

Anti-Money Laundering Return 2021

Please complete and submit this Anti-Money Laundering (“**AML**”), Counter Terrorism Financing (“**CTF**”), Counter Proliferation Financing (“**CPF**”) and Targeted Financial Sanctions (“**TFS**”) Return (collectively referred to as “**AML Return**”) in accordance with the requirement under the Anti-Money Laundering Regulations (2020 Revision) (“**AMLRs**”) of the Cayman Islands to produce information to the Supervisory Authority, Cayman Attorneys Regulation Authority (“**CARA**”), specific to AMLR 55E (2) (h).

All Attorney-at-Law Firms (including Sole Practitioners) conducting Relevant Financial Business (“**RFB**”) in the Cayman Islands must complete an AML Return on an annual basis and submit it to CARA by the deadline stated.

If you are currently registered with CARA, you have previously declared in your registration form that you as a Sole Practitioner or your Firm conducts, has conducted, or intended to conduct RFB as defined in Schedule 6 of the Proceeds of Crime Law (2020 Revision) (“**POCL**”) of the Cayman Islands.

Who is not required to complete an AML Return?

If any of the following apply to you or your Firm, you will not need to complete an AML Return:

- You sold or closed your practice.
- Your practice was merged with or acquired by another practice.
- You did not provide any ‘relevant financial business’ during the Relevant Period and are not registered with CARA.
- You are registered with CARA and your practice began after 31 December 2020. (Please note you will need to complete an AML Return next year).

Important Information

The AML Return solicits information about the ‘relevant financial business’ that you or your Firm conducted in the Relevant Period.

- The information in the AML Return, enables CARA to:
 - i. assess inherent money laundering (“**ML**”), terrorism finance (“**TF**”), proliferation finance (“**PF**”) and sanctions risks both within individual supervised Firms/Sole Practitioners and across the legal sector. The results of any analysis inform our risk-based approach to supervision and monitoring and ensure we apply our resources commensurate with risks posed;
 - ii. obtain data for both regulatory reporting and for national and sectoral risk assessment purposes;
 - iii. determine if Firms and Sole Practitioners need any extra assistance in meeting their AML compliance obligations; and
 - iv. improve and direct our guidance and outreach to Firms and Sole Practitioners.



- While we understand that exact numbers may be more difficult, you or your Firm must give percentages and robust figure estimates (where applicable) to the best of your capability. You and your Firm should be able to provide reasonable justification for any estimates to CARA, if requested.
- Responses to the questions in the AML Return should refer only to your RFB clients and associated matters as defined in Schedule 6 of the POCL. Please do not include any legal services in your answers that fall outside the scope of RFB.
- The **Relevant Period** covered by the questions in this Return is **01 January 2020 to 31 December 2020**.
- If your Firm is part of a multi-domiciliary/multinational with a separate legal entity outside of the Cayman Islands, you should answer the questions to the extent they pertain to the Cayman Islands legal entity. However, where your Firm is a parent to any subsidiary (which is a law firm) conducting RFB, you must capture that subsidiary's business in this AML Return *if the fees go through the parent entity*. This covers overseas subsidiaries providing legal services, not Cayman-based Corporate Service Providers that are regulated by CIMA.
- For percentage questions, kindly note the default percentage will be 0% unless you change this option. If left as 0%, we will consider this your answer.
- Please accept this as notice of the fact that you will need to collate, aggregate and report the data requested in this Return, both for the purposes of completing all future AML Returns and it will assist in answering questions from CARA as part of our on-site inspections, desk-based reviews and thematic work.
- In some parts of the Return, we acknowledge that the data provided to us will be more precise in the future. We accept that it is difficult to provide data you may not have been routinely collecting and aggregating, and we require you to give robust estimates in these cases. However, some data (e.g., number of PEPs) forms the foundation for compliance with the AMLRs, and you should be able to provide this information forthwith.

Deadline for submission

Please complete and submit this AML Return on or before **Friday 14 May 2021**.

Please do not return paper copies as submissions. All submissions must be made electronically via our website.

Penalties for not submitting an AML Return

We are asking Firms and Sole Practitioners to complete this Return as it will assist the Cayman Islands in meeting its international obligations.

However, if you fail to submit an AML Return by the deadline stated and we give you formal written notice such that you are required to submit a Return (under Regulation 53(A)), you can be fined.

It is also an offence to give false or misleading information in your AML Return (or to contravene the AMLRs themselves, see Regulation 56).

We are asking you to engage constructively in this process and we have produced a FAQ sheet to assist.



Anti-Money Laundering Return 2021

Declaration

I, the undersigned, hereby declare that the information I set out in this form is true, complete, and accurate¹ to the best of my knowledge and belief. I understand the provision of false or misleading information to CARA is in contravention of Regulation 55O of the AMLRs, is a criminal offence and may give rise to a penalty.

On behalf of the Firm, I confirm that:

- a. I have read and taken advice where necessary to understand the POCL and AMLRs;*
- b. the information provided in this Return is true, complete, and accurate at the time submitted, and*
- c. I acknowledge the authority of CARA to share information with other Supervisory Bodies, Competent Authorities or Government Bodies as provided in the AMLRs.*

Firm Name:	
Your Name:	
Position Held:	
Signature:	
Date:	Click or tap to enter a date.
Telephone Number:	
Email Address:	

¹ This encompasses estimates where appropriately used.



1. PRACTICE DETAILS

a. What best describes your Firm?

Sole Practitioner	<input type="checkbox"/>	Limited Liability Partnership	<input type="checkbox"/>
General Partnership	<input type="checkbox"/>	Corporate Entity	<input type="checkbox"/>
Other	<input type="checkbox"/>		

Please explain in further detail if 'Other' was selected:

b. If your Firm is an International/Multi-jurisdictional Firm or Internationally Affiliated, please confirm in which jurisdictions, outside of the Cayman Islands, your Firm has a presence or an established office:

c. Please state how long your Firm has operated in the Cayman Islands? 0 Years 0 Months

d. Has your practice within the last three years merged with, acquired, or otherwise taken over another law Firm? Choose an item.

If Yes, please provide the below details:

Name of Firm:	
Date of Takeover/Merger/Acquisition:	Click or tap to enter a date.
Further details by way of explanation:	

e. Does your Firm have any intention to cease to provide legal services and/or cease to provide RFB services in the next 12 months? Choose an item.

If Yes, please confirm whether you are: Choose an item.

If Yes, please also provide the below details:

Planned date of ceasing to provide services:	Click or tap to enter a date.
Further details by way of explanation:	

- f. How many staff are employed full-time in your Firm in total (including partners, directors, associates, and other staff)? 0
- g. How many fee earners does your Firm employ? 0
- h. Please state the following relevant staff numbers as applicable:

Sole Practitioner:	0	Equity Partner ² :	0
Senior Management (non-attorney):	0	Salaried Partner ³ :	0
Administrative ⁴	0	Associate ⁵ :	0
Compliance	0	Other ⁶ :	0

2. FIT AND PROPER STATUS

- a. Has your Firm implemented procedures to screen employees to ensure high standards when hiring?

Choose an item.

If Yes, please tick all that apply:

i.	Practicing Certificate checks	<input type="checkbox"/>
ii.	Previous employment checks	<input type="checkbox"/>
iii.	Open-source searches	<input type="checkbox"/>
iv.	Police checks	<input type="checkbox"/>
v.	Qualification checks	<input type="checkbox"/>
vi.	Professional membership checks	<input type="checkbox"/>
vii.	Reference checks	<input type="checkbox"/>
viii.	Sanctions and PEP checks	<input type="checkbox"/>
ix.	Social Media review	<input type="checkbox"/>
x.	Other	<input type="checkbox"/>

² or equity participant in a Firm.

³ or equivalent.

⁴ Support staff such as secretaries or corporate administrators.

⁵ i.e., any attorneys-at-law not in a previous category.

⁶ any employee not covered by other categories.

If Other, please provide further detail below:

- b. Has any Beneficial Owner, Officer, Manager or Director of your Firm had any professional disciplinary findings against them in any jurisdiction? Choose an item.

- c. Has any Beneficial Owner, Officer, Manager or Director of your Firm had any criminal convictions (other than minor traffic matters dealt with by way of a fine/points)? Choose an item.

- d. Has any Beneficial Owner, Officer, Manager or Director of your Firm been involved in any other business which has been in administration or liquidation other than in a capacity of providing professional services? Choose an item.

If you answered Yes to question 2b, 2c, or 2d, please provide details:

3. AML COMPLIANCE

- a. Does your Firm have clear and adequate AML policies, procedures, systems, and controls covering the requirements of the AMLRs? Choose an item.

- b. Does your Firm apply the same Group AML policies, procedures, systems and controls across all offices and subsidiaries, domestic and international (as far as local legislation/regulation permits)? Choose an item.

If No, please provide an explanation:

- c. Has your Firm outsourced⁷ the carrying out of any applicable AML/CTF obligations (including within or outside the Group where applicable)? Choose an item.

If Yes, please specify:

⁷ Excludes use of third-party software applications and lists.

- d. Does your Firm have a specific annual budget allocated for AML compliance?** Choose an item.

If Yes, please provide an estimate on the average annual budget for AML compliance, taken from the last three years?
- e. What do you consider the inherent level of ML, TF, and PF risk of your Firm to be⁸?** Choose an item.
- f. Does your Firm have a documented Firm Level Business Risk Assessment?** Choose an item.

If Yes, please provide a copy [here](#).
- g. Does your Firm’s AML compliance program consider proliferation financing risks?** Choose an item.
- h. Does your Firm’s AML compliance program consider terrorism financing risks?** Choose an item.
- i. Does your Firm have a documented process for conducting a client/client matter risk assessment?** Choose an item.
- j. Is senior management approval required to onboard high-risk customers?** Choose an item.
- k. How long does your Firm retain its client due diligence records?**
- l. For the Relevant Period, has your Firm provided AML, CTF, CPF and TFS training to staff relevant to their role and responsibilities?** Choose an item.
- m. If you answered Yes to question 3l, please indicate the dates and topics of the last two AML/CTF/CPF/TFS training sessions:**

 - i. Click or tap to enter a date.
 - ii. Click or tap to enter a date.
- n. Does your Firm have a screening mechanism in place for TFS lists (either automatically or manually)?** Choose an item.
- o. How often does your Firm screen clients and or relevant associated matter names against TFS lists?** Choose an item.
- p. Please specify the lists you are referring to most often:**

 - 1.

⁸ Accepting all Firms offering RFB services are vulnerable to ML, TF and PF. Inherent risk represents the level of risk that exists in the absence of AML controls.

- 2.
- 3.
- 4.
- 5.
- 6.

q. Has your Firm conducted an appropriate audit to review and assess the effectiveness of your AML compliance policies, procedures and systems and controls? If Yes, please confirm the date of the last audit and details on who carried out the audit.

Choose an item.

Date of last audit: Click or tap to enter a date.

Name of person/entity that carried out the audit:

r. Have any employees (including partners etc.) been disciplined internally for non-compliance with the AML policies, procedures, systems, and controls in your Firm within the past 5 years?

Choose an item.

s. Did your Firm make any changes to its AML compliance framework in the Relevant Period?

Choose an item.

If Yes, what prompted these changes? Please tick all that apply:

i.	CARA inspection or desk-based review report	<input type="checkbox"/>
ii.	CARA enforcement action	<input type="checkbox"/>
iii.	CARA feedback and guidance	<input type="checkbox"/>
iv.	Change of AMLCO	<input type="checkbox"/>
v.	Change of MLRO	<input type="checkbox"/>
vi.	Staff non-compliance with AML processes and controls	<input type="checkbox"/>
vii.	Changes to Firm level risk assessment	<input type="checkbox"/>
viii.	Newly identified or emerging risk	<input type="checkbox"/>
ix.	New relevant financial business	<input type="checkbox"/>
x.	New technology	<input type="checkbox"/>
xi.	Regular scheduled internal review	<input type="checkbox"/>
xii.	Independent audit	<input type="checkbox"/>
xiii.	Advice from consultant or service provider	<input type="checkbox"/>
xiv.	Advice from CILPA or ALPA	<input type="checkbox"/>



xv.	Changes to legislation	<input type="checkbox"/>
xvi.	Other	<input type="checkbox"/>

If Other, please provide further detail below:

--

4. AML OFFICER APPOINTMENTS

- a. Have you appointed an Anti-Money Laundering Compliance Officer (“AMLCO”)? Choose an item.

If Yes, please provide the below details:

AMLCO Name:	
Position within Firm:	
Direct Telephone Number:	
Email Address:	
Date Appointed:	Click or tap to enter a date.

- b. How many years of experience does the AMLCO have in AML/CTF? Choose an item.

- c. Have you appointed a Money Laundering Reporting Officer (“MLRO”)? Choose an item.

If Yes, please provide the below details:

MLRO Name:	
Position within Firm:	
Direct Telephone Number:	
Email Address:	
Date Appointed:	Click or tap to enter a date.



d. How many years of experience does the MLRO have in AML/CTF? Choose an item.

e. Have you appointed a Deputy Money Laundering Reporting Officer ("DMLRO")? Choose an item.

If Yes, please provide the below details:

DMLRO Name:	
Position within Firm:	
Direct telephone Number:	
Email Address:	
Date Appointed:	Click or tap to enter a date.

f. How many years of experience does the DMLRO have in AML/CTF? Choose an item.

5. RFB CLIENTS AND MATTERS

a. Please state the total number of active domestic RFB clients⁹ your Firm had during the Relevant Period: 0

b. Please state the total number of RFB matters¹⁰ your Firm had open for active domestic clients during the Relevant Period: 0

c. Please state the total number of active international RFB clients¹¹ your Firm had during the Relevant Period. Please also provide the relevant countries below: 0

** Please list the relevant jurisdiction(s) for non-Cayman Islands clients, in order of the greatest number of matters.**

⁹ Active domestic RFB clients are clients of record in respect of whom one or more RFB matter files were open during the relevant period (or had been open and were closed in the Relevant Period), and are Cayman Islands residents or companies/partnerships geographically resident in or operating solely within the Cayman Islands, including Cayman Islands trusts. Entities are 'geographically resident' in Cayman if they are incorporated here, established here, or registered here (including foreign registered companies) as would be foreign companies that only operate here (we think this unlikely).

¹⁰ This is to determine the extent of RFB as an individual active client may have more than one matter.

¹¹ Active International RFB clients are clients of record in respect of whom one or more matter files were open during the relevant period (or had been open and were closed in the Relevant Period), and are clients who are not included in the definition of domestic clients, see footnote 9.

d. Please state the total number of RFB matters your Firm had open for active international clients during the Relevant Period. Please also provide the relevant countries below. 0

**** Please list the relevant jurisdiction(s) for non-Cayman Islands matters, in order of the greatest number of matters:****

e. How have your RFB matters been risk assessed? Please confirm the relevant absolute number of clients matters per risk category¹²:

Low (or equivalent)	0	Medium (or equivalent)	0
High (or equivalent)	0	Unknown/In Progress	0

f. Does your Firm maintain a Politically Exposed Persons (“PEP”) Register? Choose an item.

g. If Yes to question 5f, how often is this reviewed by the Firm? Choose an item.

h. How many of your RFB related clients as individuals or Ultimate Beneficial Owners (“UBOs”) or Controllers of clients that are not individuals, are classified as Ultra High Net Worth Individuals (“UHNWI”) ¹³ or High Net Worth Individuals (“HNWI”) ¹⁴? Please specify by residence and provide an estimate for this question if you do not currently aggregate this data:

i.	a Cayman Islands UHNWI/HNWI:	0
ii.	a Non-Cayman Islands UHNW/HNWI:	0

**** Please list the relevant jurisdiction(s) for non-Cayman Islands UHNWI/ HNWI:****

¹² All client matter numbers categorized here are to total all active client matters disclosed in questions 5b and 5d.

¹³ An “ultra-high net worth person” is an individual whose net worth is over \$30,000,000 USD. UHNWIs indicate higher risk.

¹⁴ Section 2 of the Securities Investment Business Law (SIBL) defines “high net worth person” as an individual whose net worth is at least \$800,000 KYD or any person that has total assets of not less than \$4,000,000 KYD. HNWIs indicate higher risk.

i. How many of your RFB related clients as individuals or UBOs or Controllers of clients that are not individuals, are classified as Politically Exposed Persons (“PEPs”) as defined in the AMLRs? Please confirm the relevant figures, we expect you to have accurate data in respect of PEPs:

iii.	Domestic PEPs:	0
iv.	Foreign PEPs:	0
v.	Unknown/In Progress:	0

**** Please list the relevant jurisdiction(s) for Foreign PEPs, by largest number first:****

j. How do you identify PEPs? Please tick all that apply:

i.	Media review:	<input type="checkbox"/>
ii.	Open-source searches:	<input type="checkbox"/>
iii.	Commercial database:	<input type="checkbox"/>
iv.	Sanctions lists:	<input type="checkbox"/>
v.	Other:	<input type="checkbox"/>

If Other, please provide further detail below:

k. Please provide relevant absolute numbers or robust estimates of your Firm’s RFB matters where a company formed, or other legal persons or arrangement had:

i.	a Cayman Islands UBO:	0
----	-----------------------	---

ii.

a Non-Cayman Islands UBO:	0
----------------------------------	---

**** Please list the relevant jurisdiction(s) for Non-Cayman Islands Clients:****

I. Focusing on the usual nature of business of your clients, please give the relevant absolute numbers of your Firm’s RFB matters (for the Relevant Period), which were for clients involved in any of the following business areas.¹⁵

Cash Intensive Business (not including MSBs)	0
Virtual Asset Service Provider	0
Property Management or Development	0
High Value/Luxury Goods¹⁶	0
Government Schemes	0
Gambling	0
Shipping	0
Money Service Business	0
State-Owned Companies/Sovereign Wealth Funds	0

m. Did your Firm conduct Enhanced Due Diligence in the Relevant Period? Choose an item.

n. How many of your RFB clients are Charities or Non-Profit Organisations (“NPOs”)?

Domestic:	0
Foreign:	0

o. Are there any clients that are prohibited from doing business with your Firm based on ML, TF, or PF risk?¹⁷ Choose an item.

¹⁵ We appreciate you may not have these figures aggregated to date. Please provide robust estimates. You are on notice that for the 2022 Return accurate aggregate figures will be required. This will help inform your business risk assessment.

¹⁶ Includes matters for clients that deal in high value goods (for example, a diamond dealer) and matters for clients that deal with transfers of high value goods (for example, sale of a yacht).

¹⁷ Relates to your Firm’s risk appetite and whether certain types of clients are not accepted as a general rule. Also Includes business that was declined or terminated for AML compliance reasons.

- p. If you answered Yes to question 5o, please describe the type of client(s) or matter prohibited/declined:

6. DELIVERY CHANNELS

- a. Please list the delivery channels of your RFB clients¹⁸ (please confirm the absolute numbers of clients in each category¹⁹):

Known/Face-to-Face:	0
Local Professional Intermediary:	0
Local Non-Professional Intermediary:	0
International Non-Professional Intermediary:	0
International Professional Intermediary ²⁰ :	0
Other 3 rd Party:	0
Unsolicited Business	0

**** Please list the relevant jurisdiction(s) for non-Cayman Islands jurisdictions of any intermediaries (both professional and non-professional), by largest number first:****

7. PRODUCTS AND SERVICES

- a. Does your Firm operate a Client bank account/ Trust account? Choose an item.

- b. Does your Firm engage in any of the following incidental activities²¹ on behalf of any person or entity? (tick all that apply):

Type of Service

Receiving or Paying Funds	<input type="checkbox"/>
Accepting Deposits	<input type="checkbox"/>

¹⁸This question is asking about the genesis of the professional business relationship. How did the Firm initially meet and contract with the client?

¹⁹ Answers may include a robust and reliable estimate at this stage.

²⁰ Including an instructing lawyer.

²¹ This does not include professional fees received or paid.



Holding Funds in Escrow / Client Account(s)	<input type="checkbox"/>
Transferring Funds by other means (see below)	<input type="checkbox"/>
<i>Other Relevant Information (if applicable):</i>	

c. For the Relevant Period, please provide the total number of RFB client matters in which your Firm acted as Power of Attorney/Attorney- in-Fact: 0

d. For the Relevant Period, please provide the absolute number of clients' matters in each of the following categories²², where your Firm prepared for or carried out transactions on behalf of your client²³

Categories	# of client matters
The <u>sale</u> of land or interests in land on behalf of clients	0
The <u>purchase</u> of land or interests in land on behalf of clients	0
The <u>mortgage</u> of land or interests in land on behalf of clients	0
Management of client money, securities, or other assets	0
Management of bank, savings, or securities accounts	0
The creation, operation or management of legal persons or arrangements and buying and selling of business entities	0
The organization of contributions for the creation, operation, or management of companies	0

e. Please provide absolute number of clients that carried out 3 or more residential or commercial conveyancing transactions in the Relevant Period by:

i.	a Cayman Islands UBO:	0
ii.	a Non-Cayman Islands UBO:	0

**** Please list the relevant jurisdiction(s) for non-Cayman Islands clients, by the largest number first:****

²² The categories of RFB overlap and Firms should avoid double counting where possible

²³ 'prepared for' includes giving legal advice or assistance, preparing a document on behalf of another person, or preparing an instrument governed by law that relates to real, personal, or intangible property.

f. Please provide absolute number of clients that carried out 3 or more residential or commercial conveyancing transactions in the Relevant Period which were cash²⁴ purchases or sales by:

i.	a Cayman Islands UBO:	0
ii.	a Non-Cayman Islands UBO:	0

** Please list the relevant jurisdiction(s) for non-Cayman Islands clients, by the largest number first:**

g. Please provide absolute numbers²⁵ of your Firm’s RFB transactions (including legal advice on individual matters) for the Relevant Period, for both Cayman Islands and Non-Cayman Islands clients. Please also provide relevant numbers of any PEP affiliations in the relevant column, focusing on the residence of the PEP:

	Cayman Islands			Non-Cayman Islands		
	Individual	Entity	PEP	Individual	Entity	PEP
Wills and Estates	0	0	0	0	0	0
Insolvency (RFB)	0	0	0	0	0	0
Formations of Legal Persons and Arrangements other than NPOs and charities (and no other type of work) ²⁶	0	0	0	0	0	0

²⁴ Cash transaction not involving any form of financing or loan.

²⁵ Include currently open RFB matters and those closed within the Relevant Period. Pick the most appropriate box (any PEP involvement should be recorded) and do not double-count. You are expected to provide a robust figure but not required to spend a disproportionate amount of time or resource on the task. Please read ‘Individual’ as being non-PEP individuals. Robust estimates are permissible at this stage, accurate aggregated data will be required in 2022.

²⁶ We recognize that there will be overlap in these categories, so please construe formation of legal persons in a narrow sense. Only record clients here for whom no other work is done. Please use the separate ‘Investment Funds’ category where appropriate.

Formation and management or dissolution of NPOs or Charities	0	0	0	0	0	0
Mergers and Acquisitions	0	0	0	0	0	0
Aircraft or Shipping Finance	0	0	0	0	0	0
Registration of Aircraft or Maritime Vessels	0	0	0	0	0	0
Real Estate	0	0	0	0	0	0
Formations of Trusts	0	0	0	0	0	0
Structured Finance	0	0	0	0	0	0
Residential Conveyancing	0	0	0	0	0	0
Commercial Conveyancing	0	0	0	0	0	0

h. How many trusts, of each type listed below, has your Firm advised on the formation of, in the Relevant Period?

Charitable ²⁷	0
Private Wealth/Family ²⁸	0
Unit Trust	0
STAR	0

i. Of all the trusts your Firm has advised on the formation of, in the Relevant Period, please indicate the approximate percentage of the trusts in each category that have the following arrangements:

	Charitable	Private Wealth/Family	Unit Trust	STAR
Side letters	0%	0%	0%	0%
Letter of wishes	0%	0%	0%	0%
Other similar arrangements	0%	0%	0%	0%

If Other, please provide further detail below:

²⁷ For the purposes of the Return, Charitable trust includes only non-STAR trusts.

²⁸ Only non-STAR unless otherwise stated.

--

j. For each type of trust your Firm has advised on the formation of, in the Relevant Period, please provide an approximate geographic breakdown of the region of residence of the Settlor (by percentage for each type of trust):

	Charitable	Private Wealth/Family	Unit Trust	STAR
Cayman Islands	0%	0%	0%	0%
USA/Canada	0%	0%	0%	0%
Central & South America and Caribbean	0%	0%	0%	0%
European Union	0%	0%	0%	0%
Europe but not EU	0%	0%	0%	0%
Africa and Middle East	0%	0%	0%	0%
Asia	0%	0%	0%	0%
Oceania	0%	0%	0%	0%
Unknown	0%	0%	0%	0%

k. For each type of trust your Firm has advised on the formation of, in the Relevant Period, please indicate how many Settlers are PEPs:

	Charitable	Private Wealth/Family	Unit Trust	STAR
# of PEPs	0	0	0	0

l. For each type of trust your Firm has advised on the formation of, in the Relevant Period, please indicate the proportion of trusts (in percent) that were discretionary and non-discretionary:

	Charitable	Private Wealth/Family	Unit Trust	STAR
Discretionary	0%	0%	0%	0%
Non-Discretionary	0%	0%	0%	0%

m. For each type of trust your Firm has advised on the formation of, in the Relevant Period, please provide a breakdown by percentage for the method of establishment of the client relationship:

	Charitable	Private Wealth/Family	Unit Trust	STAR
Face to Face with Client (client directly)	0%	0%	0%	0%
Non-Face to Face with Client	0%	0%	0%	0%
Referred by Professional Firm (lawyer, accountant)	0%	0%	0%	0%
Intra-group Introducer	0%	0%	0%	0%
Other	0%	0%	0%	0%
Unknown	0%	0%	0%	0%

n. On a scale of 1 to 5 (5 meaning highest risk), what do you perceive the inherent risk of Trusts being misused for money laundering (“ML”)?
(Please note that inherent risk relates to risks associated with this line of business before the application of any regulatory measures, CDD and other AML controls).

Choose an item.

Please explain why:

o. Do you see the inherent ML risks in the Trust sector increasing, decreasing or stable?

Choose an item.

Please explain why:

p. On a scale of 1 to 5 (5 meaning highest risk), what do you perceive the risk of Trusts being misused for terrorism financing (“TF”)?

Choose an item.

Please explain why:

q. Do you see the inherent TF risks in the Trust sector increasing, decreasing or stable?

Choose an item.

Please explain why:

- r. Thinking about the profile of your Trust formation advisory business, rank from 1 to 3 (1 being the most important), the 3 most important drivers of ML risk:

i.	Geographical location of Settlor(s)	Choose an item.
ii.	Geographical location of beneficiary/ies	Choose an item.
iii.	Location of trustee(s)	Choose an item.
iv.	Type of trust (i.e. private wealth, STAR, commercial)	Choose an item.
v.	Whether the trust is dictionary or non-discretionary	Choose an item.
vi.	Type of Settlor (i.e. PEP, HNWI, etc.)	Choose an item.
vii.	Type of assets in the trust	Choose an item.
viii.	Location of trust assets	Choose an item.
ix.	Mode of introduction of the business relationship	Choose an item.
x.	Complexity of trust structure	Choose an item.
xi.	Other	Choose an item.

If Other, please provide further detail below:

- s. For the Relevant Period, please provide absolute numbers (or robust estimates) of your Firm's RFB matters for the following categories (and give the jurisdictions where non-Cayman Islands clients). We are interested in identifying the subject matter of your legal advice (RFB related only), in these categories. There may be duplication. For those questions related to trusts, we mean the location of the trustees.

Exempted Company	0
Exempted Limited Duration Company	0
Ordinary Resident/Non-Resident Company	0

Limited Liability Company/Companies:	0
Foreign Company/Companies:	0
Cayman Islands Exempted Limited Partnership(s):	0
Open-ended Fund(s):	0
Close-ended Fund(s):	0
Segregated Portfolio Company/Companies:	0
Unit Trust(s):	0
Discretionary and Fixed Interest Trust(s):	0
STAR Trust(s):	0
Non-Charitable Purpose Trust(s):	0
Revocable Trusts(s):	0
Non-Revocable Trusts(s):	0
Foundation(s):	0
Advising SIBL RPs (registered persons) on appropriate Legal Structures	0
Advising on Crowd Funding Structures	0
Advising on Initial Coin Offerings	0

**** Please list the relevant jurisdiction(s) for non-Cayman Islands matters, largest first: ****

t. Of all the legal services your Firm offers, which do you consider are the most vulnerable to being misused for ML, TF, or PF purposes and why?

u. In the Relevant Period, have any fee earners, employees or partners (or equivalent) at your Firm acted as Directors (or Managers, Trustees or Controllers) of entities (or arrangements) set up following legal advice from your Firm (NB only record where that fee earner/employee/partner acted in a professional or paid capacity)? Choose an item.

If yes, please describe the nature of business of those entities (or arrangements):

8. TRANSACTIONS

a. In the Relevant Period, please provide an absolute number of cash payments over \$2,000 USD received from RFB clients that are:

i.	a Cayman Islands UBO:	0
ii.	a Non-Cayman Islands UBO:	0

**** Please list the relevant jurisdiction(s) for non-Cayman Islands clients, largest first: ****

b. When conducting transactions, does your Firm ever accept or handle cash or virtual/non fiat currencies, e.g. notes, coins, bitcoin? Choose an item.



- c. If you answered Yes to question 8b, please indicate how many cash transactions exceeding \$2,000 USD your firm has handled in the Relevant Period (select one):

0	<input type="checkbox"/>	1+	<input type="checkbox"/>	10+	<input type="checkbox"/>	100+	<input type="checkbox"/>	1000+	<input type="checkbox"/>
---	--------------------------	----	--------------------------	-----	--------------------------	------	--------------------------	-------	--------------------------

9. REPORTING OBLIGATIONS

- a. In the Relevant Period, did your Firm’s staff (including outsourced agents if applicable) identify and internally report any unusual or suspicious activity to the MLRO? Choose an item.
- b. In the Relevant Period, how many Suspicious Activity Reports (“SARs”) has your Firm filed with the FRA? 0