



**AML/CFT/CPF
Refresher Training
2025**

**2-3 HR
CPD**

an alliance member of
BNP PARIBAS
REAL ESTATE

Mathew Beale - Chartered FCSI
Principal Director
Comsure Compliance Limited,
Comsure Technology Limited
(the "Comsure Group of Companies")




JUNE 11 2025

1

Risk Warning.....

This **3 HOUR** presentation has been designed as an **"AWARENESS"** and **"REFRESHER"** session.

It **MUST NOT** be treated as an **EXHAUSTIVE AND/OR COMPLETE** presentation on **ALL RISKS** associated with **money laundering, terrorist financing, proliferation financing, targeted UK & UN sanctions and/or other related crimes.**



2



**WHY ARE YOU
HERE.....?**

3



4



5

KEY PERSONS

1. MLRO – **Chris Daniels**

2. DMLRO – **Phil Dawes**

3. MLCO – **Chris Daniels**

4. CO – **Chris Daniels**

6



TAKING RISK

There's a fine line between taking a calculated risk and doing something dumb.


7

BARBELL RISKS




The image shows a cartoon athlete with 'ARC' on his jersey lifting a barbell. On each end of the barbell is a circular 'RISK' gauge. Each gauge has a needle pointing to the 'HIGH' section, which is colored red. The other sections are green for 'LOW' and yellow for 'MEDIUM'. The athlete is surrounded by yellow starburst effects.

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The graphic features a large red oval background. Inside, the words 'MONEY LAUNDERING' are in a blue box, followed by a green box containing an equals sign, and then 'FINANCIAL CRIME' in a yellow box. The 'Comsure' logo is in the top right corner.


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Jersey

PROCEEDS OF CRIME (JERSEY) LAW 1999


Official Consolidated Version
This is an official version of consolidated legislation compiled and issued under the authority of the Legislation (Jersey) Law 2021.
Showing the law from 11 December 2024 to Current



Jersey

TERRORISM (JERSEY) LAW 2002


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Jersey

MONEY LAUNDERING AND WEAPONS DEVELOPMENT (DIRECTIONS) (JERSEY) LAW 2012

Official Consolidated Version
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Jersey

SANCTIONS AND ASSET-FREEZING (JERSEY) LAW 2019

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**THE
FIRST
OF
TWO
RISKS**

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A cartoon character with 'ARC' on their shirt is lifting a barbell. The barbell has a wheel of financial crimes (Money Laundering, Financing of Terrorism, Corruption, Bribery, Fraud) on the left and a 'RISK' gauge (Low, Medium, High) on the right. A yellow arrow points from the wheel to the gauge.

**THE
SECOND
RISK**

**LIKELIHOOD?
PROBABILITY?**

13

A cartoon character with 'ARC' on their shirt is lifting a barbell. The barbell has a wheel of financial crimes (Money Laundering, Financing of Terrorism, Corruption, Bribery, Fraud) on the left and a 'RISK' gauge (Low, Medium, High) on the right. A yellow arrow points from the wheel to the gauge.

**THE
SECOND
RISK**

**PREVENTION
AND
DETECTION
OF
FINANCIAL CRIME**

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Jersey

**MONEY LAUNDERING (JERSEY)
ORDER 2008**

Official Consolidated Version
This is an official version of consolidated legislation compiled and issued under the
authority of the Legislation (Jersey) Law 2021.
08.790.36
Showing the Law from 1 September 2023 to Current

AML/CFT/CPF Handbook

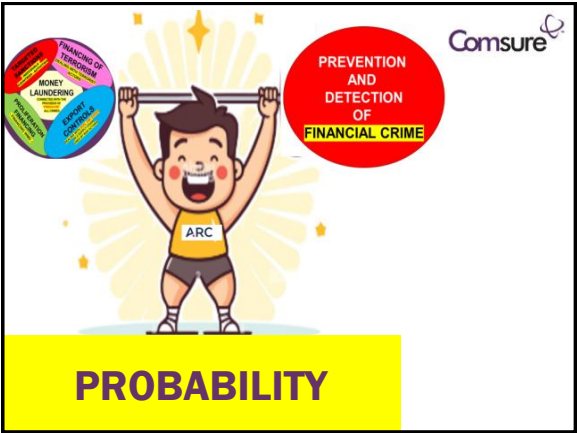
Issued: 04 September 2023
Effective from: 01 September 2023

The AML/CFT/CPF Handbook is effective from 1 September 2023 and is applicable to all supervised persons. Supervised persons are
described as 'relevant persons' in the Money Laundering (Jersey) Order 2008.

**PREVENTION
AND
DETECTION
RULES**

Jersey Financial
Services Commission




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TECHNICAL ASSESSMENT
&
EFFECTIVENESS ASSESSMENT

The Financial Action Task Force (FATF) conducts technical and effectiveness assessments to evaluate a country's measures against money laundering and terrorist financing.

Both assessments are crucial for a comprehensive understanding of a country's AML/CFT system.

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1. **Technical Assessment:** This is an evaluation of the technical compliance of a country's legal, regulatory, and institutional frameworks with the FATF Recommendations. It assesses whether the necessary laws, regulations, and other measures are in force and effect, that is, whether the necessary formal prerequisites to an effective AML/CFT system are in place.

2. **Effectiveness Assessment:** This is an assessment of the effectiveness with which a country's AML/CFT system is working. It evaluates the extent to which a country achieves a defined set of outcomes that are central to a robust AML/CFT system and whether it is making good use of its technical compliance with the FATF Recommendations.

3. In other words, the **technical assessment** looks at the "what" (what measures are in place), while the **effectiveness assessment** looks at the "how" (how well the measures are working).

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FATF

HOMEABOUTCOUNTRIESPUBLICATIONS

Calendars

Home / Publications / Mutual Evaluations

FATF Methodology for assessing compliance with the FATF Recommendations and the effectiveness of AML/CFT systems

FATF Methodology for assessing compliance with the FATF Recommendations and the effectiveness of AML/CFT systems

Methodology 2013

Download pdf (2,637kb)

20

Immediate Outcomes	Features of an effective system
IO 1	Properly identify, assess and understand ML/TF risks, and co-ordinate domestically to put in place actions to mitigate these risks.
IO 2	The country provides constructive and timely information or assistance when requested by other countries. Competent authorities assist with requests to: locate and extradite criminals; and identify, freeze, seize, confiscate and share assets and provide information (including evidence, financial intelligence, supervisory and beneficial ownership information) related to ML/TF or associated predicate offences.
3	Supervisors appropriately supervise, monitor and regulate FIs, DNFBPs and VASPs for compliance with AML/CFT requirements commensurate with their risks.
IO 4	Financial institutions, DNFBPs and VASPs adequately apply AML/CFT preventive measures commensurate with their risks, and report suspicious transactions.
IO 5	Legal persons and arrangements are prevented from misuse for money laundering or terrorist financing, and information on their beneficial ownership is available to competent authorities without impediments.
IO 6	Financial intelligence and all other relevant information are appropriately used by competent authorities for money laundering and terrorist financing investigations.
7	Money laundering offences and activities are investigated, and offenders are prosecuted and subject to effective, proportionate and dissuasive sanctions.
IO 8	Proceeds and instrumentalities of crime are confiscated.
IO 9	Terrorist financing offences and activities are investigated and persons who finance terrorism are prosecuted and subject to effective, proportionate and dissuasive sanctions.
IO 10	Terrorists, terrorist organisations and terrorist financiers are prevented from raising, moving and using funds, and from abusing the NPO sector.
IO 11	Persons and entities involved in the proliferation of weapons of mass destruction are prevented from raising, moving and using funds, consistent with the relevant UNSCRs.

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Industry update | 24 July 2024

Print

The JFSC welcomes Jersey's strong MONEYVAL outcome and Government of Jersey's strategic review

The publication today of Jersey's Mutual Evaluation Report by MONEYVAL, the Council of Europe's permanent monitoring body, confirms that Jersey's effectiveness in preventing financial crime is among the highest level found in jurisdictions evaluated around the world.

The report also confirms that the JFSC has all the key structures, powers and activities in place. Assessors recognised the strengths of the beneficial ownership regime, and JFSC colleagues' knowledge, skills and expertise.

In line with the report's recommended actions, we must now continue to enhance our approach. We have put in place a high-level action plan to address the key recommended actions and will expand further on this in the autumn, along with a programme of industry engagement.

Alongside announcing the outcome of Jersey's MONEYVAL report, the Government of Jersey has today announced that they will lead a strategic review of the approach to regulation of financial and professional services.

The review is a key opportunity for Jersey to collaboratively modernise and simplify the legal and regulatory framework. The scope of the review is being finalised and further communications will follow.

Director General Jill Britton said: "The MONEYVAL Mutual Evaluation Report sends a strong message globally that we are a reputable jurisdiction to do business with. I'm extremely proud of the JFSC team who contributed significantly to this positive outcome, which was essential for Jersey's international reputation and market access. I would also like to thank the Government of Jersey team, our agency colleagues, and all our industry partners.

"We welcome the government-led strategic review of the approach to regulation of financial and professional services in Jersey. Following this positive outcome from our MONEYVAL evaluation, we now have the opportunity to leverage compliance with international standards as a platform for further growth.

"The success of MONEYVAL has shown that when we work closely with others, we deliver far better results. Over the coming months we will engage closely with government, the financial services community and industry to ensure that we get the outcomes we need."

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JERSEY-GOV VIDEO

YouTube

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MONEYVAL 2024

COMBATTING FINANCIAL CRIME TOGETHER

George Pearmain

Director General of the Jersey Financial Services Commission

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23

EXTRACT OF JERSEYGOV VIDEO

FATF

FATF Rating System

COMBATTING FINANCIAL CRIME TOGETHER

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MONEYVAL

Watch later

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Technical Compliance Score

Recommendation	Outcome	Recommendation	Outcome	Recommendation	Outcome
1	Compliant	16	Largely Compliant	29	Largely Compliant
2	Compliant	16	Largely Compliant	30	Compliant
3	Largely Compliant	17	Largely Compliant	31	Compliant
4	Compliant	18	Partially Compliant	32	Compliant
5	Compliant	19	Compliant	33	Compliant
6	Largely Compliant	20	Compliant	34	Compliant
7	Largely Compliant	21	Compliant	35	Compliant
8	Compliant	22	Largely Compliant	36	Compliant
9	Compliant	23	Largely Compliant	37	Compliant
10	Largely Compliant	24	Largely Compliant	38	Compliant
11	Compliant	25	Largely Compliant	39	Compliant
12	Largely Compliant	26	Largely Compliant	40	Compliant
13	Compliant	27	Compliant		
14	Largely Compliant	28	Largely Compliant		

Technical Compliance

Non-Compliant

Partially Compliant

Largely Compliant

Compliant

25

MONEYVAL

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Summary Overview

Immediate Outcome	Effectiveness Rating
IO1	High
IO2	Substantial
IO3	Moderate
IO4	Moderate
IO5	Substantial
IO6	Moderate
IO7	Moderate
IO8	Substantial
IO9	Substantial
IO10	Substantial

MORE VIDEOS

Priority Actions

- IO3 – Supervision
- IO4 – Preventative Measures
- IO6 – Financial Intelligence
- IO7 – ML Investigation & Prosecution

Effectiveness

Low

Moderate

Substantial

High

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3

7

MONEYVAL

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PREVENTION AND DETECTION OF FINANCIAL CRIME

FINANCIAL CRIME PREVENTION AND DETECTION

MONEY LAUNDERING

FINANCIAL CRIME PREVENTION AND DETECTION

FINANCIAL CRIME PREVENTION AND DETECTION

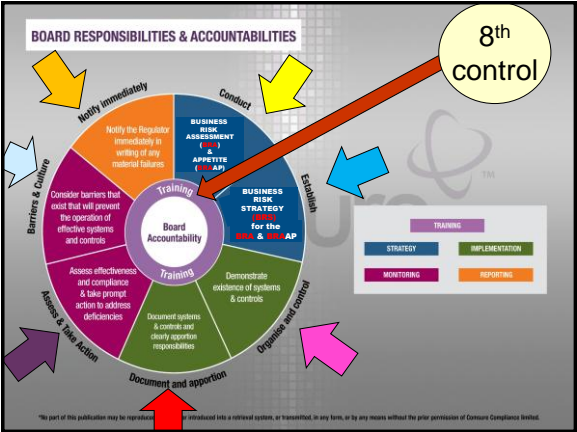
Priority Actions

- IO3 – Supervision
- IO4 – Preventative Measures
- IO6 – Financial Intelligence
- IO7 – ML Investigation & Prosecution

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28



29



30

NRA = 6 + 1 PF = 7

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Jersey's National Strategy for Combatting Financial Crime

Jersey's Statement on Financial Services and Financial Crime: Activities, Risk Appetite and Mitigation

National Risk Assessment: Legal Persons and Arrangements (2023)

National Risk Assessment: Money Laundering (2020)

National Risk Assessment: Money Laundering (2023)

National Risk Assessment: Non-Profit Organisations (2021)

National Risk Assessment: Terrorist Financing (2021 and 2023)

National Risk Overview: Virtual Asset Service Providers (2022)

Virtual Asset Service Providers National Risk Assessment (2024)

ML = 2ND

TF = 2ND

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National Risk Assessment: Proliferation Financing

An assessment of the risks of proliferation financing facing the jurisdiction to assist stakeholders to understand and mitigate the risk of Jersey being abused or misused for the purposes of financing the procurement of weapons of mass destruction.

National Risk Assessment: Proliferation Financing

National Risk Assessment: Proliferation Financing

Government of Jersey

April 2025

April 2025

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Jersey

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MONEY LAUNDERING (JERSEY)

ORDER 2008

PART 2

PREVENTION AND DETECTION OF MONEY LAUNDERING^[33]

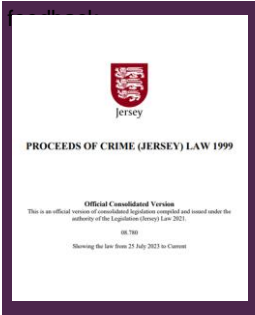
11 Policies, procedures and training to prevent and detect money laundering^[34]

(2) In paragraph (1), "appropriate and consistent policies and procedures" means policies and procedures that are appropriate and consistent having regard to the degree of risk of money laundering taking into account –

(a) the level of risk identified in a national or sector-specific risk assessment in relation to money laundering carried out in respect of Jersey; and

(b) the type of customers, business relationships, products and transactions with which the relevant person's business is


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PROCEEDS OF CRIME (JERSEY) LAW 1999

Official Consolidated Version
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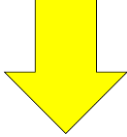
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Showing the law from 23 July 2023 to Current



FINANCING OF TERRORISM
MONEY LAUNDERING
EXPORT CONTROLS
SANCTIONS

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Substantive offences



34

PART 3
MONEY LAUNDERING

29 Criminal property
30 Offences of dealing with criminal property
31 Concealment etc. of criminal property
32 Protection for disclosures, and defence of intended disclosure
33 Restrictions on further disclosure
34 Further disclosure permitted for certain purposes
34A Failure to disclose knowledge or suspicion of money laundering
34B Statutory defences
34C Cases to which Article 34A does not apply
34D Failure in a financial institution to report to designated police officer, designated customs officer or nominated officer
34E Designated police and customs officers
35 Tip-off and interference with material
35A Failure to prevent money laundering
36 Financial services business
37 Procedures to prevent and detect money laundering

30-31 = 14 YEARS

34A = 5 YEARS

34D = 5 YEARS

35 = 5 YEARS

35A 2 YEARS - FINE

2 YEARS - FINE

JUNE 2022

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REPORTING

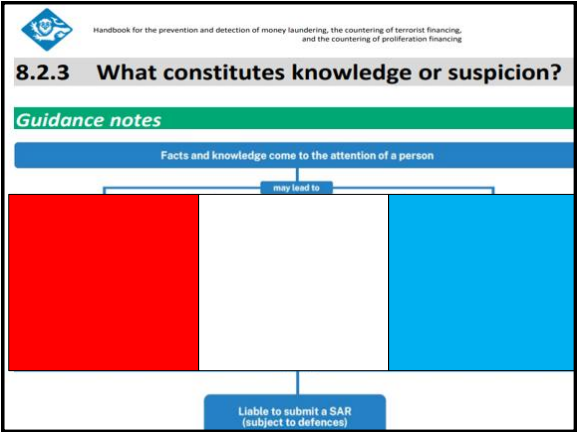
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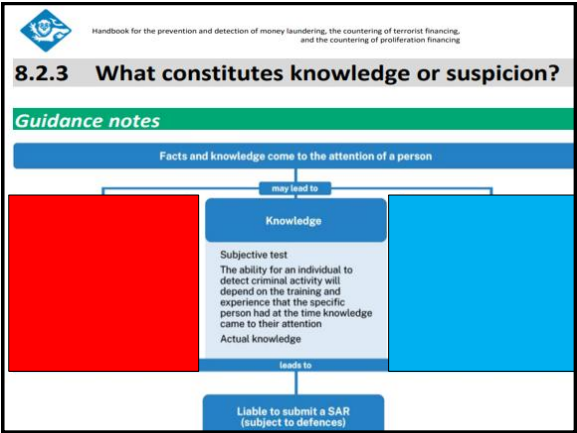
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STATES OF MIND FOR
TIMELY REPORTING

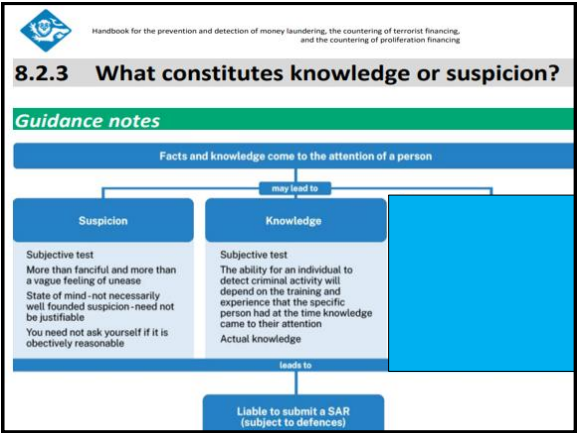
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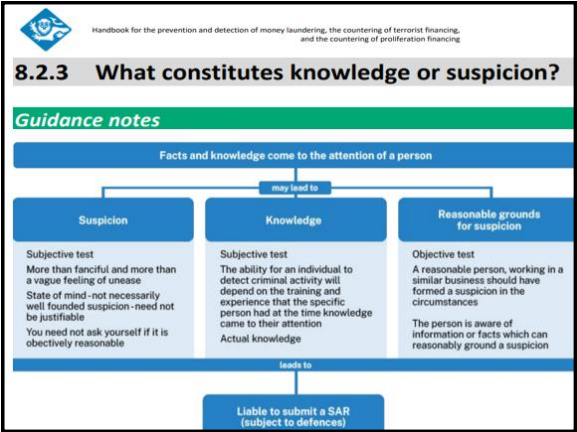
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REPORTING RULES


Under **Articles 32 and 34 of the Proceeds of Crime (Jersey) Law 1999** and **Articles 18-21 of the Terrorism (Jersey) Law 2022**,

YOU must report to the MLRO and the MLRO to the FIU (using the FIU PoISAR system)

If there is **KNOWLEDGE, SUSPICION, OR REASONABLE GROUNDS** for suspecting that:

42

- Another person is engaged in **MONEY LAUNDERING** or the **FINANCING OF TERRORISM**
- **ANY PROPERTY** constitutes or represents proceeds of **CRIMINAL CONDUCT**
- **ANY PROPERTY** has been, is being or is intended to be used in **CRIMINAL CONDUCT** or
- **ANY PROPERTY** is or may be **TERRORIST PROPERTY**



6'6"

6'4"

6'2"

6'0"

5'10"

5'8"

5'6"

5'4"

5'2"

5'0"


4'10"

4'8"

ANY PROPERTY
constitutes or represents
proceeds of
CRIMINAL CONDUCT

ANY PROPERTY
has been, is being or is
intended to be used in
CRIMINAL CONDUCT

ANY PROPERTY = CRIMINAL CONDUCT


jersey

PROCEEDS OF CRIME (JERSEY) LAW 1999

Official Consolidated Version
This is an official consolidated version of the law as amended and consolidated under the
authority of the Legislative Council (July 2015)
Repealing the 1999, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662,

ANY PROPERTY = CRIMINAL CONDUCT

predicate conduct means the conduct alleged by the Attorney General to be the criminal conduct which makes property criminal property, where the Attorney General is alleging an offence under Article 30 or 31 or an attempt or conspiracy to commit such an offence;

Any offence in Jersey for which a person is liable on conviction to imprisonment for a term of one or more years (whether or not the person is also liable to any other penalty).

29 Criminal property²⁷

(1) For the purposes of this Part –

“criminal property” includes –

(a) any property derived from or obtained, in whole or in part, directly or indirectly, through criminal conduct, if the alleged offender knows or suspects that the property is derived from or obtained, directly or indirectly, through criminal conduct; and

(b) any property that is used in, or intended to be used in, criminal conduct, if the alleged offender knows or suspects that the property is used in, or is intended to be used in, criminal conduct.²⁸

CRIMINAL PROPERTY

[illegible]

ANY PROPERTY = TERRORIST PROPERTY

Under the Terrorism (Jersey) Law 2002, "terrorist property" is defined as

- property that is intended to be used, or is likely to be used, directly or indirectly,
- for the purposes of terrorism or to support a terrorist entity
- This includes any funds, financial services, or economic resources that could be utilized in terrorist activities

Comsure

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5'8"

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4'10"

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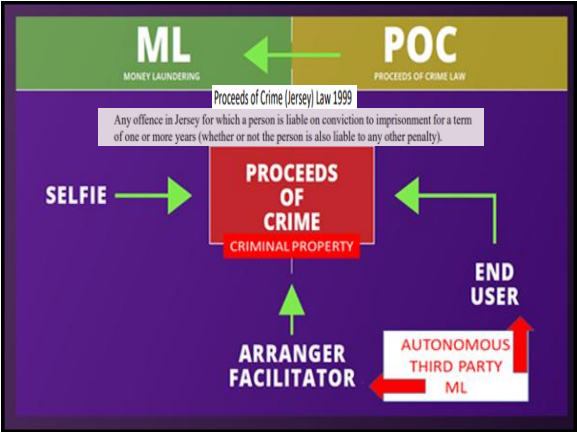
Another person is engaged in

- MONEY LAUNDERING

OR THE

- FINANCING OF TERRORISM

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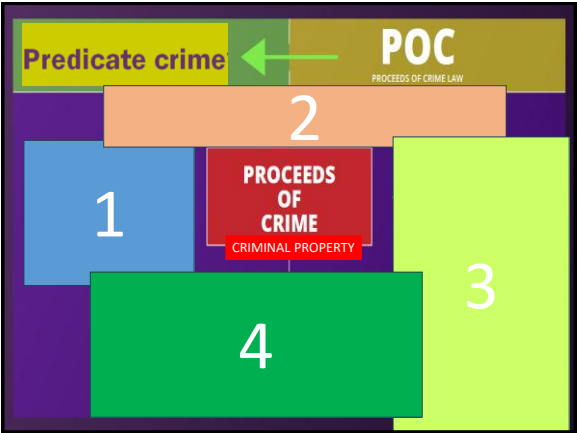
a) ANOTHER PERSON is engaged in MONEY LAUNDERING (SEE 30-31);

1/3

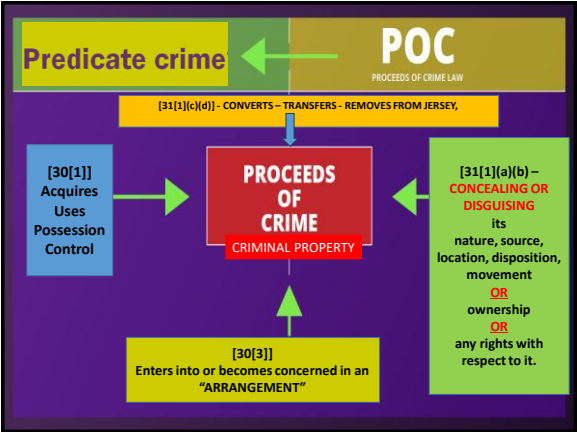
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WHAT ARE THE OFFENCES PROCESSES OF MONEY LAUNDERING

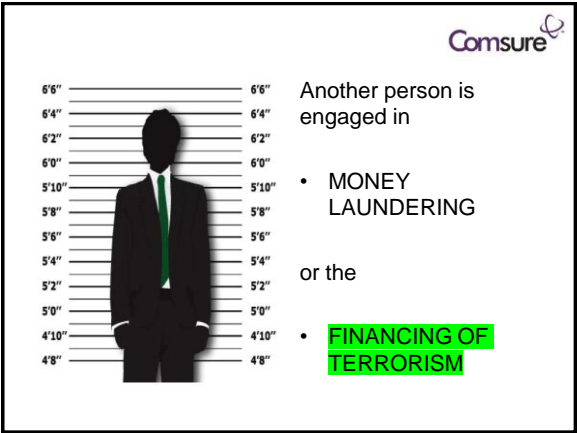
51



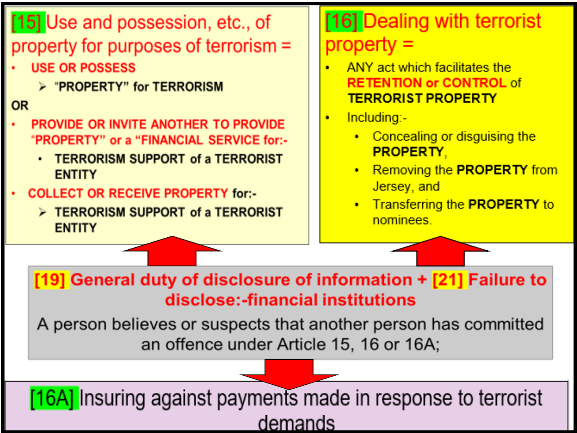
52



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REPORTING RULES

Financial sanctions reporting obligations are set out in **Article 32 of the Sanctions and Asset-Freezing (Jersey) Law 2019** and apply to all **SANCTIONS** regimes in force.

YOU must report to the MLRO and the MLRO to the Minister for External Relations;

IF YOU HAVE **KNOWLEDGE, SUSPICION, OR REASONABLE GROUNDS** THAT YOU ARE DEALING WITH SOMEONE SUBJECT TO SANCTIONS AKA – **A DESIGNATED PERSON OR SANCTIONED TRADE ACTIVITIES**

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You(D2RE)

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• hold an account of a **DESIGNATED PERSON** and/or

• enter into dealings or agreements with a **DESIGNATED PERSON**, and/or

• are approached by or on behalf of a person acting for a **DESIGNATED PERSON** and/or

• The **DESIGNATED PERSON** has committed an offence under the sanctions regime.

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DESIGNATED PERSON

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• Under the Sanctions and Asset-Freezing (Jersey) Law 2019, a designated person (INDIVIDUALS, ENTITIES, OR GROUPS) is someone who has been identified and listed for sanctions due to their involvement in activities that threaten international peace and security, human rights violations, or other serious concerns

• Designated persons are subject to:

• **ASSET FREEZES:** Their funds and economic resources are frozen.

• **RESTRICTIONS ON FINANCIAL SERVICES:** Prohibitions on making funds or financial services available to them.

• **RESTRICTIONS ON ECONOMIC RESOURCES:** Prohibitions on making economic resources available to them

• Designated persons can include INDIVIDUALS, ENTITIES, OR GROUPS involved in:

• Terrorism.

• Human rights abuses.

• Proliferation of weapons of mass destruction

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gov.je

Update my Gov.je preferences

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Dear mathew BEALE,

Content has been added or updated in areas of our site that you have subscribed to.

Official notices

Financial Sanctions Notice Global Human Rights 10 June 2025

10 JUNE 2025

Notice summary

6. Find full details in the Annex to this notice.

7. The following entries have been made and are now subject to an asset freeze:

• Itamar BEN-GVIR (UK Consolidated Group ID: 16961)

• Bezalel Yoel SMOTRICH (UK Consolidated Group ID: 16962)

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JERSEY & UK ALIGN WITH CANADA, AUSTRALIA,
NEW ZEALAND, & NORWAY,

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Sanctioned under the Global Human Rights Sanctions Regime

• Itamar Ben-Gvir and

• Bezalel Yoel Smotrich



These sanctions were imposed due to their involvement in serious
HUMAN RIGHTS ABUSES against Palestinian individuals in the
West Bank.

Details of Sanctions

• **Asset freezes:** Their funds and economic resources are frozen

• **Prohibitions on financial services:** Restrictions on making
funds or financial services available to them

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Trade Sanctions

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These sanctions restrict trade activities with certain countries or entities to prevent WEAPONS
PROLIFERATION, HUMAN RIGHTS ABUSES, OR OTHER HARMFUL ACTIVITIES.

They include:

• Arms Embargoes:

• Prohibitions on exporting or importing arms and related materials to or from
sanctioned countries

• .

• Trade Restrictions:

• Restrictions on specific goods and services: Limiting the trade of certain items,
such as dual-use goods that can be used for both civilian and military purposes

• .

• Transport Sanctions:

• Restrictions on aircraft and shipping: Preventing the use of UK ports and airspace
by designated ships and aircraft

• .

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JERSEY

Case studies

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National Risk Assessment:
Proliferation Financing
Government of Jersey

April 2025

Comsure

APRIL
2025

Case Study 2: A potential failure of a bank to file a SAR on a suspicion related to proliferation of WMD

In 2023, the authorities identified a case of potential failure by an obliged entity to file a SAR to the FIUJ concerning suspicion of money laundering stemming from proliferation of WMD (although not directly associated with the relevant Iran or DPRK UNSCRs).

The source of wealth of a non-resident with an account in Jersey may have resulted from family money associated with illicit proliferation activity. The individual was a Politically Exposed Person due to his relations with an individual, who was widely believed to be a central participant in the black-market trade of nuclear technology. The natural person with a Jersey account had no fixed income, but operated funds received from the family, some of which was used in an attempt to purchase **proceeds**.

The bank failed to identify the family connection and ties to the U.S. Department of Treasury Office of Foreign Assets Control (OFAC) sanctioned individuals.

The case was initiated in 2023 due to a request from a foreign Financial Intelligence Unit, long after the accounts of the natural person in question were closed in Jersey (in 2017). Only upon receiving a Proceeds of Crime Notice from the FIUJ did the bank file a SAR. The investigation on breaches of the AML/CFT/CPF legislation by the obliged entity is still ongoing.

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UZBEKISTAN
- MONGOLIA -
&
JERSEY



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NCA
National Crime Agency


Who we are ▾ What we do ▾ News ▾ Careers ▾ Most Wanted ▾ Contact us ▾

Home ▾ News ▾ Operation Destabilise: NCA disrupts \$multi-billion Russian money laundering networks with links to drugs, ransomware and espionage, resulting in 84 arrests

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News

Operation Destabilise: NCA disrupts \$multi-billion Russian money laundering networks with links to drugs, ransomware and espionage, resulting in 84 arrests



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Money laundering is real... 2021-2024

NEWS

Jersey police help expose money laundering network

Jersey police have helped to expose a multi-billion Russian money laundering network, which has resulted in the disruption of a "multi-billion" dollar network.

An investigation into money laundering activities in Jersey has led to the disruption of a "multi-billion Russian money laundering network", Jersey police have said.

States of Jersey Police (SJP) worked with the National Crime Agency (NCA) on an investigation in October 2021 which resulted in the arrests.

Trio get 10 years for money laundering
Tuesday 26 April 2022

- Muhiddin Umurzokov and Anvarjon Eshonkulov are from **UZBEKISTAN**
- Batsukh Bataa is from **MONGOLIA**

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- Jersey police, in collaboration with the National Crime Agency (NCA), uncovered a significant Russian money laundering operation. This investigation, which began in October 2021, disrupted a "multi-billion" dollar network.
- The operation resulted in 84 arrests and revealed attempts to launder around £60,000 in used Jersey banknotes.
- The individuals involved, Muhiddin Umurzokov, Anvarjon Eshonkulov, and Batsukh Bataa, pleaded guilty to 22 charges of money laundering and were sentenced to a combined total of 10 years imprisonment in 2022.
- The investigation also uncovered links to other criminal activities, including drug trafficking and human trafficking.

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APRIL 2022 = COLLECTIVELY 10 years

Trio get 10 years for money laundering

- Muhiddin Umurzokov and Anvarjon Eshonkulov are from **UZBEKISTAN**
- Batsukh Bataa is from **MONGOLIA**

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2021 = LLOYDS BANK & JERSEY POST INVOLVEMENT

Umurzokov initially came to Jersey by himself on **1 OCTOBER 2021**.

1. He changed £7,000 into US dollars at the **BROAD STREET POST OFFICE**
2. HE paid £2,000 into an account at the **LLOYDS BANK BRANCH** and on **Broad Street**.

Later, in October 2021, he returned to the island with Eshonkulov and Bataa.

1. They changed more money into dollars and euros **JERSEY POST?**
2. After collecting the cash, they visited **CAR DEALERS AND A JEWELLER'S SHOP** but left when the businesses told them they **would not accept money for large purchases**.




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SARS

JERSEY POLICE SAID

- o ‘We’d particularly like to thank the Jersey businesses
- o Who were **alert to the signs of money laundering** and raised the alarm.
- o **We all have a responsibility to look out for suspicious activity.’**



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Jersey News

Guilty of using a JERSEY BANK ACCOUNT to hide money obtained through tax fraud in the UK.

Alicante-based tax fraudster admits to Jersey money laundering charges

Wednesday 25 September 2024





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VAT Evasion in the UK

Martin John Hill was sentenced to 30 months in prison in 2019 for three charges of:-



- VAT evasion &
- Under-declaring sales, &
- Pocketing the VAT charged to guests at the Burlington Hotel in Sandown and the Shanklin Beach Hotel on the Isle of Wight between 2014 and 2016



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MONEY LAUNDERING IN JERSEY.

1. Martin John Hill, a 56-year-old hotelier based in Alicante, Spain, was prosecuted for money laundering in Jersey IN 2024.
2. Hill used a Jersey bank account [Santander International] to hide money obtained through tax fraud in the UK.
3. Hill pleaded guilty to six counts of money laundering in Jersey's Royal Court in September 2024
4. Hill was ordered to be extradited to Jersey for sentencing after he refused to travel to the island



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Terrorism (Jersey) Law 2002



TERRORISM (JERSEY) LAW 2002

Official Consolidated Version
This is an official version of consolidated legislation compiled and issued under the authority of the Legislation (Jersey) Law 2021.
Showing the law from 14 June 2024 to current

Terrorism (Jersey) Law 2002	Contents
19	General duty of disclosure of information
20	Disclosure of information: immunity
21	Failure to disclose financial institutions
22	Protected disclosures
23	Restrictions on disclosure
24	Disclosures for purposes within Jersey
25	Disclosures for purposes outside Jersey
26	

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Is there any **LEGAL** consequence for the two supporters wearing their football shirts?



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Police launch hunt for man wearing 'Hamas' soccer jersey in London



Fan wearing Manchester United shirt with 'Hamas' and number 7 printed on the back spotted parading through English capital, prompting outrage and police investigation



Man wearing Manchester United 'Hamas' jersey in London (Photo: Instagram)

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We should be defending our freedoms, not abandoning them

Activist arrested under terror law stays defiant

By Stephen Lister
A 28-year-old woman, who has been arrested under terrorism laws, has vowed to continue her fight for freedom of expression. She was arrested on suspicion of being involved in a plot to stage a protest in London.



Activist is arrested under anti-terror law

By Stephen Lister
A 28-year-old woman, who has been arrested under terrorism laws, has vowed to continue her fight for freedom of expression. She was arrested on suspicion of being involved in a plot to stage a protest in London.



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The "States Police" confirmed that having received a complaint, they arrested a 49-year-old woman on suspicion of an offence under:

- Article 13.1 of the Terrorism (Jersey) Law 2002 relates to inviting support for a proscribed organisation.

13 Support

(1) A person commits an offence if—

(a) he or she invites support for a proscribed organization; and

(b) the support is not, or is not restricted to, the provision of property (within the meaning of Article 15);⁶

(2) A person commits an offence if he or she arranges, manages or assists in arranging or managing a meeting which he or she knows is—

(a) to support a proscribed organization;

(b) to further the activities of a proscribed organization; or

(c) to be addressed by a person who belongs or professes to belong to a proscribed organization.

(3) A person commits an offence if he or she addresses a meeting and the purpose of his or her address is to encourage support for a proscribed organization or to further its activities.

(4) Where a person is charged with an offence under paragraph (2)(c) in respect of a private meeting it is a defence for the person to prove that he or she had no reasonable cause to believe that the address mentioned in paragraph (2)(c) would support a proscribed organization or further its activities.

(5) In paragraph (2) to (4)—

(a) "meeting" means a meeting of 3 or more persons, whether or not the public are admitted; and


(b) a meeting is private if the public are not admitted.

(6) A person guilty of an offence under this Article shall be liable to imprisonment for a term not exceeding 10 years or to a fine, or both.

PROSCRIBED ORGANISATION

↓

Hamas-Izz al-Din al-Qassem Brigades



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Jersey Royal Court to hear the case against a PRO-PALESTINE activist charged under the Terrorism (Jersey) Law

9/02/2025

A PRO-PALESTINE activist appeared in the Magistrate's Court yesterday after being charged under the Island's terrorism law.

Natalie Strecker, who describes herself as a human-rights campaigner and has been involved with the Jersey Palestine Solidarity Campaign, faces two offences under Article 13(1) of the Terrorism (Jersey) Law 2002.

Jersey Evening Post Friday

Activist in court




APPEARED AT THE ROYAL COURT ON APRIL 4 FOR INDICTMENT


Legal adviser Harrison Gollop, prosecution, told the court that Ms Strecker (49) posted material "inviting support for proscribed organisations" on X [formerly Twitter], breaching Jersey terrorism laws.

She is alleged to have tweeted in support of Hamas and Hezbollah – both classified as proscribed organisations on the Island.

The Magistrate, Bridget Shaw, decided that the Royal Court should hear the case and released Ms Strecker on bail to appear here for indictment on 4 April.

The JEP first broke the news that the peace activist had been arrested in November after the States police received a complaint.





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Jersey Evening Post Friday

Activist in court




A plea and directions hearing is scheduled for 12 May and Ms Strecker is due to go on trial before The Inferior Number of THE ROYAL COURT ON 24 NOVEMBER.


Legal adviser Harrison Gollop, prosecution, told the court that Ms Strecker (49) posted material "inviting support for proscribed organisations" on X [formerly Twitter], breaching Jersey terrorism laws.

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IN THE UK.....





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OGHENOCHUKO OJIRI
is listed on **Bargain Hunt's** website as
one of the show's experts.
He has also appeared on
Antiques Road Trip and
Channel 5's Storage: **Flog the Lot!**

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British-Nigerian art dealer Ochuco Ojiri pleads guilty to funding terrorism

A British-Nigerian art expert, Oghenochuko Ojiri who has appeared on the BBC's Bargain Hunt has pleaded guilty in a terrorism financing case after failing to report a series of high value art sales to a man suspected the alleged links to Hezbollah.

Oghenochuko Ojiri, 55, admitted eight counts of failing to make a disclosure during the course of his work under the Terrorism Act 2000.

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1. A BBC Bargain Hunt art dealer admitted failing to report high-value sales to a man suspected of financing the terrorist group **Hezbollah**.
2. Oghenochuko Ojiri, 53, pleaded guilty to eight offences under section 21A of the Terrorism Act 2000 during a hearing at Westminster Magistrates' Court.
3. The legislation makes it an offence not to alert police if someone knows or suspects a business associate of being involved in financing a proscribed group.

[illegible]

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Jersey



MONEY LAUNDERING (JERSEY) ORDER 2008




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08.780.30

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Jersey

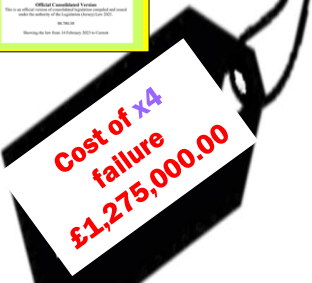
MONEY LAUNDERING (JERSEY) ORDER 2008

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08.780.30

Showing the law from 1 September 2023 to Current

FAILURE



ROYAL COURT


X4

Firm fails

(X5 if you include Mr. Bell)

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X4 LESSONS TO LEARN



NOVEMBER 2005

- Caversham Fiduciary Services Ltd Caversham Trustees Ltd And Nicholas Bell
- £100,000.00 – CAVERSHAM £65k + Bell £35K
- Non-maintenance of policies and procedures

DECEMBER 2018

- Mr. Manning traded as K R Manning & Co.
- Sent to prison for 3½ years
- Deficiencies in the operation of the firm's client account, Kevin Manning, after admitting a number of fraudulent conversion and money laundering charges.

APRIL 2020 =

- Abu Dhabi Commercial Bank PJSC, Jersey Branch (ADCBJ)
- fine of £475,000.00 and awarded costs of £25,000.00
- Failing to act on significant cash payments by x2 customers

FEB 2021 –

- LGL Trustees Limited (LGL)
- fined £550,000 for failing to note the warning signs that an investment scheme may have been a fraud designed to skim funds from Angola's public treasury.
- Failing to heed red flags LGL Trustees and risk assess and failure to collect IDV

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AML/CFT/CPF Handbook

Jersey Financial Services Commission

Cmsure

Issued: 04 September 2023
Effective from: 01 September 2023

The AML/CFT/CPF Handbook is effective from 1 September 2023 and is applicable to all supervised persons. Supervised persons are described as 'relevant persons' in the [Money Laundering \(Jersey\) Order 2008](#).

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FAILURE

JFSC

JFSC

JFSC X7 Civil fails

2019-2020 = £381,010.00 + £115,575.00
2021 = £719,541.21
2022 = 5,498,000.00 + £803,661.17
2024 = £19,211.73 + £0.00
TOTAL = £2,536,909.11

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<p>JULY 2019</p> <p>SANNE:</p> <p>Fined £381,010</p>	<p>MAY 2020</p> <p>Equity Trust:</p> <p>Fined £115,575.00</p>
<p>FEB 2021</p> <p>Kleinwort Hambros group</p> <p>Fined £719,451.21</p> <ul style="list-style-type: none"> • SGKH Bank - £510,599.67 • SGKH Trust - £155,476.54 • SGKH Corporate - £53,375 	<p>JULY 2022</p> <p>IQ EQ (Jersey) Limited:</p> <p>Fined £803,661.17</p>
<p>AUGUST 2022</p> <ul style="list-style-type: none"> • Lloyds Bank Corporate Markets Plc, Jersey Branch (LBCM, Jersey Branch) • Fined £498,000.00 	<p>20 September 2024</p> <p>BELASKO JERSEY LIMITED</p> <p>£19,211.73</p>
	<p>8 November 2024</p> <p>Post Office Limited</p> <p>£0.00</p>

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FAIL RELATED TO:

A specific customer who was considered **HIGH-RISK** because the BENEFICIAL OWNER was


- **A POLITICALLY EXPOSED PERSON (PEP)**
- **FROM A HIGH-RISK JURISDICTION (RUSSIA)**
- **WITH CONNECTIONS TO THE OIL AND GAS SECTOR AND**
- **A \$100 MILLION TRANSACTION**


Additionally, the beneficial owner

- **indirectly held shares in an entity subject to OFAC (Office of Foreign Assets Control) sanctions**

Against the above, Belasko failed to adequately assess and mitigate these heightened financial crime risks as outlined in the JFSC statement.....

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Public statement | 08 November 2024

Jersey Post Limited

Jersey Post Limited

Public statement | 08 November 2024

Jersey Post Limited


[Jersey Post Limited](#)

Jersey Post Limited

Issued: 8 November 2024

- The Jersey Financial Services Commission (JFSC) issued a public statement on 8 November 2024 regarding serious regulatory contraventions by Jersey Post Limited (JPL) in its money service business activities **between January 2019 and December 2022**

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JERSEY POST

Public statement | 08 November 2024

Jersey Post Limited

£0.00
PENALTY

5 Sanction

5.1 The JFSC concluded that JPL, to a significant and material extent, negligently contravened requirements of the regulatory framework. Under the Commission Law, such contraventions warranted a civil financial penalty.

5.2 Article 21B(3)(e) of the Commission Law requires the JFSC to consider the potential financial consequences to the registered person in this case JPL but also to third parties (including customers). In the circumstances of this case, having carefully considered JPL and third parties, the JFSC has determined it reasonable and proportionate to impose a zero penalty.


5.3 The JFSC issues this public statement under Articles 25(b) of the FSU(L) and 26(b) of the Supervisory Bodies Law to support its objectives to:

- 5.3.1 Protect and enhance the reputation and integrity of Jersey in commercial and financial matters; and
- 5.3.2 Counter financial crime.

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8 fails [1 to 4]



1. **Board Administration:** The JPL Board did not operate with formally approved Terms of Reference and held infrequent meetings. Discussions on compliance were limited and did not cover all regulatory responsibilities.
2. **Board Effectiveness:** The Board demonstrated inadequate knowledge of regulatory requirements and over-relied on an ineffective compliance function. They did not self-identify issues or review the effectiveness of their compliance function.
3. **Risk Management:** JPL's Business Risk Assessment (BRA) was inadequate, containing outdated information and failing to assess all relevant risks.
4. **Systems and Controls:** JPL lacked written policies and procedures to comply with legal obligations and the MSB Code, leading to significant compliance failures.

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8 fails [5 to 8]

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5. **Compliance Deficiencies:** JPL needed to retain customer identity documents, manage linked transactions, maintain a PEP policy, and appropriately screen customers.

6. **Monitoring and Controls:** Monitoring systems and controls were not comprehensive, and there was a lack of documented procedures for reviewing transactions.

7. **Reporting and Training:** Reports to the Board were limited in scope, and employee training needed to be appropriately tailored to roles and responsibilities.

8. **Suspicious Activity Reporting:** JPL needed to have established proper procedures for investigating and handling internal Suspicious Activity Reports (SARs), leading to incomplete documentation and unclear reports to the Financial Intelligence Unit (FIU).

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EVEN THE MOST EXPERIENCED
BOARD & PRACTITIONERS
MAY GET CAUGHT OUT!!!

Jersey Post

Tools

Menu

Our Board

The Jersey Post Group Board of Directors maintains the direction of the Company and its subsidiaries, at a strategic level. The Board also ensures that the Company adheres to high standards of corporate governance and this is reflected in the fact that the board includes five independent, non-executive directors.

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Jersey Post

Tools

Menu

Comsure

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The Jersey Post Group Board of Directors maintains the direction of the Company and its subsidiaries, at a strategic level. The Board also ensures that the Company adheres to high standards of corporate governance and this is reflected in the fact that the board includes five independent, non-executive directors.

Helen Hatton

(appointed 20 May 2020)

Non-Executive

Helen Hatton

Non-executive Director

• The Jersey Financial Services Commission (JFSC) issued a public statement on 8 November 2024 regarding serious regulatory contraventions by Jersey Post Limited (JPL) in its money service business activities between January 2019 and December 2022

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JERSEY

New laws and rules 2023/24





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IMPORTANT ENACTMENTS 2022/2023

Civil Enforcement	Dual Track	Criminal Enforcement
3 Civil Penalties Regime <small>Enforced by the JFSC</small>	1 Failure to Prevent ML/TF <small>Enforced by the LCO</small>	
	2 Deferred Prosecution Agreements	


- **WITH EFFECT FROM 24 JUNE 2022**, Jersey introduced a new offence under Article 35A of the Proceeds of Crime (Jersey) Law 1999 (the Law) of **FAILING TO PREVENT MONEY LAUNDERING** (the Failure to Prevent Offence).
- **WITH EFFECT FROM 3 MARCH 2023**, Jersey introduced the **Criminal Justice (Deferred Prosecution Agreements) (Jersey) Law 2023 (DPA Law)**
- Deferred Prosecution supplements the DPA Law Agreement guidance published by the AG (AG's Guidance).
- The effect of a DPA is that a prosecution is suspended for a defined period provided the subject entity meets certain specified conditions.

- **WITH EFFECT FROM 13 MARCH 2023**, a Statutory [JFSC] Notice designating **"senior management functions"** came into effect.
- A JFSC Notice determines which senior managers in a registered person will fall within the scope of the civil financial penalties' regime should they be **CULPABLE** in a registered person's significant and **material contravention of the Money Laundering Order or a Code of Practice**.


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Jersey



CRIMINAL JUSTICE (DEFERRED PROSECUTION AGREEMENTS) (JERSEY) LAW 2023




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Showing the law from 3 March 2023 to Current


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Afex Offshore (Jersey) Limited (AOL)





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**INCLUDES
A FINE
=
£408k +
£60k AG costs
=
£468K**

Jersey's first Deferred Prosecution Agreement (DPA).


**Afex Offshore was fined
£408k + £60k AG costs
= £468K**


- This case sets a precedent for future DPAs in Jersey, demonstrating the effectiveness of the DPA Law in providing a structured and fair approach to handling corporate wrongdoing.
- It also highlights the importance of transparency, accountability, and compliance with AML/CFT regulations.



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Summary and Closing Remarks





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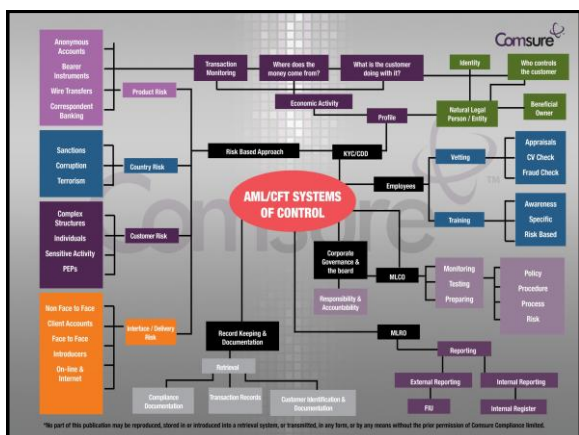
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FINISH

ANY QUESTIONS...?

Camsure

 **managing the risks**
so you can focus
on the **rewards**



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- **Comsure** was founded in 2005 with a view to providing comprehensive business **risk advisory services & is able to offer** your organisation a wealth of **skills and experience**.

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Mathew Beale

Email:


mathewbeale@comsuregroup.com

Tel:

01534 626841



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