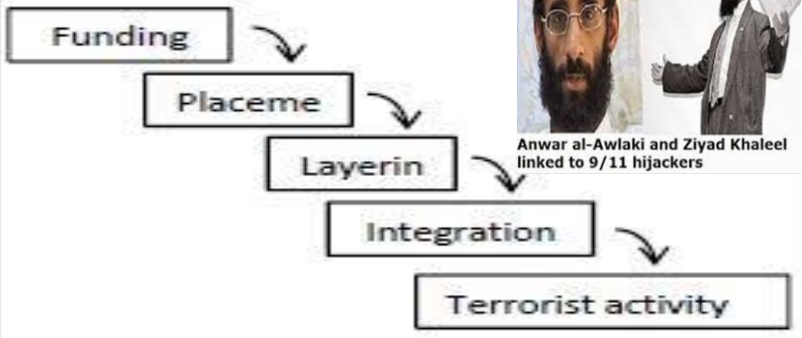

# Money Laundering vs Terrorist Financing

# Key Objectives of Anti – ML/TF

- To detect abuse of financial system by uncovering the money trail
- To disrupt criminal activities by:
  - ✓ Prohibiting transactions that facilitates ML/TF & PF;
  - ✓ Asset recovery mechanism
  - ✓ Asset freeze mechanism
- Deter crime
- Deter funding of events/ activities that may lead to major catastrophes



# Money Laundering vs. Terrorist Financing

| Comparison        | Money Laundering   | Terrorist Financing   |
|-------------------|--|---|
| Motivation        | Profit-seeking   | Ideological   |
| Intention         | To clean ill-gotten gains or dirty money so that they appear to be proceeds from legal activities.   | To intimidate a population or to compel a government or an international organization to do or abstain from doing any specific act through the threat of violence.  |
| Source of funding | <ul style="list-style-type: none"> <li>• Unlawful sources                             <ul style="list-style-type: none"> <li>- Extortion, kidnapping, narcotics trafficking, smuggling, fraud, theft, robbery, identity theft, improper use of charitable or relief funds.</li> </ul> </li> </ul>  <p>Source: <a href="http://www.fintraca.gov.af/assets/ppt/AML">www.fintraca.gov.af/assets/ppt/AML</a></p> | <ul style="list-style-type: none"> <li>• Unlawful sources                             <ul style="list-style-type: none"> <li>- Extortion, kidnapping, narcotics trafficking, smuggling, fraud, theft, robbery, identity theft, improper use of charitable or relief funds and donors many have no knowledge that their donations have been diverted to support terrorist causes.</li> </ul> </li> <li>• Legitimate sources                             <ul style="list-style-type: none"> <li>- Charitable donations, foreign government sponsors, business ownership and personal employment.</li> </ul> </li> </ul> |
| Methods           | Placement – Layering - Integration   | The same as or similar to those methods used by other criminals that launder funds.   |
| Life circle       | <p>Circular life circle</p>    | <p>Linear life circle</p>  <p><br/>Anwar al-Awlaki and Ziyad Khaleel linked to 9/11 hijackers</p>  |

# ML & TF TRENDS/ RED FLAG

## Money Laundering

- Rental of accounts
- Unauthorized third party transfers
- Cheque Fraud
- Card refund fraud
- Internal collusion
- Property and assets placed in the name of third parties, even placed in fictitious names
- Use of businesses that are discontinued, sold, transferred to disguise the real owners and operators

## Terrorist Financing

- Transfer of Cash in small amounts
- Repetitive Transfers of like nature
- Transfers to sensitive countries of destination
- Transfers from different regions to a mutual recipient(s)
- Funds transfer activity/ trade payments occurs to or from a financial secrecy haven, or to or from a high-risk geographic location without any apparent business reason
- Mismatch between the economic activity, country of origin, or person and the remittances received



# Gaming Sector Trends

## TYPOLOGIES IN THE GAMING SECTOR

The following are potential avenues for money laundering in the gaming sector:

1. The cash purchase of gaming chips valued at the “below radar” amount (below the de-minimis amount of US\$3,000) which can then be laundered through the deposit/encashment of a cheque received from the gaming institution for purported “winnings”.
2. Cash bets at several gaming lounges (structuring) and collecting cheques for chips cashed in which can be encashed or deposited.
3. The use of pay-out cheques to launder money through the combination of gaming proceeds and cash on hand to be converted into one cheque made out by the gaming institution.



# Proliferation Financing

# Proliferation Financing

- ❑ **Proliferation** is the **illegal** manufacture, acquisition, development, export, trans-shipment, brokering, transport, transfer, stockpiling or use of nuclear, chemical, or biological weapons and their means of delivery and **other related materials**.
- ❑ **Proliferation Financing** is the provision of the funding or financial services to facilitate proliferation.

*(FATF Definitions)*

# Countering Proliferation Financing

Measures implemented must ensure that persons and/ or entities involved in the proliferation of weapons of mass destruction (WMD) are:

- ✓ Identified
- ✓ Deprived of resources
- ✓ Prevented from raising, moving and using funds or other assets for the financing of proliferation

# The UN Charter

- Decisions made under Chapter VII of UN Charter are binding on all UN members under international law.
- All Rec 6 and Rec 7 UNSCRs were passed under Chap VII.( e.g. those concerning Iran and DPRK and non proliferation)
- It therefore requires the necessary domestic laws and administrative measures to implement and enforce these resolutions.

# Jamaica's Legislative Framework

## Legislation:

1. The United Nations Security Council Resolutions Implementation Act (UNSCRIA), 2013
2. The United Nations Security Council Resolutions Implementation Act (UNSCRIA), 2019 **Amendments**
3. The United Nations Security Council Resolutions Implementation (Asset Freeze-Democratic People's Republic of Korea) Regulations, 2013.
4. The United National Security Council Resolutions Implementation (Reporting Entities) Regulations, 2019

# UNSCRIA Requirements

- Duties to Report – UNSCRIA 5

1. Report at least once in every 4 months whether they are in possession or control of assets owned or controlled by or on behalf of a person or entity proscribed. (Asset Freeze-Democratic Peoples Republic of Korea) Regulations. 2013. First Proscribed Report due- January 2022.
2. Report any transaction or attempted transaction that is believed or known to be related to a proscribed person or entity and any assets that are owned or controlled by or on behalf of a proscribed person or entity.
3. Reporting entities that provide reports to the designated authority in good faith are protected from civil or criminal liability.
4. *The report must not be disclosed to anyone else (5 (6))*
5. Duty to respond timely to written notice by relevant authority – UNSCRIA 14
6. All reports done electronically (goAML)
7. All reporting entities can rely on the existing verification and identification procedures used under the TPA and POCA Regulations, for the identification of customers.
8. PF regime is rules-based (*country specific*) rather than risk-based, although risk assessment still required in some way.



# **The Regulated Sector and its Responsibilities**



# The Regulated Sector Responsibilities

1. Implements programmes, policies, procedures and controls that includes (POCA Reg. 5):
  - ✓ Procedures that ensure high standards of integrity of employees
  - ✓ Develop system to evaluate the personal employment and financial history of those employees
  - ✓ Establish programmes for training of employees on a continuing basis
  - ✓ Arrangements for an independent audit in order to ensure that the programmes are implemented
  - ✓ **Permit disclosure of information between companies within the group for the purposes of Customer ID, transaction verification & risk management**
  - ✓ **Ensure the safeguarding of confidentiality and govern the use of the information disclosed within the group**
2. Appoint a **Nominated Officer** who **MUST** be an **employee** of the regulated entity **who performs management functions.**



# Responsibilities of the Nominated Officer

- Implementation of the programmes, policies, procedures and controls .
- Submit the requisite reports to the FID that includes:
  - ❖ Threshold transaction Report
  - ❖ Suspicious Report
  - ❖ Nil Report
  - ❖ TPA Listed Entity
  - ❖ TPA Suspicious Report
  - ❖ Authorized Disclosure (request for consent or s. 100(4))
  - ❖ Cross Border
  - ❖ **UNSCRIA - United Nations Security Council Resolutions Implementation Act**
- Comply with all relevant orders



# ROLE OF NOMINATED OFFICER- goAML

## Management/implementation of programme & policies:

- Responsible officer - **Administrator**
- Assign roles to subsequent users
- Fully involved with the process
- Responsible for information uploaded unto the goAML system
- Training
- Responsible for timely response to communications sent via Message Board



# WHY goAML

- Authorization for electronic reporting (Reg. 17)
- Backed by international support-UNODC
- Electronic submission of reports
- Ability to store vast amount of data
- Flexibility
- Contains some analytical tools
- Instant messaging



# Reporting Timeframe

- TTR – within 15 days after the end of reporting month** (previously this was not defined)
- TPA & UNSCRIA – Listed Entity & Proscribed Entity 30 days after reporting period:**


| No. | Four Months Period   | Due Date     |
|-----|----------------------|--------------|
| 1   | January-April        | May 31       |
| 2   | May-August           | September 30 |
| 3   | September - December | January 31   |

- Freeze without delay – immediate notification of an updated TPA UN Listing – Submission of TPA(STR).**
- STR – as soon as is reasonably practicable and in any event within 15 days** after the information or other matter came to the person. The nominated officer has **15 days** or as soon as is reasonably practicable to submit the report after the information or other matter came to him/ her.

# STATUS & ACCEPTANCE NOTIFICATION

## Reports submitted:

- The Status must be checked to ensure it is at the **PROCESSED** stage by:
  - ✓ Selecting **Submitted Reports** tab.
  - ✓ **PROCESSED** status reports must be saved or printed.
- Will be acknowledged and the status provided, i.e. whether it was **successfully processed or rejected**.



**MINISTRY OF FINANCE and the PUBLIC SERVICE**  
**FINANCIAL INVESTIGATIONS DIVISION**  
 1 SHALIMAR AVENUE  
 KINGSTON 3  
 JAMAICA

ANY REPLY OR SUBSEQUENT REFERENCE SHOULD BE ADDRESSED TO THE CHIEF TECHNICAL DIRECTOR AND THE FOLLOWING REFERENCE NUMBER QUOTED - CTRFU mm yy

Telephone No. (876) 928-5141-8  
 Facsimile (876) 928-1883  
 Web site: <http://www.fid.gov.jm>

September 21, 2020

Regulated Entity Name  
 Address of the Regulated Entity  
 Contact Number  
 Attn. **Nominated Officer Name**



**Subject: Report Confirmation**

We hereby confirm receipt of your report #: **WAA-MAY-AUG-2020**  
 Date of submission: September 21, 2020

Your report was fully accepted.

Report Filename: \_Web\_Report\_ReportID\_44114-0-0.xml  
 Report Type: TLER

Yours sincerely,  
 Financial Investigations Division



 GoAML - an online filing solution for the Financial Investigations Division  
<https://goaml.fid.gov.jm>

**Web Reports**


Start Date: 24 October, 2021      End Date: 24 November, 2021

Drag a column header here to group by that column

| Report ID | Report Type | Created By                 | Last Updated By            | Created On | Org Name                          | Submitting Org                    | Transactions | No. Rejected | Status    | Submitted On | # |
|-----------|-------------|----------------------------|----------------------------|------------|-----------------------------------|-----------------------------------|--------------|--------------|-----------|--------------|---|
| 20061-0-0 | Nil Report  | fiduser                    | fiduser                    | 19/11/2021 | FID Bank                          | FID Bank                          | 0            | 0            | Rejected  | 19/11/2021   |   |
| 20060-0-0 | Nil Report  | yanique.peynado@fid.gov.jm | yanique.peynado@fid.gov.jm | 19/11/2021 | Financial Intelligence Unit (FIU) | Financial Intelligence Unit (FIU) | 0            | 0            | Rejected  | 19/11/2021   |   |
| 20043-0-0 | Nil Report  | kemoy.plowright@fid.gov.jm | kemoy.plowright@fid.gov.jm | 25/10/2021 | Financial Intelligence Unit (FIU) | Financial Intelligence Unit (FIU) | 0            | 0            | Processed | 25/10/2021   |   |

# REJECTION NOTIFICATION

- Rejected reports will provide details as it relates to the required amendments for resubmission



ANY REPLY OR SUBSEQUENT REFERENCE SHOULD BE  
ADDRESSED TO THE CHIEF TECHNICAL DIRECTOR

**MINISTRY OF FINANCE AND THE PUBLIC SERVICE  
FINANCIAL INVESTIGATIONS DIVISION  
1 SHALIMAR AVENUE  
KINGSTON 3  
JAMAICA**

Telephone No. (876) 928-5141-8  
Facsimile (876) 928-1883  
Web site: <http://www.fid.gov.jm>

**September 21, 2020**

Regulated Entity Name  
Address of the Regulated Entity  
Contact Number

Attn. **Nominated Officer Name**

**Subject: Report Confirmation (Rejected)**

We hereby confirm receipt of your report #: **HHP-MAY-AUG 2020**



Date of submission: September 21, 2020  
Report Filename: Web\_Report\_ReportID\_44109-0-0.xml  
Report Type: TLER

**Your report was rejected for the following reason(s):**

Please make the following amendments for resubmission: Entity Ref # should be in the following format HHP-MAY-AUG-2020. No spaces in between, all caps with the months abbreviated with the 1st 3 letters of the months. Both these Report Triggers should be selected • TPA DECLARATION – Not in possession of property owned or controlled of property owned TPA REPORT TYPE- Regular In the Activity-Related Parties section in the comments field 'LER for the period May to August 2020 should be inserted.'

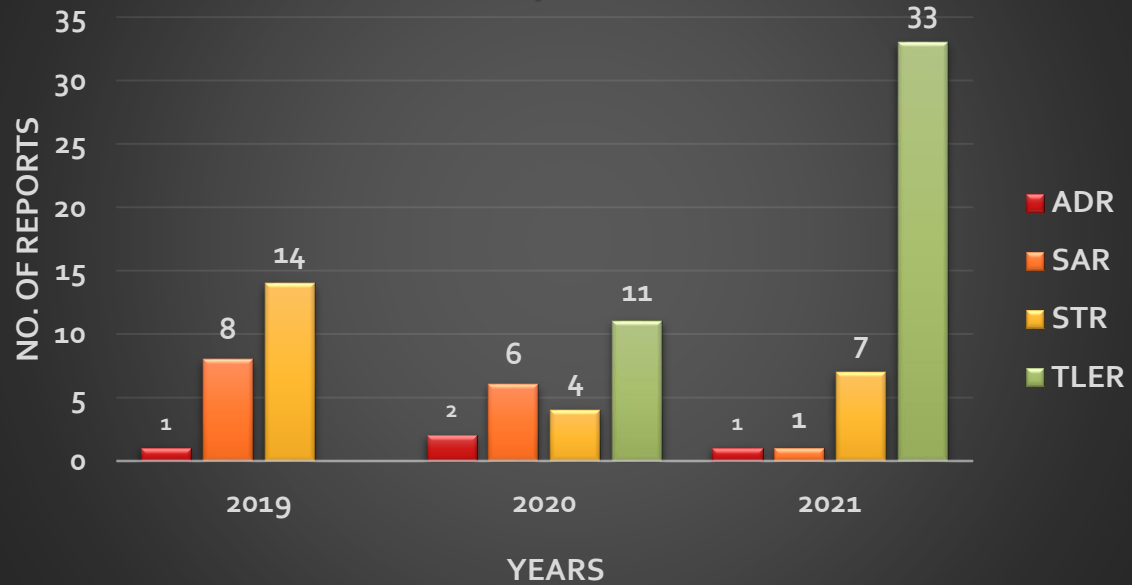
Yours sincerely,  
Financial Investigations Division

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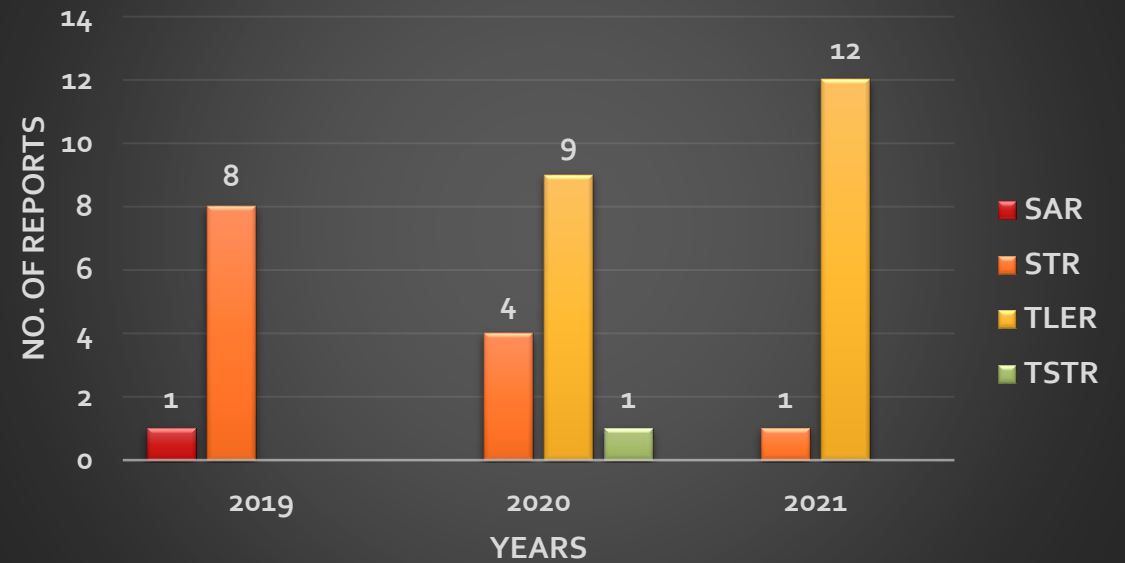
  GoAML - an online filing solution for the Financial Investigations Division  
<https://goaml.fid.gov.jm>

# STATISTICAL REVIEW


## Report Submissions for the years Sep 2019 – Sep 2021



## Rejection Statistics for the period Sep 2019 - Sep 2021







# Compliance Culture or Face the Penalties

*Quote:*

*'You cannot escape the responsibility of tomorrow by evading it today'*

*Abraham Lincoln*

# Compliance Culture

- Display keen interest in AML/CFT/PF training and general awareness
- Communicate clear AML/CFT/PF policies to senior management
- Hold senior management accountable for non-compliance
- Facilitate presentations of compliance reports by nominated officer at board level
- Provide adequate resource to the compliance unit
- Make frequent enquiry re: AML Risks, mitigating measures etc.
- Keep abreast and update accordingly policies based on risk assessed, legislative amendments and improving effectiveness of internal control
- Must be communicated to all relevant staff with the necessary documentations made available through continuous training or compliance news letters etc.



# COMPLIANCE LEVEL

☐ **Competent Authority and Designated Authority required to keep statistical records for purpose of measuring:**

✓ **effectiveness as per :**

- POCA s.137A
- TPA s.18B

✓ **Monitoring of compliance as per:**

- TPA s. 18A
- POCA 91A

| COMPLIANCE LEVEL TPA – Listed Entity Reports for reporting period May to August of each year. |       |                  |                     |
|---|-------|------------------|---------------------|
| YEAR  | TOTAL | Number Reporting | Compliance Rate (%) |
| September 2019  | 12    | 7                | 58%                 |
| September 2020  | 12    | 9                | 75%                 |
| September 2021  | 12    | 8                | 67%                 |

# Penalty – AML Policies & Procedures

Amendments to POCA Regulations - November 2019

s.5 . Failure to establish, implement policies and procedures or failure to appoint employee with management functions to implement programmes.

|                | Parish Court        | Circuit Court    |
|----------------|---------------------|------------------|
| Individual     | ≤ \$3m and/or 3 yrs | Fine or ≤ 20 yrs |
| Body corporate | ≤ \$5m              | Fine             |

s.6 Failure to implement KYC measures & training:

|                                    | Parish Court        | Circuit Court    |
|------------------------------------|---------------------|------------------|
| Individual                         | ≤ \$3m and/or 3 yr. | Fine or ≤ 20 yrs |
| Body corporate                     | ≤ \$5m              | “Fine            |
| <b>Failure to file TTR or STR:</b> |                     |                  |
| Company                            | ≤ \$1m              | “                |

# Fixed Penalty Schedule

| <b>PROCLAMATIONS, RULES AND REGULATIONS</b><br>[OCT. 29, 2019]<br>Options available to the competent authority.   |   |   |                            |
|---|---|---|----------------------------|
| <b>Second Schedule</b><br>Part 1 – Fixed Penalties  |   | <b>(Regulation 20)</b>                  |                            |
| <b>Offence:</b>   |   | <b>Fixed Penalty:</b>                   |                            |
|   |   | In case of -<br>(1) An individual<br>\$ | (2) A body corporate<br>\$ |
| <b>1. An offence under regulation 5 (5), failure to comply with -</b><br>a) Regulation 5(1)<br>a) Regulation 5(3) | Failure to establish and implement policies, procedures and controls. | 2,100,000                               | 3,500,000                  |
|   | Failure to appoint an employee as the Nominated Officer.              | 2,100,000                               | 3,500,000                  |
| <b>2. An offence under regulation 6(2)</b>  | Failure to maintain KYC & training procedures                         | 2,100,000                               | 3,500,000                  |
| <b>3. An offence under regulation 18(3)</b>   | Failure of overseas branches to conform to higher ML standards        | 2,100,000                               | 3,500,000                  |

# Fixed Penalty Schedule

| <b>PROCLAMATIONS, RULES AND REGULATIONS</b><br><b>[OCT. 29, 2019]</b><br><b>Options available to the competent authority.</b> |  |  |  |
|---|--|--|--|
| <b>Second Schedule</b>  |  | <b>(Regulation 20)</b>                           |  |
| <b>Part 1 – Fixed Penalties</b>   |  |  |  |
| <b>Offence</b>  |  | <b>Fixed Penalty</b>                             |  |
|   |  | <b>In case of -<br/>(1) An individual<br/>\$</b> | <b>(2) A body<br/>corporate<br/>\$</b> |
| <b>4. An Officer under<br/>regulation 20 (1)</b>  | Failure to comply with ID & transaction verification   | 2,100,000  | 3,500,000                              |
|   | Failure to establish risk profile to carry out due diligence   |  |  |
|   | Lack of identification procedures for transactions conducted by an agent                                   |  |  |
|   | Failure to comply with record –keeping requirements  |  |  |
|   | Failure to comply with requirements for internal reporting procedures                                      |  |  |
|   | Failure to comply with requirements to prohibit transactions on numbered, anonymous or fictitious accounts |  |  |
|   | Failure to comply with requirements as to form of reports.   |  |  |

# FIXED PENALTY NOTICE

SECOND SCHEDULE, *contd.*

Part II—Fixed Penalty Notice

THE PROCEEDS OF CRIME ACT

The Proceeds of Crime (Money Laundering  
Prevention) Regulations, 2007

*Fixed Penalty Notice*

FRONT OF FORM

Serial No. of Notice: .....

Take notice that I have cause to believe that on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at (enter location) at or about (enter time)

you: \_\_\_\_\_  
Surname First name Middle name

of \_\_\_\_\_ in the parish of \_\_\_\_\_ address

\_\_\_\_\_ committed one or more of the following

offences contrary to the provisions of the Proceeds of Crime (Money Laundering Prevention) Regulations, 2007, for which I allege that you are liable—

(Please tick Regulation Offence alleged offence)

5(5) Failure to comply with regulation 5(1)— requirement to establish and implement programmes, policies, procedures and controls necessary for the purpose of preventing or detecting money laundering.

5(5) Failure to comply with regulation 5(3)— requirement to nominate employee to be responsible for implementing programmes, etc.

offence)  6(2)

Non-compliance with regulation 6(1) in forming a business relationship or carrying out a one-off transaction.

18(3)

Failure to comply, implement and conform with, or to advise of inability to conform with, etc., standards and conduct set out in Part V of the Act and in the Regulations.

20(1)

Failure to comply with regulation—

(a) 7— requirements regarding identification and transaction verification procedures, etc.;

(b) 7A— requirement to establish risk profile and carry out due diligence;

(c) 11— requirements regarding identification procedures concerning transactions carried out by agents;

(d) 14— record-keeping requirements;

(e) 15— requirements for internal reporting procedures;

(f) 16— prohibition on conducting transaction by means of numbered account, anonymous account or account in a fictitious names;

(g) 17— requirements as to form of reports.

SECOND SCHEDULE, *contd.*

Particulars of offence(s):

Date of offence(s):

Date of offence(s):

Place of offence(s):

Brief description of the acts constituting the offence(s):

However, if before the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ (*insert date being a date not earlier than the expiration of fifteen days*) you pay the fixed penalty of \$ \_\_\_\_\_ to the Collector of Taxes proceedings will not be taken for the offence and you shall not be liable to conviction of the offence. Payments should be made in accordance with the instructions overleaf.

If you do not pay the fixed penalty within the period specified above, you are required to attend before [specify court having jurisdiction to try the offence(s)] to answer to the charge(s) for the offence(s).

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_

Signature of authorised officer

BACK OF FORM

How to pay fixed penalty:

Payment may be made in cash at any collectorate of taxes.

To: [full name and address]

I enclose the sum of \$ \_\_\_\_\_ as payment of the fixed penalty for the offence mentioned in this notice.

\_\_\_\_\_  
Surname First Name Middle Name

\_\_\_\_\_  
Address Parish

Dated this 29th day of October, 2019.

HORACE CHANG  
Minister of National Security.

# POSSIBLE IMPLICATIONS

Massive reputational damage

Loss of licence

Loss of Business relations

Financial Sanctions

Loss of fit and proper status

Loss of business relations

Subject to legal proceedings







# Jamaica's Focus & Overview of the National Risk Assessment

# Jamaica's Focus for 2021

- Implement legislation as it relates to proliferation financing.
- The Companies Act of Jamaica was amended in June 2017 to include beneficial ownership. More amendments are required to be addressed.
- Amendment to the FSC Act to be made to address the Effectiveness Requirement of the Mutual Evaluation as it relates to consolidated supervision with BOJ.
- Regulating the microcredit institutions with the passage of the Microcredit Act, 2021 which has been finally passed in January, 2021
- Passage of Trusts and Corporate Providers Act with the requisite Risk Assessment being conducted separately
- Regulations under Charities Act to deal with terrorism financing
- National Risk Assessment completed highlighted areas of deficiencies that must be addressed in short order in order to continue strengthening Jamaica's AML/CFT/CPF framework.

# FATF - Technical Compliance Ratings

Table 3: Jamaica's Technical compliance ratings, January 2017

|     |     |     |     |     |     |     |     |     |     |
|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| R1  | R2  | R3  | R4  | R5  | R6  | R7  | R8  | R9  | R10 |
| PC  | PC  | LC  | LC  | LC  | NC  | PC  | NC  | C   | PC  |
| R11 | R12 | R13 | R14 | R15 | R16 | R17 | R18 | R19 | R20 |
| PC  | PC  | C   | PC  | C   | LC  | PC  | PC  | PC  | C   |
| R21 | R22 | R23 | R24 | R25 | R26 | R27 | R28 | R29 | R30 |
| PC  | PC  | PC  | PC  | PC  | PC  | PC  | PC  | LC  | LC  |
| R31 | R32 | R33 | R34 | R35 | R36 | R37 | R38 | R39 | R40 |
| LC  | LC  | PC  | LC  | PC  | LC  | C   | LC  | C   | PC  |

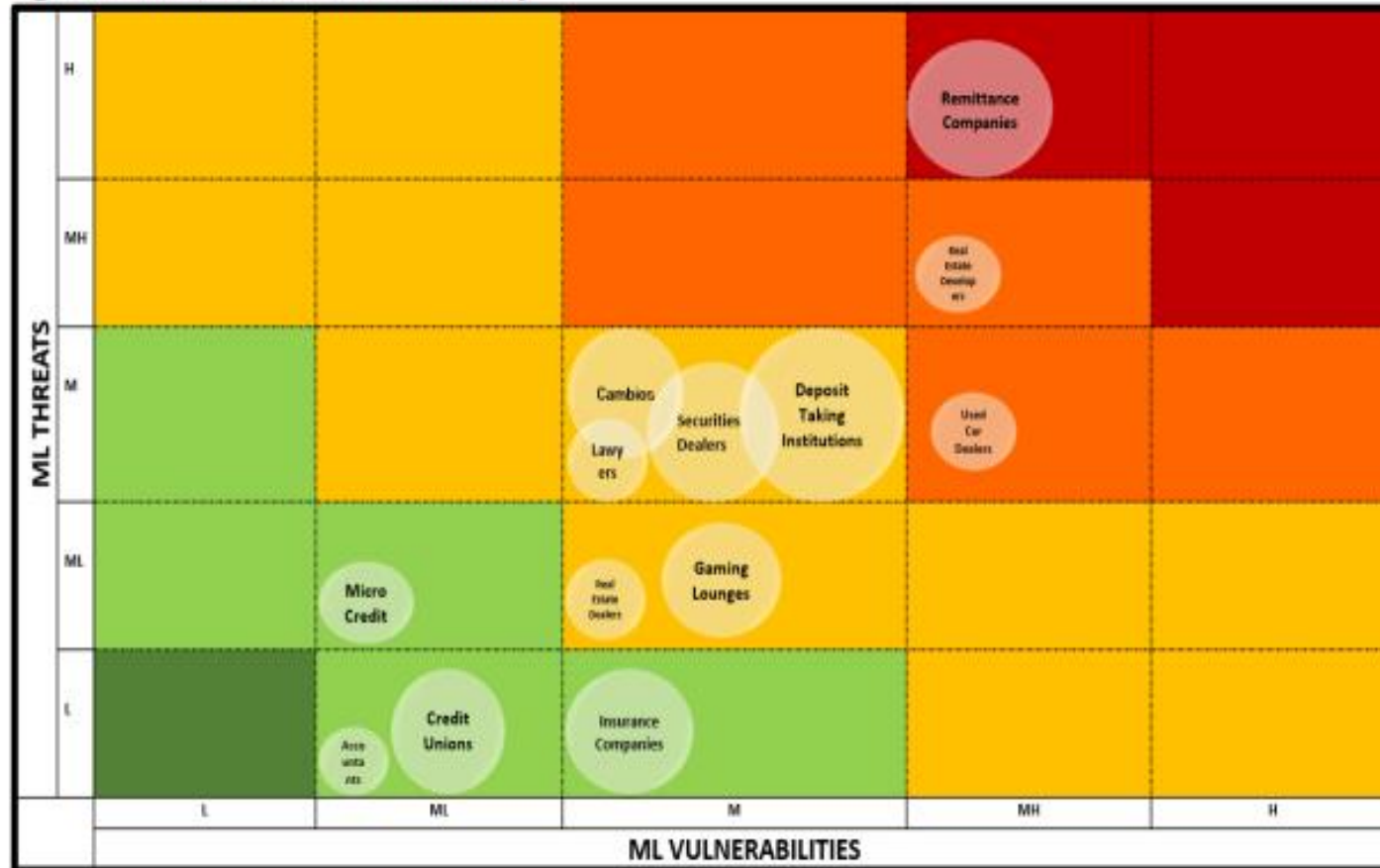
Table 4: Jamaica's Technical compliance with re-ratings - December 2020

|     |     |     |     |     |     |     |     |     |     |
|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| R1  | R2  | R3  | R4  | R5  | R6  | R7  | R8  | R9  | R10 |
| PC  | LC  | LC  | LC  | LC  | LC  | PC  | PC  | C   | LC  |
| R11 | R12 | R13 | R14 | R15 | R16 | R17 | R18 | R19 | R20 |
| LC  | C   | C   | LC  | PC  | LC  | LC  | LC  | LC  | C   |
| R21 | R22 | R23 | R24 | R25 | R26 | R27 | R28 | R29 | R30 |
| C   | PC  | PC  | PC  | PC  | PC  | PC  | PC  | LC  | LC  |
| R31 | R32 | R33 | R34 | R35 | R36 | R37 | R38 | R39 | R40 |
| LC  | LC  | C   | LC  | PC  | LC  | C   | LC  | C   | PC  |

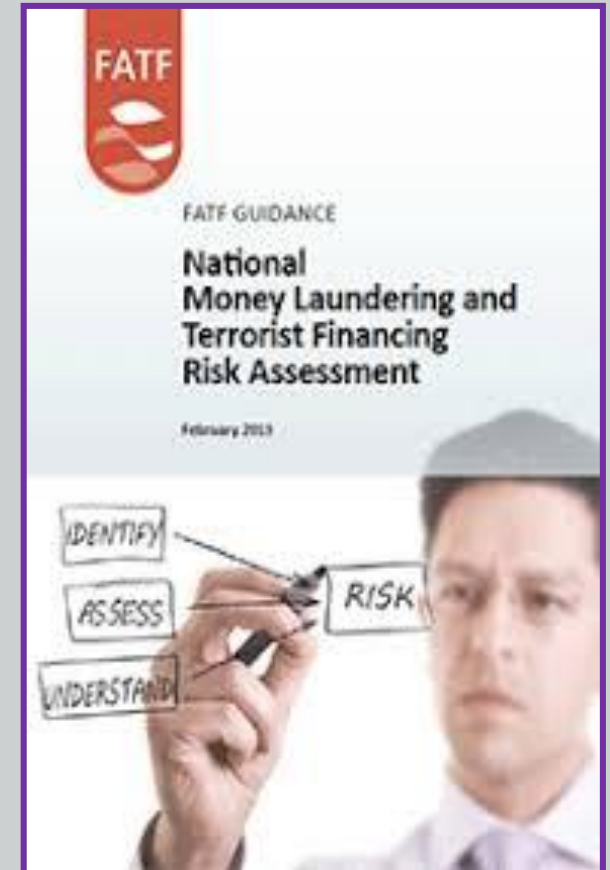
NB: Ratings in blue denote improvements, while rating in red denotes deterioration. Ratings in black remained unchanged.

# National Risk Assessment Highlights

Figure 1: Jamaica's Sectoral Heat Map



Note: DTIs include commercial banks, building societies, and a merchant bank.



# Gaming Lounge at a Glance

## 7.4.1 SECTOR AT A GLANCE



Governing Legislation

The Betting, Gaming, and Lotteries Act



Delivery Channels

Face-to-face Engagements



AML/CFT Laws

- Proceeds of Crime Act (POCA)
- Terrorism Prevention Act (TPA)
- The BGLC also published its Guidance Note



Number of Customers

In 2018 there were 38,678 clients reported across gaming lounges



Size/Value of sector (% of GDP)

Throughout the 2019 to 2020 period, sales generated from the gaming sector totalled approx. \$118.93B.



Level of Cash

- As at November 2019:
- approx. 70% of transactions were done using cash as a preferred method of payment.
  - 91% reliance on cash as a payout method.



Customer Profile

- Domestic (99%)
  - Foreign National (1%)
- (Domestic and foreign clients of which 98% were classified as Other Individuals, 2% as High-Rollers and 0.1% as PEPs)*



Number of Players

- As at March 2020, there were:
- **DNFBPs:** 13 licensed gaming machine operators and 18 prescribed premises operators.
  - **Non-DNFBPs:** 521 licensed gaming machine operators with up to 19 machines and 16 technical service operators.

Sector Risk Score

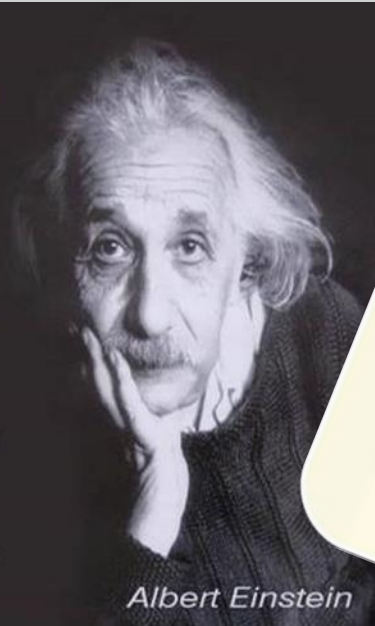
**MEDIUM**

# Conclusion

- The role of the regulated sector is of high importance in assisting to stem the threat of **Money Laundering, Terrorist Financing and Proliferation Financing**. Each entity, irrespective of size, can have a significant impact by simply ensuring:
1. Customers are known, risk assessed and there are proper record keeping methods implemented.
  2. Staff members are sufficiently trained and skilled in detecting these threats and have high standards of integrity.
  3. Appropriate policies, internal controls and reporting systems are in place to guide Management & Staff in executing their roles in detecting these threats with decisions guided by the necessary risk assessment of products, delivery channels, size of operations and geographical location.
  4. Keeping up to date with all relevant laws and statutory requirements imposed on the sector in which they operate and the international standards that guide the AML/CTF & CPF Regime.
  5. Comply with the regulatory and other legal requests as best as possible and in a timely manner.

*Thank  
You!*

THE WORLD  
WILL NOT BE  
DESTROYED BY  
THOSE WHO DO  
EVIL, BUT BY THOSE  
WHO WATCH THEM  
WITHOUT DOING  
ANYTHING



*Albert Einstein*

