

# TYOLOGY – THE SUSPECTED ABUSE OF NON-PROFIT ORGANIZATIONS RELATIVE TO THE FINANCING OF TERRORISM

EXTRACT FROM THE FIUTT STRATEGIC ANALYSIS CASE COMPILATION 2015 - 2020

## Typology

### 15. The Suspected Abuse of Non-Profit Organizations relative to the Financing of Terrorism

A faith-based charitable organisation (“the NPO”) was established to fund the renovation of local places of worship of the same faith as the NPO. Accounts were opened at Bank A to facilitate collection of donations from local persons of the same faith. The NPO subsequently conducts fund-raising activities in order to assist victims of natural disasters in foreign jurisdictions. Cash deposits to the NPO’s account at Bank A increased exponentially. The NPO partnered with foreign agencies to provide relief to persons affected by natural disasters. Funds were subsequently remitted from the NPO’s account to foreign agencies.

Ensuing fund transfers were declined by Bank A as a result of due diligence conducted which revealed that the foreign agencies were linked to suspected global terrorist organisations. It was later revealed that the director of the NPO was also linked to several other NPOs within Trinidad and Tobago and later identified as travelling internationally from Trinidad and Tobago with large amounts of cash on

Suspected Offence	Financing of Terrorism
Customer Type	Individual; Group
Industry	FI’s
Channel	Physical; Electronic
Jurisdiction	Local; Foreign

his person. The ultimate destination and/or beneficiary of these funds could not be verified.

### Suspicious Indicators

- Significant cash deposits within a short period of time where the true source and legitimacy of the source(s) cannot be determined;
- The NPO’s accounts are used to conduct suspicious or large, complex or unusual transactions;
- One of the foreign agencies being from a country listed as a high risk jurisdiction by the FATF;
- Large wire transfers to foreign agencies whom are suspected of being involved in the financing of terrorism; and
- Official of the NPO travelling to foreign jurisdictions with large amounts of foreign currency on his person circumventing the tracing of funds via the financial system.

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**DIAGRAM 12**  
**SUSPECTED NPO ABUSE FOR FINANCING OF TERRORISM**

