



**Government of the Republic of Trinidad and Tobago**  
Office of the Attorney General and Ministry of Legal Affairs

**ANTI - TERRORISM UNIT**

# Annual Report

2023-2024

ANTI-TERRORISM UNIT  
OFFICE OF THE ATTORNEY GENERAL AND MINISTRY OF LEGAL AFFAIRS

## **Table of Contents**

1. Statutory Remit
2. Department Overview:
  - 2.1 About the ATU
    - 2.1.1 Department Structure and Functions
    - 2.1.2 Anti-Money Laundering/Combatting the Financing of Terrorism (AML/CFT) Compliance Unit
3. Performance Reporting
  - 3.1 Core Objectives
  - 3.2 Activities and Achievements
  - 3.3 Ongoing Projects and Activities

## Annual Report

### 1.0 STATUTORY REMIT

The Miscellaneous Provisions (Proceeds of Crime, Anti-Terrorism and Financial Intelligence Unit of Trinidad and Tobago) Act, 2018, assented to on December 31, 2018, amended the Anti-Terrorism Act, Chapter 12:07 which provides in Part IIA, Section 38C(1) that the Attorney General shall, within three (3) months after the end of each year, cause a report with respect to the performance of his functions under this Act to be prepared.

(2) The Report shall contain such statistical and other information as the Attorney General thinks fit in relation to –

- (a) Court Listings;
- (b) International Cooperation;
- (c) Forfeitures; and
- (d) Such other matters as the Attorney General considers necessary.

(3) The Attorney General shall cause a copy of the report to be laid before both Houses of Parliament within one (1) month after its completion.

### 2.0 DEPARTMENT OVERVIEW

#### 2.1 About the Unit

The Miscellaneous Provisions (Proceeds of Crime, Anti-Terrorism and Financial Intelligence Unit of Trinidad and Tobago) Act, 2018, assented to on December 31, 2018, amended the Anti-Terrorism Act, Chapter 12:07 which *inter alia* made provision for the establishment of an Anti-Terrorism Unit.

Part IIA, Section 38B of the Anti-Terrorism Act, Chap. 12:07 (hereinafter referred to as “the Act”) provided for the establishment of the Anti-Terrorism Unit in the Office of the Attorney General and Ministry of Legal Affairs (hereinafter referred to as the “ATU”).

The primary function of the ATU is to fulfil the obligations of the Attorney General pursuant to the Act. Section 38B(2) provides that the functions of the Attorney General under the Act may be exercised by the Attorney General in person or through a public officer or legal officer who is—

- (a) employed in the Unit;
- (b) authorised by the Attorney General in writing; and



(c) acting under and in accordance with the general or special directions of the Attorney General.

The ATU was established in July 2019 in order to efficiently carry out Trinidad and Tobago's international obligations pursuant to the United Nations Security Council Resolutions (UNSCRs) and the Financial Action Task Force (FATF) Standards, coupled with the growing global threat of Terrorism and Terrorism Financing.

Of utmost importance are the amendments made to the Act in 2018, pursuant to which the Attorney General has numerous responsibilities. The ATU, *inter alia*, provides an essential role in fulfilling the obligations of the Attorney General as provided for in the Act.

### **2.1.1 Department Structure and Functions**

The ATU is comprised of the following positions established via Cabinet Note (Cabinet Minute No. 1324 of June 27, 2019 and Cabinet Minute No. 1731 of August 22, 2019 refer):

- Head
- Two (2) Senior Legal Counsel
- Two (2) Legal Counsel II
- One (1) Legal Counsel I
- One (1) Paralegal
- One (1) Business Operations Assistant II

On December 21, 2023, via Cabinet Minute No. 2274, Cabinet accepted the recommendation of the Attorney General and Minister of Legal Affairs for the re-designation of the following positions, (i) Head, Anti-Terrorism Unit and (ii) Director, Compliance (AML/CFT), to be merged and jointly referred to as Director Anti-Terrorism and Anti-Money Laundering Office of the Attorney General and Ministry of Legal Affairs.

- ✓ Subsequently, on August 8, 2024, Cabinet, via Cabinet Minute, accepted the recommendation of the Attorney General and Minister of Legal Affairs at paragraph 10 of Cabinet Note No. 1494, for the creation of the positions hereunder in the Anti-Terrorism Unit. The said positions are contractual for a period of three (3) years with effect from the dates of assumption of duty, on standardized terms and conditions as determined by the Chief Personnel Officer (CPO). The aforementioned positions are as follows:
  - ✓ Three (3) Legal Counsel III
  - ✓ Two (2) Legal Counsel II
  - ✓ Two (2) Legal Counsel I
  - ✓ One (1) Business Operations Assistant II

These positions remain vacant as of December 2024. The Director of the ATU has collaborated with the Human Resource Management Unit to ensure that the recruitment process for filling the vacant positions commenced following approval by the Permanent Secretary. The AGLA HR



Department has begun issuing internal advertisements on a phased basis for the vacant positions. This process remains ongoing under the supervision of the Permanent Secretary.

### **2.1.2 Anti-Money Laundering/Combating the Financing of Terrorism (AML/CFT) Compliance Unit:**

Pursuant to Cabinet Note No. AGLA (20)102 and Cabinet Minute No. 1113 of 2020, Cabinet approved the transfer of the Anti-Money Laundering/Combating the Financing of Terrorism (AML/CFT) Compliance Unit from the Ministry of National Security to the Office of the Attorney General and Ministry of Legal Affairs, under the purview of the ATU.

The AML/CFT Compliance Unit (Cabinet Minute No. 823 dated April 8, 2010 refers), established in the Ministry of National Security provided support to Trinidad and Tobago's Prime Contact to the Caribbean Financial Action Task Force (CFATF) and the CFATF Secretariat. The AML/CFT Compliance Unit comprised of:

- One (1) Senior Policy Adviser (Operations)
- One (1) Policy Adviser (Operations)
- One (1) Business Intelligence Analyst
- One (1) Senior Legal Officer (formerly designated Senior Legal Executive)
- One (1) Driver/Courier (formerly designated Office Courier);
- One (1) Director, Compliance
- One (1) Interface Security Officer
- One (1) Legal Officer II (formerly designated Legal Executive)
- One (1) Business Operations Assistant I (formerly designated Operations Officer)
- One (1) Hospitality Attendant (formerly designated Housekeeping Attendant)  
(Minutes No. 823 of April 8, 2010 and No. 2763 of October 13, 2011 refer)

## **3.0 PERFORMANCE REPORTING**

### **3.1 Core Objectives**

The core objective of the ATU is to efficiently carry out the functions of the Attorney General pursuant to the Act. Primarily, the ATU continuously implements Section 22B of the Act by making applications to the High Court for the designation of individuals and entities, both domestically and as detailed on various United Nations Security Council (UNSC) Sanctions Lists, as well as the application of Targeted Financial Sanctions (TFS). The term TFS encompasses both asset freezing and prohibitions to prevent funds or other assets from being made available, directly or indirectly, for the benefit of designated persons and/or entities.

The ATU also works closely with key national agencies relative to Counter-Terrorism (CT) matters as well as with our international partners. Measures to freeze terrorist funds or other assets

may complement criminal proceedings against a designated person or entity, but are not conditional upon the existence of such proceedings. The measures serve as a preventive or disruptive tool when criminal proceedings are either not possible or not practical.

Vital to the role of the ATU and the fulfilment of our obligations are the international standards in respect of countering terrorism and terrorist financing. As a member state of both the United Nations and CFATF, Trinidad and Tobago is obligated to adhere to the standards of the FATF and the mandates of UNSCRs. The effective implementation of these obligations by the ATU requires institutional arrangements allowing for close co-ordination among financial, intelligence and law enforcement authorities and the incorporation of the measures into the country's broader counter-terrorism policy. The ATU has procedures in place to protect all sources of information, including intelligence and closed-source materials, used in the designation of persons and entities being subjected to the asset freeze measures. In the execution of these obligations, the ATU works closely with both the CFATF and the FATF.

### **3.2 Activities and Achievements**

1. The ATU has worked rigorously towards fulfilling our obligations pursuant to the Act and international standards. In so doing, the ATU has designated **all** individuals and entities on the UNSC 1267(1999) (*ISIL (Da'esh) & Al-Qaida*) Sanctions List and the UNSC 1988(2011) (Taliban) Sanctions List. In addition, nine (9) individuals have been designated domestically pursuant to UNSCR 1373(2001).
2. Following the granting of the aforementioned Orders by the High Court, the ATU conducts six-monthly reviews (as of the date upon which each Order is granted), in respect of each Order and when necessary, makes applications to the Court for de-listings pursuant to section 22B(9) of the Act.
3. To date, the ATU has obtained a total of one hundred and fifty-two (152) Orders of the High Court pursuant to section 22B of the Act, with a total of four hundred and ninety (490) individuals and entities currently designated as listed entities and their assets frozen.
4. The ATU continuously implements the relevant provisions of the Act.

For the period January 2024 to November 2024, one (1) individual was delisted and his assets were unfrozen. Additionally, the UNSC ISIL (Da'esh) & Al-Qaida Sanctions Committee amended one hundred and nine (109) entries on its 1267 Sanctions List of which nine (9) were deemed substantial amendments resulting in applications for amendments being filed by the ATU.



• **Table 1: Annual Listings and Delistings**

5. The ATU also implements TFS related to Proliferation of Weapons of Mass Destruction to meet our international obligations pursuant to FATF Recommendation 7 and Immediate

| UNSCR  | Year/s            | No of Listed entities & individuals | # of Court Orders |
|--|-------------------|-------------------------------------|-------------------|
| 1267(1999)<br>1989(2011)<br>2253(2015)<br>2368(2017) | 2015/2016         | 78                                  | 8                 |
|  | 2016/2017         | 258                                 | 60                |
|  | 2017/2018         | 20                                  | 11                |
|  | 2018/2019         | 8                                   | 8                 |
|  | 2020              | 9                                   | 7                 |
|  | 2021              | 4                                   | 4                 |
|  | 2022              | 1                                   | 1                 |
|  | 2023              | 4                                   | 4                 |
| 1988(2011)   | 2018/2019         | 140                                 | 7                 |
| 1373(2001)   | 2015              | 1                                   | 1                 |
|  | 2017              | 5                                   | 5                 |
|  | 2020              | 1                                   | 1                 |
|  | 2021              | 1                                   | 1                 |
|  | 2023              | 1                                   | 1                 |
| Delistings<br>ATA Section 22B(9)                     | 2018/2019         | - 22                                | 15                |
|  | 2020              | -3                                  | 3                 |
|  | 2021              | -3                                  | 3                 |
|  | 2022              | -11                                 | 10                |
|  | 2023              | -2                                  | 1                 |
|  | 2024              | -1                                  | 1                 |
| <b>Total</b>   | <b>2015 -2024</b> | <b>490</b>                          |                   |
| <b>Total Number of Court Orders granted</b>          |                   |                                     | <b>152</b>        |



Outcome 11, as well as the mandates of UNSCR 1718(2006) and 2231(2015). It is recognised that the use of TFS is an important means to deprive proliferation financiers of their funds, thereby protecting citizens from the threats of crime, terrorism and weapons of mass destruction. As such, these measures are continuously maintained and applied so as to financially disrupt and guard against potential proliferation financing attempts.

6. In order to meet the mandates of UNSCR 2653(2022) and the UNSC Sanctions Regime on Haiti, which relate to the Program of Action (POA) to prevent, combat and eradicate the illicit trade in small arms and light weapons, the Economic Sanctions (Implementation of United Nations Security Council Resolution 2653(2022) on the Republic of Haiti) Order, 2023 was established pursuant to the Economic Sanction Act, Chap. 81:05. In alignment with the GORTT's commitment towards doing its part to ensure the restoration of peace, security and stability for Haiti by upholding the implementation of this UNSCR, the ATU has since applied to the High Court for Orders to designate all five (5) individuals on the UNSC 2653 Sanctions List and have their assets frozen. The relevant orders were successfully granted and TFS have been implemented.
7. Additionally, the ATU has continued to deliver training to law enforcement and competent agencies on the provisions of the Act, with particular emphasis on terrorism offences, terrorist financing, confiscation of terrorist funds and terrorist financing risks. Emphasis is also placed on identifying the evolving terrorism financing risks posed to the subset of Non-Profit Organisations (NPOs) in Trinidad and Tobago that fall within the FATF definition of NPOs. Following the enactment of the Anti-Terrorism (Amendment) Act, 2018 in July 2018, this training has been updated to reflect the newly amended provisions of the Act. Priority has been given to those agencies directly involved and operational in the gathering of intelligence and evidence for the investigation of terrorism and terrorist financing matters with more than eight hundred (800) individuals having been trained to date. In addition, the ATU has conducted training at forums which were participated in via teleconference and videoconferences, thereby disseminating the relevant information to regional audiences in CARICOM, as well as International Participants. A copy of the ATU's schedule of training is hereto attached.
8. Further, the ATU also assists key Committees, Task Forces and other forums in Trinidad and Tobago in understanding the provisions of the Act and their roles and mandates in the context of same. In this regard, members of the ATU have delivered presentations on relevant topics specifically tailored to focus on the applicability of the provisions of the Act, the wider AML/CFT/CPF regime in Trinidad and Tobago and our international obligations.
9. The ATU has taken the lead in coordinating training for key entities in Trinidad and Tobago in respect of Virtual Assets (VAs) and Virtual Asset Service Providers (VASPs). The training was facilitated by the Global Programme against Money Laundering, Proceeds of Crime and the financing of Terrorism (GPML), United Nations Office on Drugs and Crime (UNODC). The GPML workshops took place from February 19-23, 2024 and focused generally on

developing a framework for the licensing of VAs and VASPs and the implementation of TFS. This cooperation and assistance remain ongoing.

10. Furthermore, the ATU worked closely with the GPML, UNODC to secure funding and technical assistance for a Targeted Financial Sanctions Search Tool<sup>1</sup> (TFS Search Tool) to assist with effective implementation of TFS measures. The FIUTT took lead on the project which has since been launched and provides individuals and entities with an online TFS Search Tool for ease of access to both the UNSC Consolidated List and the Trinidad and Tobago Consolidated List of High Court Orders (Domestic List) from one online location.
11. The ATU also successfully participated in the joint UNOCT-INTERPOL initiative, CT TECH, during the period January 2022 to June 2024. During 9-12 January 2024, the United Nations Office of Counter-Terrorism CT TECH initiative completed its first national workshop for Trinidad and Tobago under the theme “developing national counter-terrorism policy and operational responses to counter the use of new technologies for terrorist purposes while protecting human rights”. One of the outcomes of CT TECH project was the development of a Law Enforcement Capabilities Framework for New Technologies in Countering Terrorism: Trinidad and Tobago Review Report, which was shared with all national CT authorities. The objective of the report is to enable Trinidad and Tobago to gain an in-depth understanding of its law enforcement capabilities and readiness to embrace new technologies for countering terrorism, in alignment with the United Nations Global Counter-Terrorism Strategy and in full respect of human rights and the rule of law. The review shall enable the Government of the Republic of Trinidad and Tobago (GoRTT) to strategically prioritize investment in the development of law enforcement capabilities for new technologies, whether developed nationally or with the support of international partners.
12. The Miscellaneous Provisions (FATF Compliance) Act, No. 25 of 2020 assented to on December 18, 2020, provides as follows:

---

<sup>1</sup> <https://fiu.sanctionslist.gov.tt/unsanctionsportal/initialize>



- Section 5(1) (a) - The Anti-Terrorism Act, Section 22B allows for applications to the High Court for the designation of individuals and entities, both in Trinidad and Tobago and elsewhere and as detailed on various UNSC Sanctions Lists, in the application of targeted financial sanctions regime. The ATU works closely with key national and international agencies relative to all CT matters. Section 22B is amended to provide that all applications made under Section 22B shall be filed under seal. This administrative measure provides for applications to the Court by the ATU and is necessary in order to protect any potential or likelihood of success for prosecutions against an individual or entity designated pursuant to Section 22B whereby the evidence relied upon in the respective application can play a substantial role in the laying of potential charge(s) by the Office of the Director of Public Prosecutions.
  - Section 5(1) (c) - new Section 44: a summary offence for persons who are currently employed or have been previously employed in the ATU who knowingly or recklessly disclose confidential information, which they have obtained as a result of such employment.
13. Further to the foregoing, the Miscellaneous Provisions (Proceeds of Crime, Anti-Terrorism, Financial Intelligence Unit of Trinidad and Tobago, Securities, Insurance, Non-Profit Organisations, Civil Asset Recovery and Management and Unexplained Wealth and Miscellaneous Provisions [FATF Compliance]) Act No. 17 of 2024 was assented to on December 16, 2024. In this regard, the ATU plays an essential role in the revision of legislation, policies and procedures relative to rectifying deficiencies in our AML/CFT Framework to meet the requirements of the FATF Standards.
14. Additionally, the ATU worked closely with other entities to implement amendments to various pieces of legislation, to rectify identified deficiencies and to meet our international obligations as set out by the Global Forum on Transparency and Exchange of Information for Tax Purposes. On September 27, 2024 the Miscellaneous Provisions (Global Forum) Act, 2024 was assented to and was fully proclaimed via Legal Notices No. 181,182,183,184 and 185 dated October 11<sup>th</sup>, 2024.

### **3.3. Ongoing Projects and Activities**

1. Task Force Charlie - The key objective of Task Force Charlie (TFC) is to provide for efficient co-ordination of intelligence, operational and strategic analysis and parallel investigations relating to terrorism and terrorist financing. An effective co-ordination mechanism will assist in the determination of matters pursued in accordance with various UNSCRs, particularly UNSCR 1267(1999) and 1373(2001). In order to implement the TFS regimes required under FATF Recommendation 6, including initiating, or making proposals for designations, there is the need for the ATU to engage with a range of authorities (for example, Ministry of Foreign and CARICOM Affairs, Immigration Division, Central Bank of Trinidad and Tobago (CBTT)) and agencies (for example,



security, intelligence, law enforcement, Financial Intelligence Unit of Trinidad and Tobago (FIUTT)). The collaboration of information, intelligence and evidence and analysis of the aforesaid also has the potential to shed light on the likelihood of success for criminal prosecution in these matters and to act as a steppingstone towards prosecution.

2. Six-monthly reviews of all High Court Orders pursuant to section 22B(9) of the Act.
3. Fulfilment of international obligations pursuant to FATF Standards, Recommendation 6 on TFS related to terrorism and terrorist financing and Recommendation 8 on Non-Profit Organisations -
  - i. Daily checks of the UNSC's website and various sanctions lists to determine whether there are any additions, amendments and/or delistings;
  - ii. Listing and delisting applications where necessary; and
  - iii. Publication of Guidance and Notices to the Public.
4. The Office of the Attorney General and Ministry of Legal Affairs (AGLA) via the ATU has established Memoranda of Understanding (MOU) with Turks and Caicos Islands, Barbados, Belize and Guyana and will continue to execute several other MOUs to allow for greater regional collaboration on TFS and counter-terrorism matters. These MOUs are being utilised as mechanisms for efficient information exchange related to *inter alia* UNSCR 1373(2001) as it pertains to individuals and entities being considered for the application of TFS in accordance with FATF Recommendations 6 [targeted financial sanctions related to terrorism and terrorist financing] and 7 [targeted financial sanctions related to proliferation].
5. Ongoing co-operation with our international partners:
  - a) *British High Commission (BHC)* and key Government departments in England and Wales;
  - b) *International Institute of Justice (IIJ)* - the IIJ in collaboration with the BHC has been working assiduously with various entities in Trinidad and Tobago since 2018 to deliver training to members of the ATU, prosecutors, law enforcement and border/immigration officials on building prosecution cases against individuals or organisations engaged in terrorism-related offences;
  - c) *United States Embassy and key Government departments of the United States of America* - the United States of America often lends invaluable support to the GoRTT in the gathering of information and making applications in respect of CT and CFT matters;
  - d) *FATF* - Trinidad and Tobago continues to work closely with the FATF in numerous AML/CFT matters such as training sessions, inclusive of but not limited to:
    - i. Joint CFATF / FATF Assessors Training
    - ii. Counter-Financing of Terrorism (CFT) Training, November 2019

- e) *Commonwealth Secretariat* - the ATU works closely with members of the Commonwealth Secretariat in relation to Preventing and Countering Violent Extremism (P/CVE) and Counter Terrorism matters;
  - f) *The Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism (GPML), United Nations Office on Drugs and Crime (UNODC)*;
  - g) *The EU Global Facility on Anti-Money Laundering and Counting Financing of Terrorism (AML/CFT) (EU GF)*- initiative funded by the European Union (EU) that aims to support the GoRTT by providing technical assistance in strengthening their systems and policies to combat ML and CFT;
  - h) *Gentium UK*- the ATU works closely with Gentium UK via the British High Commission for the provision of technical assistance and expertise in the area of Asset Recovery and Management; and
  - i) UN CTED Trends Tracker on 'Evolving Trends in the Financing of Foreign Terrorist Fighters' Activity: 2014 – 2024 Virtual Launch Event on November 12, 2024.
6. The ATU and the GoRTT at large continue to work closely with a number of our regional partners in the fight against Terrorism, namely:
- a) CARICOM Secretariat;
  - b) CARICOM IMPACS; and
  - c) CFATF.
7. Participation in various Committees in lending of expertise in respect of CT and CFT matters arising therein:
- i. National Anti-Money Laundering and Countering the Financing of Terrorism Committee (NAMLC) established by Section 57A of the Proceeds of Crime Act, Chap 11:27, as amended by the Miscellaneous Provisions Act, No. 20 of 2018;
  - ii. Inter-Ministerial Committee on Countering Terrorism (IMCCT) in accordance with the National Counter-Terrorism Strategy of Trinidad and Tobago established in March 2018;
  - iii. Task Force Nightingale (TFN) on Repatriation and Reintegration of Trinidad and Tobago Nationals established in August 2018;
  - iv. Development of Policy on Declaring Geographical Areas pursuant to Section 15B of the Act;
  - v. Participation in the National Security Council Secretariat, Integrated Threat Assessment Centre, Resident Partnership Programme, Cycle 3, 2017 to 2019;
  - vi. Participation in an Interagency Focus Group: Development of the National Counter Terrorism Operations Plan commenced on June, 30 2020 led by the Chief of Defence Staff and Chair of the Inter-Ministerial Committee on Counter Terrorism; and



- vii. The tripartite Inter-Ministerial Committee (IMC) on AML/CFT was re-established in the last quarter of 2023 via Cabinet Minute No. 1667 of 2023 in preparation for the CFATF 5<sup>th</sup> Round Mutual Evaluation Process.
8. Participation in the CFATF Plenary and Working Group Meetings held twice per year (June 2024 and November 2024) and FATF Plenary and Working Group meetings held three (3) times per year (February, June and October, 2024). Furthermore, the ATU participates in both the CFATF Steering Group monthly meetings and Council of Ministers Annual Meeting and provides support to the Attorney General and Minister of Legal Affairs for these meetings. Trinidad and Tobago is currently preparing for its 5<sup>th</sup> Round Mutual Evaluation assessment process in 2025/2026 which would be conducted by the CFATF.
9. Ongoing training delivered by the ATU to law enforcement agencies on the provisions of the Act, with particular emphasis on terrorism offences, terrorist financing and confiscation of terrorist funds. A table detailing the various training sessions and relevant agencies are hereto attached as **Annex I**.
10. Implementation of UNSCR 1540(2004) – the ATU works jointly with other domestic agencies including the Ministry of Foreign and CARICOM Affairs to fulfill Trinidad and Tobago’s obligations pursuant to UNSCR 1540(2004) which provides *inter alia*, that countries should refrain from taking part in proliferation related activities or providing any form of support to non-state actors that attempt to develop, acquire, manufacture, process, transport, transfer or use nuclear, biological, and chemical weapons and their means of delivery, in particular for terrorist purposes.
11. Continuous review of the Act and engagement with relevant CT and CFT entities on the Counter-Terrorism legislative framework.
12. Oversight and participation in the conduct of a National Risk Assessment with technical assistance from the *World Bank Group, Kings College London and the EU GF*.
13. The ATU continues to work closely with the Ministry of Finance in establishing the Civil Asset Recovery and Management Agency pursuant to section 9(2) of the Civil Asset Recovery and Management and Unexplained Wealth Act, No. 8 of 2019. The ATU has worked on contributing towards a Draft Paper on TF & PF in relation to an Asset Recovery Times Content Contributor Request.
14. The ATU worked closely with CRIMJUST, under the Global Illicit Flows Programme and in collaboration with the UNODC Regional Office for Central America and the Caribbean, with the aim of leveraging human rights and gender dimensions in criminal justice action in Trinidad and Tobago.



15. The Returnee Bill, 2024 is under the direct remit of the Ministry of National Security and is in the process of being finalized. Various entities of the GoRTT continue to work collaboratively on this Bill which is currently before the Legislative Review Committee.
  
16. In alignment with the GoRTT's commitment to improving border management, counter-terrorism and combat drug trafficking and human trafficking, the ATU together with other key entities in Trinidad and Tobago have been working in tandem with the CARICOM Implementation Agency for Crime and Security (IMPACS) through funding from the 11<sup>th</sup> European Development Fund to develop updated model Advanced Passenger Information and Passenger Name Record (API/PNR) legislation. This important initiative, with the CARICOM IMPACS, resulted in model legislation being provided to Trinidad and Tobago. The relevant entities continue to work domestically to use the model legislation to produce a draft Bill. Also, under revision are guidance documents outlining the requirements to implement the API/PNR legislation within the jurisdiction and at the CARICOM IMPACS through the sub-agency of the Joint Regional Communications Centre (JRCC).

ANNEX I

**TABLE OF TRAINING & EVENTS CALENDAR 2018 -2024**

| No. | ENTITY   | COURSE  | DATE                     | LOCATION   | No. of Participants | Status    |
|-----|--|---|--------------------------|--|---------------------|-----------|
| 1.  | Special Branch, TTPS   | Presentation on the Anti-Terrorism Act, FTFs and International Obligations re CT & Confiscation of Terrorist Property | January 19, 2018         | Agra Court, Agra Street St. James  | Approx. 20          | Completed |
| 2.  | Ministry of the Attorney General & Legal Affairs   | Legal Aspects of Combatting Terrorism Course  | March 14 – April 6, 2018 | Defence Institute of International Legal Studies (DIILS) Newport, Rhode Island, USA              | 40                  | Completed |
| 3.  | International Justice & Rule of Law  | Cross-Border and Returning Foreign Terrorist Fighter (RFTF) Training  | March 19-23, 2018        | Ministry of the Attorney General & Legal Affairs   | 40                  | Completed |
| 4.  | Exercise Fused Response 2018 Trinidad and Tobago Defense Force (TTDF), Trinidad and Tobago Police Service (TTPS) | Presentation on the Anti-Terrorism Act, FTFs and International Obligations re CT & Confiscation of Terrorist Property | April 16-27, 2018        | Knowsley Building Port of Spain  | 40                  | Completed |
| 5.  | Financial Investigations Branch, TTPS  | Presentation on the Anti-Terrorism Act, FTFs and International Obligations re CT & Confiscation of Terrorist Property | June 11, 2018            | Financial Investigations Branch Trinidad and Tobago Police Service Riverside Plaza Port of Spain | 19 (new recruits)   | Completed |

| No. | ENTITY  | COURSE  | DATE                  | LOCATION  | No. of Participants | Status    |
|-----|---|---|-----------------------|---|---------------------|-----------|
| 6.  | Trinidad & Tobago Defence Force   | Presentation on the Anti-Terrorism Act (inclusive of 2018 Amendments), FTFs and International Obligations re CT& Confiscation of Terrorist Property   | July 11, 2018         | Camp Ogden- Long Circular Road                                  | Approx. 30          | Completed |
| 7.  | The Inter-Ministerial Committee on Countering Terrorism (IMMICCT)   | Presentation on the Anti-Terrorism Act (inclusive of 2018 Amendments), FTFs and International Obligations re CT& Confiscation of Terrorist Property   | July 19, 2018         | Office of the Prime Minister, Victoria Avenue, Port of Spain    | 9                   | Completed |
| 8.  | Financial Investigations Branch, TTPS   | 1. NPO Sector Risk<br>2. Modes of Terrorism<br>Presentation on the Anti-Terrorism Act (inclusive of 2018 Amendments), FTFs and International Obligations re CT& Confiscation of Terrorist Property                                      | August 14 & 16, 2018  | Besson Street Police Station, Riverside Plaza, Port of Spain    | 40                  | Completed |
| 9.  | Special Branch, TTPS  | Presentation on the Anti-Terrorism Act (inclusive of 2018 Amendments), FTFs and International Obligations re CT& Confiscation of Terrorist Property   | August 15, 2018       | Agra Court, Agra Street, St. James                              | Approx. 20          | Completed |
| 10. | International Justice & Rule of Law <ul style="list-style-type: none"> <li>• OCIU</li> <li>• Cybercrime</li> <li>• FIB</li> <li>• FIU</li> <li>• SSA</li> <li>• ODPP</li> <li>• MOAGLA</li> </ul> | Follow-Up Counter Terrorism Investigations Training & Development Programme<br><br>Presentation on the Anti-Terrorism Act (inclusive of 2018 Amendments), FTFs and International Obligations re CT & Confiscation of Terrorist Property | September 10-21, 2018 | Ministry of the Attorney General & Legal Affairs, Port of Spain | 40                  | Completed |
| 11. | William J. Perry Center For   | The Caribbean Defense and Security Seminar  | September 25-27, 2018 | Port of Spain, Trinidad   | 30                  | Completed |



| No. | ENTITY  | COURSE  | DATE            | LOCATION   | No. of Participants | Status    |
|-----|---|---|-----------------|--|---------------------|-----------|
|     | Hemispheric Defense Studies   | <ul style="list-style-type: none"> <li>• Strategic Leadership in Defense and Security Partnerships</li> <li>• Trinidad and Tobago's National Security Framework</li> <li>• Illicit finance and money laundering</li> <li>• Latin America and the Caribbean Defense and Security Panorama</li> </ul> |                 |  |                     |           |
| 12. | Strategic Services Agency (SSA)   | Presentation on the Anti-Terrorism Act (inclusive of 2018 Amendments), FTFs and International Obligations re CT & Confiscation of Terrorist Property  | October 9, 2018 | Knowsley Building, Port of Spain                 | Approx. 20          | Completed |
| 13. | Trinidad and Tobago Coast Guard   | Presentation on Money Laundering, Anti-Terrorism and Proliferation of Weapons of Mass Destruction Financing   | April 9, 2019   | Chaguaramas, Trinidad                            | Approx. 20          | Completed |
| 14. | Trinidad and Tobago Coast Guard   | Presentation on Money Laundering, Anti-Terrorism and Proliferation of Weapons of Mass Destruction Financing.  | April 10, 2019  | Chaguaramas, Trinidad                            | Approx. 20          | Completed |
| 15. | Judicial Institute – Judicial Officers and Court Managers   | Presentation on Anti-Terrorism and Proliferation of Weapons of Mass Destruction Financing entitled “Combating Terrorism: Legislative Interventions”   | May 2019        | Hall of Justice, Port of Spain, Trinidad         | Approx. 78          | Completed |
| 16. | Team Nightingale – SSA, Children's Authority, FIB, FIU, Terrorist Interdiction Unit – Special Branch – TTPS, TTPS (Victim and Witness Support | Presentation on Anti-Terrorism, NPO (Non-Profit Organisations) and Terrorist Financing.   | July 2019       | Ministry of the Attorney General & Legal Affairs | Approx. 40          | Completed |

| No. | ENTITY  | COURSE  | DATE             | LOCATION  | No. of Participants | Status    |
|-----|---|---|------------------|---|---------------------|-----------|
| 17. | Unit, Child Protection Unit), Immigration, Ministry of Foreign and CARICOM Affairs, International Affairs Unit, Ministry of National Security, Foundation of Islamic Relief, Support and Training<br>Special Branch | Presentation on Anti-Money Laundering, Anti-Terrorism, NPOs and Proliferation of Weapons of Mass Destruction Financing  | July 2019        | SB Office, Agra Court, Agra Street, St. James                           | 20                  | Completed |
| 18. | CARICOM   | Preventing Violent Extremism in CARICOM Member States - National Efforts to Prevent and Counter Terrorist Financing     | July 23-25, 2019 |   | Regional            | Completed |
| 19. | Fraud Squad   | Presentation on Anti-Money Laundering, Anti-Terrorism, NPOs and Proliferation of Weapons of Mass Destruction Financing  | July 24, 2019    | SB Office<br>Agra Court,<br>Agra Street,<br>St. James                   | 10                  | Completed |
| 20. | Customs & Excise  | Presentation on Anti-Money Laundering, Anti-Terrorism, NPOs and Proliferation of Weapons of Mass Destruction Financing  | August 16, 2019  | Classroom #2, 6th Floor<br>South,<br>Customs House,<br>Ajax Street, POS | 30                  | Completed |
| 21. | Immigration Division  | Presentation on Anti-Money Laundering, Anti-Terrorism, NPOs and Proliferation of Weapons of Mass Destruction Financing. | August 23, 2019  | Ajax Street, POS  | 20                  | Completed |



| No. | ENTITY   | COURSE   | DATE                          | LOCATION   | No. of Participants | Status    |
|-----|--|--|-------------------------------|--|---------------------|-----------|
| 22. | University of the Southern Caribbean   | Prioritising Caribbean Security in the 21st Century: Preventing Terrorism and Countering Violent Extremism<br>Combating Terrorism: Legislative Interventions on the Anti-Terrorism Act, Foreign Terrorist Fighters and International Obligations in Relation to Combating Terrorism and Confiscation of Terrorist Property and Risk of NPO Abuse | October 2-3, 2019             | USC Auditorium, Maracas Valley, St. Joseph   | Regional            | Completed |
| 23. | 2 <sup>nd</sup> Conference of Caribbean Directors of Public Prosecutions             | The Role of the Prosecution Office in the Fourth Round CFATF Process – TF: The prosecutor's role and Trinidad & Tobago's experience  | October 30 - November 1, 2019 | The Hampton Inn Brickell, Miami, USA   | 25                  | Completed |
| 24. | 'Counter Financing of Terrorism (CFT)' Workshop - World Bank, FATF TREN and CARIORUM | Trinidad and Tobago's Approach to Domestic Coordination and Assessing the Risk of Terrorist Financing  | November 20, 2019             | St. James's Club and Villas, Antigua and Barbuda   | 40                  | Completed |
| 25. | Registrar General's Department   | Anti-Terrorism Legislation, Proliferation Financing of Weapons of Mass Destruction and the application of Targeted Financial Sanctions   | January 31, 2020              | The Office of Attorney General and Ministry of Legal Affairs, Richmond St., Port of Spain. | 5                   | Completed |
| 26. | Financial Investigations Branch, TTPS  | Understanding AML/CFT Compliance   | March 2, 2020                 | Besson Street Police Station, Riverside Plaza, Port of Spain                               | 16                  | Completed |
| 27. | Financial Investigations Branch, TTPS  | Terrorism  | March 2020                    | Besson Street Police Station, Riverside Plaza, Port of Spain                               | 16                  | Completed |



| No. | ENTITY   | COURSE  | DATE              | LOCATION   | No. of Participants    | Status    |
|-----|--|---|-------------------|--|------------------------|-----------|
| 28. | International Institute of Justice, Counter Terrorism Judicial Training  | Key Aspects of the Trinidad and Tobago Anti-Terrorism Act, Chap. 12:07                            | March 10-11, 2020 | Hall of Justice, Port of Spain, Trinidad   | Approx. 40             | Completed |
| 29. | International Institute of Justice, Counter Terrorism Prosecutors Training   | Key Aspects of the Trinidad and Tobago Anti-Terrorism Act, Chap. 12:07                            | March 12-13, 2020 | Ministry of the Attorney General and Legal Affairs, Richmond Street, Port of Spain | Approx. 25             | Completed |
| 30. | Financial Investigations Branch, TTPS  | Understanding AML/CFT Compliance  | January 4, 2021   | Virtual  | Approx. 20             | Completed |
| 31. | Financial Investigations Branch, TTPS  | Terrorism   | January 8, 2021   | Virtual  | Approx. 20             | Completed |
| 32. | Ministry of Foreign and CARICOM Affairs  | Designation of Individuals and Entities pursuant to s. 22B of the Anti-Terrorism Act, Chap. 12:07 | February 10, 2021 | Virtual  | 6                      | Completed |
| 33. | United States Department of States International Narcotics and Law Enforcement, National Centre for State Courts, and Judicial Education Institute | Different Types of Orders- Financial Crimes   | January 15, 2021  | Virtual  |                        | Completed |
| 34. | NM Leadership Consultant   | Terrorism...Is it still a threat in the Caribbean? Have we dropped our guards too soon            | March 2021        | Virtual  | Regional               | Completed |
| 35. | SSA CT Conference  | Protecting the Financial System and National Security- The AML/CFT Regime                         | June 23, 2021     | Virtual  | Regional - Approx. 175 | Completed |

| No. | ENTITY  | COURSE                                       | DATE                           | LOCATION | No. of Participants    | Status    |
|-----|---|--|--------------------------------|----------|------------------------|-----------|
| 36. | Airport Authority of Trinidad & Tobago, Trinidad and Tobago Police Service -Traffic Index, Trinidad and Tobago Police Service-Special Investigations Unit, Customs and Excise Division, Trinidad and Tobago Air Guard-Ulric Cross Station, Immigration Division, Trinidad and Tobago Civil Aviation Authority, JetBlue Airways, LIAT, Caribbean Airlines and United Airlines. | Counter Terrorism Training                   | November 11, 2021              | Virtual  | Approx. 25             | Completed |
| 37. | Sponsored by the U.S Department of State, Bureau of International Narcotics and Law Enforcement Affairs, conducted by the National Center for State Courts (NCSC)-Financial Crimes Team   | Regional Civil Recovery Live Exercise        | November 18, 2021-June 8, 2022 | Virtual  | Regional Participation | Completed |
| 38. | FIB, TTPS   | FIB Induction training on AML/CFT Compliance | March 3, 2022                  | Virtual  |                        | Completed |
| 39. | FIB, TTPS   | FIB Induction training on Terrorism          | March 9, 2022                  | Virtual  |                        | Completed |

| No. | ENTITY   | COURSE   | DATE                        | LOCATION  | No. of Participants         | Status    |
|-----|--|--|-----------------------------|-----------|-----------------------------|-----------|
| 40. | United Nations Office on Drugs and Crime (UNODC)   | Countering the Financing of Terrorism-UNSCR 1267 & 1988 Sanctions                  | March 15-18, 2022           | In-Person |                             | Completed |
| 41. | United Nations Office on Drugs and Crime (UNODC)   | Countering the Financing of Terrorism-UNSCR 1373 Sanctions                         | March 15-18, 2022           | In-Person |                             | Completed |
| 42. | United Nations Office on Drugs and Crime (UNODC)   | AML/CFT Financial Disruption Course  | May 3-6, 2022               | In-Person |                             | Completed |
| 43. | United Nations Office of Counter-Terrorism (UNOCT)   | P/CVE Strategic and Reintegration Communication Co-Design Workshop                 | June 8-9, 2022              | Virtual   |                             | Completed |
| 44. | Sponsored by the Ministry of Commerce and the People's Republic of China and organized by the Central University of Finance and Economics (CUFE)   | Regulatory Anti-Money Laundering & Countering the Financing of Terrorism           | August 3-September 16, 2022 | Virtual   | International Participation | Completed |
| 45. | AML Grey Matters presented by SILO Compliance Systems  | Terror Finance 101: A Review of Historic and Emerging Terrorist Financing Models   | September 8, 2022           | Virtual   |                             | Completed |
| 46. | Center for Policy Research, University at Albany, State University of New York (SUNY-Albany), funded by the U.S. Department of State's Export Control and Related Border Security Program (EXBS) | Virtual Proliferation Financing Training for the Government of Trinidad and Tobago | September 22-23, 2022       | Virtual   |                             | Completed |



| No. | ENTITY   | COURSE  | DATE                | LOCATION  | No. of Participants         | Status    |
|-----|--|---|---------------------|---|-----------------------------|-----------|
| 47. | Task Force Nightingale   | Key Aspects of the Trinidad and Tobago Anti-Terrorism Act, Chap. 12:07  | October 11, 2022    | In Person   |                             | Completed |
| 48. | Sixteenth Meeting of the Open-ended Intergovernmental Working Group on Asset Recovery    | Challenges With Respect to Beneficial Ownership and How it Can Foster and Enhance the Effective Recovery and Return of Proceeds of Crime, Taking Into Consideration Article 63 of the UNCAC | November 7-11, 2022 | Vienna, Austria,  | International Participation | Completed |
| 49. | Task Force Nightingale   | Comprehensive review of the Returnee Bill, 2023   | March 31, 2023      | Hybrid-Virtual and In-person                              |                             | Completed |
| 50. | Task Force Nightingale   | Comprehensive review of the Returnee Bill, 2023   | April 5, 2023       | Virtual   |                             | Completed |
| 51. | Financial Action Task Force, Risk, Trends and Methods Group (RTMG) Joint Experts Meeting | Caribbean Terrorism Financing Threats and Responses   | April 5, 2023       | New Delhi, India  | FATF & CFATF Members        | Completed |
| 52. | AML Grey Matters presented by SILO Compliance Systems                                    | Proliferation Financing   | May 24, 2023        | Virtual   |                             | Completed |
| 53. | George C. Marshall European Center for Security Studies Garmisch-Partenkirchen, Germany  | Program on Terrorism and Security Studies (PTSS)  | June 5-30, 2023     | In Person   | International participation | Completed |
| 54. | University of the Southern Caribbean   | International Conference on Security, Intelligence and Defence in the Caribbean   | June 13, 2023       | University of the Southern Caribbean, Maracas, St. Joseph | Regional Participation      | Completed |
| 55. | Ministry of Foreign and CARICOM Affairs  | Designation of Individuals and Entities pursuant to s. 22B of the Anti-Terrorism Act, Chap. 12:07   | June 28, 2023       | Virtual   | 8                           | Completed |

| No. | ENTITY   | COURSE  | DATE                  | LOCATION                                | No. of Participants         | Status    |
|-----|--|---|-----------------------|---|-----------------------------|-----------|
| 56. | Regional Security System-Asset Recovery Unit           | Regional Security System - Asset Recovery Unit's Financial Investigation and Asset Recovery Workshop<br><ul style="list-style-type: none"> <li>- <i>Terrorist and Proliferation of Weapons Financing</i></li> <li>✓ <i>How to investigate Terrorist &amp; WMDs Financing</i></li> <li>✓ <i>Working to implement UNSCRs and other Sanctions</i></li> <li>✓ <i>Applying for Freezing Orders for terrorist groups and individuals</i></li> </ul> | October 11-13, 2023   | Georgetown Guyana; presented virtually  | Regional Participation      | Completed |
| 57. | Counter Terrorist Financing Overseas Territories Forum | Caribbean Terrorism Financing Threats and Responses for five (5) CFATF British Overseas Territories – Anguilla, Bermuda, British Virgin Islands, The Cayman Islands and the Turks & Caicos Islands  | September 20-21, 2023 | British Consulate, Miami, United States | Approx.15                   | Completed |
| 58. | EU AML/CFT Global Facility                             | 'Risk and Consequence: The Future of FATF Recommendation 8 for Financial Integrity and for Civil Society' Global Conference   | September 26-27, 2023 | Hybrid – in person and Virtual          | International Participation | Completed |
| 59. | EU AML/CFT Global Facility                             | NPO Risk Assessment Workshop  | October 31, 2023      | Virtual                                 | Approx. 15                  | Completed |
| 60. | Financial Intelligence Unit, Belize                    | Virtual Workshop hosted by the FIU of Belize on the Designation of Individuals and Entities Pursuant to UNSCR 1373 (2001)<br><ul style="list-style-type: none"> <li>- <i>The Implementation of Targeted Financial Sanctions related to Terrorism and Terrorist Financing: Trinidad &amp; Tobago's</i></li> </ul>  | November 2, 2023      | Virtual                                 | Regional Participation      | Completed |



| No. | ENTITY   | COURSE   | DATE              | LOCATION          | No. of Participants | Status    |
|-----|--|--|-------------------|-------------------|---------------------|-----------|
|     |  | <i>Domestic Framework</i><br><i>Designation</i>                                      |                   |                   |                     |           |
| 61. | TFC, TFN, TTPS, Prisons, MoNS, Immigration, MoFCA, FIUTT etc | <b>Training on TFS-TF and TFS-PF to Competent Authorities in Trinidad and Tobago</b> | September 2, 2024 | Virtual: MS Teams | Approx. 45          | COMPLETED |
| 62  | Supervisory Authorities (CBTT, FIUTT, TTSEC)                 | <b>Training on TFS-TF to Supervisory Authorities in Trinidad and Tobago</b>          | November 8, 2024  | Virtual: MS Teams | Approx. 15          | COMPLETED |

As outlined in the table above, the ATU, AGLA has continued to deliver training to law enforcement agencies on the provisions of the Anti-Terrorism Act, Chap. 12:07, with particular emphasis on terrorism offences, terrorist financing and confiscation of terrorist funds and the terrorist financing risks related to Non-profit Organizations.

Following the enactment of the Anti-Terrorism (Amendment) Act, 2018 in July 2018, this training has been updated to reflect the newly amended provisions of the Act. Priority has been given to agencies directly involved in the gathering of intelligence and evidence for the investigation of terrorism and terrorist financing with more than one thousand (1,000) individuals having been trained and/or presented on the Act to date. In addition, the ATU has conducted training at various forums which were participated in via teleconference and videoconferences, thereby disseminating the relevant information to regional audiences in CARICOM.

ANNEX II

**TABLE OF DOMESTIC DESIGNATIONS**

|    | Listed Entity & List of Offences   | CV No. & Date of Order          |
|----|--|---------------------------------|
| 1. | <p><b>Kareem Ibrahim</b></p> <p>Section 12 - Recruitment<br/>Section 17 - Bombing offences.</p>  | CV2015 - 04040 December 3, 2015 |
| 2. | <p><b>Abdul Kadir</b></p> <p>Section 5 - Collection or provision of property to commit terrorist acts<br/>Section 12 - Recruitment<br/>Section 17- Bombing offences.<br/>Section 22A- Terrorism Financing</p>        | CV2017 - 00471 February 9, 2017 |
| 3. | <p><b>Abdel Nur</b></p> <p>Section 5 - Collection or provision of property to commit terrorist acts<br/>Section 17- Bombing offences.<br/>Section 22A - Terrorism Financing</p>                                      | CV2017- 00472 February 9, 2017  |
| 4. | <p><b>Russell Defreitas</b></p> <p>Section 5 - Collection or provision of property to commit terrorist acts<br/>Section 12 - Recruitment<br/>Section 17- Bombing offences.<br/>Section 22A - Terrorism Financing</p> | CV2017- 00473 February 9, 2017  |
| 5. | <p><b>Shane Dominic Crawford</b></p> <p>S. 9- Support<br/>S.12- Recruitment<br/>S.14- Inciting or Promoting the Commission of a Terrorist Act</p>  | CV2017- 01081 March 31, 2017    |
| 6. | <p><b>Milton John Algernon</b></p> <p>S. 9- Support<br/>S.12- Recruitment</p>  | CV2017- O1973 June 12, 2017     |



|    | Listed Entity & List of Offences  | CV No. & Date of Order         |
|----|---|--------------------------------|
|    | S.13- Conducting Training<br>S.14- Inciting or Promoting the Commission of a Terrorist Act  |                                |
| 7. | <b>Enraan Ali</b><br>S. 4- Providing of Servicers for the Commission of a Terrorist Act<br>S. 9- Support<br>S.11- Provision of Devices<br>S.12- Recruitment<br>S.13A- Attending or Receiving Training to Commit a Terrorist Act<br>S.15A- Traveling for the purpose of committing a Terrorist Act | CV2020-04440 December 21, 2020 |
| 8. | <b>Zaid Abdul Hameed</b><br>S. 9- Support<br>S.13A- Attending or Receiving Training to Commit a Terrorist Act<br>S.15A- Traveling for the purpose of committing a Terrorist Act   | CV2021- 04406 December 6 2021  |
| 9. | <b>Jihad Muhammad Ali</b><br>S. 9- Support<br>S.13A- Attending or Receiving Training to Commit a Terrorist Act<br>S.15A- Traveling for the purpose of committing a Terrorist Act  | CV2023- 01133 April 13, 2023   |

