

**AML COUNTRIES OF CONCERN CHART - NOVEMBER 13, 2019**

Country or Territory	1. OFAC Sanctioned	2. State Sponsor of Terrorism	3. Major Money Laundering Country	4. Tax Havens/ IMF & USDS	5. FATF AML/CFT & FinCEN	6. Section 311 ML Concerns	7. Other Concerns (See Legend)
Afghanistan (Taliban)			MMLC				BP, ST, TIP
Aland Islands							IG
Albania							TIP
Alderney (Channel Islands)							IG
Algeria							T3TIP
Andorra				IMF OFC			IG
Angola (UNITA)			USDS UC				BP, TIP
Anguilla				IMF OFC			
Antigua & Barbuda			MMLC				IG, TIP
Argentina			MMLC				IG, BMPE, TIP
Aruba				IMF OFC			TIP
Australia			MMLC				IG
Austria			MMLC				IG
Azerbaijan							TIP
Bahamas			MMLC	IMF OFC, USDS OFC	X**		IG
Bahrain							TIP
Balkans	<a href="#">BALKANS</a>						BP
Bangladesh							TIP
Barbados							TIP
Belarus	<a href="#">BELARUS</a>						BP, T3TIP
Belgium							IG
Belize			MMLC	IMF OFC, USDS OFC			IG, T3TIP
Benin			USDS UC				TIP
Bermuda				IMF OFC			
Bhutan							TIP
Bolivia			MMLC				TIP
Bosnia and Herzegovina							TIP
Botswana			USDS UC		X**		TIP
Brazil			MMLC, USDS UC				IG, BMPE, TIP
British Virgin Islands			MMLC	IMF OFC			
Brunei							TIP
Bulgaria							TIP
Burma			MMLC, USDS UC			Entities	BP, T3TIP
Burkina Faso							TIP
Burundi	<a href="#">BURUNDI</a>						T3TIP
Cabo Verde							TIP
Cambodia			MMLC		X**		TIP
Cameroon							TIP
Canada			MMLC				
Central African Republic	<a href="#">CAR</a>						BP, T3TIP
Caymen Islands			MMLC	IMF OFC, USDS OFC			IG
Chad							TIP
Chile							IG
China			MMLC, USDS UC				DF, TIP
Colombia			MMLC				IG, BMPE
Comoros							IG, T3TIP
Congo, Democratic Republic	<a href="#">DRCONGO</a>						BP, TIP
Cook Islands				IMF OFC			IG
Costa Rica			MMLC				IG, TIP
Côte d'Ivoire (Ivory Coast)							BP, TIP
Croatia							TIP
<a href="#">Cuba</a>	X		USDS UC				TIP
Curacao			MMLC				IG, DF
Cyprus			MMLC	IMF OFC			IG
Czech Republic							IG
Denmark							IG
Djibouti							T3TIP
Dominica							EC, IG
Dominican Republic			MMLC				IG, TIP
Ecuador							TIP
Egypt							TIP
El Salvador							TIP
Equatorial Guinea			USDS UC				T3TIP
Eritrea			USDS UC				T3TIP
Estonia							IG, TIP
Ethiopia							TIP
Fiji							TIP
Finland							IG
France			MMLC				IG
Gabon							TIP
Gambia							T3TIP
Germany			MMLC				IG

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Ghana					X**		TIP
Gibraltar				IMF OFC			IG
Grand River Mohawk Lands							IG
Greece			MMLC				TIP
Grenada							IG
Guatemala			MMLC				IG, BMPE, TIP
Guernsey (Channel Islands)			MMLC	IMF OFC			
Guinea			USDS UC				TIP
Guinea -Bissau			MMLC				T3TIP
Guyana							TIP
Haiti			MMLC				T3TIP
Honduras							TIP
Hong Kong			MMLC				DF, TIP
Hungary							IG, TIP
Hutt River Principality							IG
Iceland					X**		IG
India			MMLC				IG, TIP
Indonesia			MMLC				TIP
<a href="#">Iran</a>	X	X	MMLC, USDS UC		X* & FinCEN	Entities	T3TIP
Iraq	<a href="#">IRAQ2 &amp; IRAQ3</a>		MMLC				TIP
Ireland							IG
Isle of Man (UK)			MMLC	IMF OFC			IG
Israel			MMLC				IG
Italy			MMLC				IG
Jamaica							IG, TIP
Japan			MMLC				TIP
Jersey (Channel Islands)			MMLC	IMF OFC			IG
Jordan							TIP
Kahnawake (Canada)							IG
Kalmykia							IG
Kazakhstan							IG, TIP
Kiribati							TIP
Kenya			MMLC				TIP
Korea, Republic of							
Kosovo							TIP
Kuwait							TIP
Kyrgyzstan							TIP
Lao PDR (Laos)			USDS UC				TIP
Latvia			MMLC				IG, TIP
Lebanon	<a href="#">LEBANON</a>		MMLC			Entities	TIP
Lesotho							TIP
Liberia (Diamonds)							IG, TIP
Libya	<a href="#">LIBYA2</a>		USDS UC		FinCEN		T3TIP
Liechtenstein			MMLC	IMF OFC			IG
Lithuania							IG
Luxembourg			MMLC, USDS UC	USDS OFC			IG, TIP
Macau SAR			MMLC	IMF OFC		Entities	IG, TIP
Macedonia							TIP
Madagascar			USDS UC				TIP
Malawi							TIP
Malaysia				IMF OFC			TIP
Maldives							TIP
Mali							TIP
Malta							IG, TIP
Marshall Islands							T3TIP
Mauritania							T3TIP
Mauritius							IG, TIP
Mexico			MMLC				BMPE, TIP
Micronesia, Federated States of			USDS UC				TIP
Moldova							TIP
Mongolia					X**		TIP
Monaco				IMF OFC			IG
Montenegro							TIP
Montserrat				IMF OFC			
Morocco							TIP
Mozambique							TIP
Namibia							TIP
Nauru			USDS UC				
Nepal			USDS UC				IG, TIP
Netherlands			MMLC				
Netherlands Antilles				IMF OFC			IG
Nicaragua							TIP

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Niger			USDS UC				TIP
Nigeria			MMLC				TIP
Norfolk Island							IG
<a href="#">North Korea (DPRK)</a>	X		USDS UC		X* & FinCEN		IG, BP, T3TIP
Norway							IG
Oman							TIP
Pakistan			MMLC		X**		TIP
Palau				IMF OFC			TIP
Panama			MMLC	IMF OFC	X**		IG, DF, TIP
Papua New Guinea			USDS UC				T3TIP
Paraguay			MMLC				IG, BMPE, TIP
Peru							TIP
Philippines			MMLC				IG
Poland							IG
Portugal							IG
Qatar							TIP
Romania							TIP
Russian Federation			MMLC				IG, T3TIP
Rwanda							TIP
Samoa				IMF OFC			
Saudi Arabia							TIP
Senegal							TIP
Serbia							IG, TIP
Seychelles				IMF OFC			IG, TIP
Sierra Leone							TIP
Singapore			MMLC, USDS UC				IG, TIP
Slovakia							IG
Slovenia							IG
Solomon Islands							IG, TIP
Somalia	<a href="#">SOMALIA</a>		MMLC, USDS UC				T3TIP
South Africa							IG, TIP
South Korea							IG, DF
South Sudan	<a href="#">SOUTH SUDAN</a>		USDS UC				T3TIP
Spain			MMLC				IG, DF
Sri Lanka							TIP
St. Kitts & Nevis							EC, IG
St. Lucia							IG, TIP
St. Maarten			MMLC				
St. Vincent & the Grenadines							IG, TIP
Sudan	<a href="#">SUDAN</a>	X					BP, T3TIP
Suriname							T3TIP
Swaziland							IG, TIP
Sweden							IG
Switzerland			MMLC				IG
<a href="#">Syria</a>	X	X	USDS UC		X** & FinCEN	Entities	BP, T3TIP
Taiwan			MMLC				IG
Tajikistan							TIP
Tanzania							IG, TIP
Tasmania							IG
Thailand			MMLC				TIP
Togo							TIP
Tonga							TIP
Trinidad and Tobago					X**		TIP
Tunisia							TIP
Turkey			MMLC				TIP
Turkmenistan							T3TIP
Turks & Caicos				IMF OFC			IG
Uganda							TIP
Ukraine	<a href="#">UKRAINE-EO...</a>		MMLC				TIP
United Arab Emirates			MMLC, USDS UC	USDS OFC			TIP
United Kingdom			MMLC				IG
Uruguay			MMLC				BMPE, TIP
US Virgin Islands							IG
Uzbekistan							T3TIP
Vanuatu				IMF OFC			IG
Venezuela	<a href="#">VENEZUELA</a>		MMLC				IG, BMPE, T3TIP
Vietnam							IG, TIP
West Bank and Gaza			MMLC				
Yemen	<a href="#">YEMEN</a>				X**		BP, T3TIP
Zambia							TIP
Zimbabwe	<a href="#">ZIMBABWE</a>		MMLC		X**		BP, T3TIP

**Legend:**

1. Office of Foreign Assets Control (OFAC) Sanctioned Countries <http://www.treas.gov/ofac>. OFAC maintains a [country sanctions webpage](#) with active links to detailed information about each. If the country tag is listed in column 1 rather than an "X", the sanction program is not all encompassing and impacts only transactions with or benefitting designated persons. Countries with broad prohibitions are indicated in Column 1 with an "X." Detailed information on the sanctioned countries in column 1 can be found at <https://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx>. Effective September 14, 2016, sanctions against Côte d'Ivoire were terminated. Refer to [Executive Order 13739](#).
2. [US Department of State Designation as State Sponsors of Terrorism](#): Countries determined by the Secretary of State to have repeatedly provided support for acts of international terrorism are designated as State Sponsors of Terrorism. For more details about State Sponsors of Terrorism, see "Overview of State Sponsored Terrorism" in the [US State Department's Country Reports on Terrorism](#).
3. US Department of State's Bureau for International Narcotics and Law Enforcement Affairs, [2016 Major Money Laundering Countries \(MMLC\)](#) are areas where banks engage in significant transactions involving serious crime proceeds. It is not an assessment of the area's legal framework to combat money laundering (ML); its role in terrorist financing (TF); or the degree of its cooperation in the international fight against ML and TF. Additionally, the Bureau has identified areas still uncooperative with international law enforcement and/or have not yet criminalized TF ([Comparative Table in Volume II](#)) and are identified on our report as "USDS UC."
- 4A. [Organization for Economic Cooperation and Development](#) Designation as Uncooperative Tax Haven (UTH). There are none as of December 2015.
- 4B. [International Monetary Fund \(IMF\) Offshore Financial Centers \(OFC\)](#) last published an official list of OFC's in March 2004. These countries are still listed as additional country considerations and identified using "IMF OFC" as a point of reference. The IMF integrated OFC assessment with the [Financial Sector Assessment Program \(FSAP\)](#), a joint effort of [IMF and the World Bank](#). The focus of FSAP assessments is twofold: to gauge the stability of the financial sector and to assess its potential contribution to growth and development, listed at Jurisdictions with Systemically Important Financial Sectors. These countries are important to stability in our overall global economy, but are not considered higher AML/CFT and are therefore not listed on this chart.
- 4C. The [International Narcotics Control Strategy Report \(INCSR\)](#) is an annual report by the Department of State. The report provides a snapshot of the AML/CFT infrastructure of each country or jurisdiction and its capacity to share information and cooperate in international investigations. Countries of primary concern identified by the US State Department as still being offshore financial centers in the [2016 Report's Volume II](#) are listed as "USDS OFC."
5. Financial Action Task Force (FATF) does not have any jurisdictions listed as Non-Cooperative Countries or Territories (NCCT) as of this update. The countries indicated above are identified as jurisdictions with strategic Anti-Money Laundering or Combating the Financing of Terrorism (AML/CFT) deficiencies. Refer to recent FinCEN Advisories in addition to [earlier advisories and other FATF guidance](#) for details and updates. **FinCEN** designation indicates countries involved in recent events that elevate the risk of increased assets movement or illicit finance threats. **X\*\* = Jurisdictions with AML/CFT deficiencies. X\* = Jurisdictions have strategic AML/CFT deficiencies and have not made sufficient progress addressing deficiencies.**
6. USA PATRIOT Act Section 311 authorized Treasury's designation of jurisdictions as "[Primary Money Laundering Concern](#)" to enforce Special Measures for Jurisdictions, Financial Institutions, or International Transactions. "Entities" in this column indicates the country is not designated, but specifically identified entities within the country are.
7. [International Monetary Fund summary of OFC services](#) last published March 2004 and the State Department's listing of [OFC services](#) **EC= Sells Economic Citizenship; IG = Internet Gaming; ST = Commit, threaten to commit, or support terrorism; BP - Blocked Property.** To compile a comprehensive list of jurisdictions allowing Internet Gambling, several sources were consulted. The [GAO Report](#) to Congress on Internet Gambling, December 2002, as well as comprehensive lists found on [Casino City](#) and [Internet Gambling - Google Answers](#). Countries in the State Department's [2016 Human Trafficking Report \(TIP\)](#) Countries whose governments do not fully meet the Trafficking Victims Protection Act's (TVPA) minimum standards, but are making significant efforts to meet those standards are identified as "TIP." The additional designation of "T3TIP" denotes Countries whose governments do not fully comply with the minimum standards and are not making significant efforts to do so. **BMPE = Countries with Black Market Peso Exchange activity and DF = Duty Free** trade zones which may be used in trade-based money laundering as highlighted in [FinCEN 2010-A001](#).

**NOTE: For reference only in complying with BSA/AML regulations. Not legal advice.**