



# **GUIDANCE DOCUMENT ON TERRORIST FINANCING (TF) FOR ACCOUNTABLE INSTITUTIONS**

**JULY, 2019**



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# ACRONYMS

AI	–	Accountable Institution
DNFBP	–	Designated Non-Financial Businesses and Professions
FIC	–	Financial Intelligence Centre
GIABA	–	Inter-Governmental Action Group against Money Laundering in West Africa
IMC	–	Inter -Ministerial Committee
OECD	–	Organization for Economic Cooperation and Development
AQIM	–	AL-QAEDA in the Islamic Maghreb
MOJAG	–	Ministry of Justice and Attorney General
MUJAO	–	Movement for Oneness and Jihad in West Africa
MER	–	Mutual Evaluation Report
PC	–	Partially Compliant
LC	–	Largely Compliant
MNLA	–	Movement for the Liberation of Azawad
NPO	–	Non- Profit Organisation
TF	–	Terrorist Financing

# Introduction

In 2016, the Organisation for Economic Cooperation and Development (OECD) countries experienced the most deaths from terrorism. According to the Global Terrorism Index, there has been a 67% increase in attacks and a nearly 600% increase in deaths from terrorism since 2014.

An OECD study of illicit financial flows and AL-QAEDA in the Islamic Maghreb (AQIM) revealed that a large share of the regional population became reliant on AQIM as a source of income—for example, the group established training camps, paid salaries and bribed community members to perpetrate their terrorist activities.

In West Africa, there has been a significant concern about the rise of terrorism in the region. The source of funding for terrorist activities has equally been of concern in the sub-region. The rapid radicalisation of the youth and the southward migration of terrorists and extremists, particularly members of AQIM, through the Sahel towards Mali, Mauritania, and Niger remains a challenge in the region.

Indeed, there are indications that AQIM has operational bases in some West African countries and has forged tactical alliances with other terrorist groups such as Boko Haram in Nigeria, the Movement for Oneness and Jihad in West Africa (MUJAO), the National Movement for the Liberation of Azawad (MNL), and Ansar Eddine in Mali and Niger.

Terrorists require funds to recruit and support members, acquire and maintain logistics as well as conduct operations. *Terrorists need money and other assets to purchase weapons, train recruits, pay for the cost of travel, accommodation and to execute attacks.*

*Disrupting and preventing terrorism-related financial flows and transactions is one of the most effective ways to fight terrorism.* Thus, preventing terrorists from accessing financial resources is crucial to successfully counter the threat of terrorism. Ghana has taken keen interest in putting mechanisms in place to prevent terrorist activities including its financing from occurring.

# Background

In Ghana's first Mutual Evaluation Report (MER) adopted in November 2009, the country was rated Partially Compliant (PC) on preventive measures on terrorism because no regulations for the implementation of the Anti-Terrorism Act, 2008 (Act 762) had been issued.

In September 2016, Ghana was subjected to the Second Round of Mutual Evaluation exercise by the Inter-Governmental Action Group against Money Laundering in West Africa (GIABA) and was rated Largely Compliant (LC) on TF because some measures had been put together on the criminalisation of TF offences. The report was adopted at the GIABA plenary in May 2017 in Liberia, Monrovia.

The Second Round of Mutual Evaluation revealed that Ghana's criminalization of TF offence is largely consistent with the international standards but has some technical deficiencies. The outcome of the evaluation further indicated that although Ghana had a Counter - Terrorism Strategy in place, the Strategy needed to include provisions on the Financing of Terrorism. There were no adequate sanctions for non-compliance, no statistics on TF investigations and the lack of implementation of Targeted Financial Sanctions by the Non-Bank Financial Institutions and Designated Non-Financial Businesses and Professions (DNFBPS) was also identified. The evaluation also revealed that the extent to which Ghana pursues, identifies and investigates TF offences is unclear.

The following recommendations were therefore made to ensure that Ghana puts in place effective mechanisms to fight TF:

- Ghana should ensure that there is targeted sensitization of Financial Institutions and DNFBPS to ensure that these Institutions adequately understand TF typologies and indicators for TF to enhance the reporting regime.
- Ghana should ensure that law enforcement agencies have adequate awareness and skills to detect or identify TF and TF related activities.
- Ghana should ensure that TF investigation is well integrated into the country's counter-terrorism policy and the country should pursue financial investigations as a matter of course when conducting investigations on terrorism.
- Competent authorities should maintain statistics on TF investigation

# Objective of the guidance document

The purpose of this guidance document is to ensure that Financial Institutions are able to identify terrorism financing schemes and red flags to trigger the filing of STRs.

The Bank of Ghana/ Financial Intelligence Centre Anti-Money Laundering and Combating the Financing of Terrorism Guideline for Financial Institutions and Non-Bank Financial Institutions requires entities under its purview to thoroughly monitor customers and maintain information on them in line with record keeping provisions. A Financial Institution that carries out a transaction, knowing that the funds or property involved are owned or controlled by terrorists or terrorist organisations, or that the transaction is linked to, or likely to be used in terrorist activity, may be committing a criminal offence under the laws of many jurisdictions. Financial Institutions will thus be better able to protect themselves from being used as a conduit for such activity. This guidance document therefore seeks to;

- enhance the knowledge and understanding of investigative and prosecutorial authorities of how illegal and legal funds are used for terrorist financing;
- identify relevant indicators and red flags to assist financial institutions and other reporting entities to monitor and report suspicious transactions on terrorist financing; and
- assist policy makers as well as legislative and the judiciary to identify and close possible gaps in legislation on terrorism and terrorist financing.

## Definition of Terrorist Financing

According to the UN Convention for the Suppression of the Financing of Terrorism, the definition of terrorism—Article 2 states: any person commits an offence within the meaning of this convention if that person by any means, directly or indirectly, unlawfully and wilfully, provides or collects funds with the intention that they should be used or in the knowledge that they are to be used, in full or in part, in order to carry out:

- (a) an act which constitutes an offence within the scope of and as defined in one of the treaties; or
- (b) any other act intended to cause death or serious bodily injury to a civilian, or to any other person not taking an active part in the hostilities in a situation of armed conflict, when the purpose of such act, by its nature or context, is to intimidate a population, or to compel a government or an international organisation to do or to abstain from doing any act”

The World Bank and the International Monetary Fund (IMF) also define terrorist financing as “the financial support, in any form, of terrorism or of those who encourage, plan or engage in it”.

The Financial Action Task Force (FATF) also defines terrorist financing as “extending to any person who willfully provides or collects funds by any means, directly or indirectly, with the unlawful intention that they should be used, or in the knowledge that they are to be used, in full or in part:

- (a) to carry out a terrorists act(s);
- (b) by a terrorist organization; or
- (c) by an individual terrorist.

FATF describes the act of terrorist financing to include the financing of terrorist acts, and of terrorists and terrorist organizations.

## Legal framework

The Anti-Terrorism Act, 2008 (Act 762) provides for a range of offences including support, facilitation, harbouring, solicitation and promotion of terrorist activities.

Section 2 of the Anti-Terrorism Act, 2008 (Act 762) provides that;

- (1) an act is a terrorist act if it is performed in furtherance of a political, ideological, religious, racial or ethnic cause and
  - (a) causes serious bodily harm to a person;
  - (b) causes serious damage to property;
  - (c) endangers a person’s life;
  - (d) creates a serious risk to the health or safety of the public;
  - (e) involves the use of firearms or explosives;

- (f) releases into the environment or exposes the public to (i) dangerous, hazardous, radioactive or harmful substances; (ii) toxic chemicals; or (iii) microbial or other biological agents or toxins;
  - (g) is prejudicial to national security or public safety;
  - (h) is designed or intended to disrupt
  - (i) a computer system or the provision of services directly related to communications;
  - (ii) banking or financial services;
  - (iii) utilities, transportation; or
  - (iv) other essential services; or (i) is designed or intended to cause damage to essential infrastructure.
- (2) a person who contravenes subsection (1) commits an offence and is liable on conviction on indictment to a term of imprisonment of not less than seven years and not more than twenty-five years.

Section 6 of the Anti-Terrorism Act, 2008 (Act 762) provides for the criminalization of terrorist financing. It states that it is an offence to “provide, collect or make property available by any means, directly or indirectly, with the intention or knowing or having reasonable grounds to believe that the property will be used in full or in part to carry out or in relation to carrying out a terrorist act”.

Section 7 of Act 762 prohibits provision of financial or other related services to terrorists, terrorist organizations or for a terrorist act. Regulation 1 of the Anti-Terrorism Regulations, 2012 (L.I. 2181) also prohibits the provision of financial or other related service to a specified entity. A specified entity under Section 23 of the Act includes a person and an organization associated with acts of terrorism and declared to be a specified entity by the Minister of Justice and Attorney General.

Again, the TF offence covers persons who directly or indirectly provide or make available financial or other related service, with the intention that the financial or other related service be used, in whole or in part to commit or facilitate the commission of a terrorist act, to benefit a person who is committing or facilitating the commission of a terrorist act, or for the benefit of a terrorist group.

The Executive Instrument 114 mandates the Inter-Ministerial Committee (IMC) to coordinate with competent authorities for the implementation of United Nations Security Council Resolution 2178 regarding suspected foreign fighters and designated foreign terrorist fighters.

TF is designated as a money laundering predicate offence in Section 1 of Act 749 as amended by Section 1(2) of Act 874. Section 5 of the Anti-Terrorism Act, 2008 (Act 762) states that the high court has jurisdiction over an act which constitutes an offence outside the country if the act constitutes an offence in Ghana if the perpetrator ordinarily resident in Ghana, or is a Ghanaian citizen. The court also has jurisdiction where the act is committed against a Ghanaian citizen or committed to compel the government to do or refrain from doing an act.

## Types of reports

The Financial Intelligence Centre is mandated to receive the following reports:

1. **Suspicious Transaction Report (STRs)** - This report is to be filed to the FIC within twenty-four hours upon the grounds of suspicion. Financial Institutions are to continue to monitor the activities of clients and report suspicious or unusual transactions immediately without delay to the FIC.
2. **Cash Transactions Report (CTRs)** - Financial Institutions are to submit daily reports on cash transactions above specified thresholds. The FIC in collaboration with sector regulators are to determine the threshold for reporting of CTRs. Currently, the threshold for reporting for commercial banks is ₪50,000.00, Non-Bank Financial Institutions ₪20,000.00, Securities ₪50,000.00 and Insurance ₪5,000.00
3. **Electronic Currency Transaction Report (ECTRs)** - This report is to be filed to the FIC on all inflows and outflows exceeding US\$1,000.00 conducted by customers of financial institutions.
4. **Currency Declaration Report (CDRs)** - This report is to be submitted to the FIC on all currencies conveyed or transported from and/or to the country through the various points of entry and exit.

## TF Red Flags

A Red flag/ indicator of suspicious financial activity are valuable tools for detecting potential illicit activities linked to terrorism financing (TF), Money Laundering and other related financial crimes. This document provides a list of suspicious or unusual activities that could raise a red flag for additional scrutiny and reporting. These indicators are not exhaustive but only provides grounds for reporting entities to identify, escalate and report suspicious transactions linked to TF and other related financial crimes. Examples of such red flags includes but not limited to;

- wire transfers to or from high risk jurisdictions.
- multiple deposits into a single account followed by large cash withdrawals or transfer to third parties.
- frequent daily cash withdrawals below reporting threshold.
- transactions on accounts of charitable organizations not consistent with the account profile.
- constantly accessing bank accounts through the use of ATM cards from jurisdictions of specific concerns.
- unusual concern for secrecy by a customer, particularly with respect to their identity, type of business, or properties.
- possesses vague knowledge of the amount and details of a transaction or offers inconsistent or confusing details about the transaction.
- unwilling to provide explanation of financial activity.
- transfers between bank accounts of related or unrelated entities or charities for no apparent reason.

- an account opened in the name of a recently formed legal entity and in which a higher than expected level of deposits are made in comparison with the income of the founders of the entity.
- sudden reactivation of a dormant account followed by periodic deposits that are used to create transactions which appear legitimate.

### Indicators Triggered By Subject

- Subject avoids direct contact with the bank official such as constantly using ATMs and avoiding the bank officials whenever they try to contact him.
- Subject or his representative show signs of confusion and nervousness during the conduct of a transaction.
- Subject or his representative inquires a lot about the Anti-Money Laundering measures by financial institution;
- Subject or his representative requests the cancellation of the transaction as soon as the bank official tries to obtain further information to conclude a transaction.

### Sources of Terrorist Funds

Generally, terrorist financing is believed to emanate from two primary sources. The first source is the financial support provided by states or organisations with large infrastructures to collect and then make funds available to the terrorist organisation. An individual with sufficient financial means may also provide funding to terrorist groups.

The second major source of funds for terrorist organisations is incomes derived directly from various “revenue-generating” activities. A terrorist group in a particular region may support itself through illicit activities such as kidnapping and extortion. Besides kidnapping and extortion, terrorist groups may engage in large-scale smuggling, fraud, robbery, and narcotics trafficking.

Funding for terrorist groups may also include income derived from legitimate sources or from a combination of lawful and unlawful sources. Indeed, this funding from legal sources is a key difference between terrorist groups and traditional criminal organizations. Some of the specific fundraising methods might include: collection of membership dues and/ or subscriptions; sale of publications; speaking tours, cultural and social events; door-to-door solicitation within the community; appeals to wealthy members of the community; and donations of a portion of their personal earnings.

### Characteristics of financial transactions that may trigger suspicion of TF;

Financial institutions should be aware of elements of individual transactions that could indicate funds involved in terrorist financing activities.

The following list of potentially suspicious or unusual activities is meant to show types of transactions that could be a cause for additional scrutiny. This list is not exhaustive, nor

does it take the place of any legal obligations related to the reporting of suspicious or unusual transactions.

## Accounts

- accounts that receive periodic deposits and are dormant at other periods. These accounts are used to create a legitimate appearance so that fraudulent activities may be carried out without being detected.
- a dormant account containing a minimal sum suddenly receives a deposit or series of deposits followed by daily cash withdrawals that continue until the transferred sum has been depleted.
- when opening an account, the customer refuses to provide information required by the financial institution, attempts to reduce the level of information provided or provides information that is misleading.
- an account for which several persons are signatories, yet these persons appear to have no relation among each other.
- the opening of multiple accounts by the same person and making small deposits below the threshold.
- an account opened in the name of a legal entity that is involved in the activities of an association or foundation.
- an account opened in the name of a legal entity, a foundation or an association, which may be linked to a terrorist.
- use of NPO accounts to accept funds from suspected terrorists and their associates.
- transactions involving key personnel of foreign NPOs associated with United Nations Security Council designated terrorist entities.
- media reports on NPO linked to known terrorist organisations or entities that are engaged, or suspected to be involved, in terrorist activities.
- an NPO sending funds to multiple individuals and entities in a high-risk country.
- An NPO employee withdraws cash from the NPO account and then deposits it into a personal account, before diverting the funds to a suspected terrorist's account.

## Deposits and Withdrawals

- (1) deposits for a business entity in combinations of monetary instruments that are atypical of the activity normally associated with such a business (for example, deposits that include a mix of business, payroll and social security cheques).
- (2) large cash withdrawals made from a business account not normally associated with cash transactions.
- (3) large cash deposits made to the account of an individual or legal entity when the apparent business activity of the individual or entity would normally be conducted in cheques or other payment instruments.

- (4) multiple transactions carried out on the same day at the same branch of a financial institution but with an apparent attempt to use different tellers.
- (5) the structuring of deposits through multiple branches of the same financial institution or by groups of individuals who enter a single branch at the same time.
- (6) the deposit or withdrawal of cash in amounts which fall consistently just below identification or reporting thresholds.
- (7) the deposit or withdrawal of multiple monetary instruments at amounts which fall consistently just below the reporting thresholds..

## Wire Transfers

- (1) wire transfers ordered in small amounts in an apparent effort to avoid reporting requirements.
- (2) wire transfers to or for an individual where information on the originator, or the person on whose behalf the transaction is conducted, is not provided with the wire transfer.
- (3) use of multiple personal and business accounts or the accounts of Non-Profit Organisations or charities to collect and then channel the funds immediately or after a short time to a small number of beneficiaries outside the jurisdiction.
- (4) foreign exchange transactions that are performed on behalf of a customer by a third-party followed by wire transfers of the funds to locations having no apparent business connection with the customer or to countries of specific concern.

## Characteristics of the customer or his business activity

- (1) funds generated by a business owned by individuals of the same origin or involvement of multiple individuals of the same origin from countries of specific concern acting on behalf of similar business types.
- (2) shared address for individuals involved in cash transactions, particularly when the address is also a business location and/or does not seem to correspond to the stated occupation of subject.
- (3) stated occupation of the subject is not commensurate with the level or type of activity (for example, a student or an unemployed individual who receives or sends large numbers of wire transfers, or who makes daily maximum cash withdrawals at multiple locations over a wide geographic area).
- (4) regarding Non-Profit or Charitable organisations, financial transactions for which there appears to be no logical economic purpose or in which there appears to be no link between the stated activity of the organisation and the other parties in the transaction.

- (5) a safe deposit box is opened on behalf of a commercial entity when the business activity of the customer is unknown or such activity does not appear to justify the use of a safe deposit box.
- (6) unexplained inconsistencies arising from the process of identifying or verifying the customer (for example, regarding previous or current country of residence, country of issue of the passport, countries visited according to the passport, and documents furnished to confirm name, address and date of birth).

### Transactions linked to high risk locations

- 1) Transactions involving foreign currency exchanges that are followed within a short time by wire transfers to locations of specific concern (for example, countries designated by national authorities, FATF etc.).
- 2) Deposits are followed within a short time by wire transfers of funds, particularly to or through a location of specific concern.
- 3) a business account through which a large number of incoming or outgoing wire transfers take place and for which there appears to be no logical business or other economic purpose, particularly when this activity is through or from locations of specific concern.
- 4) the use of multiple accounts to collect and then channel funds to a small number of foreign beneficiaries, both individuals and businesses, particularly when these are in locations of specific concern.
- 5) a customer obtains a credit instrument or engages in commercial financial transactions involving movement of funds to or from locations of specific concern when there appears to be no logical business reasons for dealing with those locations.
- 6) the opening of accounts of financial institutions from locations of specific concern.
- 7) sending or receiving funds by international transfers from and/or to locations of specific concern.

### Combined indicators for TF

- Client identified by media or law enforcement as having travelled, attempted/intended to travel to high risk jurisdictions, specifically countries under conflict and/or political instability or known to support terrorist activities and organizations.
- Client conducted travel-related purchases (e.g. purchase of airline tickets, travel visa, passport, etc.) linked to high-risk jurisdictions, specifically countries under conflict and/or political instability or known to support terrorist activities and organizations.

- The client mentions that they will be travelling to, are currently in, or have returned from, a high risk jurisdiction, specifically countries under conflict and/or political instability or known to support terrorist activities and organizations.
- Individual/Entity's online presence supports violent extremism or radicalization.
- Client indicates planned cease date to account activity.
- Client utters threats of violence that could be of concern to National Security.
- Sudden settlement of debt(s) or payments of debts by unrelated third parties.
- Law enforcement indicates to reporting entities that the individual/entity may be relevant to a law enforcement and/or national security investigation.
- Client's transactions involve individuals/entities identified by media or law enforcement as the subject of a terrorist financing or national security investigation.
- Client donates to a cause that is subject to derogatory publicly available information (crowdfunding initiative, charity, NPO, NGO, etc.).
- Client conducts uncharacteristic purchases (e.g. camping/outdoor equipment, weapons, ammonium nitrate, hydrogen peroxide, acetone, propane, etc.).
- A large number of bank transfers between client and unrelated third parties.
- Client provides multiple variations of name, address, phone number or additional identifiers.

## Securities Fraud Indicators for TF

The following have been identified as suspicious indicators associated with securities products:

The customer opens numerous accounts for different legal entities that the customer controls;

- The customer receives many incoming cheques or wire transfers from unrelated third parties;
- The customer allocates incoming third-party deposits among numerous accounts;
- The customer makes numerous outgoing payments to third parties close in time to when the customer receives many incoming third-party cheques or wire transfers;
- The customer's profile does not suggest a legitimate business reason for receiving many third party deposits;
- The cheques or wire transfers note that the funds are for an investment.
- The customer engages in large or repeated trading in securities that are illiquid, low priced or difficult to price;
- The issuing company has no apparent business, revenues or products; •The issuing company has experienced frequent or continuous changes in its business structure and/or undergoes frequent material changes in its business strategy or line of business;
- The officers or insiders of the issuing company are associated with other low priced, illiquid or low volume companies or high risk jurisdictions;
- The officers or insiders of the issuing company have a history of regulatory violations;

- The issuing company has failed to make required regulatory disclosures;
- The issuing company has been the subject of a prior trading suspension;
- A customer's transactions show a pattern of receiving physical securities or receiving incoming shares transfers that are then sold, with the proceeds wired out of the account;
- The customer deposits physical securities together with a request to journal the shares into multiple accounts that do not appear to be related, or to sell or otherwise transfer ownership of the shares;
- One party purchases securities at a high price and then sells them at a considerable loss to another party;

### Insurance Fraud Indicators for TF

- Transactions in which policies are cancelled shortly after premiums have been paid, resulting in the return of premiums.
- Transactions that are not commensurate with the customer's apparent financial means, for example, where customers without reasonable financial standing purchase large single premium policies for a large assured sum.
- Abnormal settlement instructions, including payment to apparently unconnected parties.
- Overpayment of premium with a request to refund the excess to a third party or an account held in a different country or jurisdiction.
- Paying premiums in large third party cheques on behalf of the customer.
- Unconvincing or unclear purpose or motivation for purchasing life policies.
- Policies managed by external asset managers who may not be adequately regulated and supervised.
- The customer uses intermediaries which are not subject to adequate AML/CFT laws.
- When a young person purchases a life policy with cash value and surrenders it within a short period.
- The customer fails to reasonably justify the purpose of a transaction when queried by the direct life insurer

### What to do if you suspect terrorist financing activities/schemes

An accountable institution shall pay special attention to transactions that (a) are complex, (b) involve unusually large/small sums of money, (c) have unusual patterns, or (d) have no apparent or visible economic or lawful purpose.

An accountable institution shall examine the background and purpose of the transactions specified, (b) record the findings in writing within twenty-four hours, and (c) forward the findings to the Centre.

An accountable institution shall report on the freezing of funds of a person engaged in terrorism or proliferation of weapons of mass destruction; where the High Court issues

- (a) an order to freeze the funds of a person engaged in terrorism or proliferation of weapons of mass destruction in accordance with section 5(2) of the Act, or
- (b) a declaration that an entity is a specified entity under section 19 of the Act the Minister shall, within twenty-four hours inform the institutions specified under regulation 5(2) and publish the order in the Gazette within seven days.

Regulation 6(2) states institutions specified under Regulation 5(2) shall monitor and secure compliance with the Act by the institutions, businesses or individuals which the institutions specified under Regulation 5(2) supervise, represent or license.

An accountable institution shall report on funds frozen by order of the High Court to the Financial Intelligence Centre in accordance with Section 5(4) of the Anti-Terrorism Act, 2008 (Act 762).

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