

24 April 2024

RUSSIA EXPLOITS WESTERN VACUUM IN AFRICA'S SAHEL

On 23 April, Defense One reported that Niger's shift away from traditional allies like the US and France toward Russia and China echoes actions by fellow North African states Mali and Burkina Faso. As yet another major player in the Sahel succumbs to military rule and Russian influence, Niger's actions signal a profound geopolitical transformation, potentially reshaping the balance of power and stability in West Africa.



<https://www.defenseone.com/threats/2024/04/russia-exploits-western-vacuum-africas-sahel-region/396006>

FinCEN PROVIDES ADDITIONAL GUIDANCE ON PREPARING FOR CORPORATE TRANSPARENCY ACT COMPLIANCE

On 22 April, Duane Morris reported that FinCEN had updated its FAQ on beneficial ownership to include new questions and updated information about reporting companies, beneficial ownership through trusts and access to beneficial ownership information, among other topics.

https://www.duanemorris.com/alerts/fincen_provides_additional_guidance_preparing_corporate_transparency_act_compliance_0424.html

UK CHARITY COMMISSION INVESTIGATES COMPANIES FOR FUNDING PRO-HAMAS NEWS AGENCY CONTROLLED BY DESIGNATED PERSON

On 24 April, the Global Sanctions blog reported the launch of a "statutory inquiry to investigate funds raised for charitable purposes by and on behalf of Aozma Sultana". It is suspected funds which

were supposed to be used for humanitarian aid for Gaza were instead used to fund 'Gaza Now', a news agency that allegedly promotes Hamas and Palestinian Islamic Jihad.

<https://globalsanctions.co.uk/2024/04/uk-charity-commission-investigates-companies-for-funding-pro-hamas-news-agency-controlled-by-designated-person/>

US PROSECUTORS ALLEGE SCHEME TO SUPPLY VENEZUELAN OIL COMPANY WITH AIRCRAFT PARTS

On 23 April, the Wall Street Journal reported that prosecutors had unsealed an indictment charging 10 individuals with a scheme to illegally procure aircraft parts for Venezuela's state-controlled oil company. To carry out the scheme, the group allegedly used third-party companies, including a Costa Rican logistics company and a Spanish aeronautics company, to conceal the ultimate end-user of the aircraft parts, according to the indictment.

<https://www.wsj.com/articles/prosecutors-allege-scheme-to-supply-venezuelan-oil-company-with-aircraft-parts-a7e59727>

RUSSIA SANCTIONS: DUTCH SUPREME COURT REQUESTS PRELIMINARY RULING FROM CJEU ON SHAREHOLDER VOTING RIGHTS

On 24 April, the Global Sanctions blog reported that the Dutch Supreme Court it will refer 2 preliminary questions to the European Court of Justice asking them to interpret EU Russia sanctions relating to the restriction on shareholder meeting and voting rights of designated people.

<https://globalsanctions.co.uk/2024/04/dutch-supreme-court-requests-preliminary-ruling-from-cjeu-on-dp-shareholder-voting-rights/>

DESPITE FATF MONEY LAUNDERING LIST EXIT, UAE HAS MUCH TO PROVE

On 23 April, Transparency International said that the FATF decision to delist the UAE was controversial, to say the least. Indeed, in the past 2 years, the UAE government took some steps in the right direction. But are these enough, and is the country now well-equipped to deal with its serious dirty money problem? It notes that the EU Parliament has blocked its removal from the EU list.

<https://www.transparency.org/en/news/money-laundering-list-exit-uae-much-to-prove>

EUROPEAN PARLIAMENT OPPOSES DECISION TO REMOVE GIBRALTAR FROM AML/CFT ‘HIGH RISK’ LIST

On 23 April, the Gibraltar Chronicle reported that the European Parliament had opposed the European Commission’s decision to remove Gibraltar from its list of high-risk countries with “strategic deficiencies” in mechanisms to counter money laundering and terrorist financing.

<https://www.chronicle.gi/european-parliament-opposes-ec-decision-to-remove-gib-from-high-risk-list/>

EUROPEAN COMMISSION REBUKES CYPRUS OVER MONEY LAUNDERING

On 24 April, the Cyprus Mail reported that the EU Commission had sent a reasoned opinion to Cyprus for failing to correctly incorporate EU legislation. This details that Cyprus, along with Greece, failed to correctly transpose a Directive which includes the foundation for the European Public Prosecutor’s Office (EPPO).

<https://cyprus-mail.com/2024/04/24/european-commission-rebuked-cyprus-over-money-laundering/>

IRELAND, FRANCE, AND LATVIA ACCUSED OF FLAWS IN AML REGULATIONS

On 24 April, the Irish Times reported that the European Commission has opened up infringement proceedings against Ireland and 2 other EU Member States for incorrectly transposing an amended AML Directive.

<https://www.irishtimes.com/business/2024/04/24/ireland-accused-of-flaws-in-anti-money-laundering-regulations/>

EX-ECUADOR OFFICIAL FOUND GUILTY OF LAUNDERING MILLIONS IN ODEBRECHT BRIBES IN MIAMI

On 23 April, the Miami Herald reported that former Ecuadorean Comptroller General Carlos Polit, 73, had been found guilty of conspiring to commit money laundering and 5 related counts.

<https://www.miamiherald.com/news/local/crime/article287929485.html>

UK: INDEPENDENT REVIEW OF DISCLOSURE AND FRAUD OFFENCES

On 24 April, the Home Office published preliminary findings of a review set up to consider the challenges of investigating and prosecuting fraud cases and the operation of the disclosure regime in a digital age. The recommendations and final report are scheduled to be submitted to the Home Secretary in the Summer.

<https://www.gov.uk/government/collections/independent-review-of-disclosure-and-fraud-offences#full-publication-update-history>

<https://www.lawgazette.co.uk/news/government-reviewer-hails-enormous-benefits-of-early-disclosure-for-criminal-justice/5119479.article>

UKRAINE: FOOD MINISTER ACCUSED IN A SCHEME TO ILLEGALLY ACQUIRE STATE-OWNED LAND WORTH \$7 MILLION BETWEEN 2017 AND 2021

On 23 April, Jurist reported that NABU didn't openly name the Ukrainian minister but said the criminal group included the ex-head of the agrarian committee of the Verkhovna Rada, a current minister, top officials of the State Geocadastry bodies, and people who controlled the activities of these bodies.

<https://www.jurist.org/news/2024/04/ukraine-anti-corruption-agency-accuses-food-minister-of-illegally-acquiring-state-owned-land/>

US 2023 COUNTRY REPORTS ON HUMAN RIGHTS PRACTICES

On 22 April, the State Department released its annual Country Reports on Human Rights Practices – the Human Rights Report – which covers internationally recognised individual, civil, political, and worker rights, as set forth in the Universal Declaration of Human Rights and other international agreements.

<https://www.state.gov/reports/2023-country-reports-on-human-rights-practices/>

IMO DIVIDED ON HOW TO TACKLE FRAUDULENT SHIP REGISTRIES

On 24 April, Lloyds List reported that calls for a new set of guidelines to deal with the growing problem of fake flags has been met with a muted response at the IMO, where member states are divided over how to tackle the issue.

<https://www.lloydslist.com/LL1148950/IMO-divided-on-how-to-tackle-fraudulent-ship-registries>

8 LATIN AMERICAN COUNTRIES FIGHTING HUMAN TRAFFICKING TOGETHER

On 22 April, the UN Office on Drugs and Crime reported on UNODC project TRACK4TIP bringing countries in the region together to stand against this horrific crime, resulting in some 90 criminal investigations and the identification of more than 600 trafficking victims. UNODC organised a special event in Panama, the “Best Practices Regional Exchange Forum”.

Regional UNODC Initiatives and Beneficiary Countries:
Aruba Brazil Colombia Curacao Dominican Republic Ecuador Peru Trinidad and Tobago



<https://www.unodc.org/unodc/frontpage/2024/April/nine-latin-american-countries-fighting-human-trafficking-together.html>

<https://www.unodc.org/unodc/human-trafficking/track4tip/overview.html>

RUSSIAN MINISTER DETAINED AFTER TAKING BRIBE

On 24 April, the Guardian reported that a well-connected Russian deputy defence minister has been charged with bribe-taking, in the highest-profile corruption scandal in the country in years, triggering speculation about a possible purge within the elites.

<https://www.theguardian.com/world/2024/apr/24/russian-defence-minister-timur-ivanov-us-eu-sanctions-jail-term>

UK: INSOLVENCY LAW “ENTIRELY CAPABLE” OF DEALING WITH DIGITAL ASSETS

On 24 April, Legal Futures reported that English insolvency law is “entirely capable of convenient and sensible application to disputes concerning digital assets”, according to an expert panel.

<https://www.legalfutures.co.uk/latest-news/insolvency-law-entirely-capable-of-dealing-with-digital-assets>

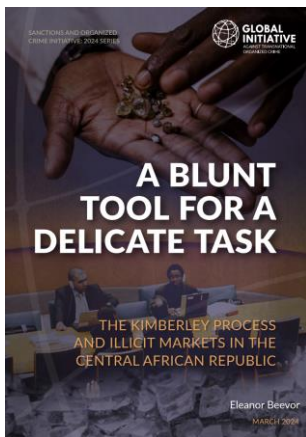
RUSSIAN COURT ORDERS SEIZURE OF JPMORGAN CHASE FUNDS IN VTB LAWSUIT

On 24 April, Rferl reported that a Russian court has ordered the seizure of funds in JPMorgan Chase bank accounts in Russia, in a lawsuit filed by state-owned bank VTB as it seeks to regain funds blocked abroad.

<https://www.rferl.org/a/russia-court-seizure-jpmorgan-chase-funds-vtb/32918726.html>

THE KIMBERLEY PROCESS AND ILLICIT MARKETS IN THE CENTRAL AFRICAN REPUBLIC

In March, the Global Initiative Against Transnational Organised Crime published this report which looks at the use of the Kimberley Process, which aims to prevent conflict diamonds from reaching licit markets. This report seeks to assess the extent to which the Kimberley Process has shaped the CAR's diamond market, whether its suspension of the CAR has helped to sever the link between diamonds and conflict actors, how this has affected artisanal mining, and how illicit economies have adapted to, and been shaped by, the suspension.



<https://globalinitiative.net/wp-content/uploads/2023/12/Eleanor-Beevor-A-blunt-tool-for-a-delicate-task-Kimberley-Process-and-illicit-markets-in-CARGI-TOC-March-2024.pdf>

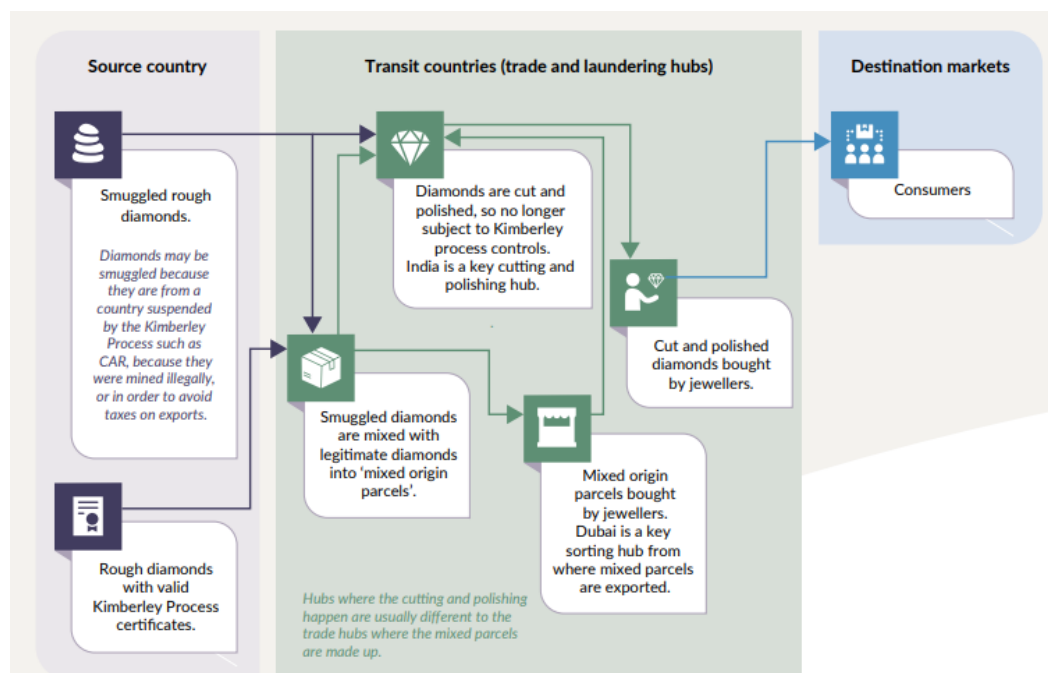


FIGURE 3 The typical laundering process for smuggled diamonds.

CANADA: CONMAN WHO SWINDLED \$175 MILLION IN 'MASSIVE' PSYCHIC FRAUD SCHEME SENTENCED TO 10 YEARS

On 15 April, the Guardian reported that a Canadian conman, who swindled more than US\$175 million from his North American victims through “a massive psychic mass-mailing fraud scheme” has been sentenced to 10 years in prison. Among Runner’s scams, his companies sent letters, falsely purported to be individualized, to millions of people. The correspondence, written in cursive, was seemingly from the famed French psychic Maria Duval and promised the recipient an “opportunity to achieve great wealth and happiness with the psychic’s assistance”.

<https://www.theguardian.com/world/2024/apr/15/canada-con-man-psychic-fraud-sentenced>

SMOKING OUT AUSTRALIA'S GROWING ILLICIT TOBACCO MARKET: CURRENT TRENDS AND FUTURE CHALLENGES

This paper from the May edition of the International Journal of Drug Policy discusses recent trends in Australia's illicit tobacco trade, reasons why this is of concern, potential drivers of Australians’ illicit tobacco use, and policy measures that could be implemented to mitigate increasing illicit tobacco trade such as implementing a track and trace system, increased investment in the Australian Border Force to enhance detection of illicit tobacco shipments at Australia's borders, and encouraging public tip-offs of illicit tobacco sales.

<https://www.sciencedirect.com/science/article/pii/S0955395924001099>

RUSSIAN FSB COUNTERINTELLIGENCE CHIEF GETS 9 YEARS IN CYBERCRIME BRIBERY SCHEME

On 22 April, Krebs on security posted that the head of counterintelligence for a division of the Russian Federal Security Service (FSB) had been sentenced to 9 years in a penal colony for accepting a \$1.7 million bribe to ignore the activities of a prolific Russian cybercrime group that hacked thousands of e-commerce websites.

<https://krebsonsecurity.com/2024/04/russian-fsb-counterintelligence-chief-gets-9-years-in-cybercrime-bribery-scheme/>

UK: GUIDANCE – MISUSE OF NON-DISCLOSURE AGREEMENTS (NDA)

CILEX Regulation (which provides guidance etc for legal executives) has published this guidance intended to help one understand your obligations and the standards of behaviour expected as a regulated legal professional in accordance with the CILEx Code of Conduct.

<https://cilexregulation.org.uk/misuse-of-non-disclosure-agreements-ndas>

UK: MINISTER SAYS OFSI TO IMPOSE PENALTIES FOR RUSSIA SANCTIONS BREACHES IN 2024

On 24 April, the Global Sanctions blog reported on a letter of reply from a Foreign Commonwealth and Development Office minister to the Parliamentary Foreign Affairs Committee.

<https://globalsanctions.co.uk/2024/04/minister-says-ofsi-to-impose-penalties-for-russia-sanctions-breaches-in-2024/>

NORTH KOREANS MAY HAVE HELPED CREATE WESTERN CARTOONS

On 22 April, Reuters reported that North Korean animators may have helped create popular television cartoons for big Western firms, including Amazon and HBO Max, despite international sanctions on North Korea, a research report has found. CNN says that the discovery raises questions about the ability of US tech and creative arts companies to control their supply chains and avoid work that could inadvertently violate sanctions banning countries from doing business with North Korea.

<https://www.reuters.com/world/asia-pacific/north-koreans-may-have-helped-create-western-cartoons-report-says-2024-04-22>

<https://edition.cnn.com/2024/04/22/politics/us-animation-studio-sketches-korean-server/index.html>

<https://www.38north.org/2024/04/what-we-learned-inside-a-north-korean-internet-server-how-well-do-you-know-your-partners>

US: CFIUS UPDATE - LARGER PENALTIES, SHARPER MONITORING

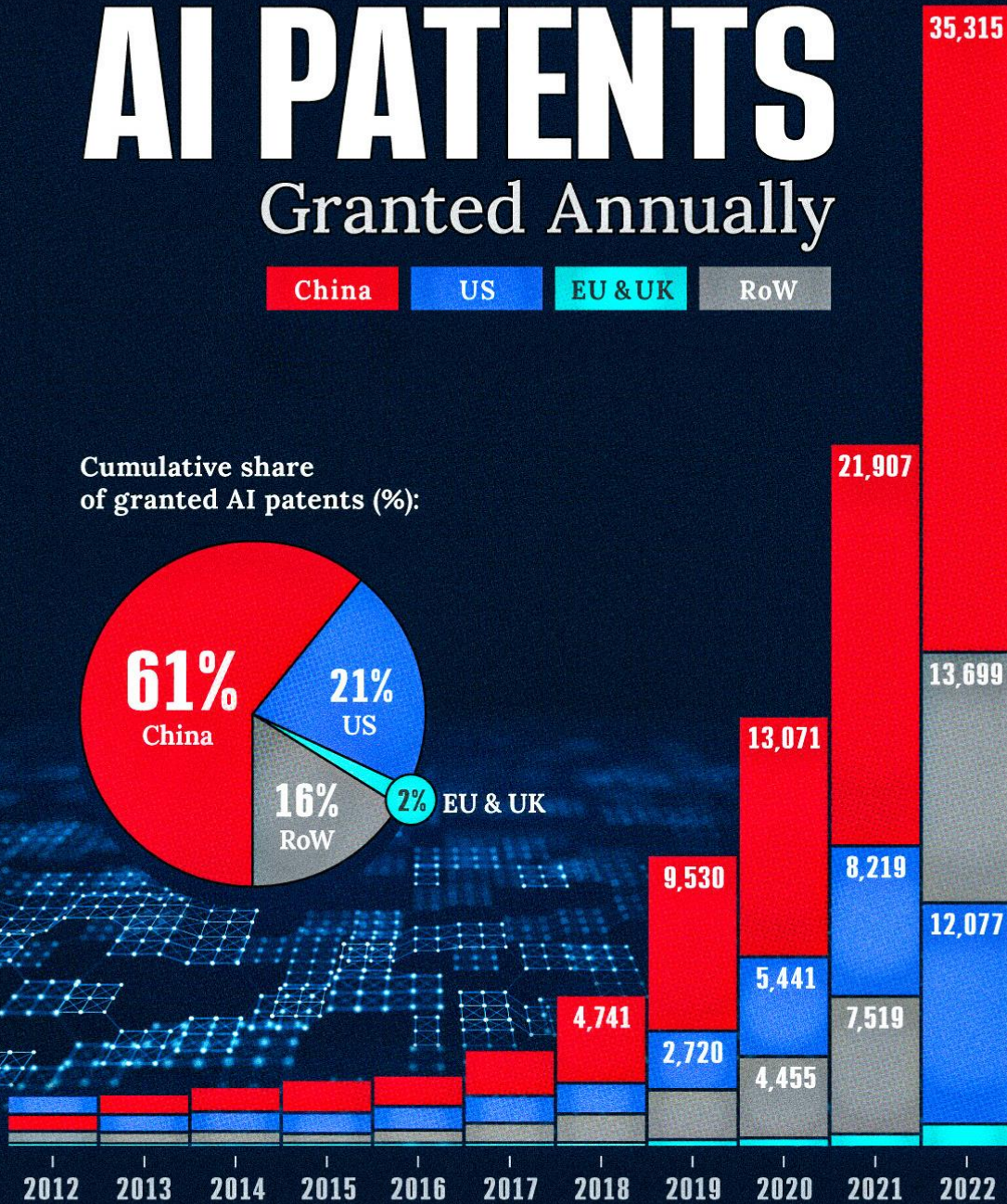
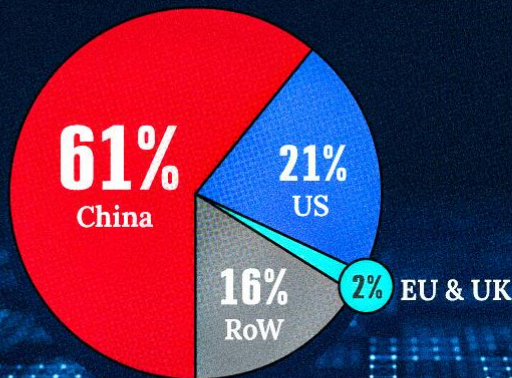
On 24 April, a post from Bass Berry & Sims said that the US Treasury had notified proposed changes amending the regulations that govern the operations of the Committee on Foreign Investment in the United States (CFIUS) to increase penalties on offenders, expand CFIUS authority to request information, and tighten the time frame parties have to respond to drafts of mitigation agreement terms.

<https://www.bassberrygovcontrade.com/cfius-penalties-monitoring>

Number of AI PATENTS Granted Annually

China US EU & UK RoW

Cumulative share
of granted AI patents (%):



Cumulative data based on patents granted between 2010-2022
Source: The AI Index 2024 Annual Report



Where Data Tells the Story



https://www.visualcapitalist.com/visualizing-ai-patents-by-country/#google_vignette

**US: CHANGE OF POLICY FOR EPA OFFICE OF ENFORCEMENT AND COMPLIANCE ASSURANCE
(OECA)**

On 24 April, a post from the program on corporate Compliance & Enforcement at the New York University School of Law said that a new Policy, effective immediately, mandates that the entire EPA coordinate and communicate, not only at the outset of an investigation, but even months after an investigation has begun, to determine whether the matter should be pursued as administrative, or civil or criminal or both.

https://wp.nyu.edu/compliance_enforcement/2024/04/24/epa-announces-new-enforcement-policy-requiring-civil-criminal-coordination/

IF YOU WOULD LIKE TO MAKE A (VERY) MODEST CONTRIBUTION FOR MY TIME AND COSTS, YOU

CAN “BUY ME A COFFEE”

CONTRIBUTIONS START FROM JUST \$3

<https://www.buymeacoffee.com/KoIvM842y>