CURTAILING THE FLOW OF CORRUPT BENEFITS: THE SINGAPORE EXPERIENCE IN COMBATING MONEY-LAUNDERING AND ASSET RECOVERY FROM CORRUPTION

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I. INTRODUCTION

Modern corruption often assumes a transnational character. The corrupt are no longer content with keeping the proceeds of their criminal conduct within their borders. Advances in technology and the interconnected nature of global finance bring both promise of shared prosperity, but also risk abuse by the corrupt who use these systems to transfer their benefits of criminal conduct across multiple jurisdictions.

For a global and regional financial hub like Singapore, the sheer volume of transactions, most of which legitimately pass through the Singapore financial system, compounds the difficulty in detecting the laundering of proceeds of foreign corruption. Coupled with Singapore's reputation as an international financial hub, the nature of our interconnected financial systems poses a significant risk that the corrupt will seek to use Singapore as a transit point to launder their ill-gotten gains. Between 2017 and 2018, total assets managed by Singapore-based asset managers grew by 19% to S$3.3 trillion, compared to $2.7 trillion in 2016, outpacing the 15% growth rate of the previous five years. This exposure is exacerbated by the fact that about 78% of the funds managed in Singapore are foreign sourced, with the majority of assets under management coming from the Asia Pacific region.[1]

Accordingly, effective seizure of benefits of criminal conduct and the swift detection of these transactions are crucial to cutting the financial vein of the corrupt. Singapore regularly reviews and updates its legal framework to ensure its efficacy in investigating, prosecuting and preventing the transferring of corrupt benefits through our jurisdiction. Beyond the judicious use of legal mechanisms, Singapore has also sought to cultivate a culture of proactive reporting and taking dissuasive action against errant gatekeepers. These successes guide the spirit in which we approach new challenges on the horizon.

II. EFFECTIVE USE OF LEGAL MECHANISMS TO SEIZE AND CONFISCATE CORRUPT PROCEEDS

In the fight against global corruption, Singapore's strategy lies not just in effectively using anti-money-laundering legislation and prosecution, but also leveraging on international cooperation with foreign agencies and honing the edge of our investigators on the ground.

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[1] https://www.straitstimes.com/singapore/singapore-reclaims-top-spot-in-competitive-economy-ranking.

A. The Corruption Drug Trafficking and other Serious Crimes Act

The Corruption Drug Trafficking and other Serious Crimes Act ("CDSA") (Chapter 65A) is Singapore's primary legislation to criminalize the laundering of criminal benefits. The offences under the CDSA include the laundering of the benefits of corruption and other serious offences within and beyond Singapore. Offenders convicted of money-laundering offences face imprisonment terms of up to 10 years and possibly fines of up to S$500,000. Companies and other bodies corporate may be liable to fines of up to S$1 million or double the value of the property concerned in the offence. In cases where the companies or body corporate's money-laundering activities are proved to have been committed with the consent, connivance or neglect of any officer of the former, the officer will additionally be personally liable for the money-laundering offences of the company or body corporate.

In addition to criminalizing money-laundering, the CDSA also provides for the seizure and confiscation of benefits derived from corruption and serious offences. Where there is reasonable cause to believe that a person has derived benefits from corruption and serious offences, the prosecution may apply to court under section 16 of the CDSA to restrain any of his property before he is convicted of such offences, and to obtain confiscation orders against the person after his conviction, for the value of the benefits derived from such offences. A restraining order prevents the person from dissipating his property and ensures that the property is available to be realized to satisfy the confiscation orders.

The property that is liable to be restrained and realized under the CDSA includes money and all movable or immovable property, including things in action and other intangible or incorporeal property. The power to restrain and realize assets extends beyond laundered property or its traceable proceeds: assets that are not directly traceable to the offence in question are also liable to be restrained or realized. This includes both the offender's untainted assets, as well as properties given by the offender to third parties (these are often family members and associates) up to six years before criminal proceedings are started against the offender for the corruption or serious offences.

B. Action against Absconded Persons

The CDSA also allows prosecutors to apply for confiscation orders against absconded persons, i.e. persons who cannot be found, apprehended or extradited at the end of six months from the commencement of investigations against them and against whom there is evidence which, unrebutted, would warrant their conviction of corruption or serious offences. This preserves the efficacy of the CDSA's anti-money-laundering measures against fugitives, including foreigners, who remain outside of Singapore.

This recourse under the CDSA is not a dead letter law. The Corrupt Practices Investigation Bureau investigated a Chief Executive Officer ("CEO") of a publicly listed electronic waste recycling company for corruption. However, the CEO fled Singapore with his family just prior to the CPIB's investigations. He was placed on Interpol's wanted person list, and his whereabouts are still unknown today.

Notwithstanding the CEO's absconding, the CPIB's investigations uncovered strong evidence that he had misappropriated and diverted electronic scrap to overseas syndicates for repackaging and sale as standard products, and bribed various parties to conceal his wrongdoing. Working with foreign authorities, the CPIB identified the beneficiaries of the disbursements stemming from the illegal proceeds credited into overseas bank accounts. Satisfied that the CPIB had exhausted its efforts to locate the CEO, the Singapore High Court pronounced him an absconded person under the CDSA and deemed him convicted of the alleged serious offences. Subsequently, the High Court issued a confiscation order of US$51 million, which represented what was known of the CEO's benefits from his embezzlement. In total, about S$25 million of assets were disgorged.

C. Confiscating Assets of an Offender that are Disproportionate to his Known Sources of Income

The CDSA has legal mechanisms that assist the prosecution in proving that a person has derived benefits of corruption or serious offences. Where a person is believed to have derived benefits of corruption or serious offences beyond bribe moneys or actual proceeds of crime, the prosecution may undertake a concealed income analysis to ascertain if he possesses property disproportionate to his known sources of income. If such property is proved from the analysis, the CDSA presumes that the benefits of corruption or serious offences derived are such property, unless the person can provide a satisfactory explanation to the court. In the CPIB's experience, this is invaluable in disgorging the full benefits of corruption from the *givers* of bribes.

In 2014, following the CPIB's investigations and a successful prosecution, an international match fixer was convicted of bribing match officials to fix a football match. The CPIB conducted financial investigations against him as he was suspected to be in possession of assets disproportionate to his known sources of income. CPIB investigators conducted an extensive and in-depth concealed income analysis that examined the gaping difference between the assets he held, and what income was available to him from his businesses in Singapore and other investments. The analysis covered assets including bank balances, property, insurance policies and vehicles acquired in the six years prior to his arrest along with a concurrent audit of the match fixer's known liabilities. The CPIB also engaged an independent accountant to review the CPIB's concealed income computation for fairness and reasonableness.

Ultimately, just earlier this year, the court approved of the analysis and issued a confiscation order for S$3.4 million, being the match fixer's disproportionate wealth and, therefore, being deemed criminal benefits which he was unable to provide a satisfactory explanation to the court.

The above paragraphs illustrate the dynamic nature of the CDSA as Singapore's primary tool to prevent the corrupt from enjoying the benefits of their criminal conduct.

III. INTERNATIONAL COOPERATION AND MUTUAL ASSISTANCE

Singapore takes its membership in the global community in the fight against corruption seriously. As a financial hub, the Singapore authorities receive numerous requests for assistance in both investigating transnational corruption and seizing of assets representing the proceeds of corruption. Where we have received such requests for aid, we have promptly responded.

The CDSA's provisions apply equally to domestic as well as foreign corruption, and have often served as the basis for domestic money-laundering investigations to enable effective seizure of corrupt proceeds prior to the receipt of formal mutual legal assistance requests. Even where the CPIB has received information from public sources, we have not shied away from first commencing domestic investigations.

Recently, the CPIB received information that significant sums (about S$10 million) believed to be corrupt proceeds of persons charged in another jurisdiction were suspected to have been received in financial institutions in Singapore. The CPIB then commenced domestic money-laundering investigations under the CDSA to track down the money. In the course of investigations, the CPIB froze the relevant bank accounts and restrained dealing in the properties held in the names of the persons prosecuted in the foreign jurisdiction. At present, the Singapore authorities are processing the formal request for mutual legal assistance received from the country, and have followed up with our own request for information relating to the underlying predicate offences.

Our approach in viewing domestic and foreign investigations into money-laundering of corrupt proceeds as two sides of the same coin enhances effective engagement of both our local law enforcement agencies and our foreign counterparts. This idea of joint ownership between countries in cracking a cross-border money-laundering case sharpens the investigators' edge to swiftly progress investigations and prevent the dissipation of assets.

One way we have sought to build trust between law enforcement agencies is the participation in international enforcement networks, like the International Anti-Corruption Coordination Centre ("IACCC"), which serves to enhance international cooperation in the fight against grand corruption. Singapore has been a part of the IACCC since July 2017.

IV. EFFECTIVE MANAGEMENT OF SEIZED ASSETS

In addition to the legal powers under the CDSA, law enforcement agencies have recourse to seizure powers under the Criminal Procedure Code ("CPC") (Chapter 68). Specifically, section 35 of the CPC confers broad powers on the police and the CPIB to seize assets, documents and other property that represent proceeds of criminal conduct, or constitute evidence of an offence, in connection with domestic investigations. Investigators are also empowered to prohibit persons, legal and natural, from dealing in or disposing specific property (for example, interests in real estate). In the context of cross-border money-laundering, the CPIB has used its section 35 CPC powers to seize and curtail assets that represent the traceable fruits of both domestic corrupt conduct and foreign corruption.

When untainted assets are concerned, i.e. assets belonging to the offender which are not the traceable proceeds of criminal conduct, investigators cannot utilize their seizure powers under section 35 of the CPC. For these situations, the prosecution seeks a restraint order under section 16 of the CDSA to restrain offenders from dealing with specific assets owned by the offender that are *not* the traceable proceeds of criminal conduct (see sec. II.A above). Effectively, the restraining order prevents dealing in such untainted assets, while ownership and possession of the property remains with the person.[2]

With the seizure and freezing of assets come the concomitant issue of preservation and maintenance, especially for seizures of real estate and tangible property. While the CPIB has legal powers to seize the traceable proceeds of corruption, a particularly tricky issue has been how to effectively preserve the value of these assets pending final resolution of the case.

In recent years, the CPIB has taken a more realistic and proactive approach in preserving and/or realizing the value of seized assets. This has entailed working with the defendant, the victims involved and other stakeholders to develop workable arrangements to realize the value of the seized assets at an early stage. This preserves the value of the assets, as well as reduces the need for preservation and upkeep of the same.

In 2015, the CPIB's corruption investigations against an employee of a private company, revealed conspiracies with other parties to cheat the company using fictitious quotations and invoices. Further financial investigations showed that the benefits of the employee's criminal benefits were estimated to be about S$5 million, which was mostly converted to the luxury items such as branded watches, jewellery, branded handbags and clothes, as well as investments in properties in Singapore and overseas. Resulting from its detailed financial investigations into the employee's spending patterns, the CPIB seized three bank accounts, two insurance policies, numerous luxury items and branded apparel, and prohibited the dealing in and disposal of four properties under section 35 of the CPC.

[2] However, section 16(8) of the CDSA allows for property to be seized by the authorities in order to prevent it from being removed from Singapore.

In the course of investigations, the CPIB engaged the employee and the victim company to liquidate the luxury items and branded apparel. Subsequently, the value of the luxury items was realized via a public auction. Altogether, the CPIB recovered about S$500,000 through the auction of over 500 items of luxury watches, jewellery and branded bags. It is worth highlighting that the public auction was completed months before the employee was prosecuted for the cheating and money-laundering offences in December 2016. Eventually, a total of about S$2.8 million, comprising proceeds from the public auction, disposal of other properties and monies seized, was eventually recovered and released to the victim company.

In this case, managing the luxury items was a particular concern. The CPIB took extra efforts to prevent loss and damage to the items. These items were, therefore, catalogued meticulously, individually photographed, and stored in a strong safe under optimal conditions (e.g. in a room with lowered humidity to prevent damage to luxury items).

Separately, where maintenance costs may exceed the realizable value of the seized asset, the CPIB avoids taking physical possession of the asset while preventing dealing in or disposal of the asset. For example, where corrupt proceeds have been converted into real estate, the CPIB usually exercises its powers under section 35 of the CPC to serve an order on the owner of the real estate to prevent the dealing in the property on grounds that it represents the traceable proceeds of crime. The CPIB then follows up with a request to the Registrar of the Singapore Land Authority for a caveat on the property to prevent the registered owner from dealing with the property without giving prior notice to the CPIB on the same basis. The effect is that while the suspect may still live in the property (if he is in jurisdiction), he cannot transfer or liquidate it without notifying the enforcement agencies.

By adopting a practical approach towards the restraint of assets, the CPIB walks the middle ground of ensuring that the corrupt do not enjoy their ill-gotten gains and maximizing the restitution for the innocent.

V. BUILDING A CULTURE OF PROACTIVE REPORTING

Singapore's experience is that the success of identifying and tracing the proceeds of corruption hinges primarily on a proactive culture of reporting suspicious transactions. Suspicious transaction reports ("STRs") have supported 66% of domestic money-laundering investigations and 82% of money-laundering investigations into foreign predicate offences.[3] STRs are also taken seriously by law enforcement agencies in Singapore, resulting in 199 investigations arising from 500 STRs.[4] Singapore's FATF mutual evaluation in 2016 found Singapore to have achieved a substantial level of effectiveness. Our Suspicious Transaction Reporting Office is well coordinated with law enforcement processes with "secure communications" and "access to law enforcement agency information that can be integrated with Financial Intelligence Unit information". Since then, we have undertaken several initiatives to strengthen Singapore's suspicious transaction reporting regime and reporting culture across various sectors.

A. Proactive Use of STRs in Investigations

The CPIB, and other law enforcement agencies, has for many years leveraged financial intelligence for early detection of money-laundering offences and for asset tracing. The following case underscores the need for close cooperation and trust among foreign law enforcement agencies to allow for sharing of financial intelligence and, at times, investigation findings to enable prompt action to arrest illicit fund flows.

[3] Anti-Money Laundering and Counter-Terrorist Financing Measures, Singapore Mutual Evaluation Report, September 2016 at page 55. Last accessed on 27 October 2019 at <https://www.fatf-gafi.org/publications/mutualevaluations/documents/mer-singapore-2016.html>.
[4] Ibid.

In 2016, through a review of an STR, the CPIB suspected that a Singapore corporate bank account was used as a conduit to receive funds intended for bribing foreign politically exposed persons. The filer of the STR reported that its client, which was featured in overseas adverse media, had received significant funds from an offshore company. Through STRO, the CPIB immediately alerted the relevant foreign authorities as the beneficial owner of the bank account was making plans to move the funds out of Singapore. Within a day, the foreign authorities responded and provided court affidavits to prove that monies in the bank accounts were likely to be illicit funds. With this information and relying on powers under section 35 of the CPC, the CPIB immediately seized about US$16 million in the bank account on the basis that it constituted suspected proceeds of criminal conduct. Simultaneously, the CPIB also commenced domestic money-laundering investigations. Almost a year later, the foreign authorities followed up with a formal mutual legal assistance request to restrain the bank account.

Had the CPIB not acted to seize the assets at the earliest opportunity, the funds in the bank account would have been dissipated by the time a formal request for mutual legal assistance was made. Subsequently, the beneficial owner of the bank account made a legal challenge on the seizure made by the CPIB, claiming that the monies were legitimate funds meant to be used for investments. The CPIB then sought assistance from its foreign counterpart to defend the seizure and subsequently obtained the court's assent to retain the seizure while investigations remained underway. The CPIB is currently working with its foreign counterpart to obtain further evidence to prove that the funds in the seized account were indeed bribe monies linked to their investigations into the foreign predicate offence, with a view to confiscating them.

B. Effective Enforcement of STR Filing Obligations

Section 39 of the CDSA requires all persons who encounter suspicious transactions in the course of their business to report them. This obligation to file STRs, with effective and dissuasive sanctions for failure to do so, protects the nerve centre of Singapore's confiscation and asset recovery regime. The requirement applies not only to financial institutions, but also to, among others, employees within these institutions. Singapore has not shied away from taking persons to task for their failure to file such reports.

In 2016, in connection with its largest cross-border money-laundering investigation, Singapore successfully prosecuted the branch manager of a local branch of a foreign private bank for not only failing to file STRs in connection with suspicious transactions, but also for consenting to the branch's failure to file STRs in compliance with the regulator's anti-money-laundering directions. The branch was concerned in a series of transactions which carried clear red flags and involved almost US$1.2 billion. For these offences and for lying to investigators, the branch manager was sentenced to a total of 28 weeks' imprisonment and fined S$128,000. Arising from the same investigation, two bankers, a senior private banker and his colleague, were also prosecuted over separate instances of omitting to file STRs in respect of a suspicious transaction involving US$110 million transferred between their clients' accounts. The two bankers were sentenced to 18 weeks' imprisonment and a $24,000 fine, and 2 weeks' imprisonment and a $10,000 fine for their respective conduct.

To fortify the regime, section 39 of the CDSA was amended earlier this year to increase the maximum sentences for failing to report suspicious transactions to a maximum fine of $250,000 and/or imprisonment of up to 3 years for individuals and a maximum fine of $500,000 for corporate offenders.

C. Expansion of Categories of Persons Expressly Required to File STRs

While section 39 of the CDSA imposes a general obligation on those whose businesses reveal suspicious transactions to report them, Singapore has taken pains to specifically identify certain sectors of the economy that must comply with this obligation and, where necessary, maintain records of transactions. These sectors include gatekeepers and designated non-financial businesses and professions ("DNFBPs").

D. Gatekeepers – the Legal Profession

Gatekeepers, especially the legal profession, are expected to take their reporting obligations seriously. The Law Society of Singapore is tasked with regulating the legal profession and ensuring the upkeep of the standards of professional conduct of lawyers in Singapore. As part of its mandate, the Law Society of Singapore is also primarily responsible for anti-money-laundering/countering the financing of terrorism ("AML/CFT") framework for lawyers. Section 70D of the Legal Profession Act (Chapter 161) ("LPA") imposes a separate obligation on lawyers to file STRs alongside the CDSA. Where lawyers have omitted to file these STRs, aside from criminal prosecutions, they have been subject to disciplinary actions under the LPA.

In 2016, a senior lawyer was disciplined over failing to report suspicious circumstances in respect of a conveyancing transaction involving real estate in Singapore. The transaction was in fact a front for an unlicensed money-lending transaction, the circumstances of which should have raised alarm bells for the senior lawyer who had more than 30 years' experience. For her infraction, she was suspended from legal practice for two and a half years.

Following this case, several other lawyers were taken to task over related failures to conduct due diligence into their clients' affairs (which, had they done, may have given rise to a need to file an STR).

In 2018, a lawyer was disciplined for repeated failures to perform even basic background checks on his clients' identities and obtaining evidence of his clients' business relationships. For his misconduct, he was suspended from legal practice for two years and fined S$100,000.

In 2017, the Attorney-General's Chambers of Singapore successfully took another senior lawyer to task for failing to file an STR in respect of a conveyancing transaction. In brief, the lawyer was engaged by the former President of a Chinese company to purchase a $23.8 million property in Singapore. The Chinese company had launched a Chinese peer-to-peer lending platform that turned out to be a $10.8 billion Ponzi scheme. In addition to negative public news reports on the Chinese company and its platform, the Singapore authorities obtained the information regarding the purchase of the property through an STR filed by the counterparty to the conveyancing transaction (which was ultimately not completed).

However, despite having read negative news reports about her client who was not only suspected of perpetrating a Ponzi scheme in China, but who had also been arrested in connection with the same, the lawyer failed to file an STR to notify the authorities that her client could be involved with the Ponzi scheme. For her failure to file the necessary STR, the lawyer was fined $10,000, half of the maximum penalty at the time. In 2019, she was subsequently also subject to disciplinary proceedings and was fined an additional $5,000.

The above cases illustrate the comprehensive approach toward regulating gatekeeper professions, which is crucial to fostering a culture of reporting within such sectors of the economy.

E. Other DNFBPs – Precious Stones and Precious Metals Dealers

Earlier this year, Singapore enacted the Precious Stones and Precious Metals ("PSPM") (Prevention of Money Laundering and Terrorism Financing) Act 2019 ("PSPM Act"). The purpose of the Act and the Regulations thereunder is to regulate PSPM dealers to strengthen the AML/CFT framework for the PSPM industry and bring our regime fully in line with international standards set by the Financial Action Task Force.

The PSPM Act and PSPM Regulations came into force on 10 April 2019. The PSPM Act and Regulations are administered by the AML/CFT Division of the Ministry of Law in Singapore, which will

be headed by a Registrar of Regulated Dealers (the "Registrar"). The Registrar has broad powers to register dealers in PSPM, impose conditions for operating in Singapore, as well as powers of investigation, enforcement and composition of offences.

Among other things, the PSPM Act and its Regulations mandates customer due diligence for transactions for precious stones, metals, products involving sums above $20,000, prohibits regulated dealers from entering into certain transactions and requires them to keep records on pain of criminal sanction. Specifically, regulated dealers are required under section 21 of the PSPM Act to report suspicious transactions in accordance with the CDSA.

Anecdotally, the response of the industry has been heartening. As at 11 August 2019, the Division has received 1,272 applications for registration and expects there to be approximately 1,800 registered entities doing business at approximately 2,300 outlets in Singapore. With the advent of the PSPM Act, we expect it to be much more difficult for the corrupt to launder their ill-gotten gains through Singapore via DNFBPs.

VI. DEALING WITH NEW THREATS ON THE HORIZON

The CPIB and other Singapore law enforcement agencies remain vigilant and alive to the evolving landscape of AML/CFT risk. On the technological front, the advent of cryptocurrencies is a recurrent trend in international law enforcement fora. While cryptocurrencies may have legitimate uses, they are notorious for their potential for money-laundering, concealment of assets and cyberextortion due to their "anonymous" nature. The novelty of the block chain technology backing the operation of such alternative "currencies" have also compelled law enforcement agencies to relook their investigation capabilities.

As a financial hub, Singapore has seen growth in the number of cryptocurrency exchanges and initial coin offerings, which indicate the growing traction of virtual currencies as a mode of obtaining value. It is thus important for both financial institutions as well as law enforcement and regulatory agencies to be equipped with the "know-how" on detection and comprehension of cryptocurrency transactions.

Thus far, our findings reveal unique challenges in dealing with cryptocurrencies. *Firstly*, cryptocurrencies are intangible property. While dealing in cryptocurrencies would be considered dealing in property, and a confiscation order may be sought to realize such cryptocurrency, a suspect cannot physically surrender it to the investigators. *Secondly*, unlike conventional intangible assets like stocks and interests in land, there is no central depository for these currencies. There are no known cryptocurrency exchanges in Singapore that may be subject to orders to prohibit dealing in a specific cryptocurrency. *Thirdly*, cryptocurrency is comprised of computer data, as opposed to the traditional chose-in-action. The data itself may be, and likely is, stored on a server outside Singapore's jurisdiction. While the owner may exercise control over the coin, the coin (and data) itself lies beyond the reach of traditional investigative powers.

The unique nature of cryptocurrency lends itself to two possible responses by law enforcement: the adapting of the anti-money-laundering legal framework to cater for this new reality, and the upskilling of law enforcement to think and investigate differently. Singapore has responded in both ways.

In respect of legal powers to deal with computer data, Singapore has recently amended section 39 of the CPC. Investigators are now empowered to access a computer and even compel person(s) in charge of such computers to assist them. Investigators are also able to access computers located outside Singapore if (a) the computer's owner consents; or (b) if the investigator gains access to the computer through the use of traditional investigative powers, including seizing documents which provide the username and password. This enhancement would allow the investigators to log into a suspect's cryptocurrency wallet/account, that is based overseas, and transfer the currency electronically to a wallet held by the law enforcement agency

at the earliest opportunity. This approach would be enhanced through investigative strategies to preserve the value of the assets sought to be seized.

Building on the tried-and-tested use of traditional powers expands the reach of law enforcement agencies to these new frontiers in ways that they are familiar. It is also crucial to help investigators understand the true nature of the asset they are dealing with. In this regard, the CPIB has developed investigative procedures (which include technical processes and precautions) to guide officers when dealing with the seizure and management of cryptocurrencies. The investigators are educated on the tracking and tracing of the origins of cryptocurrency transactions, and keep abreast of emerging cryptocurrency trends, like bitcoin mixing. Since 2017, the Computer Forensics Branch of the CPIB has been conducting its own research and development into the use of cryptocurrency, which includes simulating transactional flows to gain a better understanding of a particular currency's technical inner-workings to enhance the CPIB's investigative abilities in dealing with the same. The CPIB also supports international efforts to prevent and detect cryptocurrency-facilitated crime, and regularly shares its research findings with counterpart agencies and regional fora and workshops.

VII. CONCLUSION

Singapore's experience is that it is necessary to adopt a certain dynamism to investigations and seizure of assets within our legal framework in order to keep up with trends in the laundering of corrupt proceeds. At times, the legal framework needs to evolve to align with best practices around the world, but in an autochthonous manner. Leveraging the well-functioning aspects of our legal framework, like the use of STRs and the powers our CDSA confers on investigators, is one way to guide this evolution to effectively meet the new challenges on the horizon.