



Nathaniel Wienecke

Nathaniel (Nat) Wienecke is the founder and President of Conscience Point Consulting where he advises and represents a diverse set of clients in the financial services, national security, housing, and political arenas. He engages Congress and the executive branch on behalf of his clients helping them to navigate Washington, DC and in state capitols. Nat has been named one of *The Hill's* top lobbyists for many years running and has also been named Top Lobbyist by the National Institute for Lobbying and Ethics.

Prior to founding Conscience Point Consulting, Wienecke worked at the American Property and Casualty Insurance Association (APCIA) and JPMorgan, Chase & Co. At APCIA he was the chief federal advocate, enacting legislative provisions each year of his 12 year tenure, including including the Terrorism Risk Insurance Act reauthorization, flood insurance, the Tax Cuts and Jobs Act, reforms to the Dodd-Frank Wall Street Reform Act, among dozens of others. He also ran APCIA's the political engagement division and \$1.6 million PAC where he led dozens of campaigns each year in state capitols across America. At JPMorgan Chase, he worked on state, federal, and international government relations, handling issues ranging from financial reform and cybersecurity to Congressional oversight. He helped lead the creation of a grassroots Ambassador program and also worked with the bank's International Council, which included former British Prime Minister Tony Blair and former U.S. Secretary of State Henry Kissinger.

Sworn in on August 21, 2006 as Assistant Secretary for Legislative and Intergovernmental Affairs of the U.S. Department of Commerce, Wienecke was the youngest assistant secretary of Commerce during the Bush Administration and a senior advisor to Secretary Carlos Gutierrez on issues including international trade, immigration, economic development, and the response to the 2008 financial crisis. Wienecke managed legislative efforts across the department's 12 bureaus and oversaw a staff of 86 and \$10 million in annual funding.

Also a veteran of numerous political campaigns, Wienecke has extensive experience building grassroots, advocacy coalitions, and get out the vote efforts. He holds a master's degree in business administration from the Massachusetts Institute of Technology and a bachelor's degree from the State University of New York College at Oneonta. He currently lives on Washington, D.C.'s Capitol Hill and in Southampton, Long Island with his wife Chantal and daughter Kendall.

Pakistan's Progress Following FATF White listing

Executive Summary

Pakistan reaffirms its unwavering commitment to global efforts against money laundering, terrorist financing (ML/TF), and proliferation financing. Following its removal from the FATF “grey list” in October 2022, Pakistan has submitted four confidential progress reports on five agreed areas through the Asia Pacific Group (APG). With the submission of the final report on 17 March 2025, Pakistan urges closure of this unprecedented post-whitelisting reporting arrangement in line with the agreed timeline.

Key Achievements

- **Fulfillment of All ICRG Action Plan Items:** All items fully implemented by October 2022.
- **Sustained Compliance on Five Residual Areas:** Regular reporting on National Risk Assessment, TF case investigations, NPO oversight, cash/gold smuggling referrals, and judicial outcomes.
- **Legal & Institutional Reforms:** Creation of National AML/CFT Authority; finalization of National Risk Assessment (2023); implementation of Internal National Action Plan; and formulation of AML/CFT Strategy (2024–26) and National Security Policy (2024–29).
- **Operational Impact:** 2,645 TF cases filed, which led to 2727 arrests and 549 convictions, dismantling of EOCs, seizure of over 900 properties, proscription of 2,000 individuals and 80+ organizations.
- **Regional and Global Cooperation:** Active MOUs with 20 foreign FIUs; strategic and tactical intelligence sharing.

Concerns and Objections

- **Introduction of New Issues Beyond Mandate:** Inclusion of new issues in the final analysis violates agreed parameters of the confidential reporting mechanism. Yet in good faith Pakistan submitted its report on those issues.
- **Politicization by a Particular Jurisdiction:** India's media campaigns and disinformation efforts have consistently attempted to politicize FATF proceedings and weaponize them against Pakistan.
- **Unfair Weight to Unverified Open-Source Claims:** raising objections of Pakistan’s commitment based on unverified public media reports risk undermining FATF’s technical objectivity.

Pakistan’s Appeal: Pakistan urges to:

1. **Conclude** the post-whitelisting reporting in June 2025 as originally agreed.
2. **Oppose** attempts to shift goalposts through last-minute, politicized additions.
3. **Ensure** that future evaluations remain grounded in technical compliance, procedural fairness, and objective review.

Pakistan stands ready to continue cooperation and remains committed to the global AML/CFT architecture. It is essential that the integrity and neutrality of FATF are preserved.

**Pakistan's Progress Following FATF White listing
Brief

Background

At the time of removal from the FATF list of countries with enhanced monitoring (grey list) in October 2022, Pakistan was asked to share updates on some specific items through Asia Pacific Group (APG), after every eight months at the alternate plenary meeting of FATF. Through a confidential reporting mechanism, Pakistan submitted its reports in June 2023, February 2024 and October 2024. The final report under this arrangement was shared on 17th March 2025 and it will be presented during the FATF Plenary on 11th June 2025 in Strasbourg, France.

Key Messages

2. As a responsible member of international community, Pakistan continues its drive in respect of Anti Money Laundering / Countering Financing of Terrorism (AML / CFT). Pakistan remains committed to advancing shared global efforts against AML/CFT.
3. In October 2022, Pakistan came out of the grey list after successfully addressing all items in its ICRG Action Plan that was acknowledged by the International Cooperation Review Group (ICRG) and the FATF.
4. Despite the progress, it was nonetheless decided unprecedentedly that Pakistan will continue confidential reporting on some specific areas to ICRG through APG on ML such as updates on National Risk Assessment (NRA), Terror Financing (TF) cases which are sub-judice at appellate courts and penalties imposed in new TF convictions, efforts to guide Charity Commission on how to supervise and monitor activities low-risk NPOs vigilantly and referral of cash and gold smuggling cases with signs of TF links to Counter-Terrorism Departments (CTDs) etc.
5. It was agreed in Oct 2022, that these reports will continue for two years, concluding in June 2025 or 22 months before Pakistan's next Mutual Evaluation Report (MER) in 2029, whichever is earlier. At this point, the ICRG will decide whether to discontinue reporting (or otherwise). *Pakistan strongly urge to discontinue the reporting considering its significant progress and high-level political commitment.*

Interplay of vested interests

6. Pakistan's commitment shall not be doubted on any pretext especially citing publicly available information which is being propagated by India through social and print media.
7. Pakistan has made enormous contributions to the global fight against terrorism. Rather, no other country, outside active conflict zones, has sacrificed as much as Pakistan has done due to its decades long fight to combat terrorism.
8. Pakistan's efforts have been acknowledged by the international community including FATF, UNMT and other countries.
9. Throughout the FATF process, Pakistan's robust efforts are prominent. Compared to situation in 2018, all the entities of concern (EOCs) have been completely dismantled and their public gatherings and fund-raising activities effectively checked. This has been acknowledged by FATF Risk, Trends and Methods Working Group (RTMG), and Sanctions Monitoring Team of the UN (UNMT).

10. Pakistan has also introduced significant reforms in its systems to ensure compliance of FATF standards and improving the domestic AML/CFT regime. Key initiatives include: -

Institutional and Policy Reforms

- The establishment of National AML/CFT Authority is a key initiative. This authority plays a pivotal role in ensuring effective coordination amongst relevant stakeholders, thereby contributing to post whitelisting sustainability measures.
- Pakistan successfully completed its National Risk Assessment (NRA) in 2023, identifying and addressing vulnerabilities in its AML/CFT regime. Subsequently, the country initiated the implementation of NRA recommendations through an Internal National Action Plan (INAP), which includes prioritized actions with specific timelines. The authorities regularly review and monitor the progress of INAP implementation to ensure effectiveness in addressing identified risks and enhancing the national AML/CFT framework.
- National AML/CFT/CPF Strategy 2024-26 has been designed which focuses on the ML/TF/PF risks identified in NRA 2023 and provide a roadmap to address these risks.
- Pakistan recently formulated its National Internal Security Policy (NISP) 2024-29 which will serve as a road map to tackle the prevalent threats to the country's internal security. NISP stipulates key policy interventions, mechanisms, and procedures required to ensure internal security of Pakistan with a special focus on terrorism financing.
- A National working group notified in January 24, 2025 and Crypto Council notified in March 25, 2025 are working to propose a framework on virtual assets. The working group conducted the risk assessment and recommended legal, regulatory, taxation framework and resource requirements to the government.

Strengthened AML CPT Operational Capabilities

- Specialized AML/CFT Directorate in Federal Investigation Agency (FIA), Anti Narcotics Force (ANF), Federal Bureau of Revenue (FBR) along with five specialized units were established.
- Establishment of dedicated International Cooperation Cells in Ministry of Interior (MoI) & Law Enforcement Agencies (LEAs) to coordinate all international cooperation aspects.
- Development of case management system to monitor and improve MLA data records and a dedicated portal for implementation of sanction regime of 1373 and 1267 at National Counter Terrorism Authority (NACTA) and MoFA.
- Following comprehensive review of the confiscation regime across LEAs, the National Confiscation Policy has been revised.

Enhancing Data Sharing and Intelligence Mechanism

- Since the enactment of Custom General Order (CGO) 1 of March 2023, Pakistan has achieved a significant decline in cash smuggling through a multi-pronged strategy. The legal framework introduced mandatory cash declarations at all entry and exit points. Improved border management, including 2,611 kilometers of fencing and advanced surveillance-equipped crossing points, has curtailed unauthorized movement. Technological tools such as the

Currency Declaration System (CDS), coupled with data analytics, have enhanced monitoring and coordination between agencies. The national anti-smuggling campaign disrupted the parallel economy, reducing the demand for illicit foreign exchange.

- Financial Monitoring Unit (FMU) has successfully obtained access to databases maintained by various government agencies, enabling more efficient analysis of Suspicious Transaction Reports / Currency Transaction Reports (STRs/CTRs). Currently, FMU has access to 14 databases maintained by various government agencies.
- FMU has strengthened its international cooperation through MOUs with 20 Financial Investigation Units (FIUs) of various countries.
- To manage MLA requests in timely and efficient manner, MoI has developed a case management system to monitor timelines and improve its data records.
- Post whitelisting, FMU has conducted 19 strategic analyses to assist LEAs/regulators in addressing the identified risks. Based on Strategic Analysis, a number of cases related to ML/TF have been registered to identify money laundering and terrorist financing trends and patterns.

Capacity Building & Awareness Initiatives

- Capacity-building remains a cornerstone of Pakistan's AML/CFT strategy. Regular training sessions are organized for a broad range of stakeholders, including law enforcement officials, regulators, financial institutions, judges, and prosecutors (more than 1500 officials have been trained through 300+ sessions). These sessions are conducted both domestically and in collaboration with Donors and Providers Group (DAP), UNODC and ICITAP ensuring a comprehensive and multifaceted approach.
- National Counter Terrorism Authority (NACTA) issued a guidance document in July 2024, to enhance understanding of LEAs and other authorities regarding the possible misuse of crowdfunding platforms for ML/TF and to increase vigilance/coordination in identifying, preventing, and investigation.

Pakistan's perspective

- Pakistan assures its political commitment to international community and is committed to completing its referrals agreed by FATF it will conclude by June 2025. Pakistan is firmly committed and ready to an open exchange of information bilaterally to address any concerns related to the five residual items.
- After whitelisting, significant and consistent progress has been made to comply with FATF standards as well as Pakistan's domestic AML/CFT requirements.
- Pakistan's ICRG Action Plan was a protracted and combalve process and we wish to avoid this in the current process. Pakistan seeks assistance in ensuring procedural fairness in this matter.
- Pakistan values extremely helpful support by the US in completion of both FATF Action Plans, and sincerely believes that same will continue in concluding the referral process as well in June 2025 Plenary. We are confident that US will acknowledge, on technical merits and fairness, the substantial progress made by Pakistan.

- Pakistan reiterates its commitment to continue working closely with the international community in its efforts to fight terrorism in all its forms and manifestations.
- Fairness and legal merit must remain the basis of decision being made by FATF to ensure its own credibility and stature.
- Needless to emphasize that the assessment must remain purely in technical domain and focused on the mutually agreed items outlined by the ICRG. Any deviation from these established parameters will not only undermine the credibility and fairness of the process, but also demoralize and disincentivize Pakistan in its efforts against terrorism

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