

April 13, 2017

DISSEMINATION BY THE LIVINGSTON GROUP, LLC.

FARA registration #6344

Senior representatives of the Centrale Bank of Curacao en Sint Maarten (Central Bank) are coming to Washington, DC and would appreciate the opportunity to talk to you about de-risking as an unintended consequence of Anti-Money Laundering and Terrorist Financing (AML-CFT) policy.

The Central Bank will be in DC for the IMF/World Bank Spring meetings the week of April 17. Thus, we kindly request a meeting with you on either Tuesday, April 18 or Wednesday, April 19.

We are interested in your assessment of the reform landscape and how your reform suggestions are being received by policy makers, especially in the Trump administration.

Since last April 2016, the Central Bank has been engaging the US Administration, US Congress, and policy influencers in an active and direct dialogue on next steps to ensure US policy and international standards are well-defined and supportive of correspondent banking. It is critical for all stakeholders that there is continued access to the international financial system.

The Central Bank delegation will include:

Mrs. Ersilia de Lannooy – Advisor to Management

Mr. Kelvin Kleist – Head Financial Stability

Mrs. Gisah de Sousa-Hollander – Secretary to the Board of Directors/Legal Advisor

Mr. Shelwyn Salesia (pending) – Executive Director for Supervision Affairs

THE LIVINGSTON GROUP, LLC PROVIDES REPRESENTATION FOR THE CENTRALE BANK OF CURACAO EN SINT MAARTEN. ADDITIONAL INFORMATION IS AVAILABLE AT THE DEPARTMENT OF JUSTICE, WASHINGTON, DC.

I would like to bring a client by to talk about Anti-Money Laundering and Terrorist Financing policy.

The client is the Central Bank of Curacao en Sint Maarten. The specific issue is the increasing threat of de-risking – the loss of access to the American banking system for cross border financial transactions.

With the new Congress underway and AML/CFT policy very much in the forefront, countries whose economies are threatened by de-risking are very interested in communicating with US policy makers.

The client is in town for the IMF/World Bank meetings the week of April 17th. I would like to schedule a meeting sometime Tuesday, April 18 or Wednesday, April 19. I recognize this is a recess week, but hope that you might be able to meet.

THE LIVINGSTON GROUP, LLC PROVIDES REPRESENTATION FOR THE CENTRALE BANK OF CURACAO EN SINT MAARTEN. ADDITIONAL INFORMATION IS AVAILABLE AT THE DEPARTMENT OF JUSTICE, WASHINGTON, DC.