



**PUBLICATION OF ADMINISTRATIVE SANCTION IN TERMS OF SECTION 56(14) OF THE
FINANCIAL INTELLIGENCE ACT 13 OF 2012, AS AMENDED**

KANGUEEHI & KAVENDJI LEGAL PRACTITIONERS

1. On 18 October 2024, the Financial Intelligence Centre imposed an administrative sanction in the form of a **Caution** against Kangueehi & Kavendji Legal Practitioners (“K & K Inc”).
2. This caution was issued in consideration of the available facts and information, pursuant to section 56(3)(a) of the Financial Intelligence Act 13 of 2012, as amended (“FIA”), due to K & K Inc's initial failure, at the time when the FIA compliance assessment was conducted, to implement a ML/TF/PF risk assessment in terms of section 20A (1), (2), (4), (5) and (6) of the FIA and Guidance Note No. 14 of 2023, Targeted Financial Sanctions and conduct Customer Due Diligence/Enhance due Diligence as required under section 25 (1) and (2) of the Prevention and Combatting of Terrorist and Proliferation Activities Act 4 of 2014 (“PACTOPAA”), read with Regulation 15 of the FIA Regulations, and Directive 01 of 2023 and sections 21(2) and (3), 23A and 24 (4) of the FIA and not providing timeframes within which STRs/SARs must be reported under section 33(4A) of the FIA.
3. The administrative sanction was imposed in consideration of the factors and circumstances surrounding KK Inc's non-compliance.

4. Kindly contact the Legal, Policy, and Enforcement Division (fic.legal@fic.na) should you have any further questions or queries in this regard.

Yours sincerely,

Bryan Eiseb
Director

23 December 2024