Financial Intelligence Unit - FIU

Money Laundering Typology Report

MONEY LAUNDERING TRENDS AND PATTERNS ASSOCIATED WITH THE AA ARMED GROUP

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Content

INTRODUCTION 1

OBJECTIVE 2

KEY FINDING 2

INFORMATION 2

IDENTIFIED MONEY LAUNDERING TYPOLOGIES 3

CASE STUDIES OF MONEY LAUNDERING IDENTIFIED 3

Money Laundering methods and trends of AA armed group 11

RECOMMENDATION 12

CONCLUSION 13

TABLE OF ACRONYMS 14

Money Laundering Trends and Patterns Associated with the AA Armed Group

INTRODUCTION

1. In accordance with Section 10(c) of the Anti-Money Laundering Law, the Myanmar Financial Intelligence Unit (MFIU) is responsible for compiling, maintaining, and disseminating information and statistics related to the trends and patterns of money laundering and terrorist financing, along with the results of monitoring assessments and the associated risks of such offenses.

2. In Myanmar, the National Risk Assessment was conducted in 2017 and published in 2018. According to that report, illicit narcotic drug trafficking was identified as the crime that predominantly generates proceeds of crime (POC) and described as a high-risk crime for money laundering.

3. Myanmar is one of the countries with the largest production of opium in the world, and criminals and armed organizations are most often involved in illegal drug trafficking. The Advisory Commission on Rakhine State led by former United Nations Secretary General Kofi Annan released the Final Report in August 2017 and it was described in page 45 of the second paragraph that "Also in Rakhine, drug smuggling is reportedly funding the activities of non-state armed groups, such as the Arakan Army (AA) and the Arakan Rohingya Salvation Army (ARSA)." [1]

4. Therefore, it has become important to prevent the funds collected from the illegal drug sales of the AA (Arakan Army) armed group, declared a terrorist group by the government, from entering the national financial system effectively.

5. In this report, the methods of raising, transferring, and utilizing the proceeds collected from the illicit drug trafficking of the AA (Arakan Army) armed group, as well as money laundering trends, are identified and assessed.

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[1] https://www.kofiannanfoundation.org/app/uploads/2017/08/FinalReport_Eng.pdf
https://www.kofiannanfoundation.org/mediation-and-crisis-resolution/rakhine-final-report/

OBJECTIVE

6. The purpose of this report is to enable the Law Enforcement Agencies, Competent Authorities and Reporting Organizations to understand the money laundering methods used by armed groups and drug traffickers, and support the following:

a) to assist the Law Enforcement Agencies (LEAs) in their financial investigation process when investigate the predicate offences;

b) to assist the Competent Authorities in carrying out AML/CFT supervisory procedures on their relevant reporting entities;

d) to assist the Reporting Organizations in their implementation of AML/CFT compliance procedures.

KEY FINDING

7. According to case studies of this report, the key finds are as follows -

a) the main source of funding for the AA armed group is the illegal production and sale of drugs;

b) the AA armed group is deeply connected with illicit narcotic drugs cartels and arm traffickers, and trying to buy weapons and ammunition;

c) Illicit drug cartels associated with armed groups camouflage the beneficial owner (BO) by using the factitious national identity cards, and by providing falsify address in carrying out financial transactions.

d) Transferring money to an intermediary's account, withdrawing cash, and using money transfer services to transfer it to other locations is a changing method that makes it difficult for law enforcement agencies to trace the money trail.

INFORMATION

8. According to the provisions of Section 13 of the Anti-Money Laundering Law, Myanmar Financial Intelligence Unit (MFIU) form the Scrutiny Board and assign to investigate when it is suspected that money laundering or any crime related to money laundering has been committed.

9. This report identifies money laundering typologies and trends based on the results of the analyses of the following AA armed group-related crimes conducted by the Scrutiny Board of Financial Intelligence Unit (FIU):

a) **Scrutiny Board No-19/2016(Drug):** Scrutinizing by money laundering regarding to illicit drug trafficking, arms smuggling and destruction of public property.

b) **Scrutiny Board No-12/2018:** Scrutinizing by money laundering regarding to homicide, arms smuggling, wood smuggling and illicit drug trafficking.

c) **Scrutiny Board No-2/2020:** Scrutinizing by money laundering regarding to illicit drug trafficking and terrorism.

e) **Scrutiny Board No-2/2020:** Scrutinizing by money laundering regarding to illicit drug trafficking.

IDENTIFIED MONEY LAUNDERING TYPOLOGIES

10. According to the investigation by Scrutiny Board, it was found that the illicit drug trafficking is the main source for raising funds for the armed groups. Funds collected are transferred through the banking system and illegal money transfer services, sometimes using cash couriers. Those funds are used in purchasing vehicles and boats for illicit drug trafficking, fire arms and in establishing business, and usually in purchasing real estates.

11. AA armed group used the money laundering methods in transferring their funds such as disposition or transferring under threshold amount, sending a representative and withdrawing money, using fictitious names, falsify national identity cards and frequently used disposable SIM cards.

CASE STUDIES OF MONEY LAUNDERING IDENTIFIED

12. **Money laundering methods identified from the case investigated by the Scrutiny Board No-19/2016(Drug):** In this case, the AA armed group members used the banking system to transfer the money they collected from illicit drug trafficking. In doing transaction, they used the subordinate or someone else by sending them to bank to deposit the money without doing themselves it. In doing so, they used the various methods such as using falsified national identity cards, multiple split deposition into numerous banks and transfer to others, describing different addresses of the recipient of the money in order to evade the tracing and conceal the beneficial ownership.

13. In addition, AA armed members do not directly transfer the funds they collect illegally to the final destination; instead, they transfer them to different places through intermediaries. After withdrawing cash in these intermediate areas, they carry out transfers through unregistered money transfer services, using falsified national identity cards, fictitious names, and disposable SIM cards. The withdrawal of cash using falsified national identification cards in intermediate areas makes it difficult to identify the money trail. Additionally, by depositing the cash in money transfer businesses and transferring it again, they attempt to avoid Customer Due Diligence (CDD) measures implemented by reporting entities.

Case Study 1: Scrutiny Board No.19/1016 (Investigation into Money Laundering Case related to Illicit Drugs Trafficking Case)

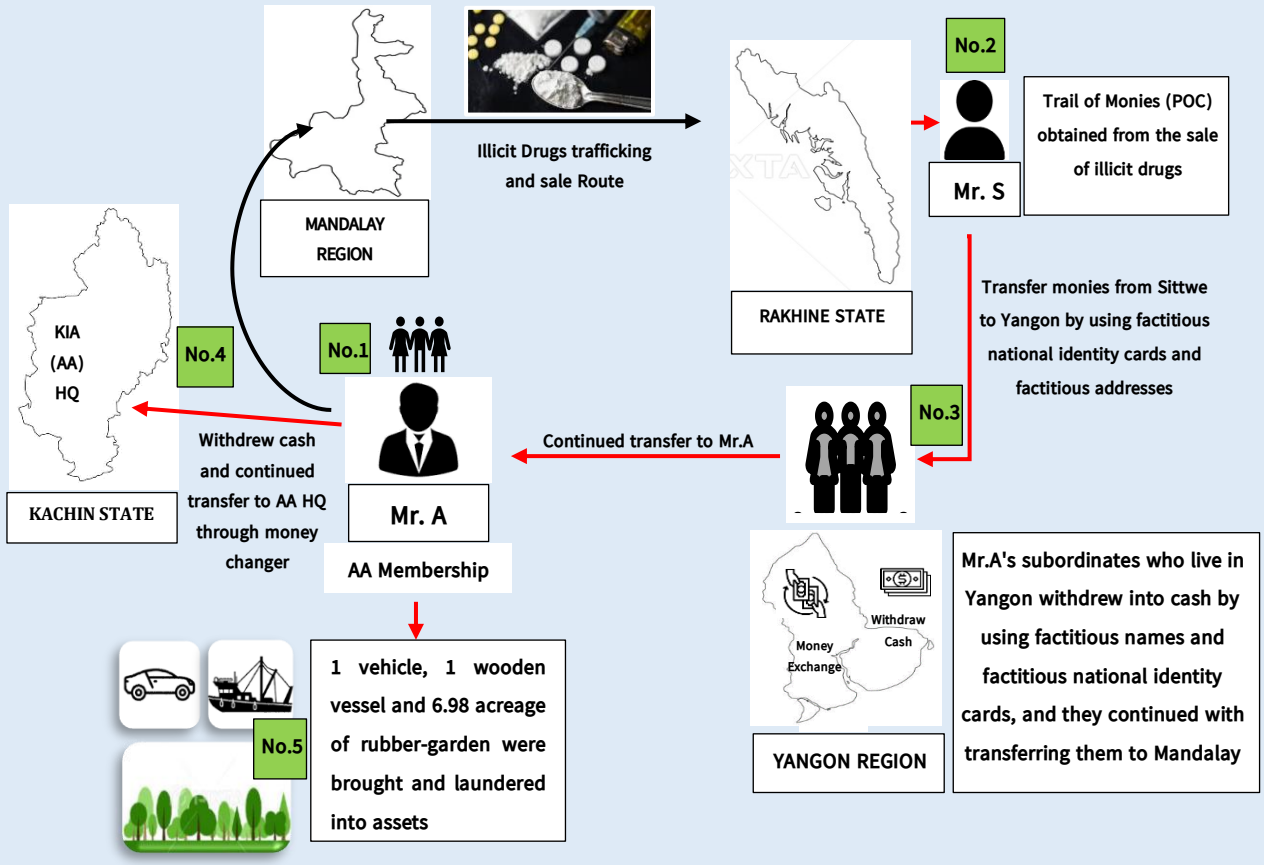
The scrutiny board verified whether the funds obtained from the illicit drug trafficking by defendant **Mr.A** and his associates were laundered or not, which was the case (predicate offence) of North Okkalapa Myoma Police Station's (Illicit Drug) FIR-No. 5/2016, under the Narcotic Drugs and Psychotropic Substances Law section 15/19(a)/21.

According to the verification, **the defendant Mr. A,** a lieutenant colonel in the **Arakan Army (AA),** was also trafficking illicit drugs from Mandalay to Sittwe and selling them in Sittwe. The funds collected from the sale of illicit drugs, **Mr. A's partner,** named **Mr.S** transferred them form the banks in Sittwe to Yangon, by using falsified national identity cards made in various names and disposable phone SIM cards. In transferring, when it was a total amount of 1000,000 Kyats, the address was also divided into two separate places and transferred.

It was discovered that the aforementioned transferred monies were withdrawn into cash by **the defendant Mr.A's subordinates** who live in Yangon by using fictitious names and falsified national identity cards, and they continued to transfer the funds to Mandalay.

The monies (funds) received in Mandalay were also withdrawn by and he continued with transferring them to AA armed headquarters through money transfer services, using fictitious names was also discovered.

According to the verification, **the defendant Mr.A** laundered the funds (POC) obtained from the sale of illicit drugs by purchasing 1 vehicle, 1 wooden vessel and 6.98 acreage of rubber-garden.



Money Laundering Typologies

Source of POC	-	Proceeds obtained from trafficking and selling of illicit drugs
Technique	-	Depositing monies by structuring, and using cash courier
Mechanism	-	Exploiting banking system and unregistered money changers
Instrument	-	Using falsified national identity cards, a lot of mobile SIM cards and disposable phone SIM cards

14. **Money laundering methods identified from the case investigated by the Scrutiny Board No-12/2018:** In this case, AA armed group was found to be in contact with drug dealers to obtain more direct supplies of fire arms and ammunition than to obtain funds. They have tried to obtain fire arms and ammunition by making connections between drug traffickers and arms smugglers.

15. Drug cartels associated with armed groups use banks to transfer funds collected from illicit drug trafficking and withdraw cash using an account of an intermediary to conceal the beneficial ownership (BO) and to cut off the money trail. In addition, when drugs are sold to foreign countries, the money transferred from that country is used as export income by the export earnings (earnings) dealers, and then transferred to money

transfer services, and they try to cut off the money trail by withdrawing cash from those money transfer services.

16. In purchasing arms and ammunition, Drug Cartels meet and purchase arms smugglers through the connections of the AA arms group. When purchasing, payment is made by using the banking system. Sometimes, if using the banking system, there is a potential risk of CDD being made, so in order to avoid this, they used cash for payment.

17. Additionally, drug cartels linked to armed groups open multiple accounts in multiple banks and deposit cash separately to avoid being reported.[2] They purchase real-estates and farmland in the names of their family members at the integration stage.

Case Study 2: Scrutiny Board No.12/2018 (Investigation into Money Laundering Case related to Illicit Drugs Trafficking Case and Arms Smuggling Case)

The scrutiny board verified whether the monies obtained from the illicit drugs trafficking case and arms trafficking case by defendant **Mr.M**, **Mr.H** and 25-chain-culprits were laundered or not, which were the case (predicate offence) of Mingalardon Myoma Police Station's (Illicit Drug) FIR-No. 18/2018, under the Narcotic Drugs and Psychotropic Substances Law section 19(a), and FIR-No. 237/2018, under the Arms (Temporary Amendment) Act section 19-a.

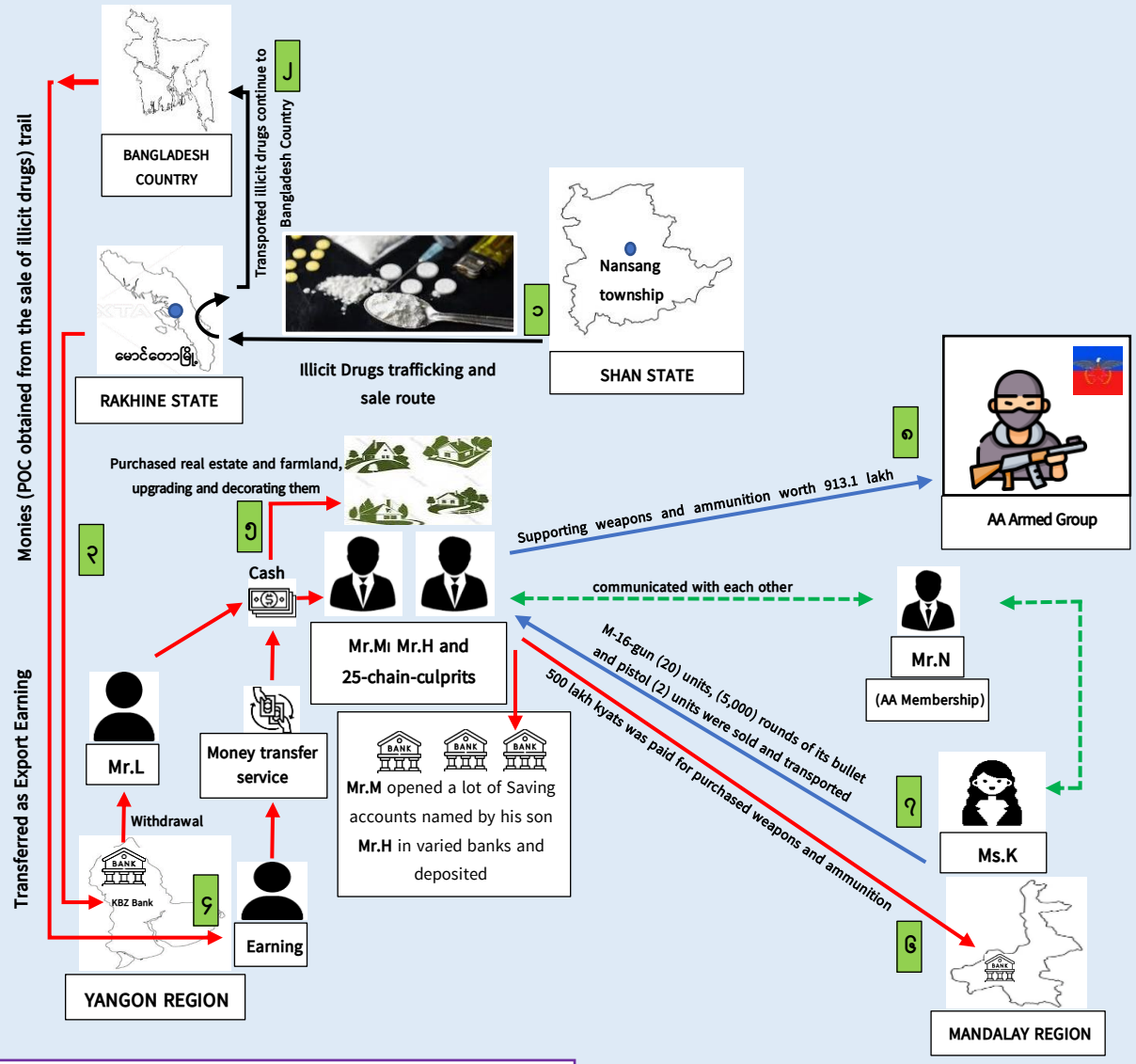
According to the verification, it was discovered that **the defendant Mr.H** contacts with illicit drug traffickers from Nansang township in Shan State and, he trafficked and sold the illicit drug through people (illicit drug traffickers) who would buy them in Maungdaw township in Raknine State. And the illicit drug traffickers also transferred monies to **Mr.L** through a bank located in Botataung Township, Yangon Region. **Mr.L** withdrew in cash and he had to send them again to **the defendant Mr.H.** It was also discovered that **Mr.H** received the cash and he had also opened a lot of Saving Accounts named by his son Mr.H in varied banks and deposited them again.

According to the verification, by the connection through **Mr. N** who is a captain-rank member of **AA armed group**, the defendant **Mr. M** and **Mr. H** met with **Ms.K** who live in Mandalay. After that the defendant **Mr. M** and **Mr. H** purchased M-16-gun (20) units, (5,000) rounds of its bullet and (2) units of pistol for 500,000,000 kyats from **Ms.K** and transported them to the **AA armed group** in Rakhine State. According to the inspection, it was also discovered that they transferred monies to **Ms.K's bank account** by the banking system to pay for all of weapons and ammunition.

According to the inspection, it was discovered that the defendant **Mr. M** and **Mr. H** sold the illicit drugs to buyers in Bangladesh and the buyers transferred the monies to Yangon's export earnings dealers and, they converted the monies into export earnings and transferred to money remittance, and then the defendant **Mr. M** and **Mr. H** had withdrawn in cash.

[2] Banks and financial institutions conduct the CDD and reporting STR to the FIU when it is suspected that related to money laundering and related crimes on the customer's deposit and transfer of money.

It was revealed that the defendant **Mr. M** and **Mr. H** bought **weapons and ammunition** worth 913.1 lakh kyats with the illicit drug profits (POC) for the **AA armed group**. In addition, it was discovered that the defendant **Mr. M** and **Mr. H** also purchased real estate and farmland using family members' names, upgrading and decorating them with the profits obtained from the sale of illicit drugs (POC) had been laundered.



INDEX

- **Illicit Drugs trafficking and sale route**
- **Monies (POC) flow**
- **the relation routes**
- **the transported routes of weapons and ammunition**

Source of POC	-	Proceeds obtained from trafficking and selling of illicit drugs
Technique	-	Using transit accounts, Trade-Based Money Laundering (TBML), opening saving account in the name of family members, purchasing assets, and cash withdrawal
Mechanism	-	Exploiting banking system, and using money transfer services
Instrument	-	Using fraudulent invoices and documents

18. **Money laundering methods identified from the case investigated by the Scrutiny Board No-2/2020(Drug):** In this case, it was found that the arms traffickers met drug cartels and sold ammunition through the connections of the AA armed group. In dealing in arms and ammunition, arms smugglers receive funds using the banking system for advance and receive the rest in cash to reduce the potential risk of CDD measures applied by reporting entities.

19. When receiving funds through the banking system, at the layering stage[3], Arms traffickers used various methods such as opening multiple owned accounts and joint accounts with family members. In order to avoid the potential risks of CDD measures and being reported by banks, they divide collected funds into small amounts of money and transferred those funds into those accounts.

20. Besides, the arms traffickers laundering the proceeds from arms trafficking by purchasing the vehicles, plots of land, purchasing and upgrading the real-estate at the integration stage.

Case Study 3: Scrutiny Board No.2/2020 (Investigation into Money Laundering Case related to Act of Terrorism Case and Illicit Drugs Trafficking Case)

The scrutiny board verified Ms.K, Mr.N, Mr.T and their associates by money laundering case, who were the defendants of Kamayut Myoma Police Station's FIR-No.2241/2019, under the Counter Terrorism Law section 51(b)/52(c), and (Illicit Drug) FIR-No. 66/2019, under the Narcotic Drugs and Psychotropic Substances Law section 19(a)/21.

According to the verification, by the connection through **Ms. E** who was familiar from working together as broker, the defendant **Ms. K** made an appointment with **Mr.N, Mr.T** and **another unidentified Rakhine man who were the AA memberships** at the Summer Palace Hotel located in Kamayut township and had communicated with them about the trading of illicit arms and ammunition for use by the **AA armed group** was discovered.

It was also identified that the defendant **Ms.K** sold the illicit arms and ammunition to the buyers named **Mr.M** and **Mr.H** (*the defendants from the case of Scrutiny Board No.12/2018*) by the connection through **Ms. N** who was **the AA membership**. When the sale of the illicit arms and ammunition, it was discovered that the advance monies were received by bank account and the remained monies were received in cash.

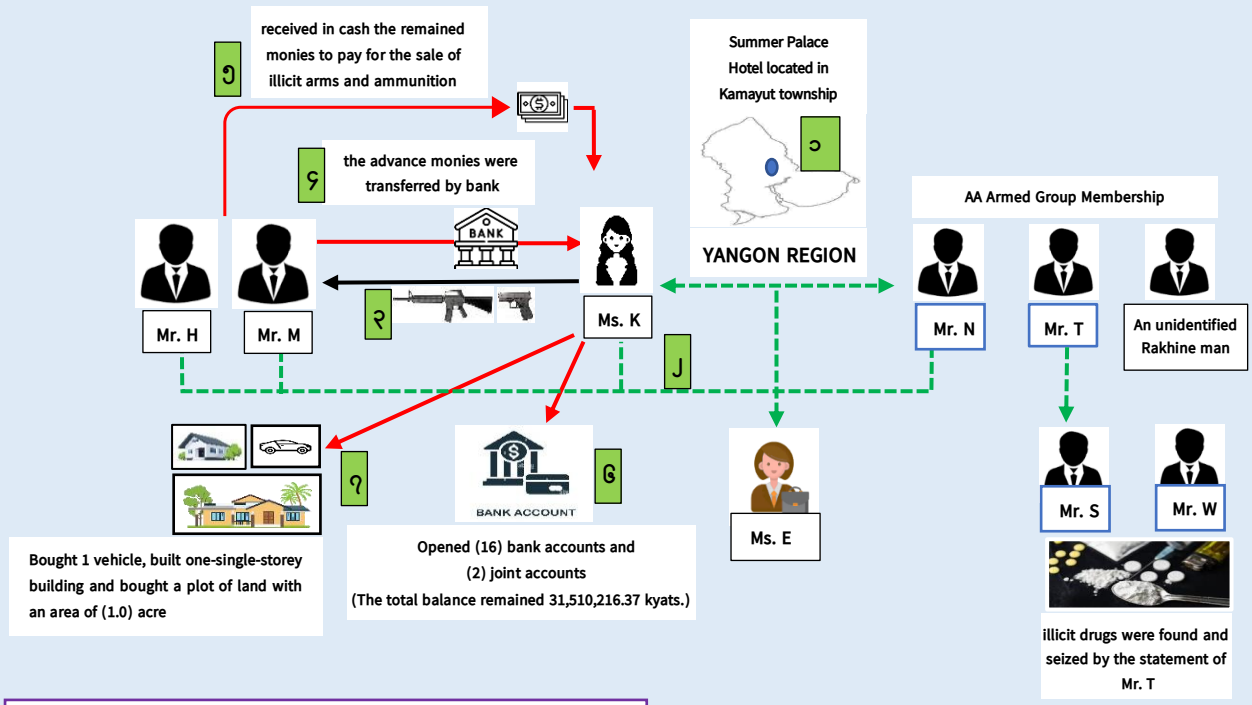
According to the inspections, it was verified that the defendants camouflaged the funds obtained from the sale of the illicit arms and ammunition by building one-single-storey building, buying a Suzuki Carry Pickup, buying a plot of land with an area of (1.0) acre and building such as the brick wall, one

[3] Money Laundering usually involves three stages (Placement, Layering and Integration.)

of bungalow house, one of bungalow dining room, two of storeroom which roofed with zinc and surrounded with brick-wall, and a house which roofed with zinc and surrounded with bamboo-matting-wall.

In addition, according to the inspection, it was discovered that the defendant **Ms. K** has (16) bank accounts in her name and the (2) joint accounts were opened with her name and her mother's name, all of these (18) bank accounts had transferred and received monies from the sale of illicit arms and ammunition. The total balance of these bank accounts was examined to be (31,510,216.37 Kyats) and a bank account jointly opened with the mother had a balance of (30,650,892.92 Kyats).

In addition, according to the statement of the defendant **Mr. T**, 29,770 methamphetamine tablets labeled WY/R, had a total weight of 2.977 kg was found and seized in a house which located in Yangon where **Mr. S** and **Mr. W** live, who are connected with the **AA armed group**, it was discovered that the **AA armed group** was carrying out illicit drug trafficking.



Index

- **Illicit arms trafficking and sale route**
- **Monies (POC) trail**
- **the relation routes**

Money Laundering Typologies

Source of POC	-	Proceeds obtained from illicit arms trafficking
Technique	-	Opening numerous bank accounts in the name of family members, depositing in cash, purchasing vehicle, purchasing real estate and upgrading
Mechanism	-	Exploiting banking system
Instrument	-	Using a lot of bank accounts, Joint Accounts, and cash.

21. **Money laundering methods identified from the case investigated by the Scrutiny Board No-62/2021(Drug):** In this case, AA armed group tried to avoid being tracked by purchasing land without giving the correct address in order to store ammonium nitrate which is used in the manufacture of drugs.

22. In addition, when transferring large amounts of funds for the AA armed group, they try to avoid being noticed by banks and financial institutions by using multiple bank branches instead of using a single bank. The funds collected are used for supplies, living expenses, salaries and for purchase of ammonium nitrate which be used in production of drugs. Besides, AA armed group also used it to buy food and consumer goods which are to be used as a cover for transporting drugs.

23. In order to avoid the potential risks of CDD measures and to easily make money deposits and withdrawals, they open the mobile wallets such as KBZPay Accounts and used it to deposits/withdrawals the collected funds.

Case Study 4: Scrutiny Board No-62/2021(Drug) (Investigation into Money Laundering Case related to Illicit Drugs Trafficking Case)

The scrutiny board verified **Mr.A** by money laundering case, who was the defendant from Kyaukpadaung Myoma Police Station's (Illicit Drug) FIR-No. 4/2021, under the Narcotic Drugs and Psychotropic Substances Law section 16(b)/21.

According to the inspections, by the arrangement of **Mr.C** who is a lieutenant-rank from **AA armed group**, it was verified that both of **Mr.A** who is a warrant-officer-rank from **AA armed group** and **Mr.B** (fugitive) lived in an area of (0.146 acres) warehouse in Kyaukpadaung township which located in Mandalay Region and served as the warehouse guards.

According to the inspections, it was verified that the two defendants, **Mr.A** and **Mr.B** (fugitives) while living in the aforementioned warehouse, performed by receiving ammonium nitrate bags used in the production for illicit drugs which transported by **Mr. C** who is a lieutenant-rank from **AA armed group**, and then had transported them again to the **AA armed group** in Rakhine State.

According to the inspections, it was discovered that the defendant **Mr. A** had 14 times withdrawn from his XYZ bank account, the monies were transferred by some members of the **AA armed group** and their supporters through **XYZ bank branches.** And then used it for buying consumer goods and commodities, chickpeas for **AA armed group headquarters** and, supplied such as food expense, travel expenses, vehicle repair expense and salaries used for while they serving.

In addition, according to the inspections, it was discovered that the warehouse and residential building with land where the defendants live is owned by the AA armed group, were purchased with the profits obtained from the sale of illicit drugs and the buyer's address was also incorrect.

Money Laundering Typologies

Source of POC	-	Proceeds from trafficking and selling of illicit drugs
Technique	-	Transferring from numerous bank branches, purchasing land plot by falsified address
Mechanism	-	Exploiting banking system, opened mobile pay account and exploiting
Instrument	-	Using a lot of bank accounts, and cash.

Money Laundering methods and trends of AA armed group

24. Money laundering involves converting the origin of the proceeds of crime, transferring and concealing, and in doing so, various typologies are used to avoid the attention of reporting organizations[4] and authorities.

25. The AA armed group is engaged in drug production and transportation as its main source of income in order to raise a large amount of funds. AA armed group have deeply linked with drugs cartels, arms traffickers and act an intermediary connector between drug cartels and arms traffickers to obtain direct supply of arms and ammunition from the drug cartels instead of receiving the necessary funds.

26. The money laundering methods employed by the AA armed group during the placement stage, such as using falsified national identity cards, depositing cash into multiple banks through structuring with disposable phone SIM cards, and frequently employing subordinates or others for fund transfers and cash withdrawals, were discovered.

27. In the layering stage of laundering illicit funds, it was discovered that the AA armed group opened numerous bank accounts, including joint accounts with family members in various banks. They engaged in multiple fund transfers (proceeds from the sale of illicit drugs) between accounts, withdrew cash, and acquired assets using falsified national identity cards and providing incorrect addresses.

[4] Reporting organizations refer to banks, financial institutions, and designated non-financial businesses and professions (DNFBPs) designated by the Anti-Money Laundering Central Board through issued notices. These organizations are responsible for submitting Suspicious Transaction Reports (STRs) to the Financial Intelligence Unit (FIU).

28. In addition, various methods of altering the addresses of fund recipients, withdrawing cash using falsified national identity cards, and gradually transferring it to other locations through money transfer services have also been uncovered. Furthermore, drug cartels avoid direct fund transfers; instead, they initially transfer the funds to an intermediary's account. Subsequently, they withdraw the funds in cash and redeposit them into multiple bank accounts through structuring. This approach complicates the efforts of law enforcement agencies and money laundering investigators in scrutinizing the predicate offence, making it challenging to trace the money trail and identify the beneficial owner (BO).

29. During the integration process, it was revealed that the AA armed group and illicit drug cartels utilized the proceeds of crime obtained from drug sales to acquire firearms, ammunition, real estate, farms, and vehicles

RECOMMENDATION

30. The following recommendations aim to prevent the proceeds of crime (POCs) obtained from the AA armed group's illicit drug trafficking from entering the national financial system:

a) provide training to staff in banks and financial institutions to enhance their understanding of red-flag indicators related to AML/CFT;

b) banks and financial institutions should enhance customer due diligence (CDD) by obtaining information on beneficial owners (BO) during customer interactions, such as opening bank accounts, initiating deposits/withdrawals, and conducting transfers. Additionally, there should be an increased focus on reporting suspicious transactions (STRs) to the Financial Intelligence Unit (FIU);

c) relevant competent authorities should advocate for the proper registration and supervision of money transfer services, prohibit unregistered money transfer services and their illegal activities, and take necessary legal actions;

d) ensuring accurate and complete information on beneficial ownership during the registration of purchased real estate;

e) as competent authorities, enhance the oversight of reporting entities by elevating the processes of AML/CFT regulations;

f) as law enforcement agencies, conduct financial investigations alongside the examination of predicate offences and collaborate with the FIU to acquire necessary information during the investigation;

g) ensure proper registration of telephone SIM cards and promptly deactivate unregistered SIM cards;

h) upgrade national identity cards to prevent easy forgery.

CONCLUSION

31. As summarily, between the AA armed group and illicit drug dealers and illicit arms trafficker have a very close relationship, and they abuse banks and financial institutions to transfer illicit funds (POC) and the purchase and collection of firearms and ammunition have been increased. By increasing cooperation between banks and financial institutions and law enforcement agencies (LEAs), prevention of AML/CFT sector will be more effective and, terrorists and perpetrators will not be possible to abuse financial system.

Myanmar Financial Intelligence Unit

TABLE OF ACRONYMS

Abbreviations	Definition
AML/CFT	Anti-Money Laundering / Countering the Financing of Terrorism
AMLCB	The Anti-Money Laundering Central Body
AA	Arakan Army
ARSA	Arakan Rohingya Salvation Army
BO	Beneficial Owner
CBM	Central Bank of Myanmar
CDD	Customer Due Diligence
DNFBPs	Designated Non-Financial Business & Professions
EDD	Enhance Due Diligence
FIU	Financial Intelligence Unit
FIs	Financial Institutions
KIA	Kachin Independence Army
LEAs	Law Enforcement Agencies
NRA	National Risk Assessment on Money Laundering and Terrorist Financing
STR	Suspicious Transaction Report
POC	Proceeds of crime/ Ill-gotten-gains / Illicit funds obtained from committing crime
Placement	It is the first stage of money laundering. In this stage, POCs are started introduce into financial system.
Layering	It is the second stage of money laundering. In this stage, the first stage of POCs introduced were divided into small amounts and started transfer from a place to a place to be tricky to trace.
Integration	It is the third stage of money laundering. In this stage, the divided POCs were integrated as legitimate sources, to can be used it again in legitimate financial system and owned as legitimate assets.

For more studies

- Strategic Analysis Report on Trade-Based Money Laundering
  https://www.mfiu.gov.mm/sites/default/files/document/files/MFIU%ꩻStrategic%ꩻAnalysis%ꩻon%ꩻTBML%ꩻ၈ꩻ၀ꩻ၂%ꩻ၉%ꩻMyan%ꩻ၉%ꩻAmend%ꩻ၉.pdf
- Money Laundering Trends Related to Drugs Crime
  https://www.mfiu.gov.mm/sites/default/files/document/files/Drugs%ꩻStrategic%ꩻReports%ꩻAugust%ꩻ၉%ꩻMyn%ꩻ၉%ꩻupdate%ꩻ၉.pdf
- Review on Suspicious Transactions Reported by Banks
  https://www.mfiu.gov.mm/sites/default/files/document/files/Review%ꩻon%ꩻSTR%ꩻReported%ꩻby%ꩻBanks_ꩻ၂%ꩻNovember_Myanmar%ꩻVersion%ꩻ-%ꩻAG.pdf
- Money Laundering Risk Assessment on Legal Person
  https://www.mfiu.gov.mm/sites/default/files/document/files/Legal%ꩻPerson%ꩻRisk%ꩻAssessment%ꩻReport%ꩻ%ꩻ၈၇%ꩻJan%ꩻ၀ꩻ၀၂%ꩻ၉%ꩻMyanmar%ꩻ၉.pdf
- National Strategy on Anti-Money Laundering and Financing of Terrorism
  https://www.mfiu.gov.mm/sites/default/files/document/files/The%ꩻNational%ꩻStrategy%ꩻon%ꩻAML-CFT%ꩻ၀ꩻ၁ဝ၉-ꩻ၂%ꩻ၀%ꩻEnglish%ꩻVersion%ꩻ၉.pdf

For more information

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