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This approach justifies the integration of terrorist financing into money laundering counter-measures with an exaggerated focus on two inaccurate assumptions: terrorists' involvement in criminal activities (especially organized crime), and utilising money laundering tools by terrorists to move their funds. Regarding the nature and characteristics of terrorist financing, this paper aims to examine whether from a factual standpoint, it is sufficiently reasonable to address the suppression of ...

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67 In regard to FATF Recommendation 19 countermeasures, see

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FATF, 'International Standards on Combating Money Laundering and the Financing of Terrorism & Proliferation: The FATF Recommendations' (February 2012) 19 ('Financial institutions should be required to apply enhanced due diligence measures to business relationships and transactions with natural and legal persons, and financial institutions, from countries for which this is called for by the FATF.

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