



The Government of Belize

Financial Intelligence Unit

GUIDANCE ON ASSESSING NAME MATCHES FOR TARGETED FINANCIAL SANCTIONS

1. Introduction

This document is meant to help Financial Institutions, other Reporting Entities¹, Non-Profit Organizations and members of the public in understanding how to determine whether an individual or entity is a “listed person”.

2. What is a listed person?

The United Nations Security Council Resolutions (UNSCRs) set out the decisions of the United Nations Security Council, some of which include measures to protect global peace and security. Belize, as a UN member state is bound by these decisions. Several UNSCRs are aimed at protecting against the threats of terrorism and the proliferation of weapons of mass destruction and require countries to take specified measures against individuals and entities:

- Identified by the United Nations Security Council or a specified subsidiary body; or
- Identified by the country based on criteria determined by the United Nations Security Council.

When these measures are implemented in Belize, these individuals and entities are referred to as “listed persons².”

3. What are the laws that set out listed persons?

¹ The Money Laundering and Terrorism (Prevention) Act, Cap. 104 (“the MLTPA”) defines “reporting entity” as any person whose regular occupation or business is the carrying on of– (a) any activity listed in the Schedule I; (b) any other activity defined by the Minister as such by an Order published in the *Gazette*;

² “Listed person” includes a person or entity listed in accordance with section 68 of the MLTPA.

In Belize, listed persons are identified in accordance with:

- The Money Laundering and Terrorism (Prevention) Act, Chap. 104 Revised Edition 2020 (“the MLTPA”) as amended by The Money Laundering and Terrorism (Prevention) (Amendment) Act, 2023;

4. Where can I find information on listed persons?

Pursuant to the MLTPA, the Financial Intelligence Unit will be required to maintain and publish a list³ of listed persons as designated by Belize (“the Consolidated Belize Sanctions List”), as well as the original lists published by the United Nations Security Council (“UN Sanctions Lists”) containing as much identifier information as is available. These lists can be found at the following links:

<https://scsanctions.un.org/hz7nhen-al-qaida.html>

<https://scsanctions.un.org/hu38nen-taliban.html>

<https://scsanctions.un.org/293knen-dprk.html>

<https://scsanctions.un.org/up9j1en-iran.html>

Note that there will be some overlap between the Consolidated Belize Sanctions List and the UN Sanctions Lists, however, the UN Sanctions Lists are often updated with the most recent identifier information for the listed person. The steps below should therefore include verifying against any relevant UN Sanctions List.

5. How do I determine whether I have a name match?

5.1 If you are dealing with a transaction:

Step 1. Compare the name in your transaction with the name on the Consolidated Belize Sanctions List and applicable UN Sanctions List. Is the name on the sanctions list a vessel, organization, or company, whilst the name in your transaction is an individual (or vice-versa)?

- If yes, you do not have a valid match.*

³ Section 68 (5Q) of the MLTPA requires the Financial Intelligence Unit to maintain a consolidated list of all orders issued under sub-section (5F) or section 12. It also includes all individuals and entities remaining on the list in Schedule VIII of the MLTPA.

- If no, please continue to step 2 below.

Step 2. How much of the listed person's name is matching when compared to the name in your transaction? Is just one of two or more names matching (e.g., just the last name)?

- If yes, you do not have a valid match.
- If no, please continue to step 3 below.

Step 3. Compare the information you have on the matched name in your transaction with the entry on the sanctions list. An entry will often include full name, address, nationality, passport, ID, or drivers license number, place of birth, date of birth, previous names, and aliases. Are you missing several of this information for the name in your transaction?

- If yes, go back and get more information and then compare your complete information against the entry.
- If no, please continue to step 4 below.

Step 4. Are there a number of similarities or exact matches?

- If no, you do not have a valid match. *
- If yes:
 - you should inform the FIU by:
 - completing a Suspicious Transaction Report⁴ (STR) Form if you are a Reporting Entity/Financial Institution which is available at the following link <https://fiubelize.org/wp-content/uploads/2017/02/STR-FORM.pdf>. The completed Suspicious Transaction Report with supporting documentation is to be sent to Financial Intelligence Unit, 4998 Coney Drive Plaza, PO Box 2197 Belize City, BELIZE; or emailed at fiu.belize@fiubelize.org ;
 - completing the Compliance Reporting Form if you are a Non-Profit Organizations (NPO) or a member of the public, which is available at the following link <https://fiubelize.org/compliancereportingform.html>. The completed Compliance Reporting Form with supporting documentation is to be sent to Financial Intelligence Unit, 4998 Coney Drive Plaza, PO Box 2197 Belize City, BELIZE; or emailed at fiu.belize@fiubelize.org; or
 - calling the FIU at (+501) 223-2729 or (+501) 223- 0596; and

⁴ Section 17 (4)(b) of the MLTPA require the reporting entity to take this step.

- you should not proceed with the transaction⁵.

5.2 If you are dealing with an account:

Step 1. Compare your customers name with the name on the sanctions list. Is your customers name an individual while the name on the sanctions list is a vessel, organization or company (or vice-versa)?

- If yes, you do not have a valid match. *
- If no, please continue to step 2 below.

Step 2. How much of the listed person's name is matching when compared to the name of your account holder? Is just one of two or more names matching (i.e., just the last name)?

- If yes, you do not have a valid match. *
- If no, please continue to step 3 below.

Step 3. Compare the information you have on the matching name in your transaction against the complete sanctions list entry. An entry will often include full name, address, nationality, passport, ID, or driver's license number, place of birth, date of birth, previous names, and aliases. Are you missing several of this information for the name of your account holder?

If yes, get further details then proceed to compare your complete information against the entry.

- If no, please continue to step 4 below.

Step 4. Are there a number of similarities or exact matches?

If no, you do not have a valid match. *

- If yes:
 - you should inform the FIU by:
 - completing a Suspicious Transaction Report⁶ (STR) Form if you are a Reporting Entity/Financial Institution which is available at the following link <https://fiubelize.org/wp-content/uploads/2017/02/STR-FORM.pdf>.
The completed Suspicious Transaction Report with supporting

⁵ Sections 68(5G), (5H) and (5R) of the MLTPA prohibit the reporting entity from proceeding with these transactions.

⁶ Section 17 (4)(b) of the MLTPA require the reporting entity to take this step.

documentation is to be sent to Financial Intelligence Unit, 4998 Coney Drive Plaza, PO Box 2197 Belize City, BELIZE; or emailed at fiu.belize@fiubelize.org ;

completing the Compliance Reporting Form, if you are a Non-Profit Organizations (NPO) or a member of the public, which is available at the following <https://fiubelize.org/compliancereportingform.html> The completed Compliance Reporting Form with supporting documentation is to be sent to Financial Intelligence Unit, 4998 Coney Drive Plaza, PO Box 2197 Belize City, BELIZE; or emailed at fiu.belize@fiubelize.org; or

- o calling the FIU at (+501) 223-2729 or (+501) 223- 0596;

6. “Low quality” aliases (AKAs)?

Decisions on screening are to be made by Reporting Entities, Non-Profit Organizations and members of the public based on their particular circumstances and compliance approach.

At the time of designation, as much identifier information as is available will be included in the Sanctions list. Entries will be updated as information becomes available. Some identifier information may include multiple aliases or “AKAs.” A relatively broad or generic alias that may potentially generate a large number of false hits, if relied on in isolation from other information, is referred to as a "low-quality AKA". These AKAs are included in designations based on available information and may include names by which the listed entities refer to themselves or are referred to by third parties. Consequently, these AKAs may be useful for identification purposes in confirming a possible “hit” or “match” triggered by other identifier information. Low-quality AKAs should not however be relied on in isolation.

7. Where can I get more information?

For further information, please contact the Financial Intelligence Unit via the following contact information:

4998 Coney Drive Plaza
Coney Drive
Belize City, Belize
P.O. Box 2197
Tel: + (501) 223 – 2729 / 223-0596
Fax: + (501) 223 – 2531
E-mail: fiu.belize@fiubelize.org

NOTICE This document has been prepared for information purposes only and does not relieve you of any obligation under the laws of Belize. Members of the public should familiarize themselves with the Money

Laundering and Terrorism (Prevention) Act, Cap. 104 and all other relevant laws. This document is not intended as and does not constitute legal advice. Each case is unique and members of the public should seek the advice of a qualified attorney-at-law with respect to their particular case.

* If you still have reason to know or believe that processing this transaction or operating this account would violate any provision of the MLTPA, you should contact the FIU and explain this knowledge or belief.