

OEA/Ser.L/XIV.6.1 MEM/INF.2004 Add.27

# ORGANIZATION OF AMERICAN STATES Inter-American Drug Abuse Control Commission (CICAD)

Multilateral Evaluation Mechanism (MEM)
Governmental Expert Group (GEG)

# **SAINT LUCIA**

**EVALUATION OF PROGRESS IN DRUG CONTROL** 2003-2004



### INTRODUCTION

St. Lucia, the second largest of the Windward Islands, has a total area of 616 km² and 158 km of coastline; it is located at 13 53N, 60 68W. The island has a population of 164,213 (2004) which is primarily of African and mixed African-European descent with a small segment of East Indian and European descent. The literacy rate is 67%. English is the official language; however, the majority of the population speaks the local Creole dialect patois. St. Lucia is a parliamentary democracy and a member of the Commonwealth. It is divided into 11 administrative regions. The country has a GDP per capita of US\$2,542 and an inflation rate of three percent (2001). St. Lucia's exports total US\$66 million annually, which is 15.81 percent of the GDP (2003) relying on the principal exports of bananas, clothing, cocoa, vegetables, fruits, and coconut oil.

# I. INSTITUTIONAL BUILDING/NATIONAL ANTI-DRUG STRATEGY

# A. National Anti-drug Plan and National Commission

St. Lucia had an approved its National Anti-drug Plan with an expiration date of February 2005. The country informs that the Plan, when renewed, will continue to be implemented by its central national authority, the Substance Abuse Advisory Council Secretariat. The Plan receives funding by direct allocation of the central government, allocations from domestic agencies, and funds obtained from international sources. The total domestic budget for the plan, which is allocated as needed for various counter-drug measures, has decreased somewhat in the last three years from US\$97,728 in 2002 to US\$85,359 in 2004. St. Lucia reports that its current budget is not adequate to meet its needs, but that severely limited national resources prohibit additional funding.

CICAD is concerned that St. Lucia's National Anti-Drug Plan has expired and that a new plan has not been written and submitted for approval by national authorities. CICAD is also concerned that central funds for the Plan have decreased during the period under review.

#### **RECOMMENDATION:**

1. DEVELOP AND IMPLEMENT A NEW NATIONAL ANTI-DRUG PLAN.

#### B. International Conventions

St. Lucia has ratified the following Conventions:

- The Inter-American Convention against the Illicit Manufacturing of and Trafficking in Firearms, Ammunition, Explosives and Other Related Materials (1997).
- The Inter-American Convention against Corruption (1996).
- The United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances (1988).
- The United Nations Convention on Psychotropic Substances (1971).
- The United Nations Single Convention on Narcotic Drugs (1961).

St. Lucia has signed, but not ratified, the United Nations Convention against Transnational Organized Crime (2000) and its three Protocols. It has not signed or ratified the Inter-American Convention on Mutual Assistance in Criminal Matters (1992).



Although St. Lucia has made progress on acceding to international treaties, it has still not ratified the United Nations Convention against Transnational Organized Crime and its Three Protocols. Neither has it signed or ratified the Inter-American Convention on Mutual Assistance in Criminal Matters. Ratification of these two treaties are important steps in building the institutional framework necessary to combat international drug trafficking and criminal activity.

#### **RECOMMENDATIONS:**

- 2. RATIFY THE INTER-AMERICAN CONVENTION ON MUTUAL ASSISTANCE IN CRIMINAL MATTERS, A RECOMMENDATION REITERATED FROM THE FIRST EVALUATION ROUND, 1999-2000.
- 3. RATIFY THE UNITED NATIONS CONVENTION AGAINST TRANSNATIONAL ORGANIZED CRIME AND ITS THREE PROTOCOLS, A RECOMMENDATION REITERATED FROM THE SECOND EVALUATION ROUND, 2001-2002:
  - A) THE PROTOCOL AGAINST THE SMUGGLING OF MIGRANTS BY LAND, SEA AND AIR
  - B) THE PROTOCOL TO PREVENT, SUPPRESS AND PUNISH TRAFFICKING IN PERSONS, ESPECIALLY WOMEN AND CHILDREN
  - C) THE PROTOCOL AGAINST ILLICIT MANUFACTURING OF AND TRAFFICKING IN FIREARMS, THEIR PARTS AND COMPONENTS AND AMMUNITION

# C. National Information System

Although St. Lucia does not have a formal, centralized mechanism to compile drug-related statistics, it captures data through various agencies and reports this data to international organizations, including CICAD's Inter-American Uniform Drug Use Data System (SIDUC), CICAD's Uniform Statistical System on Control of the Supply Area (CICDAT), the International Narcotics Control Board (INCB), and the UNODC Annual Report Questionnaire. In the past, St. Lucia has provided data regarding illegal drugs and laboratories seized, area cultivated with illegal crops, and persons processed through the judicial system for drug-related crimes.

- St. Lucia distributes material relating to drug issues (including treatment and rehabilitation information) through a variety of public sources, although there is no dedicated budget for this purpose. Outlets for distribution of materials include print, radio, and television media, the Internet, official government publications, schools and universities.
- St. Lucia has made a fair effort to distribute material relating to drug abuse and demand reduction issues despite the lack of a dedicated budget for this purpose. The absence of a national drug observatory or an organized mechanism for centralized collection and sharing of all drug-related data, however, limits the effectiveness of St. Lucia's overall efforts to combat drug cultivation, trafficking and abuse.

#### **RECOMMENDATION:**

4. Develop a National Drug Observatory to collect, analyze, and maintain illegal drug control information, including statistics on the magnitude of drug consumption in the country, a recommendation reiterated from the First Evaluation Round, 1999-2000.



# II. DEMAND REDUCTION

#### A. Prevention

St. Lucia does not have a national system of drug abuse prevention programs to target key populations, although it is working on programs to target school children and inmates at its male juvenile correctional facility. St. Lucia is also implementing a CICAD supported "drugs in the workplace" program for the general public sector as well as workers in the tourism industry.

The country reports that during years 2002-2004 no professional education courses were offered in St. Lucia in drug abuse prevention, treatment, or research.

CICAD is concerned about the absence of prevention programs and professional training courses in drug prevention in St. Lucia. Although CICAD recognizes that St. Lucia has limited resources, prevention programs are an essential element of the counter-drug effort for the country.

#### **RECOMMENDATION:**

5. Develop and implement prevention programs to cover all key populations.

#### B. Treatment

St. Lucia has no established guidelines on standards of care for drug abuse treatment. The country informs that it operates one public drug treatment center, "Turning Point, Alcohol and Drug Detoxification and Rehabilitation Centre," which offers residential as well as outpatient services. The center offers treatment for men, women and children of all ages. In 2002, 77 sought and received drug treatment in this facility, 70 persons in 2003, and only eight in 2004. St. Lucia attributes the decrease in the number of persons receiving treatment to a decline in the outreach services provided by the Centre.

Treatment provided by "Turning Point" includes detoxification, rehabilitation, social reintegration and after care and self help groups, both in the public and private sectors. St. Lucia has not conducted an evaluation of the impact of early intervention, drug abuse treatment, and rehabilitation or after care programs.

St. Lucia reports that treatment facilities available in the country are not adequate to meet the national demand for treatment particularly as relates to aftercare. Nor is the country able to determine the number of persons who seek treatment who are denied because treatment facilities are so limited in the country.

CICAD is concerned that there are no minimum standards of care for drug treatment facilities and that no professional training courses in drug abuse treatment and/or research were offered in 2003 and 2004.

#### **RECOMMENDATIONS:**

- ESTABLISH MINIMUM STANDARDS OF CARE FOR PERSONS SEEKING TREATMENT FOR DRUG ABUSE.
- 7. PROVIDE TRAINING FOR PROFESSIONALS WORKING IN THE AREA OF DRUG ABUSE TREATMENT.



# C. Statistics on Consumption

St. Lucia does not have an estimate for the prevalence of drug abuse among the general population or specific populations. Also, the country does not possess official data on the average age of first use. The country also reports that it currently lacks methods to identify the number of drug-related deaths or drug-related morbidity among injecting drug users. Nor does St. Lucia have effective mechanisms to record data on drug and alcohol related to crime or in the workplace.

St. Lucia's limited number of demand reduction programs and the absence of a reliable method for gathering statistics or identifying trends in drug use are of considerable concern. Given the absence of statistics, it is difficult for CICAD to accurately evaluate the extent of the drug problem in the country.

#### III. SUPPLY REDUCTION

## A. Drug Production and Alternative Development

St. Lucia does not currently measure the area of illicit cannabis cultivation or the total area eradicated. Moreover, the country reports that no illicit laboratories for the production of organic or synthetic drugs were found in the country during 2003 and 2004.

Although St. Lucia does not have an alternative development program in the traditional sense, the country carries out integrated development to provide alternative livelihoods for persons who might otherwise engage in illegal drug activities. Efforts by St. Lucia in this area include such programs as educational opportunities and rural business credits.

CICAD encourages the St. Lucia to carry out a survey of illegal crop cultivations to determine the extent of the threat such cultivations pose to the national interest.

# B. Drug Supply and Control of Pharmaceutical Products and Chemical Substances

#### **Pharmaceutical Products**

St. Lucia's Ministry of Health, Human Services, Family Affairs, and Gender Relations has the principal responsibility for controlling licensing, production, exports, imports, distribution and diversion of pharmaceutical products listed in the United Nations Conventions. However, the country reports there is no formal mechanism in place to evaluate the effectiveness of controls on pharmaceuticals.

Although St. Lucia has penal and administrative sanctions, including fines, for the diversion of pharmaceuticals, the country reports that no law enforcement arrests, convictions or other sanctions were imposed during the two-year period under review.

Even though St. Lucia has a framework for controlling pharmaceuticals, it provided contradictory information with respect to penal and administrative sanctions. Moreover, since there was no reported law enforcement action in this area during the period under review, CICAD cannot properly evaluate the country's oversight for pharmaceuticals.



# **RECOMMENDATION:**

8. CREATE A DRUG INSPECTORATE TO MONITOR AND REGULATE THE USE AND DISTRIBUTION OF PHARMACEUTICAL PRODUCTS AND CONTROLLED CHEMICAL SUBSTANCES.

#### **Controlled Chemical Substances**

St. Lucia did not provide information on the operational scope of national entities responsible for controlling chemical substances or any information on national controls on precursors and essential chemicals. However, St. Lucia criminalizes the diversion of controlled chemical substances and reports that three seizures of controlled chemicals were made in 2004 (two for acetone and one for ethanol) while no such seizures were made in 2003.

CICAD is concerned about St. Lucia's inability to provide information regarding its methods for regulating controlled chemical substances as well as the country's apparent lack of a mechanism to comply with international treaties in this area.

# **RECOMMENDATION:**

9. ESTABLISH REGULATIONS ACCORDING TO INTERNATIONAL STANDARDS FOR THE CONTROL OF CHEMICAL SUBSTANCES, A RECOMMENDATION REITERATED FROM THE FIRST EVALUATION ROUND, 1999-2000.

#### IV. CONTROL MEASURES

#### A. Illicit Drug Trafficking

St. Lucia's legislation criminalizes drug trafficking and the possession of drugs for personal use. The country reports that the number of persons charged for illicit drug trafficking increased from 280 in 2002 to 532 in 2003. The number of persons arrested for illicit drug possession decreased from 780 in 2002 to 536 in 2003. While virtually all persons arrested for illicit drug possession in 2002 and 2003 were tried, St. Lucia did not provide information on the disposition of these cases or any of those related to drug trafficking in the same timeframe. St. Lucia provided no related statistics for 2004 in either category.

St. Lucia states that it facilitates the exchange of operational information among national authorities responsible for controlling illicit drug trafficking through joint forces, operations and training. However, according to the country, there is currently no mechanism to monitor the effectiveness of the system for sharing enforcement information. St. Lucia did not provide information on judicial cooperation with other countries to investigate and convict drug traffickers or on the number of extradition requests made and received related to drug trafficking.

Cannabis, including resin, leaf and plants, is the main drug seized in St. Lucia, although no specific statistics were provided. In 2002, St. Lucia also seized 164 kg of cocaine hydrochloride during 19 seizure operations; in 2003, that quantity increased to 394.97 kg during 25 seizures. In 2004, 54.23 kg of cocaine hydrochloride were seized during 14 seizures. Crack cocaine seizures decreased from 1.17 kg (54 seizures) in 2002 to 986 grams (27 seizures) in 2003. In 2004, 1.02 kg of crack cocaine were seized during 20 seizures.



CICAD is not able to evaluate the effectiveness of the country's actions to prevent illicit drug trafficking and/or possession due to the absence of statistics regarding the number of persons convicted in connection with such crimes.

#### B. Firearms and Ammunition

St. Lucia reports that the responsibility for the control of firearms and related materials lies with the St. Lucia police force which is responsible for maintaining records, issuing of import, export and in-transit licenses, exchange of information within the country among relevant national institutions and the exchange of relevant information with counterpart law enforcement agencies in other countries.

The country informs that the Firearms Act No. 9 of 2003 is the national law that criminalizes the illicit possession, trafficking and manufacture of firearms. Sanctions include minimum fines of approximately US\$3,750, and jail sentences ranging from 3 years for trafficking and manufacture and 5 years for possession, to a maximum of 10 years.

However, the country reports that no requests to foreign countries for information concerning shipments of firearms, ammunition, explosives, or other related materials were made by St. Lucia or received from other countries in 2002 and 2003. Computerized records on the import and export of firearms and related materials are maintained for five years, according to St. Lucian authorities.

While St. Lucia reports on the specific entities charged with specific responsibilities with respect to firearms and related materials, at the same time the country states that there is no mechanism to evaluate the effectiveness of controls.

St. Lucian law requires that firearms be marked at the time of manufacture, for importation, and when officially used after confiscation or forfeiture.

St. Lucia reports that 55 persons were arrested and charged for illicit possession and trafficking of firearms and ammunition in 2002, and 62 were arrested and charged for these offenses in 2003. However, the country did not specify the number of convictions on these charges. There were no arrests, charges, or convictions for illicit possession and trafficking of explosives in the period under review.

In addition to the police, the Customs and Excise Department and the St. Lucia Air and Sea Ports Authority are jointly responsible for confiscation or forfeiture of illegally trafficked firearms and related materials. St. Lucia reports that it seized a total of five firearms in 2003 and 2004 (four in 2003; and one in 2004) in the course of three arrests for illicit drug trafficking offenses. No ammunition or explosives were seized.

CICAD recognizes St. Lucia's efforts to control illegal activity with respect to firearms. However, given the limited amount of information provided, it is difficult to properly evaluate the country's efforts in this area.

#### C. Money Laundering

St Lucia reports that the Money Laundering (Prevention) Act of 2003, and the Proceeds of Crime Act of 1993, are the National Laws that criminalize money laundering and provide sanctions for non-compliance. Money laundering is considered an autonomous crime in St. Lucia and a person



can be convicted of money laundering without being charged with a predicate offense. Predicate offenses in the money laundering law include Illicit drug trafficking, trafficking in firearms, trafficking in human beings, prostitution, kidnapping, extortion, corruption, terrorism and its financing, fraud, robbery, blackmail, counterfeiting, forgery, gambling, illegal deposit taking and theft. The law does not include organ trafficking and pornography offenses. There are also no provisions in the law for special investigative techniques as they pertain to money laundering.

The country reports that there are administrative controls to prevent money laundering in banks, offshore banks, stock exchanges, insurance concerns, casinos, real estate, cross border movements of currency and negotiable bearer instruments, jewelry businesses, internet gaming and betting operations. However, these controls do not include lawyers, notaries, and accountants. Sanctions under the Proceeds of Crime Act 1993 can range up to US\$50,000.

The country also informs that bank documents and/or financial records can be provided in money laundering investigations for financial intelligence and indictment purposes. In 2003, 28 bank documents and/or financial records were provided in two money-laundering cases. There were no forfeitures of property for money laundering from 2003 to 2004.

It is mandatory for financial institutions to report suspicious or unusual transactions; however, there are no laws to exempt financial institutions and others responsible from liability for reporting suspicious transactions in accordance with the obligating law. It is also mandatory for financial institutions to abide by control measures including client registry, verification of client identity, transaction registry, preservation of records, existence of enforcement officials, existence of independent audits, know-your-client policies, know-your-employee policies, prohibition of anonymous accounts, and training of staff to recognize and handle suspected money laundering transactions.

St. Lucia's Financial Intelligence Authority (FIA) is an autonomous unit with its own budget allocation of US\$139,852 per year. Its principal functions include investigation, analysis and reporting of suspicious financial activity to the police and other competent authorities such as the Director of Public Prosecutions as well as foreign counterparts. Communications by the FIA do not require any formal bilateral agreements. The FIA can also directly consult bank accounts. Currently, the FIA is not a member of the Egmont Group.

The FIA is also the entity responsible for the management and/or disposition of assets seized and forfeited for illicit drug trafficking and money laundering offenses. However, the country reports that there were no properties managed (seized or forfeited) during years 2002 through 2004.

The FIA dealt with 18 financial disclosures in 2003 and 8 in 2004. Moreover, the country reports that there were 18 suspicious transactions reported in 2003 and 3 in 2004. Data from St. Lucia reveals that 10 investigations relating to suspicious financial reports were conducted in 2003 and 3 were conducted in 2004. However, there were no criminal charges or convictions for money laundering between 2002 and 2004. Nor were there any sanctions imposed on financial institutions or other responsible entities for failure to report suspicious transactions.

While extradition of nationals is not permitted under national laws, St. Lucia did not report whether or not there are exceptions in the law for extradition of nationals in cases related to money laundering or transnational crimes allegedly involving money laundering.

St. Lucia reports that there are provisions in international cooperation treaties to facilitate requests to and from other countries for the freezing of assets in money laundering cases, but no requests were made by St. Lucia from 2003 through 2004. One request was received in 2003 from another country to freeze assets relating to a money laundering case. There were no requests



made or received for bank documents and/or financial records during the same two-year period. The country reports that there are no formal provisions in international cooperation treaties to facilitate requests to or from other countries for the lifting of bank secrecy in money laundering cases.

The country reports that three administrative officials received specialized training to enforce laws controlling money laundering in 2003 and two in 2004. No judges received specialized training to administer money laundering cases during the period under review.

St. Lucia has a basic framework of laws in place to combat money laundering, and its efforts to expand that framework are encouraging. There are, however, gaps in this framework, such as the inability to use special investigation techniques in money laundering cases. Moreover, CICAD notes that practical implementation of the two national money laundering laws is very limited inasmuch as there were no criminal charges or convictions brought against any suspect for money laundering between 2002 and 2004.

# **RECOMMENDATIONS:**

- 10. EXPAND THE LIST OF INDIVIDUALS SUBJECT TO ADMINISTRATIVE CONTROLS TO PREVENT MONEY LAUNDERING, TO INCLUDE LAWYERS, NOTARIES AND ACCOUNTANTS.
- 11. ENACT LAWS AUTHORIZING SPECIAL INVESTIGATIVE TECHNIQUES IN MONEY LAUNDERING CASES.
- 12. PROVIDE APPROPRIATE TRAINING FOR ADMINISTRATIVE AND LEGAL OFFICIALS RESPONSIBLE FOR INVESTIGATING AND PROCESSING MONEY LAUNDERING CASES.

#### D. Corruption

St. Lucia criminalizes various forms of public corruption in the Integrity in Public Life Act, as required by the Inter-American Convention Against Corruption, including: (1) the solicitation or acceptance of a bribe by a government official; (2) the offering or granting of a bribe to a government official; (3) an act or omission by a government official for the purpose of illicitly obtaining benefits for himself or for a third party; (4) fraudulent use or concealment of property derived or obtained through corruption; (5) illicit enrichment of a government official; (6) embezzlement by a government official; (7) any act or omission by any person who seeks to illicitly obtain a decision from a public authority, any benefit or gain; and (8) diversion of assets managed by a government official for his own benefit. There have been no officials arrested, tried, or convicted to date under this new law.

St. Lucia does not criminalize transnational bribery by a government official or improper use by a government official of confidential information.

St. Lucia did not provide any information related to public officials arrested, charged or convicted for corruption related to drug trafficking.

Although St. Lucia has criminalized many forms of corruption, consistent with the Inter-American Convention Against Corruption, it still lacks legislation criminalizing transnational bribery by a government official and improper use by a government official of confidential information. CICAD cannot evaluate the country's progress in this area because no information was provided on practical law enforcement activities.



# **RECOMMENDATION:**

13. ENACT LEGISLATION CRIMINALIZING TRANSNATIONAL BRIBERY BY A GOVERNMENT OFFICIAL AND IMPROPER USE BY A GOVERNMENT OFFICIAL OF CONFIDENTIAL INFORMATION.

# E. Organized Crime

St. Lucia reports that transnational organized crime is not criminalized as a separate category of crime; however, police can take law enforcement action against underlying criminal activity based upon existing laws.

CICAD's ability to evaluate St. Lucia's law enforcement efforts against transnational organized crime is limited by the absence of statistical information about specific law enforcement cases.



# V. CONCLUSIONS

CICAD recognizes that St. Lucia has made some progress in strengthening its counter-drug efforts, but the Commission is concerned that a national anti-drug plan is not currently in place. To promote future progress, St. Lucia specially needs to develop a mechanism for collecting data that permits it to accurately identify the nature and scope of its drug-related problems. Such data would also assist St. Lucia in efficiently allocating its limited human and financial resources. As a small country, St. Lucia acknowledges that many of its demand reduction programs do not fully meet the needs of its population.

The country still needs to ratify three major international conventions. In addition, St. Lucia should update relevant laws and regulations to strengthen controls on chemicals, pharmaceuticals, money laundering, public corruption and transnational organized crime. CICAD notes that in St Lucia there has been only limited concrete law enforcement action (arrests, trials and convictions) in these areas. At the same time, CICAD acknowledges the country's enactment of a new Firearms law in 2003 to help curve illicit activity in this area.

St. Lucia's supply reduction efforts apparently focus on the seizure and eradication of cannabis, which appears to be the primary drug of concern in the country. Statistics indicate, however, that cocaine is also trafficked in the country. Lack of concrete data in this area also hampers CICAD's ability to analyze the scope of the problem.

CICAD recognizes that St. Lucia continues to participate in the MEM process and has demonstrated a willingness to engage in a transparent evaluation of its counter narcotics and anticrime efforts.



# VI. SUMMARY OF RECOMMENDATIONS

The following recommendations are assigned to St. Lucia in order to assist the country in strengthening its policies to combat the problem of drugs and related activities and increase multilateral cooperation in the Hemisphere:

#### **INSTITUTIONAL BUILDING**

- 1. DEVELOP AND IMPLEMENT A NEW NATIONAL ANTI-DRUG PLAN.
- 2. RATIFY THE INTER-AMERICAN CONVENTION ON MUTUAL ASSISTANCE IN CRIMINAL MATTERS, A RECOMMENDATION REITERATED FROM THE FIRST EVALUATION ROUND, 1999-2000.
- 3. RATIFY THE UNITED NATIONS CONVENTION AGAINST TRANSNATIONAL ORGANIZED CRIME AND ITS THREE PROTOCOLS, A RECOMMENDATION REITERATED FROM THE SECOND EVALUATION ROUND, 2001-2002:
  - A) THE PROTOCOL AGAINST THE SMUGGLING OF MIGRANTS BY LAND, SEA AND AIR
  - B) THE PROTOCOL TO PREVENT, SUPPRESS AND PUNISH TRAFFICKING IN PERSONS, ESPECIALLY WOMEN AND CHILDREN
  - C) THE PROTOCOL AGAINST ILLICIT MANUFACTURING OF AND TRAFFICKING IN FIREARMS, THEIR PARTS AND COMPONENTS AND AMMUNITION
- 4. Develop a National Drug Observatory to collect, analyze, and maintain illegal drug control information, including statistics on the magnitude of drug consumption in the country, a recommendation reiterated from the First Evaluation Round, 1999-2000.

#### **DEMAND REDUCTION**

- 5. Develop and implement prevention programs to cover all key populations.
- 6. ESTABLISH MINIMUM STANDARDS OF CARE FOR PERSONS SEEKING TREATMENT FOR DRUG ABUSE.
- 7. Provide training for professionals working in the area of drug abuse treatment.

### **SUPPLY REDUCTION**

- 8. CREATE A DRUG INSPECTORATE TO MONITOR AND REGULATE THE USE AND DISTRIBUTION OF PHARMACEUTICAL PRODUCTS AND CONTROLLED CHEMICAL SUBSTANCES.
- 9. ESTABLISH REGULATIONS ACCORDING TO INTERNATIONAL STANDARDS FOR THE CONTROL OF CHEMICAL SUBSTANCES, A RECOMMENDATION REITERATED FROM THE FIRST EVALUATION ROUND, 1999-2000.



# **CONTROL MEASURES**

- 10. EXPAND THE LIST OF INDIVIDUALS SUBJECT TO ADMINISTRATIVE CONTROLS TO PREVENT MONEY LAUNDERING, TO INCLUDE LAWYERS, NOTARIES AND ACCOUNTANTS.
- 11. ENACT LAWS AUTHORIZING SPECIAL INVESTIGATIVE TECHNIQUES IN MONEY LAUNDERING CASES.
- 12. PROVIDE APPROPRIATE TRAINING FOR ADMINISTRATIVE AND LEGAL OFFICIALS RESPONSIBLE FOR INVESTIGATING AND PROCESSING MONEY LAUNDERING CASES.
- 13. ENACT LEGISLATION CRIMINALIZING TRANSNATIONAL BRIBERY BY A GOVERNMENT OFFICIAL AND IMPROPER USE BY A GOVERNMENT OFFICIAL OF CONFIDENTIAL INFORMATION.