# Moving Money

Inside the global watchlist for banking across borders



Tom Wills (UK) Times of London





Eveline Lubbers (Netherlands) Argos & OneWorld



Jasmin Klofta (Germany) PANORAMA (NDR/ARD)

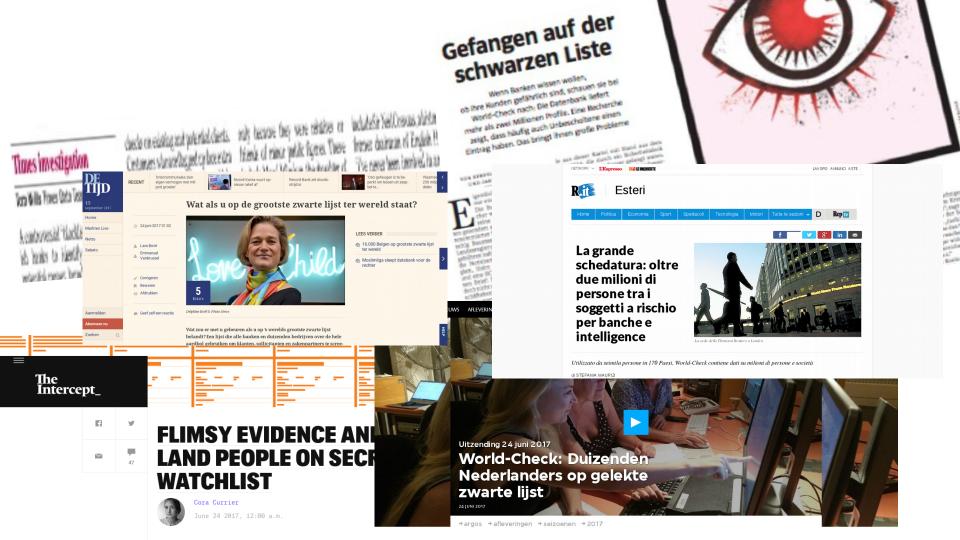
> Stefania Maurizi (Italy) La Repubblica



Lars Bové (Belgium) De Tijd



Cora Currier (USA) The Intercept



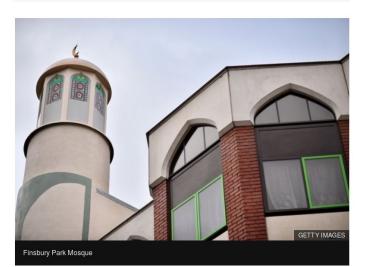


#### Why did HSBC shut down bank accounts?

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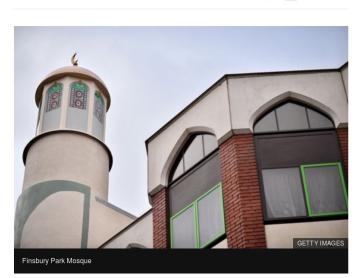
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#### Why did HSBC shut down bank accounts?

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VICE News Reveals the Terrorism Blacklist Secretly Wielding Power Over the Lives of Millions



By Namir Shabibi and Ben Bryant February 4, 2016 | 1:20 pm

An American Muslim civil rights leader praised by George W. Bush, an economist honored by the British Queen, and a prominent anti-extremism campaigner have all been secretly given a "terrorism" designation on a confidential database that banks use as a reference tool for blacklisting customers, a VICE News investigation can reveal.

#### THOMSON REUTERS WORLD-CHECK ONLINE

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# **Thomson Reuters World-Check**

### FIND HIDDEN RISK





Since 2000, World-Check has been used for KYC compliance and to help identify relationship, reputational, and AML/CFT risks by providing highly structured intelligence profiles of heightened risk individuals and entities globally.



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Intelligence is sourced from hundreds of thousands of reputable sources in the public domain – and our researchers are bound to comply with strict research criteria and must remain objective at all times. This process is subject to thorough quality control procedures and is audited regularly.



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# World Check

- adds 20,000 profiles a month
- updates 40,000 profiles a month



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Assistant Research Associate Job

Date: Aug 25, 2015

Location: Washington, DC, US

Title:Assistant Research Associate ID:15001286

Description

Thomson Reuters (GRC) Inc. 1100 13th Street, NW Suite 200, Washington D.C. 20005 Assistant comprehensive commercially-available database on high-risk and heightened risk individuals and 100s of regulatory and enforcement organizations, World-Check empowers customers to comply



provide compliance support. Edit and manage World-Check Risk Intelligence database of Politically Exposed Persons (PEPs), terrorist groups and State-Owned Enterprise (SOE) with a focus in the Middle East. Conduct comprehensive research and write risk analysis with a keen understanding of the geopolitical complexities and the security situations in the Middle East. Create monthly more than 220 of highly-structured and sourced biographical intelligence profiles. Help clients effectively and efficiently adhere to established financial and economic sanctions Help clients effectively and efficiently adhere to established financial and economic sanctions format, easy-to-read profiles of individuals and entities. Communicate with other units of

Assistant Research Associate Job

Date: Aug 25, 2015

Location: Washington, DC, US

Title:Assistant Research Associate ID:15001286

Description

Thomson Reuters (GRC) Inc. 1100 13th Street, NW Suite 200, Washington D.C. 20005 Assistant comprehensive commercially-available database on high-risk and heightened risk individuals and 100s of regulatory and enforcement organizations, World-Check empowers customers to comply



#### Gold standard that defined an industry

#### OVER A DECADE IN THE MAKING

Founded in 1999 to meet the Swiss banking community's KYC requirements, World-Check data pioneered the provision of open source intelligence for customer database entity screening. Today,

#### **RISK SOLUTION ECOSYSTEM**

Risk Management solutions from Thomson Reuters are optimised to use World-Check data and enable excellent integration, simplicity of workflow and the best possible content. Solutions include:

in 170 countries

global law firms

300+ Government

& intelligence

agencies

# Then, there was a leak.

# **Chris Vickery**



Foto: Medium.com



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#### Terrorism Blacklist: I have a copy. Should it be shared? (self.privacy)

eingereicht vor 1 Jahr \* von FoundTheStuff

About me: Hello, my name is Chris Vickery. In the recent past I have discovered dozens of databases consisting of voter registries, medical histories, insurance records, Hello Kitty fan accounts, and much more. A quick googling can provide additional info.

When private data is involved, I always do my best to get the database secured before disclosing news of the exposure. However, this brand new find is a different kind of animal. It appears to all be sourced from publicly available material (although I'm certain someone will correct me if I'm mistaken about that).

What I just recently found: A few years ago, Thomson Reuters purchased a company for \$530 million. Part of this deal included a global database of "heightened-risk individuals" called World-Check that Thomson Reuters maintains to this day. According to Vice.com, World-Check is used by over 300 government and intelligence agencies, 49 of the 50 biggest banks, and 9 of the top 10 global law firms. The current-day version of the database contains, among other categories, a blacklist of 93,000 individuals suspected of having ties to terrorism.

#### I have obtained a copy of the World-Check database from mid-2014.

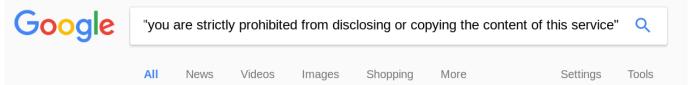
No hacking was involved in my acquisition of this data. I would call it more of a leak than anything, although not directly from Thomson Reuters. The exact details behind that can be shared at a later time.

This copy has over 2.2 million heightened-risk individuals and organizations in it. The terrorism category is only a small part of the database. Other categories consist of individuals suspected of being related to money laundering, organized crime, bribery, corruption, and other unsavory activities.

### World-Check.json

# Field list

id revision entity type first name surname aliases position category sub-category date of birth country citizenship locations information text linked to linked companies source urls date entered date updated



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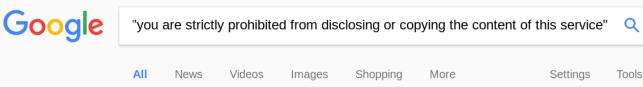
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World-Check Page 1 of 2 481602 WORLD-CHECK REDUCING RISK THROUGH INTELLIGENCE Legal Notice You are strictly prohibited from disclosing or copying the content of this service to third parties excluding regulatory agencies. our client Please note (1) General Legal Notice (2) Category Legal Notice (3) Reported Link Legal Notice USER: Miny105 PRINTED: 10-06-2008 16:14 CET LAST NAME: COSENTINO DA CUNHA CATEGORY(2): POLITICAL INDIVIDUAL FIRST NAME: Eduardo SUBCATEGORY: PEP OFFICIAL LIST(S): ALIAS(ES): CUNHA, Eduardo ALTERNATIVE SPELLING: TITLE: **POSITION:** Federal Deputy AGE: 49 DOB: 1958/09/28 PLACE OF BIRTH: Rio de Janeiro, Brazil DECEASED: PASSPORT(S): SSN: COUNTRY: BRAZIL (BR) LOCATION(S): State of Rio de Janeiro ~ BRAZIL COMPANY(IES) REPORTED IN SOURCES BELOW:

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THE FOLLOWING INFORMATION WAS REPORTED IN ONE (	DR MORE OF THE SOURCES BELOW:
[BIOGRAPHY] Federal Deputy Member of the Chamber of Deputies, representin de Janeiro State (2001-2003). Member of Partido do Movimento	g Rio de Janeiro State (2003-2007) (2007-2011). State Deputy for Rio Democrático Brasileiro (PMDB). Economist.
[IDENTIFICATION] Son of Elcy Teixeira da Cunha and Elza Cosentino da Cunha.	
[REPORTS] Oct 2007 - reportedly failed to declare profit on property sale and (US\$100,000). Denied all accusations.	d re-purchase deal reportedly involving Juan Carlos Ramírez Abadía
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Number of people in World-Check by country											
	Non-PEPs	PEPs	relatives		Non-PEPs	PEPs	relatives		Non-PEPs	PEPs	relatives
USA	288,925	33,425	53,034	FRANCE	1,526	11,629	895	GUATEMALA	4,423	3,599	424
BRAZIL	83,299	82,854	6,533	CHILE	3,664	7,607	2,545	ECUADOR	1,511	5,761	1,075
CHINA	44,774	47,472	1,040	POLAND	2,832	9,365	1,115	EGYPT	2,866	4,807	500
MEXICO	28,825	56,594	2,657	BANGLADESH	4,828	7,140	1,214	KAZAKHSTAN	2,072	4,896	1,077
UK	62,433	15,100	7,625	SERBIA	6,612	5,495	443	HONG KONG	5,001	2,510	278
INDIA	50,124	22,014	12,867	VIET NAM	5,131	6,449	802	KOREA, SOUTH	1,298	5,232	1,038
ITALY	54,020	19,193	4,555	SWITZERLAND	664	9,758	1,898	BELGIUM	624	5,636	1,184
RUSSIAN FED.	23,601	35,382	2,841	UNKNOWN	8,528	2,527	738	CZECH REPUBLIC	2,300	4,049	1,071
COLOMBIA	36,405	13,397	1,731	MALAYSIA	5,397	4,882	1,067	<b>BOSNIA &amp; HERZEGOV</b>	4,450	2,792	164
CANADA	25,101	9,144	5,784	THAILAND	3,209	4,474	3,624	PORTUGAL	961	5,596	423
PERU	7,080	25,956	1,139	TURKEY	5,458	4,109	1,707	NETHERLANDS	1,043	4,725	778
ARGENTINA	4,016	26,605	3,442	TAIWAN	6,858	3,663	668	GEORGIA	2,619	2,432	1,000
SPAIN	4,855	18,708	863	UKRAINE	1,236	7,014	2,637	CROATIA	2,730	3,087	215
GERMANY	2,193	17,012	3,213	EL SALVADOR	8,124	2,308	271	LITHUANIA	1,943	2,502	1,402
ROMANIA	10,715	7,826	2,252	SOUTH AFRICA	4,349	5,474	877	COSTA RICA	535	3,634	1,571
IRELAND	16,525	2,475	934	BOLIVIA	1,804	8,047	526	AUSTRIA	472	3,891	1,344
JAPAN	11,748	7,009	558	URUGUAY	1,716	7,295	564	PUERTO RICO	3,845	1,272	465
PAKISTAN	8,697	6,521	1,292	DOMINICAN REP.	3,331	3,490	2,743	BULGARIA	1,202	3,618	691
AUSTRALIA	7,397	4,159	4,883	ALBANIA	7,287	1,617	308	NEW ZEALAND	2,488	1,958	1,033
INDONESIA	4,093	8,877	3,399	HUNGARY	1,266	4,954	2,872	GREECE	1,449	2,264	1,679
NIGERIA	7,077	8,440	681	PARAGUAY	3,339	4,990	720	KENYA	1,389	3,440	319
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PHILIPPINES 4488 10,267 1151 HONDURAS 3549 4,905 NEPAL Countries with at least 5,000 entries. Non-PEPs are individuals not designated as Politically Exposed Persons. PEPs are Politically Exposed Persons, not including relatives of other PEPs. PEP relatives are people designated as relatives of other PEPs.

Source: @TomWills analysis of a leaked copy of the World-Check database as it stood in 2014



Greenpeace protesting the "Star Wars" missile-defense program in 2001



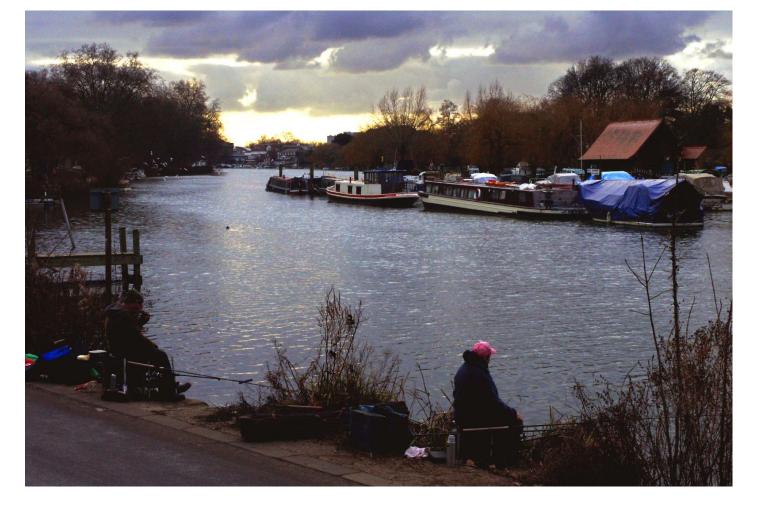


Photo: <u>SeaDave</u> on Flickr. Reproduced under the Creative Commons Attribution 2.0 Generic license.



Photo: Kreepin Death on Wikimedia. Used under the Creative Commons Attribution 3.0 Unported license.

#### Yogan Yoganathan MBE

St Mark's, Surbiton Neighbourhood



Email: Yogan.Yoganathan@kingston.gov.uk

Phone: 020 8390 5630

Address: Liberal Democrat Group Office Guildhall Kingston Upon Thames KT1 1EU

#### Responsibilities

Opposition spokesperson for Partnerships

#### **Election statement 2014**

I have lived in Surbiton for over 42 years, and been a Liberal Democrat member since 1992. I've been married for 37 years, with a 34 year old son, who was a former Councillor in Berrylands Ward, and we have two beautiful grand children aged 3 and 2 years and we fully enjoy

#### Yogan Yoganathan MBE

#### St Mark's, Surbiton Neighbourhood



Email: Yogan.Yoganathan@kingston.gov.uk

Phone: 020 8390 5630

Address: Liberal Democrat Group Office Guildhall Kingston Upon Thames KT1 1EU

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Since 2000, World-Check has been used for KYC compliance and to help identify relationship, reputational, and AML/CFT risks by providing highly structured intelligence profiles of heightened risk individuals and entities globally.

Intelligence is sourced from hundreds of thousands of reputable sources in the public domain – and our researchers are bound to comply with strict research criteria and must remain objective at all times. This process is subject to thorough quality control procedures and is audited regularly.

# **U**ikipedia

#### WikipediA Die freie Enzyklopädie Deutsch English 2 131 000+ Artikel 5 530 000+ articles Русский 日本語 1 439 000+ статей 1 087 000+ 記事 W Español Français 1 372 000+ artículos 1 936 000+ articles a 維 Italiano 中文 981 000+ 條目 1 404 000+ voci 3 Português Polski 985 000+ artigos 1 255 000+ haseł DE 🗸 Q

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## **Conspiracy Sites**

### Cyberclass.net

TILL OF ADOL 11.1.10 unde usum in une juce of a corrigin government enuals risks of num in orge una invest ones, to choose to ao nonning is to surrender one's self-image of standing for principles. MOST PEOPLE DO NOT HAVE THE COURAGE TO FACE THAT CHOICE. Hence, most propagande is not designed to fool the critical thinker but only to give MORAL COWARDS an excuse not to think at all." -- Michael Rivero

> A must read .. www.911cxposed.com and www.bonkworid.org/vtc/wtc.html and www.whatreallyhappened.com and http://members.home.net/daru-salam/English.htm and www.flight92reah.com and http://www.propagandamatrix.com/atrocities\_1.html

#### More information posted at this URL: www.cyberclass.net/dayafter.htm

In what authorities want us to believe was a coordinated terrorist attack (but many believe otherwise) two planes struck the World Trade Center in New York City on Tuesday, September 11th, 2001 while another plane struck the Pentagon in Washington, D.C and a fourth plane was shot down in Pennsylvannia.

You will no doubt read the mainstream medias account of these tragic events with their spin. Now I invite you to read some accounts from the alternative media. It will give you a different slant on what the manstream media is and has been telling you.

We are being 'duped' into World War III - The DUPE War cause it's about Drugs, Usury, Petroleum and Egos. Afghanistan is the opium breadbasket of the 'usury' elite who must destroy 'usury/free' Islamic banking before they can impose their one word' usury 'hant. There's many stories behind the stories about the trillion dollar petroleum piptine that the 'usury' elite want to install in Afghanistan and there's so many stories on the political word's agree who let their egos can their hard waynoe who believes that World War III is about terrorism is being 'duped'.

Each of the alternative media sources listed below has either print or video reports along with commentaries. I invite you to search the internet for other alternative media sources and share whatever you find. I

## 3.

## State-Run/ Propaganda Sites



#### **Commentary: Tibetan Youth Congress is a terror group**

(chinadaily.com.cn) Updated: 2008-04-15 11:02

World terrorist organizations like Al-Qaida are notorious for criminal activities including bombing and hijacking to achieve their ugly aims. The terror groups often target and victimize innocent lives. Few people in the world have ever heard of the Tibetan Youth Congress (TYC). It is not until the Lhasa Riot on March 14 that people in the world began to know this terrorist group.



anton beating, stabbing, arsoning and killing, in which 18 innocent lives including an inf

The wanton beating, stabbing, arsoning and killing, in which 18 innocent lives including an infant and five ethnic Chinese and Tibetan girls working at a clothing store in central Lhasa, have shed a light on

## 2.

### Race-hate sites



### TAG: BLACK CRIME



#### Video: Black Suspects Stalk Robbery Victim in Philadelphia, Break His Jaw And Inflict Head Injuries

WPVI-TV reports that a vicious robbery and assault took place in North Philadelphia on June 27 and police are looking for three black teenage suspects: Police are looking for 3 teenage suspects caught on camera beating and robbing a man in North

by BREITBART NEWS 5 Jul 2016, 1:40 PM PST 37



#### Sarah Palin: 'I'm Suing' Azealia Banks for Her Gang-Rape Demands: 'Put the Fear of God in Her by Holding Her Accountable'

Sarah Palin vowed to sue Azealia Banks over comments the rapper made on Twitter Monday calling for the former Alaska governor and Republican vice presidential nominee to be gang-raped by black men. In a statement provided to People magazine, Palin

#### by DANIEL NUSSBAUM 5 Apr 2016, 5:11 PM PST 530



#### Report: Career Criminal Accused of Assaulting Victim, Calling Her 'White Bitch'

NEW YORK POST: The career criminal accused of slashing a woman on her way to work at Whole Foods on Wednesday is also suspected of striking a 25-year-old victim on the head with a bottle while calling her a "white bitch," police sources said.

#### by BREITBART NEWS 9 Jan 2016, 7:33 AM PST 1,057



#### Tyshawn Lee: The Real 'Hands Up, Don't Shoot' that Black Lives Matter Ignores

The death of Michael Brown brought the birth of "Hands up, don't shoot," the media-fuelled fallacy and force behind a Black Lives Matter movement that flat-out ignores the main driver of Black America's morass.



## Neonazi Site

### Stormfront



live to Stormfront Radio with Don Black & Friends Followed by Dr. David Duke. Weekdays 9:00-11:00am ET | <u>Archives</u>

e White Nationalists who support **true** diversity and a homeland for **all** peoples. Thousands of of non-White minorities. We promote ours.

#### e voice of the new, embattled White minority!

ction to Stormfront. You are also welcome to browse our other ten million posts, but you must Forums.

Tell the truth and fear no one!

### news site = conspiracy site = state-run site = extremist sites

#### 1) General Legal Notice

\* All information identified or correlated in this profile, appears in the listed sources. We are not responsible for the content of third party sites or sources. Information correlated is necessarily brief and should be read by users in the context of the fuller details available in the external sources to which hypertext links are provided. Users should also carry out independent checks in order to verify the information correlated.

MPC1\_20150603\_026\_0105

**4 8 1 6 0 2** Source: Veja magazine (Brazil)

#### 2) Category Legal Notice

Category is based on information contained in the sources provided.

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## Andrej Holm

- renowned sociologist
- for a short time Housing Secretary in the Berlin state government





## Andrej Holm

"I have a bad feeling when my life is recorded there without me being aware of it or having any influence on it."



## The **co-operative** bank

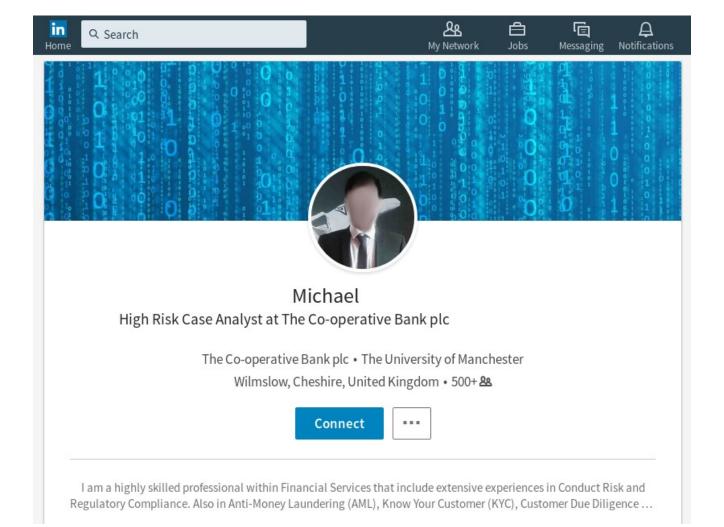
Q. Please could you confirm that the Co-op Bank has used World Check as part of its antimoney laundering procedures?

## The **co-operative** bank

Q. Please could you confirm that the Co-op Bank has used World Check as part of its antimoney laundering procedures?

A. "I can confirm that The Co-operative Bank doesn't use, and has not used World Check."

### site:linkedin.com "world-check" "co-operative bank"





Q Search

My Network

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Jobs

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Messaging

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Notifications

Reporting any suspicious activity through internal systems to the Nominated Officer and 2nd Line.

co-operative

#### AML Analyst / Quality Assurance The Co-operative Bank plc Mar 2015 - Dec 2015 • 10 mos

Manchester, United Kingdom

I worked on an AML De-risking and Remediation Project that involved Investigating and Quality Controlling in identifying potential Commercial and Retail Bank Customers who were Politically Exposed Person (PEP), Special Interest Person (SIP), Relative or Close Associates (RCA), Sanction Individuals. I also Investigated and Quality Controlled bank customers who were Charities, Money Service Bureaus (MSB's) and Dissolved Companies to determine level of risk they posed to the bank.

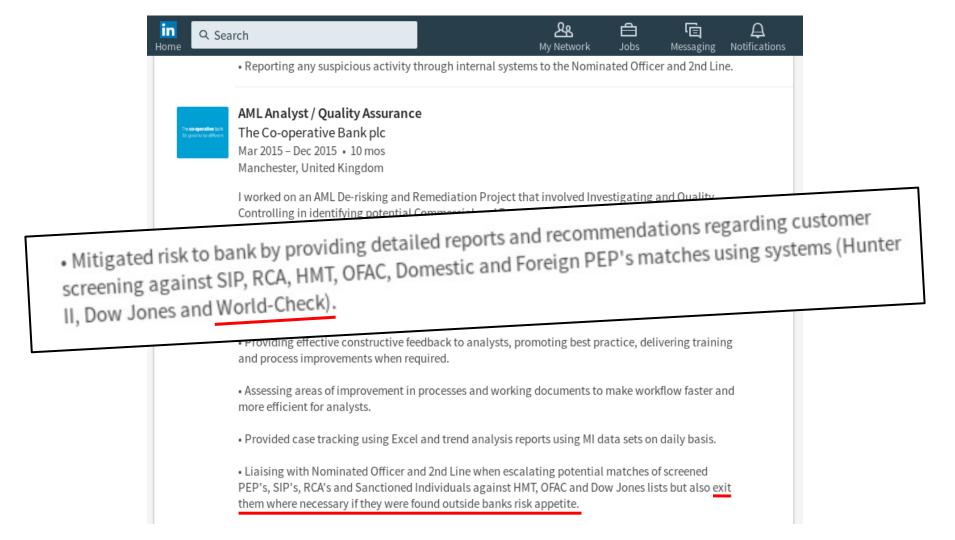
 Quality Control of customer screening investigations worked by analysts ensuring accurate quality were met whilst adhering to the banks control standards and legislation.

 Providing effective constructive feedback to analysts, promoting best practice, delivering training and process improvements when required.

 Assessing areas of improvement in processes and working documents to make workflow faster and more efficient for analysts.

Provided case tracking using Excel and trend analysis reports using MI data sets on daily basis.

 Liaising with Nominated Officer and 2nd Line when escalating potential matches of screened PEP's, SIP's, RCA's and Sanctioned Individuals against HMT, OFAC and Dow Jones lists but also exit them where necessary if they were found outside banks risk appetite.



## The **co-operative** bank Q. See LinkedIn profile attached.

## The **co-operative** bank

## Q. See LinkedIn profile attached.

A. "I can confirm that we do not use World Check and any access to that database the bank had was in excess of five years ago."

## World-Check's response

## Why has this happened?

From:

Sent: Tuesday, May 21, 2002 4:47 PM

To: regcomments@fincen.treas.gov

Subject: Attn. Section 352 AMLP Regulations

DATE: May 21, 2002

ATTENTION: Section 352 AMLP Regulations

Per guidelines stipulated in 31 CFR Part 103 I am submitting comments regarding the interim final rules issued by FinCEN on April 29, 2002.

My name is **Example** and I am the general counsel for a company named World-Check. It is my job responsibility in part to understand and follow the evolution of the USA Patriot Act. My company, World-Check, helps financial institutions avoid money laundering. I therefore have also been in the unique position of witnessing firsthand the functional impact, or lack thereof, of the Patriot Act to date.

I am writing to bring attention to the significant dilution in both the wording and enforcement of the interim final rules in comparison to the Act's original and clearly communicated intent. In fact, the interim final rules for financial institutions flatly contradict the proactive approach proscribed by the Patriot Act.

Through the Patriot Act, Congress and the President set a standard that required financial institutions to address their unique money laundering vulnerabilities <u>proactively</u>. Yet the interim final rules flatly contradict the legislation in stating that financial institutions "will be deemed to be in compliance . . . if (the institution) complies with the regulations of its regulator governing the establishment and maintenance of anti-money laundering programs." Under this approach, as I have witnessed firsthand, financial institutions are passively waiting for direction from regulators.

The interim final rules go beyond promoting passivity - they sanction it. By "deeming" financial institutions to be in compliance if they meet their regulators existing rules, the interim final rules place the burden of defining and enforcing anti-money laundering programs firmly on the regulators - and not the financial institutions.

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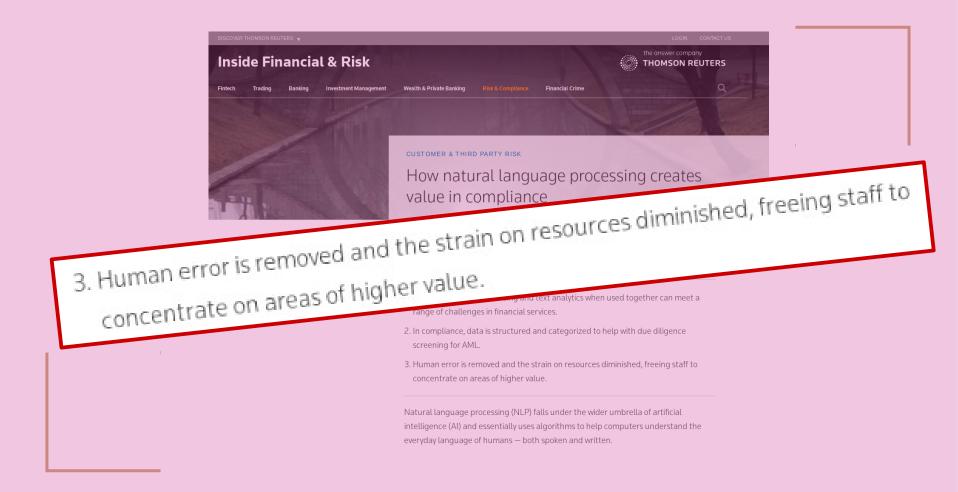
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As a bridge between humans and computers, the use of natural language processing in compliance demonstrates how this branch of AI is adding value across the financial services industry.

- 1. Natural language processing and text analytics when used together can meet a range of challenges in financial services.
- In compliance, data is structured and categorized to help with due diligence screening for AML.
- 3. Human error is removed and the strain on resources diminished, freeing staff to concentrate on areas of higher value.

Natural language processing (NLP) falls under the wider umbrella of artificial intelligence (AI) and essentially uses algorithms to help computers understand the everyday language of humans — both spoken and written.



# Can the system be repaired?

- Better sources?
- Indication of information quality?
- Right of reply?
- Open source watchlist: www.opensanctions.org?
- Transfer responsibility to the judicial system?



If you have an idea for an investigation, please contact me...



## Tom Wills Freelance Data Journalist Email mail@tomwills.net **PGP** fingerprint B3B8 C7A6 A594 5F95 F412 E7B5 B052 FDA0 2D05 954C