



GLOBAL FINANCIAL INTEGRITY

The Role of Professional Gatekeepers in Facilitating or Preventing Illicit Financial Flows in Belize

October 2025

OCTOBER 2025

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Acknowledgements

This report was prepared by Global Financial Integrity (GFI) within the framework of the “Increasing Domestic Resource Mobilization (DRM) by Promoting Corporate, Natural Resource and Professional Integrity” project, funded by the Norwegian Agency for Development Cooperation (NORAD). This project, carried out by GFI, aims mainly to promote corporate, natural resource and professional integrity in Belize, and enhance the existing regulatory frameworks to strengthen multi-actor struggle against different financial and environmental crimes along with local civil society organizations, and to provide technical support to the competent authorities in both countries.

The report was produced by GFI's Latin America and the Caribbean Program:

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GFI extends its sincere gratitude to all those who contributed to this study through interviews and survey responses. Your perspectives and experiences provided valuable insights into the role of professional gatekeepers in Belize. We also acknowledge the ongoing support of the supervisory authorities, particularly the Financial Intelligence Unit (FIU) and the Financial Services Commission (FSC), whose commitment to promoting fiscal transparency and strengthening oversight has been instrumental in advancing the national integrity framework.

GFI is a Washington, DC-based think tank focused on illicit financial flows, corruption, illicit trade and money laundering. Through high-caliber analyses, fact-based advocacy to promote beneficial ownership, and a cloud-based database to curtail trade fraud, GFI aims to address the harms inflicted by trade misinvoicing, transnational crime, tax evasion, and kleptocracy. By working with partners to increase transparency in the global financial system and promote Trade Integrity, GFI seeks to create a safer and more equitable world.



This report was made possible with the support of the Norwegian Government.

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Acronyms

Acronym	Meaning
AML	Anti-Money Laundering
BO	Beneficial Ownership
BDF	Belize Defense Force
BNN	Belize Network of NGOs
CDD	Customer Due Diligence
CFATF	Caribbean Financial Action Task Force
CSO	Civil Society Organization
DNFBP	Designated Non-Financial Businesses and Professions
EDD	Enhanced Due Diligence
EIA	Environmental Impact Assessment
FATF	Financial Action Task Force
FIU	Financial Intelligence Unit
FSC	Financial Services Commission
IBC	International Business Company
IFF	Illicit Financial Flows
KYC	Know Your Customer
MER	Mutual Evaluation Report

ML/TF	Money Laundering / Terrorist Financing
MLTPA	Money Laundering and Terrorism (Prevention) Act
NAMLC	National Anti-Money Laundering Committee
NGO	Non-Governmental Organization
NRA	National Risk Assessment
OBRS	Online Business Registry System
PEP	Politically Exposed Person
STR	Suspicious Transaction Report
TCSP	Trust and Company Service Provider
TBML	Trade-Based Money Laundering



Executive Summary

Professional gatekeepers, lawyers, accountants, real estate agents, trust and company service providers (TCSPs), and others, occupy a strategic position within Belize's legal and financial architecture. Their services are integral to company formation, trust management, property transfers, and financial reporting. However, these same functions, if left unchecked or exploited, can facilitate illicit financial flows (IFFs), particularly in jurisdictions where oversight is inconsistent, transparency is limited, or regulatory enforcement can be improved.

This scoping report examines the role of professional gatekeepers in either facilitating or mitigating IFFs in Belize. Drawing on legal analysis, institutional review, stakeholder interviews, and international benchmarking, the study offers a multidimensional view of how these actors shape the country's financial integrity ecosystem. The analysis focuses on lawyers, real estate professionals, Trust and Company Service Providers, and accountants because their roles in company formation, property transfers, and financial reporting place them at high-risk junctures for misuse. These professions, consistently flagged by the Financial Action Task Force as vulnerable to money laundering and tax evasion, are examined to assess the conditions under which they function as compliance agents or enablers of financial crime.

Belize has made important strides in aligning its regulatory framework with international AML/CFT standards. The Money Laundering and Terrorism (Prevention) Act (MLTPA), the Companies Act 2022, and the FSC's 2025 Guidelines on Beneficial Ownership have all introduced clearer requirements for due diligence, beneficial ownership verification, and reporting obligations across gatekeeping sectors. The launch of the Online Business Registry System (OBRS), in November 2022, by the Belize Companies and Corporate Affairs Registry – an arm of the Financial Service Commission (FSC), represents a significant step forward in centralizing and digitizing corporate data.

Yet, the **implementation of these reforms remains uneven**. Interviews with legal professionals, registered agents, real estate actors, and regulators revealed **persistent gaps in capacity, sector-specific guidance, and oversight**. The **number of Suspicious Transaction Report filings** by non-financial gatekeepers **remains low**. Many professionals' report **uncertainty about their reporting requirements** or encounter challenges in verifying client data, particularly in complex, layered ownership structures. **Real estate transactions** continue to **pose ML risks**, particularly in cash-heavy markets with limited licensing requirements. **Registered agents**, while increasingly subject to FSC



supervision, **vary widely in their internal controls and risk awareness.**

Public officers, particularly in law enforcement and environmental agencies, also emerged as de facto gatekeepers. Evidence from environmental NGOs and law enforcement interviews highlights systemic risks: bribery at checkpoints, irregular land concessions, and weak oversight of resource exploitation. These dynamics not only facilitate IFFs but also contribute to what are increasingly defined as environmental financial crimes, where natural resource sectors are used as vehicles for laundering or illicit gain.

Civil society organizations (CSOs) play a crucial role in monitoring these developments but often lack access to data, formal channels of redress, or protection for whistleblowers. Meanwhile, regulatory bodies such as the FIU and FSC acknowledge capacity constraints and limited reach in sectors like legal, real estate, and accounting services.

Based on these findings, the report identifies both immediate vulnerabilities and long-term reform opportunities. Key recommendations include:

- Strengthening sector-specific AML guidance and training
- Introducing mandatory licensing for high-risk professions such as real estate agents
- Improving inter-agency coordination
- Expanding access to the BO register
- Clarifying legal obligations around privilege and STRs
- And enhancing civil society engagement through transparency mechanisms and public data access

Ultimately, this report finds that while Belize's gatekeeping system is evolving, it continues to face challenges related to institutional coordination, legal clarity, and consistent enforcement. Addressing these areas involves more than just technical compliance.

It is essential to protect national revenues, deter corruption, and build a more transparent and accountable economic system. By reinforcing the integrity of gatekeeper roles, Belize can move toward a financial governance model that not only meets global standards but also serves the interests of its people, institutions, and natural resources management.



1. Introduction

Professional gatekeepers are individuals and firms that, by virtue of their specialized expertise and access to financial and legal systems, occupy strategic positions capable of either preventing or facilitating IFFs. These include lawyers, accountants, real estate agents, TCSPs, and other financial professionals whose services are often required to initiate, structure, or finalize complex financial and legal transactions.

According to the Financial Action Task Force (FATF), professional gatekeepers, sometimes referred to as professional enablers, may play a direct or indirect role in laundering illicit proceeds when their conduct is willfully blind, negligent, or complicit.¹ These actors often enjoy positions of trust and operate within regulated professions, which enhances their capacity to obscure the origins, ownership, or destination of funds through legal mechanisms such as the creation of companies, trusts, or layered transactions across jurisdictions with weak oversight.²

In Belize, this category includes, but is not limited to, lawyers who form and manage trusts or shell companies; accountants who manipulate financial statements; real estate professionals who facilitate high-value property transfers; and TCSPs that create opaque legal structures, often in offshore contexts.³ These professionals, when unregulated or insufficiently monitored, can serve as essential conduits in the architecture of financial crime.

Gatekeepers play a dual role in the anti-money laundering (AML) ecosystem: they are both the first line of defense and, when compromised, the point of greatest vulnerability. Their ability to access and navigate complex financial and legal systems positions them uniquely to detect irregularities, conduct customer due diligence, and file suspicious transaction reports. However, this same access makes them attractive tools for criminal enterprises seeking to legitimize illicit assets.⁴

¹ Financial Action Task Force & Egmont Group, (2018), Concealment of beneficial ownership, FATF/OECD, [Valvi, E.-A. \(2023\), "The role of legal professionals in the European and international legal and regulatory framework against money laundering", Journal of Money Laundering Control, Vol. 26 No. 7, pp. 28-52, https://doi.org/10.1108/JMLC-12-2021-0139](https://doi.org/10.1108/JMLC-12-2021-0139)

² 7 News Belize, (2016, April 5), Belize cited in Panama Papers, 7 News Belize, [Zagaris, B., MacDonald, S. B., & Adhoob, M. \(2021\), Money Laundering and Bank Secrecy, International Enforcement Law Reporter, 37, https://heinonline.org/HOL/LandingPage?handle=hein:journals/ielr37&div=29&id=&page=](https://heinonline.org/HOL/LandingPage?handle=hein:journals/ielr37&div=29&id=&page=).

³ Global Financial Integrity, (2025), Increasing professional integrity: Understanding professional gatekeepers and Belize's regulations, <https://gfintegrity.org/wp-content/uploads/2025/01/Increasing-Professional-Integrity-Understanding-Professional-Gatekeepers-and-Belizes-Regulations-Final-1.pdf>.

⁴ Financial Action Task Force (2013), Money laundering and terrorist financing vulnerabilities of legal professionals, FATF/OECD, <https://www.fatfgafi.org/content/dam/fatfgafi/reports/ML%20and%20TF%20vulnerabilities%20legal%20professionals.pdf>.



Gatekeepers can facilitate financial crimes in multiple ways. They may create shell companies to hide beneficial ownership, manipulate invoices to disguise the movement of funds, or engage in real estate transactions that convert illicit funds into tangible assets. As FATF and the Egmont Group have documented, these practices are particularly dangerous in jurisdictions with limited oversight or where legal loopholes permit excessive secrecy.⁵

The presence of professional enablers within Belize's financial landscape, particularly as revealed in high-profile cases such as the Panama Papers, has drawn attention to gaps in regulatory enforcement. Professionals in Belize were reportedly instrumental in forming and managing offshore entities used to hide assets and evade taxes, highlighting the need for stronger regulatory responses.⁶ In short, gatekeepers represent both a risk and an opportunity. When properly regulated and held accountable, they enhance financial transparency and deter abuse. When left unchecked, they can actively enable IFFs and undermine national and international financial integrity efforts.

This analysis seeks to examine the role of professional gatekeepers in facilitating or preventing IFFs in Belize, with a view toward strengthening national mechanisms for integrity, accountability, and economic resilience. Through focusing on lawyers, accountants, real estate professionals, and trust and company service providers, the report assesses how these actors, operating at the intersection of legal, financial, and regulatory systems, can either reinforce or undermine efforts to safeguard the country's financial architecture.

The primary objective is to identify the institutional, legal, and behavioral drivers that shape gatekeeper conduct, and to evaluate the effectiveness of the current regulatory framework in mitigating the misuse of professional services for illicit ends. In doing so, the report contributes to national and regional priorities aimed at reducing IFFs and enhancing compliance with international AML/CFT standards.

Ultimately, the findings are intended to support evidence-based reforms that promote professional and corporate integrity, while bolstering Belize's ability to increase domestic resource mobilization. In curbing the avenues through which illicit finance erodes tax

⁵ Financial Action Task Force & Egmont Group, (2018), Concealment of beneficial ownership, FATF/OECD, <https://www.fatfgafi.org/en/publications/Methodsandtrends/Concealment-beneficial-ownership.html>

⁶ 7 News Belize, (2016, April 5), Belize cited in Panama Papers, 7 News Belize, <https://www.7newsbelize.com/sstory.php?nid=35863>.



revenue, distorts economic governance, and weakens public trust, this report aims to inform strategies that protect the integrity of public institutions and improve the sustainability of Belize's development financing efforts.

This analysis employs a multi-method qualitative research design to explore how professional gatekeepers in Belize contribute to or help mitigate IFFs. The methodology combines legal analysis, stakeholder insights, and comparative evaluation against global standards to ensure a comprehensive and contextually grounded understanding of the gatekeeper landscape.

The first phase involved a desk-based review of ten key national laws and regulations that govern the conduct and oversight of gatekeeper professions. These include the Money Laundering and Terrorism (Prevention) Act (MLTPA), Financial Intelligence Unit Act, International Business Companies Act, Companies Act, Legal Profession Act, Accountancy Profession Act, and relevant provisions under the Financial Services Commission (FSC) Regulations. The review also incorporated policy documents, such as FSC guidelines and compliance frameworks, beneficial ownership disclosure regulations, FIU-issued typologies, and suspicious transaction reporting (STR) guidelines, as well as regional and international evaluations from the Caribbean Financial Action Task Force and the Financial Action Task Force.

To complement the legal analysis, semi-structured key informant interviews were conducted with a diverse set of stakeholders, including lawyers, registered agents, real estate professionals, representatives from the Financial Intelligence Unit, the Financial Services Commission, and select NGOs and civil society watchdogs. These interviews, conducted both in person and virtually, provided critical qualitative insights into the operational realities, compliance behavior, and systemic challenges faced by professionals across sectors.

In parallel, the analysis drew upon observational insights gained through GFI's ongoing engagements in Belize, including technical assistance, policy dialogue, and stakeholder workshops. These experiences offered practical perspectives on enforcement capacity, professional conduct, and inter-agency coordination.

Finally, data triangulation was applied using international AML/CFT frameworks, particularly the FATF Recommendations and guidance from the OECD and Egmont Group. This process ensured that national findings were assessed against globally



recognized benchmarks and helped identify key gaps, strengths, and areas for reform in Belize's current system for gatekeeper regulation.

Together, these methodological components enabled a rigorous and multidimensional inquiry into how Belize's professional gatekeepers interact with and influence the broader financial integrity ecosystem.

As a limitation, the report does not encompass all possible gatekeepers in Belize but instead concentrates on a defined set of professions and areas. The focus on lawyers, accountants, TCSPs, and real estate professionals reflects their heightened risk exposure as identified in the Mutual Evaluation, NRA, and related assessments, while recognizing that other actors, including public officers in enforcement and environmental agencies, also play important roles that warrant further study.

2. Legal and Regulatory Context in Belize

2.1 The Money Laundering and Terrorism (Prevention) Act (MLTPA)

The Money Laundering and Terrorism (Prevention) Act⁷ serves as the primary legislative instrument guiding Belize's anti-money laundering (AML), counter-terrorism financing (CTF), and counter-proliferation financing (CPF) efforts. Enacted to ensure alignment with international standards, particularly those issued by the FATF,⁸ the Act establishes the legal basis for identifying, detecting, and prosecuting illicit financial activity. Importantly, it also outlines the obligations of both financial institutions and Designated Non-Financial Businesses and Professions (DNFBPs), including lawyers, accountants, real estate agents, and trust and company service providers, collectively referred to as professional gatekeepers.

⁷ Government of Belize, (2017), Money Laundering and Terrorism (Prevention) Act (CAP. 104). Central Bank of Belize, [https://www.centralbank.org.bz/about-the-bank/laws-and-regulations/money-laundering-terrorism-\(prevention\)-act](https://www.centralbank.org.bz/about-the-bank/laws-and-regulations/money-laundering-terrorism-(prevention)-act).

⁸ Financial Action Task Force, (2023), The FATF recommendations, FATF, <https://www.fatf-gafi.org/en/topics/fatf-recommendations.html>.



Under the MLTPA, gatekeepers are legally recognized as reporting entities, subject to a range of compliance requirements designed to reduce the risk of their services being misused for illicit purposes. These include the implementation of Customer Due Diligence (CDD) measures, the collection and maintenance of Know Your Customer (KYC) information, the identification and verification of BO, and the obligation to file Suspicious Transaction Reports (STRs) with the Financial Intelligence Unit (FIU) when reasonable grounds for suspicion arise.

In addition to transactional monitoring, the MLTPA requires reporting entities to maintain internal control systems, conduct ongoing employee training, and appoint a designated compliance officer. These obligations are particularly important in sectors where client relationships are often long-standing and based on professional trust, making the detection of abuse more difficult without systematic risk-based controls.

The Act further grants regulatory and enforcement powers to the FIU, including the authority to inspect entities for compliance, impose administrative sanctions, and refer matters for criminal investigation where warranted. These oversight mechanisms apply equally to financial institutions and DNFBPs, reflecting the evolving understanding that non-financial professionals can act as key facilitators of complex financial crimes if left unregulated.

Crucially, the MLTPA reflects the FATF's emphasis on regulating professional gatekeepers under Recommendations 22 and 23, which require enhanced due diligence and monitoring of DNFBPs engaged in high-risk activities, such as company formation, real estate transactions, and the handling of client assets. By incorporating these international standards into domestic legislation, Belize has signaled its recognition of the vulnerabilities present in these sectors and its intention to mitigate those risks through legal and institutional frameworks.

However, as subsequent sections will explore, while the MLTPA provides a strong legal foundation, effective implementation and enforcement, particularly in resource-constrained regulatory environments, remain critical to closing the compliance gap across gatekeeping professions.

2.2 Beneficial Ownership Transparency

Beneficial ownership refers to the natural person(s) who ultimately own or control a legal entity or arrangement, whether directly or indirectly. As defined in Belize's legal



framework, specifically, the Money Laundering and Terrorism (Prevention) Act (as amended in 2023)⁹ and reinforced by the Financial Services Commission's (FSC) 2025 Guidelines,¹⁰ a beneficial owner is any individual who holds more than 25% of the shares or voting rights in a legal person, or who otherwise exercises ultimate effective control over a legal entity or trust, regardless of formal ownership status.

This definition applies across a wide range of legal persons and arrangements, including domestic and foreign companies, limited liability companies, partnerships, foundations, and trusts registered with the FSC. Importantly, Belize's framework also recognizes that control may be exercised through indirect means, such as nominee arrangements, informal agreements, or financial instruments that confer decision-making authority.

Registered agents and resident directors are legally mandated to obtain, verify, and maintain accurate and up-to-date BO information. The FSC Guidelines prescribe a "simultaneous approach," whereby entities must identify any individual who owns or controls at least 25% of the legal person or arrangement. If no individual meets this threshold, the obligation shifts to identifying the relevant senior managing official.

Gatekeepers are required to take all reasonable steps to determine whether control is exercised indirectly, such as through layered corporate structures or nominee shareholders. In cases where indirect control is suspected, the gatekeeper must trace through the ownership chain and identify the ultimate natural person(s) exercising control. The guidelines¹¹ stress that nominees acting on behalf of others must not be considered beneficial owners themselves; instead, the person they represent should be identified and recorded.

Belize's legal framework requires that each legal entity maintain an internal register of its beneficial owners. For companies, this register must be kept at the registered office or the registered agent's office and be made available to the FSC within 24 hours upon request. Similar requirements exist for limited liability companies, partnerships, trusts, and foundations, though the timelines for information submission range from 7 to 30 days depending on the entity type.¹²

⁹ See 7.

¹⁰ Financial Services Commission, (2025, March 18), Guidelines on beneficial ownership information, Government of Belize, https://www.belizefsc.org.bz/wp-content/uploads/2025/03/18-03-2025-FSC-Guidelines-on-BO-Information_Aproved_E.pdf.

¹¹ See 10.

¹² Ibid.



Gatekeepers also bear responsibility for ensuring that any changes in BO information are communicated promptly. For example, companies with foreign shareholders must notify their registered agent within 15 days of any change, and legal entities must submit updated information to the FSC or the Online Business Registry System.

Annual attestation reports are also required from limited liability companies and trusts, which must detail all relevant parties, owners, controllers, members, trustees, beneficiaries, and any other persons exercising ultimate effective control. Belize has taken steps to centralize the collection and storage of beneficial ownership data through the Online Business Registry System, managed by the FSC. For legal entities that cannot access the online platform, such as some trusts and foundations, data must be submitted by email directly to the FSC.

While the system is not publicly accessible, it ensures that the FSC and other competent authorities can obtain BO information efficiently for supervisory, investigative, or enforcement purposes. Gatekeepers are required to facilitate this process by maintaining proper internal records and ensuring timely submission.

Failure to comply with BO obligations, including failure to establish or update a BO register, failure to submit required reports, or obstruction of FSC inspections, may result in administrative penalties of up to \$100,000, or additional daily fines for ongoing non-compliance, depending on the nature of the legal entity.¹³

2.3 Company and Trust Formation

The legal framework in Belize permits both natural and legal persons to form companies and establish trusts, subject to compliance with applicable laws and regulations. Under the Trusts Act (Cap. 202),¹⁴ any person who has the legal capacity to own and transfer property under Belizean law may act as a settlor, the individual who creates a trust by placing assets under the control of a trustee (Section 9). The Act allows for flexibility, enabling a settlor to simultaneously serve as a trustee, beneficiary, or protector, provided the terms of the trust do not create legal inconsistencies or conflicts of interest.

In the case of company formation, the Companies Act (Cap. 250)¹⁵ and the International

¹³ Ibid.

¹⁴ Government of Belize, (2020). Trusts Act, Chapter 202, Revised Edition 2020, Financial Services Commission, <https://www.belizefsc.org/bz/trusts-act-chapter-202/>.

¹⁵ Government of Belize, (2022). Belize Companies Act, 2022, Belize Companies and Corporate Affairs Registry, <https://bccar.bz/belize-companies-act-2022/>.



Business Companies Act (Cap. 270)¹⁶ outline the procedures and requirements for incorporating domestic and offshore entities. The formation of companies, whether limited liability companies, partnerships, or foundations, is typically executed through registered agents, who are licensed by the FSC to facilitate corporate registration, ensure statutory compliance, and maintain records.

At the point of formation, both registered agents and legal professionals involved in establishing companies or trusts are subject to mandatory CDD and KYC requirements under the MLTPA. These obligations are further reinforced by FSC Guidelines and compliance notices, which mandate that gatekeepers must obtain and verify identity documents, assess the legitimacy of the source of funds, and document the beneficial ownership structure before proceeding with incorporation or trust registration.

For trusts, the Trusts Act does not independently impose due diligence standards; however, these are effectively absorbed through the MLTPA and related AML/CFT regulations, which treat TCSPs as regulated entities. This integration ensures that both company formation and trust establishment are subject to risk-based assessments, with special scrutiny applied in cases involving complex ownership structures, politically exposed persons (PEPs), or high-risk jurisdictions.

Belizean law does not explicitly prohibit the use of nominee directors or shareholders, but such arrangements are governed by the requirement to disclose the ultimate beneficial owner and maintain transparency. Under the 2025 FSC Guidelines on Beneficial Ownership,¹⁷ gatekeepers must ensure that nominee arrangements do not obscure the identity of the controlling individual. Nominees acting on behalf of others must declare the natural person for whom they act, and that person must be recorded as the beneficial owner.

Bearer shares, which allow for ownership transfer without a formal registry, are not permitted under current Belizean corporate law. This prohibition aligns with global best practices and FATF recommendations aimed at preventing the anonymous transfer of corporate ownership.

With respect to shell entities, Belize does not provide a formal legal definition. However, the regulatory framework implicitly addresses their risk by requiring substantive information on the ownership, control, and purpose of all legal entities at formation.

¹⁶ Government of Belize, (2020), International Business Companies Act, Chapter 270, Revised Edition 2020, Belize Companies and Corporate Affairs Registry. <https://bccar.bz/international-business-companies-act-chapter-270/>.

¹⁷ See 10.



Entities with no significant operations or assets, particularly those with foreign ownership or layered structures, are subject to additional scrutiny by both the FSC and the FIU.

Registered agents serve as the primary intermediaries between clients and the corporate registry in Belize. Licensed by the FSC, they are responsible for executing the legal, procedural, and compliance aspects of company and trust formation. Their duties include:

- Performing due diligence and verifying beneficial ownership
- Filing incorporation documents and trust deeds
- Maintaining statutory registers and accounting records
- Submitting updates on ownership or control changes to the FSC
- Responding to regulatory requests and inspections within legally defined timeframes

In essence, registered agents function as frontline compliance actors in the regulatory architecture, and their conduct significantly shapes the integrity and transparency of the corporate environment in Belize. When effectively regulated and monitored, these professionals help prevent the misuse of legal structures for illicit purposes. Conversely, weak oversight or non-compliance among agents creates vulnerabilities that can be exploited by those seeking to obscure financial crime.

2.4 Oversight and Supervision

Belize employs a multi-agency model for supervising gatekeepers, with roles distributed across specialized regulatory bodies and professional associations. The FSC¹⁸ acts as the primary supervisor for TCSPs, international business companies (IBCs), and other non-bank financial entities operating within its licensing scope. The FIU¹⁹ serves as the overarching AML/CFT supervisory authority, empowered to oversee compliance across all reporting entities, including lawyers, accountants, and real estate professionals designated as DNFBPs under the Money Laundering and Terrorism (Prevention) Act.

In parallel, professional bodies such as the Bar Association of Belize²⁰ and the Institute of Chartered Accountants of Belize may play internal oversight or ethical roles within their

¹⁸ Financial Services Commission, (n.d.), About non-bank financial services sector in Belize, Government of Belize, <https://www.belizefsc.org.bz/about-non-bank-financial-services-sector-in-belize/>.

¹⁹ Financial Intelligence Unit, (n.d.), Who we are, Government of Belize, <https://fiubelize.org/who-we-are/>.

²⁰ Government of Belize, (2020), Legal Profession Act, Chapter 320, Revised Edition 2020, Belize Bar Association, https://belizebarassociation.com/wp-content/uploads/2023/03/Cap_320_Legal_Profession_Act.pdf.



respective professions, although they are not formal AML supervisors under law. Instead, the responsibility for ensuring compliance with AML/CFT obligations rests with statutory regulators such as the FSC and the FIU.

Gatekeepers operating as registered agents, company service providers, or TCSPs must be licensed by the FSC in accordance with its licensing framework. Applicants are to fit-and-proper criteria, including the assessment of their qualifications, financial integrity, and compliance record. Ongoing registration is contingent on maintaining adherence to reporting obligations and demonstrating effective internal controls.

Lawyers and accountants are required to register with their respective professional bodies, but in the context of AML/CFT supervision, they must also register with the FIU if they engage in high-risk activities such as managing client assets, forming legal persons, or engaging in transactions above specified thresholds. Real estate agents similarly fall under FIU oversight when involved in transactions that meet the definition of “reportable activities.”

Both the FSC and FIU possess statutory powers to inspect, audit, and investigate reporting entities under their supervision. These powers include the right to request records, access client due diligence files, and conduct on-site inspections to assess internal compliance frameworks. The FIU, in particular, has authority to carry out targeted reviews of STR practices, beneficial ownership data management, and training protocols. The FSC may also conduct risk-based audits or thematic reviews of specific sectors, particularly in response to emerging typologies or findings from national risk assessments. These inspections are designed not only to detect non-compliance but also to strengthen supervisory dialogue with private sector actors.

Compliance monitoring is guided by a risk-based approach, meaning that entities classified as high-risk, due to client profiles, service offerings, or jurisdictional exposure, are inspected more frequently. FSC inspections may occur annually or biennially, depending on the entity’s risk rating, while the FIU conducts both scheduled and ad hoc inspections, often in response to STRs, referrals, or intelligence leads.

In practice, resource constraints and staffing limitations have historically affected the frequency of supervision, particularly for DNFBPs. However, both the FSC and FIU have made efforts in recent years to improve outreach, streamline data requests, and implement compliance self-assessment questionnaires to supplement direct supervision.



Enforcement and Penalties

Entities that fail to meet their AML/CFT obligations may be subject to a range of administrative and financial penalties.²¹ These include fines for failure to conduct customer due diligence, maintain adequate internal controls, or submit required filings. The MLTPA and FSC regulations empower regulators to suspend licenses, impose conditional restrictions, or refer matters for criminal prosecution in cases of willful non-compliance.

The FSC may impose penalties up to BZ\$100,000 per violation for breaches of beneficial ownership obligations,²² and escalating daily fines for ongoing non-compliance. These penalties are designed to reinforce the importance of timely and accurate reporting and to deter habitual or intentional breaches.

Failure to submit STRs or to maintain proper client records can trigger both civil and criminal liabilities. The FIU has the authority to levy administrative penalties, issue compliance directives, or freeze accounts pending investigation. Under the MLTPA, willful neglect or obstruction of regulatory duties, such as refusal to produce documents or concealment of beneficial ownership, may also result in criminal charges, including imprisonment for responsible individuals.

While the legal and regulatory framework provides for graduated and proportionate sanctions, enforcement history to date suggests that penalties have been inconsistently applied across different gatekeeper categories. Notably, more robust enforcement has been observed in the financial sector compared to DNFBPs, where gaps in registration, inspection coverage, and training remain.²³

Efforts are ongoing to strengthen deterrence through greater inter-agency coordination, enhanced supervisory technology, and updated compliance guidance. The publication of enforcement outcomes remains limited, which may affect the overall visibility of deterrence efforts. Nonetheless, recent institutional reforms signal a growing recognition of the need for transparent, proportionate, and dissuasive enforcement as a central pillar of effective AML supervision.

²¹ See 7 & 15.

²² See 10.

²³ Global Financial Integrity, (2025, February 13), Belize's fourth round mutual evaluation: Progress, challenges, and the road ahead, <https://gfintegrity.org/belizes-fourth-round-mutual-evaluation-progress-challenges-and-the-road-ahead/>.



2.5 Alignment with Regional and International Standards

Belize’s legislative framework has made progress toward aligning with the FATF Recommendations, particularly Recommendations 22 and 23, which govern the roles and obligations of DNFBPs.²⁴ These recommendations require DNFBPs, such as lawyers, accountants, real estate agents, and trust and company service providers, to conduct Customer Due Diligence (CDD), maintain records, report suspicious transactions, and be subject to appropriate supervision and monitoring.

MLTPA, supported by regulatory guidance from the FSC and FIU, outlines CDD obligations and defines the reporting duties of DNFBPs engaged in activities such as company formation, managing client funds, and high-value real estate transactions. Both Recommendations 22 and 23 are addressed in Belize’s legal framework, although implementation remains uneven across gatekeeper sectors.

Belize’s most recent Mutual Evaluation Report (MER), published in January 2025 by the Caribbean Financial Action Task Force (CFATF),²⁵ provided a comprehensive assessment of the country’s technical compliance and the effectiveness of its AML/CFT regime. The evaluation found that while Belize has taken notable steps to improve its regulatory environment. These improvements are particularly through recent reforms to beneficial ownership disclosure and the FSC’s risk-based supervision model, important deficiencies remain, especially concerning gatekeeper supervision and enforcement.

According to the 2025 evaluation, Belize was rated partially compliant with FATF Recommendations 22 and 23, primarily due to:

- Inadequate coverage of DNFBPs, especially lawyers, real estate agents, and accounting professionals, many of whom operate outside formal supervisory arrangements.
- Limited supervisory engagement with DNFBPs, including low inspection rates and minimal use of enforcement powers.
- Insufficient sector-specific guidance, which has contributed to uneven implementation of AML/CFT obligations by professionals operating in high-risk areas

²⁴ See 20.

²⁵ Caribbean Financial Action Task Force, (2025), Anti-money laundering and counter-terrorist financing measures: Belize, fourth round mutual evaluation report, FATF & CFATF, <https://www.fatf-gafi.org/en/publications/Mutualevaluations/MER-Belize-2025.html>.



The evaluation further noted that while the FIU and FSC possess the legal authority to supervise gatekeepers, these functions are constrained by resource limitations, a lack of specialized training, and data management challenges.

In response to the CFATF's findings, Belize has undertaken a set of reforms aimed at enhancing its AML/CFT regime and addressing weaknesses identified in the 2025 evaluation. These include:

- Publication of the 2025 FSC Guidelines on Beneficial Ownership Information,²⁶ which strengthened due diligence and transparency obligations for all legal persons and arrangements.
- Expanded licensing and registration requirements for trust and company service providers.
- Continued development of the Online Business Registry System, intended to improve information-sharing and central access to beneficial ownership data.
- Enhanced engagement by the FSC in conducting risk-based inspections of registered agents and service providers.

These reforms signal Belize's commitment to increasing compliance with FATF standards, although the implementation phase remains ongoing, particularly in sectors not traditionally subject to AML supervision.

Despite the progress made, several critical gaps persist, as documented in the 2025 Mutual Evaluation and in GFI's independent analysis.²⁷ These include:

- Low quantity of STR reporting by lawyers, real estate agents, and accountants.
- Unregulated or informally operating professionals, particularly in remote areas or among smaller firms.
- Limited outreach and training tailored to DNFBPs, resulting in compliance gaps and uncertainty about reporting obligations.
- Limited enforcement to date, with few public examples of penalties or sanctions imposed on gatekeepers for non-compliance.
- Insufficient integration of gatekeeper data into national risk assessments and policy planning.

Collectively, these gaps highlight the need for continued institutional strengthening, improved regulatory coordination, and a sustained commitment to bringing Belize's gatekeeping sectors in line with global AML/CFT expectations.

²⁶ See 10.

²⁷ See 20.



3. Gatekeeper Roles and Practices in Belize

3.1 Defining Gatekeepers and their Functions in Belize Financial Integrity Landscape

In the Belizean context, gatekeepers encompass a diverse set of professionals whose roles place them at critical junctures of legal, financial, and regulatory transactions. Traditionally, this group includes²⁸ lawyers, registered agents, TCSPs, accountants, auditors, notaries public, real estate professionals, and corporate service providers, all of whom are recognized under international standards as DNFBPs.

However, in a broader interpretation, especially relevant in jurisdictions with overlapping institutional mandates, public officers²⁹ such as customs officials, police officers, Belize Defence Force (BDF) personnel, forest officers, fisheries officers, and lands department staff can also act as de facto gatekeepers through their discretionary powers and control over regulatory approvals.

These individuals and entities often serve as access points to the formal economy and can either reinforce or undermine financial integrity systems depending on how their responsibilities are executed. They are subject to oversight, reporting obligations, and professional accountability mechanisms has a direct impact on the effectiveness of Belize's AML/CFT framework.

Within the private sector, lawyers, accountants, and TCSPs play a frontline role in implementing CDD, KYC procedures, and identifying and reporting suspicious transactions. These functions are mandated under the MLTPA and further elaborated in regulatory guidelines issued by the FSC and the FIU. When functioning effectively, these actors contribute to the early detection of illicit activity, provide intelligence to competent authorities, and act as a buffer between the legitimate economy and financial abuse.

²⁸ FATF-Egmont Group, 2018, Concealment of Beneficial Ownership, <https://www.fatf-gafi.org/content/dam/fatf-gafi/reports/FATFEgmont-Concealment-beneficial-ownership.pdf>.

²⁹ U.S. Department of the Treasury, (2024), National money laundering risk assessment 2024, U.S. Department of the Treasury, <https://home.treasury.gov/system/files/136/2024-National-Money-Laundering-Risk-Assessment.pdf>



However, weaknesses in implementation, regulatory arbitrage, or deliberate non-compliance can invert their role, from compliance agents to facilitators of crime.³⁰ A lack of sector-specific training, inconsistent supervisory coverage, and limited deterrence mechanisms have all contributed to vulnerabilities within the gatekeeper ecosystem.³¹

Company formation services are primarily provided by registered agents, law firms, and corporate service providers licensed by the FSC.³² These professionals are responsible for incorporating domestic and IBCs, establishing limited liability partnerships, and managing trust and foundation structures. In this capacity, they are expected to conduct thorough beneficial ownership verification, collect the necessary identification documents, and assess the purpose and risk profile of the legal entity being formed.

Nevertheless, these services can be exploited to create layered or opaque corporate structures, especially when nominee arrangements or foreign intermediaries are involved.³³ The formation of shell companies, entities with no substantial operations or assets, is one such risk, particularly in cases where client information is not adequately vetted or updated.

Professionals involved in land transactions, including real estate agents, lawyers, surveyors, and lands department officials, facilitate financial transfers and the conversion of illicit funds into fixed assets. Real estate,³⁴ due to its appreciation potential and relative insulation from short-term financial volatility, is a known vehicle for money laundering, especially in cash-heavy economies or where property ownership records lack transparency.

While real estate agents and legal advisors are expected to conduct due diligence on both buyers and sellers, challenges persist around verifying sources of funds, identifying PEPs, and detecting fronting arrangements. Additionally, public officials with discretionary authority over land allocation or approvals may be vulnerable to corrupt inducement. This can enable fraudulent title transfers, undervaluation schemes, or land flipping practices.

³⁰ Financial Action Task Force, (2024), Horizontal review of gatekeepers' technical compliance, FATF, <https://www.fatf-gafi.org/content/dam/fatf-gafi/reports/HRGTC.pdf>.

³¹ See 25.

³² See 15.

³³ See 25.

³⁴ Financial Action Task Force, (2018), Guidance for a risk-based approach: Real estate sector, FATF/OECD, <https://www.fatf-gafi.org/en/publications/Fatfrecommendations/Guidance-rba-real-estate-sector.html>.



Customs officers and brokers, freight forwarders, and legal professionals involved in the preparation of trade documentation hold key gatekeeping roles in cross-border commerce. Fraudulent invoicing, under- or over-declaration of goods, and misclassification of exports and imports are commonly cited TBML typologies, often facilitated by front companies or layered corporate structures that obscure the parties involved.³⁵

Gatekeepers may be unwitting facilitators or, in some cases, complicit actors who design structures to evade scrutiny. Lawyers drafting contractual arrangements, accountants preparing false financial statements, or Customs officers accepting bribes to misreport cargo content each represent a point at which illicit financial flows can be enabled or disrupted.

Accountants and auditors also occupy a critical gatekeeping position, particularly through their responsibilities for financial reporting, tax compliance, audit verification, and advisory services.³⁶ As professionals often entrusted with reviewing and certifying the financial health of companies, they are uniquely positioned to detect anomalies indicative of illicit activity, such as unexplained revenue streams, false invoicing, or asset concealment. In Belize, accountants are considered reporting entities under the MLTPA when they perform certain high-risk functions, such as managing client funds or preparing financial documents for legal persons.

However, oversight in this sector remains limited, with low rates of STR submissions and varied levels of AML training across firms.³⁷ When misused, accounting services can be employed to manipulate balance sheets, facilitate tax evasion, or validate false documentation, thereby reinforcing the legitimacy of fraudulent enterprises. As such, the role of accountants must be recognized not only as technical but regulatory, warranting greater engagement from supervisory authorities and professional bodies alike.

While professional gatekeepers are traditionally defined in relation to legal and financial services, in Belize, public officers, particularly those with regulatory or enforcement authority, function as critical gatekeepers within the broader financial integrity ecosystem. By virtue of their roles, these individuals have direct access to frontline decision-making spaces related to land, natural resources, customs processing,

³⁵ Financial Action Task Force & Egmont Group, (2020), Trade-based money laundering: Trends and developments. FATF/Egmont. <https://www.fatf-gafi.org/en/publications/Methodsand Trends/Trade-based-money-laundering-trends-and-developments.html>

³⁶ Financial Action Task Force, (2019), Guidance for a risk-based approach for the accounting profession, FATF/OECD, <https://www.fatf-gafi.org/en/publications/Fatfrecommendations/Rba-accounting-profession.html>.

³⁷ Caribbean Financial Action Task Force, (2025), Anti-money laundering and counter-terrorist financing measures: Belize, fourth round mutual evaluation report, FATF & CFATF, <https://www.fatf-gafi.org/en/publications/Mutualevaluations/MER-Belize-2025.html>.



marine oversight, and environmental regulation. Their positions carry both power and discretion, making them uniquely situated to either disrupt IFFs or, conversely, enable them through bribery, collusion, or willful negligence.

In day-to-day operations, these officers may be responsible for:

- Approving or denying permits and licenses for land clearing, logging, fishing, or development in protected areas.
- Conducting border checks or port inspections related to goods, vessels, or natural resources.
- Investigating or reporting suspicious environmental activities or financial irregularities related to illegal trade.
- Detaining individuals involved in illegal logging, poaching, unlicensed fishing, or other resource-related crimes.

Despite their pivotal role in protecting public assets and enforcing environmental law, the effectiveness of these gatekeepers is frequently challenged by resource constraints, a lack of specialized training in financial crime detection, and limited institutional oversight.³⁸ In some instances, officers may accept bribes³⁹ in exchange for overlooking violations, facilitating illegal exports of timber or wildlife, or shielding individuals engaged in unregulated extraction or land acquisition.

These activities contribute to what are increasingly referred to as environmental financial crimes, the use of natural resource sectors as vehicles for laundering money or generating illegal profits. This includes the illegal wildlife trade, unauthorized land sales, illicit logging, and unreported or unregulated fishing, all of which can intersect with corruption and money laundering practices.

Recognizing these individuals as gatekeepers broadens the scope of AML/CFT frameworks and highlights the need for integrated supervision, cross-training, and anti-corruption safeguards across agencies responsible for environmental governance. Strengthening internal accountability mechanisms, enabling whistleblower protections, and enhancing inter-agency coordination, particularly between environmental bodies, law enforcement, and financial intelligence agencies, are essential to closing these systemic vulnerabilities.

³⁸ Guerra, W., & Manzanero, R. (2025). Status of cross-border cattle ranching encroachments in the Vaca Forest Reserve and Chiquibul ecosystem. Friends for Conservation and Development. <https://gfiintegrity.org/report/status-of-cross-border-cattle-ranching-encroachments-in-the-vaca-forest-reserve-and-chiquibul-ecosystem/>

³⁹ Love FM News. (2023, March 16). Court grants judicial review for ex-cop fired over bribery allegation. [Love FM. https://lovefm.com/court-grants-judicial-review-for-ex-cop-fired-over-bribery-allegation/](https://lovefm.com/court-grants-judicial-review-for-ex-cop-fired-over-bribery-allegation/)



3.2 Evidence from the Field: Insights from Practitioners

To better understand how gatekeepers in Belize experience and implement their anti-money laundering AML/CFT responsibilities, this section presents findings derived from interviews, written submissions, and structured survey responses. These perspectives were gathered from a range of professionals, including lawyers, registered agents, real estate professionals, law enforcement personnel, civil society representatives, and environmental watchdog organizations. Additional input was obtained from national authorities such as the FIU and the FSC, both of which serve as key supervisory and policy actors in the country's AML/CFT landscape.

The insights presented here complement the legal and institutional analysis detailed earlier in the report and ground the findings in lived realities and sector-specific challenges. While the number of participants was limited and not all gatekeeper groups were represented, the qualitative data collected still reveal important patterns in compliance behavior, regulatory awareness, sectoral risks, and the structural barriers to stronger enforcement.

Participants were asked to reflect on a range of themes, including CDD and KYC practices, BO verification, experiences with STRs training received from regulators, conflicts of interest, and potential policy reforms. Special attention was also paid to the extent to which public officers and professional enablers contribute, intentionally or inadvertently, to illicit financial flows and environmental financial crimes. Their responses, presented in the subsections that follow, are anonymized where necessary to protect confidentiality, but reflect authentic voices from across Belize's professional and regulatory spectrum.

3.2.1 Lawyers and Registered Agents

Lawyers and registered agents serve as critical gatekeepers at the intersection of company formation, trust services, real estate transactions, and regulatory compliance. Under Belizean law, these professionals are obligated to perform CDD, verify BO information, and STRs in accordance with the Money Laundering and Terrorism (Prevention) Act and associated regulatory guidelines. Interviews with legal practitioners revealed a strong awareness of these obligations, though practical challenges persist.

Legal professionals described a multi-tiered approach to onboarding clients, including the collection of identification documents, proof of address, bank or professional references, and BO declarations. Enhanced due diligence measures are reportedly



applied when dealing with PEPs, high-risk jurisdictions, or clients requesting complex ownership structures. In some cases, practitioners emphasized their refusal to proceed with transactions when transparency was insufficient or where the client's rationale could not be substantiated.

Verification of beneficial ownership is conducted using notarized or apostilled documentation, cross-checked against corporate registries and public databases. The introduction of the Online Business Registry System (OBRS) in 2022 has reportedly improved the ability of professionals and regulators alike to validate BO data in real time. Nevertheless, some respondents noted that clients, particularly foreign investors, occasionally attempt to obscure ownership through proxies or layered structures, often citing privacy or tax efficiency as justifications.

STR reporting was identified as an area of tension, particularly among smaller law firms without dedicated compliance personnel. Practitioners acknowledged the difficulty of balancing client confidentiality with legal reporting obligations, especially when the threshold for "suspicion" remains interpretively vague. While the FIU provides training and reporting templates, several interviewees pointed to the need for more sector-specific guidance and clearer definitions of reportable activity. Some also highlighted the lack of feedback from the FIU once an STR is submitted, which limits the ability to evaluate risk thresholds or improve internal compliance protocols.

From a regulatory standpoint, respondents appreciated the outreach efforts of the FIU and the FSC, particularly their workshops on BO transparency and AML/CFT compliance. However, there remains a desire for more interactive, scenario-based training that addresses real-world dilemmas, such as the interface between attorney-client privilege and AML obligations. Practitioners also flagged gaps in enforcement consistency, citing cases where firms with repeated deficiencies received only warnings, and broader concerns about the opaque nature of disciplinary actions.

Conflicts of interest, especially in a small jurisdiction like Belize, were also highlighted. Several interviewees noted the dual roles played by some legal professionals as advisors and political actors, raising questions about undue influence and preferential access to regulatory decisions. While most firms implement internal escalation procedures for PEPs and conflict-sensitive clients, the lack of a centralized PEP database or sector-wide guidance increases the risk of exposure.



In terms of reforms, practitioners suggested the expansion of public access to the BO registry for vetted stakeholders, standardized digital KYC tools for small firms, and clearer demarcation between legal privilege and AML compliance. There was also strong support for mandatory annual AML certification for attorneys involved in corporate and trust-related services. Across the board, there was consensus that Belizean lawyers generally seek to operate within ethical bounds, but are constrained by resource limitations, regulatory ambiguity, and an uneven compliance landscape.

3.2.2 Real Estate Professionals

Real estate professionals in Belize occupy a pivotal role in the gatekeeper ecosystem, particularly in facilitating high-value property transactions that can serve as vehicles for laundering illicit proceeds. The real estate sector is inherently vulnerable to misuse, given the large volumes of capital involved, the common use of cash, and the relative opacity that can be maintained through the use of intermediaries or corporate vehicles. While not all real estate transactions are high risk, the sector's exposure is amplified in a jurisdiction like Belize, where foreign investment in property markets, especially in coastal and tourist zones, is frequent and regulation remains fragmented.

Interviews with licensed agents and sector representatives revealed an emerging compliance culture among more established firms and individuals. Respondents confirmed the use of KYC forms, the collection of identification documents, and the verification of proof of address and source of funds, particularly for cash transactions and purchases by non-residents. In practice, the use of IBCs to acquire property is reportedly common among foreign buyers. While not inherently suspicious, these arrangements often obscure the true beneficial owner and complicate verification processes.

Professionals acknowledged that intermediaries such as attorneys or corporate service providers sometimes act on behalf of clients, which adds layer of complexity in determining beneficial ownership. In these cases, leading agents request BO declarations and registry extracts to ensure that the legal person or entity making the purchase is properly vetted. However, in the absence of a centralized property transaction database or mandatory licensing of real estate professionals, there are still significant barriers to sector-wide compliance and oversight. Some agents reported encountering red flags, including clients unwilling to meet in person, unexplained



urgency to close in cash, and transactions priced significantly above market value. While most respondents expressed confidence in identifying and reporting suspicious activity, it was noted that the lack of formal licensing requirements for real estate agents in Belize makes it difficult to ensure universal adherence to AML/CFT obligations. This regulatory gap also limits the capacity of competent authorities to enforce compliance or provide targeted supervision.

Despite these limitations, there has been progress in awareness-raising and training. Several interviewees credited outreach efforts by the FIU and the Belize Real Estate Association, including AML/CFT seminars and the dissemination of guidance materials adapted from FATF recommendations. These initiatives have contributed to improved risk awareness, although training remains voluntary and enforcement mechanisms are underdeveloped.

In terms of institutional reform, real estate professionals recommended the introduction of mandatory licensing and registration for all practicing agents, along with a central database of property transactions accessible to regulators and law enforcement. They also expressed support for standardized AML compliance training and the development of red flag checklists specific to property-related money laundering typologies.

Overall, while there are agents operating at high standards of due diligence, the sector remains exposed to misuse due to inconsistent oversight, voluntary compliance measures, and gaps in legal authority. Strengthening regulation, standardizing professional requirements, and improving access to transaction-level data will be key to mitigating money laundering risks in Belize's real estate sector.

3.2.3 Environmental and Civil Society Organizations

Environmental stakeholders and civil society organizations in Belize, while not conventional gatekeepers in the legal or financial sense, play a critical oversight role in monitoring how natural resource transactions intersect with financial integrity. Their proximity to land use approvals, environmental licensing, and resource exploitation makes them key observers of how both professional enablers and public officials may facilitate or prevent environmental financial crimes.

Interview data from representatives of environmental NGOs, including national and internationally-affiliated organizations, underscored the prevalence of informal



networks and weak transparency mechanisms that allow corruption to persist within the environmental governance framework. Participants cited specific cases involving gold mining in protected areas and illegal logging in cross-border zones, where concessions were granted or permits issued under questionable circumstances. In several instances, land and forestry licenses were obtained by individuals or entities linked to politically connected insiders, with front-facing companies used to mask the true beneficiaries of resource exploitation.

These oversight groups identified law firms as central actors in facilitating these arrangements, often through the creation of corporate vehicles or the provision of legal advice that shields ownership structures from scrutiny. These professionals, while not necessarily complicit, contribute to an environment where opacity is normalized and where access to beneficial ownership information remains limited. The misuse of shell companies and short-term concession agreements was also highlighted as a mechanism to quickly extract value from public resources with minimal oversight.

Environmental NGOs reported limited access to land ownership and environmental project information, noting that while some data is technically available, it is often incomplete, unstructured, or difficult to obtain without formal requests. This lack of access hampers civil society's ability to conduct independent monitoring or to hold both public and private actors accountable. In several cases, attempts to obtain relevant data were reportedly met with resistance or administrative delays, particularly where sensitive political or financial interests were involved.

Civil society actors also observed that government enforcement agencies, including forestry and fisheries officers, often lack the capacity, resources, or institutional independence to effectively monitor environmental crimes. In some cases, direct collusion between enforcement personnel and illegal operators was reported, particularly along border areas where natural resources are trafficked. These circumstances were described as symptomatic of a wider system of informal governance, where "who you know" often determines access, impunity, or enforcement outcomes.

Despite these challenges, environmental CSOs have continued to play a proactive role in advocacy, monitoring, and public awareness. Some of the environmental oversight groups have called for a more digitized and transparent licensing system, stronger whistleblower protections, and the depoliticization of environmental oversight



boards. There is also growing recognition of the need for civil society inclusion in oversight frameworks, including access to beneficial ownership information and participation in environmental impact assessment reviews.

The role of civil society in promoting gatekeeper integrity is thus twofold: as external monitors capable of flagging misconduct, and as policy advocates pushing for reforms that reduce discretion, increase transparency, and strengthen accountability. Their contributions are particularly relevant in a context where environmental and financial crimes intersect, and where public resources are at risk of being captured by private or criminal interests through opaque and unregulated channels.

3.2.4 Public Officers in Enforcement and Resource Agencies

As previously mentioned, while not formally designated as gatekeepers under Belize’s AML/CFT regulatory framework, public officers in enforcement and resource management agencies wield considerable discretionary authority that directly influences the integrity of financial and environmental governance systems. These include police officers, Customs officials, BDF personnel, and officers from the Departments of Forestry, Fisheries, and Lands. Findings from this scoping exercise suggest that, in certain operational contexts, these frontline actors can function as de facto gatekeepers, particularly in the facilitation or prevention of environmental financial crimes, trade-based money laundering, and informal land transactions. Even in the absence of formal reporting obligations, their conduct materially shapes whether illegal activities are flagged, sanctioned, or quietly enabled.

Stakeholder feedback highlighted systemic vulnerabilities related to bribery and informal payments, particularly at border checkpoints and along major trade routes. Instances were noted where cargo trucks reportedly passed through inspection points without proper scrutiny after providing cash payments or “gifts” to law enforcement or customs officials. Such practices enable the unchecked movement of goods, ranging from untaxed consumer items to timber and potentially illicit substances, across the Belize–Guatemala border. These behaviors mirror the risks posed by professional enablers in the private sector, where discretionary authority can be exploited to facilitate IFFs.

Interviewees also observed that senior officers sometimes issue informal instructions to junior personnel not to interfere with certain vehicles or individuals, creating an environment of selective enforcement where power dynamics and patronage override



due process. Specialists mentioned that officers who attempt to resist or report such practices risk reassignment, marginalization, or other penalties, reinforcing a culture of silence and complicity. These vulnerabilities underscore the importance of extending supervisory attention beyond traditional gatekeepers to include public officers, ensuring that institutions like the FIU and FSC are supported in promoting accountability across both professional and enforcement sectors.

Agencies like the Professional Standards Branch and Internal Affairs provide a nominal layer of accountability, but their capacity and independence remain constrained, resulting in inconsistent enforcement and a lack of meaningful deterrence. Together, these conditions create systemic vulnerabilities that undermine gatekeeper integrity and weaken the credibility of Belize's AML/CFT framework.

The implications of this dynamic are far-reaching. When enforcement officers facilitate illicit trade, whether knowingly or through omission, they become enablers of IFFs. This weakens Belize's border integrity, undermines legitimate commerce, and contributes to a parallel economy that circumvents regulatory and tax systems. Moreover, it erodes public trust in institutions charged with upholding the law and protecting national resources.

Addressing the risks they pose requires a multidimensional approach: improving salaries and working conditions, strengthening internal monitoring, deploying technology (e.g., digital cargo tracking, body-worn cameras), and enhancing inter-agency collaboration with bodies such as the FIU and Customs Department. More fundamentally, building a culture of integrity within enforcement agencies, rooted in accountability and transparency, is essential to reducing the enabling role these officers may play in illicit financial flows.

3.2.5 The Supervising Authorities

As the primary supervisory and enforcement authorities for Belize's AML/CFT framework, the FIU and the FSC play central roles in shaping gatekeeper compliance and accountability. Discussions and survey responses from these institutions revealed both progress and persisting challenges in the regulation of DNFBPs, especially lawyers, real estate professionals, and TCSPs.



The FIU, in its questionnaire response, noted that while STR filings from gatekeepers remain relatively low in volume, the quality of submissions has generally improved. This improvement likely reflects the cumulative impact of outreach, training sessions, and sectoral engagement carried out by the FIU and FSC in recent years, which have raised awareness among professionals about their reporting obligations and the elements of a “good quality” STR. According to the FIU, the deficiencies that persist are mainly procedural, including delays in submission and incomplete or unclear information that require follow-up.

The FIU further explained that certain gatekeeper professions are more frequently associated with investigations, though typically as providers of information rather than subjects of inquiry. In domestic contexts, real estate professionals are most often linked to money laundering investigations by assisting law enforcement with relevant data. Internationally, registered agents (formerly referred to as TCSPs) are more frequently associated with mutual legal assistance requests, primarily through the provision of corporate or beneficial ownership records. In both cases, these professions serve as conduits of information to investigators rather than being direct targets themselves.

The FIU emphasized the importance of its outreach and training efforts, which are regularly adapted to reflect evolving risks identified in Belize’s National Risk Assessment (NRA). Training modules have been delivered to gatekeeper sectors on STR reporting, ML/TF indicators, and compliance obligations. The FSC has similarly supported these efforts by providing compliance advisories and licensing workshops for TCSPs. However, stakeholders noted that training sessions are often generalized and would benefit from more sector-specific case studies and applied scenarios.

In terms of access to BO information, both the FIU and FSC acknowledged significant improvements following the enactment of the Belize Companies Act 2022 and the launch of the Online Business Registry System (OBRS). The system provides competent authorities with timely, direct access to beneficial ownership data, addressing a previously cited challenge in verification and information gathering. Nonetheless, limitations remain regarding access for civil society and journalists, and there are calls for greater transparency through tiered access mechanisms.

From a supervisory perspective, the FSC reported using a combination of on-site inspections and off-site surveillance to monitor compliance among its licensees. While



these measures are risk-based and guided by the NRA, internal capacity constraints continue to affect the frequency and depth of inspections. This is particularly relevant in sectors such as legal and corporate services, where the proliferation of small firms poses challenges for consistent oversight.

Coordination between the FIU and FSC is formally structured through joint participation in the National Anti-Money Laundering Committee (NAMLC), which facilitates policy alignment, information sharing, and collective supervision strategies. However, both institutions acknowledged the need for further investment in digital compliance tools, enhanced human resources, and legislative clarity, particularly around professional privilege and reporting obligations for lawyers and accountants.

To strengthen their oversight capabilities, the FIU is currently piloting a web-based risk assessment tool for DNFBPs, developed in collaboration with international partners. This initiative aims to automate entity-level risk evaluations, improve prioritization, and ensure proportionate supervisory responses. If successful, it could represent a significant advancement in Belize's capacity to monitor and regulate gatekeepers more efficiently.

4. Risks and Red Flags

Despite recent improvements in Belize's regulatory framework and supervisory systems, the findings of this scoping study reveal a number of persistent risks and red flags that continue to affect the integrity of gatekeeper roles across sectors. These vulnerabilities are not uniformly distributed but appear more acutely in areas where oversight is fragmented, resources are limited, or where professional obligations intersect with political or personal interests. Drawing from stakeholder interviews, surveys, and desk research, this section outlines the most notable risk factors associated with professional gatekeepers in Belize.

From the interviews, a few registered agents noted the continued use of multi-jurisdictional corporate structures by foreign clients, often citing asset protection, privacy, or tax efficiency as justification. However, not all such arrangements withstand scrutiny. Interviews highlighted cases where clients requested shell companies, entities with no real economic activity or presence, to obscure beneficial ownership or to shield assets from legal accountability. While some agents apply EDD and decline opaque



structures, the risk remains that others may accept clients without fully verifying the legitimacy of the business rationale, particularly in the absence of automated or centralized verification tools.

Although Belize has made significant progress through the OBRS and new BO disclosure regulations, challenges remain in ensuring the accuracy, timeliness, and completeness of beneficial ownership records. Some stakeholders cited difficulties when clients presented proxies or nominee arrangements that masked true ownership, especially in cases involving layered offshore structures. Enforcement agencies reported that while they now have better access to BO data, the non-public nature of the register limits broader accountability. Moreover, the legal profession raised concerns about ambiguities surrounding attorney-client privilege and its interaction with BO verification and reporting duties.

The rate of STR filings by gatekeepers remains disproportionately low compared to the volume and complexity of financial and legal transactions they facilitate. Several interviewees, particularly in smaller firms, cited a lack of confidence in identifying reportable activity, insufficient feedback from the FIU, and uncertainty around what constitutes “reasonable suspicion.” Some professionals also reported reluctance to submit STRs due to reputational concerns or fears of client backlash. In practice, this “backlash” can take several forms, including the potential loss of clients who perceive STR reporting as a breach of trust, damage to a firm’s reputation in a small and interconnected professional market, or, in some cases, the fear of negative word-of-mouth among prospective clients. In sectors such as real estate, where large cash transactions are common, the risk of underreporting remains particularly high.

In Belize’s relatively small and interconnected society, the boundaries between professional, political, and personal roles are often blurred. Interviewees from both the legal and environmental sectors raised concerns about lawyers or advisors holding public office, or providing services to politically connected clients without sufficient safeguards. The limited application of EDD and inconsistent internal policies around handling PEPs contribute to this vulnerability. Moreover, the perception of influence and favoritism, particularly in land or concession-related decisions, undermines trust in gatekeepers’ impartiality.

A recurring theme across interviews was the perception of uneven enforcement across gatekeeper professions. While FSC licensees are subject to structured inspections, respondents noted that smaller or unregistered service providers, particularly in the real estate and legal sectors, often operate without meaningful oversight. This creates



opportunities for regulatory arbitrage, where clients may deliberately seek out less-regulated intermediaries to avoid scrutiny. Weak enforcement mechanisms, coupled with low penalties or non-punitive warnings for repeat offenders, limit the deterrence effect of existing laws.

Law enforcement and regulatory officers, including police, customs officials, forest rangers, and fisheries officers, emerged as key gatekeepers in the context of environmental and trade-related financial crimes. Interview data pointed to routine instances of bribery at checkpoints, manipulation of inspection procedures, and discretionary approvals of permits or concessions. These activities not only enable illegal resource exploitation and smuggling but also intersect with broader money laundering and tax evasion schemes. The absence of specialized training, whistleblower protections, and internal accountability mechanisms within enforcement agencies compounds these risks.

In some gatekeeping sectors, such as real estate and accounting, there is no mandatory licensing or centralized registry of practitioners. This regulatory gap makes it difficult to ensure uniform compliance, monitor conduct, or enforce standards. Interviewees emphasized that without mandatory certification or continuing education requirements, some professionals may lack the knowledge or tools to recognize and respond to financial crime indicators. This lack of professionalization creates space for opportunistic actors to operate with limited consequences.

5. Gaps in Capacity, Resources, Policy, and Awareness

While Belize has made notable strides in aligning its AML/CFT architecture with international standards, persistent institutional and operational gaps continue to limit the effectiveness of gatekeeper oversight and financial integrity safeguards. Across sectors, resource constraints, legal ambiguities, and uneven training have created vulnerabilities that can be exploited by bad actors or contribute to inadvertent non-compliance.

The two primary supervisory bodies, FIU and FSC, face well-documented constraints in staffing, funding, and technical capacity. These limitations affect their ability to conduct frequent and robust inspections, follow up on STRs, or deliver tailored outreach to



gatekeeper professions. In particular, FSC oversight of registered agents and corporate service providers has improved in scope, but remains constrained in depth due to limited personnel and evolving supervisory methodologies. Similarly, the FIU's efforts to expand risk-based supervision and sector-specific training are hampered by operational bandwidth and the diverse profile of reporting entities.

Interviews with professionals across legal, real estate, and environmental sectors revealed significant inconsistencies in AML/CFT knowledge and implementation. While some actors demonstrated a strong grasp of their obligations, others were unclear about basic requirements such as STR thresholds, EDD triggers, or reporting channels. This was especially evident among real estate professionals, where the absence of a mandatory licensing regime has led to a fragmented compliance culture. Smaller law firms and sole practitioners, lacking dedicated compliance officers, often struggle to keep pace with evolving obligations, particularly around BO verification and the use of layered structures.

Legal uncertainty remains a critical issue, particularly in the legal profession, where the boundaries of attorney-client privilege vis-à-vis STR obligations are not clearly defined. This ambiguity creates hesitation among legal practitioners who must balance ethical duties to clients with statutory AML/CFT responsibilities. A similar lack of clarity applies to public officers operating in environmental or enforcement roles, where no explicit policy guidance connects their work to IFF mitigation or financial oversight, despite their frontline exposure to bribery, illegal trade, and permit manipulation.

Technological limitations also persist. While the OBRS represents a significant advancement, several stakeholders noted that access remains largely limited to competent authorities, with civil society, media, and even some professionals facing hurdles in obtaining timely BO information. In addition, there is currently no centralized screening system for PEPs, nor are there sector-wide tools for automated risk assessment, transaction monitoring, or document verification, especially among non-financial gatekeepers.

Finally, gaps in interagency coordination and public engagement continue to undermine broader AML/CFT objectives. Stakeholders expressed the need for structured information-sharing platforms between regulators, law enforcement, and professional associations to improve case-based learning and risk detection. Civil society actors and journalists, who can serve as integrity watchdogs, reported a lack of access to relevant data and legal protections. Whistleblower mechanisms are either absent or perceived as unsafe, further limiting the exposure of gatekeeper-related misconduct.



Current gaps, spanning technical, regulatory, and cultural dimensions, must be addressed holistically. Doing so will require sustained investment in institutional capacity, clarification of legal mandates, and the development of inclusive, multi-stakeholder approaches that bring gatekeepers, regulators, and the public into a shared ecosystem of integrity and accountability.

6. Opportunities for Reform and Strategic Recommendations

Belize stands at a critical juncture in its efforts to strengthen financial integrity, enhance professional accountability, and safeguard public resources from illicit financial flows. While the scoping study identified systemic gaps across gatekeeping sectors, it also revealed a range of practical, achievable reforms that can reinforce national AML/CFT objectives and align Belize more closely with regional and international best practices.

Drawing on comparative regulatory analysis information from the interviews and survey responses, this section outlines key opportunities for reform, grouped into four interlinked domains: legal and policy reform, institutional strengthening, professional capacity-building, and public transparency. These recommendations are not exhaustive but provide a strategic foundation for targeted interventions that can yield measurable improvements in oversight and integrity across both public and private gatekeeper roles.

6.1 Legal and Policy Reform

- Clarify the interface between legal privilege and AML obligations. Provide statutory guidance to clarify when lawyers are required to submit STRs, especially in trust and corporate service contexts, without undermining legitimate confidentiality protections.
- Mandate licensing and registration for all real estate professionals. Create a legal framework requiring all agents and brokers to be licensed, subject to AML obligations, and periodically trained in compliance best practices.
- Strengthen and codify whistleblower protections. Introduce legislation that protects individuals who report suspicious activity within professional or public service environments, reducing fear of retaliation.



- Expand access to the Beneficial Ownership Register. Consider approaches to broaden access to the Beneficial Ownership Register in a secure and controlled manner, enabling improved oversight and due diligence by trusted stakeholders such as civil society, journalists, and financial institutions.
- Codify environmental gatekeepers as reporting entities. Amend relevant AML/CFT regulations to explicitly define regulatory officers (e.g., BDF, forest, fisheries, customs) as part of the gatekeeper ecosystem, with duties to report red flags linked to environmental financial crimes.

6.2 Institutional Strengthening

- Enhance FIU and FSC supervisory capacity. Allocate budgetary and staffing resources to expand the frequency and depth of inspections, improve follow-up mechanisms on STRs, and implement proactive surveillance in high-risk sectors.
- Develop interagency coordination protocols. Establish formal information-sharing mechanisms between FIU, FSC, law enforcement, the Lands Department, and environmental agencies to track IFF typologies that cross sectoral boundaries.
- Invest in digital monitoring tools. Deploy compliance management systems, centralized STR dashboards, and risk-rating software to improve efficiency and data-driven enforcement across sectors.
- Harmonize sanctions and disciplinary frameworks. Ensure that penalties for non-compliance are consistent, proportionate, and dissuasive across all gatekeeping professions, including public officials.

6.3 Professional Capacity-Building

- Introduce mandatory AML training for all gatekeepers. Require recurring, sector-specific training modules for lawyers, real estate agents, accountants, and public officers engaged in regulatory oversight or financial approval processes.
- Promote sector-specific AML/CFT guidelines. Develop clear, practical guidance documents tailored to each profession, including model KYC checklists, case studies, red flag indicators, and reporting procedures.
- Support smaller firms and sole practitioners. Offer subsidized access to compliance tools and training for small law firms, accounting practices, and rural real estate agents who may lack internal compliance teams.
- Expand public officer training in environmental financial crimes. Equip frontline regulators and enforcement personnel with the skills to identify, report, and prevent illegal resource transactions tied to illicit finance.



6.4 Transparency, Engagement, and Accountability

- Create an open-access property and land transaction database. Centralize and digitize land and property ownership records to reduce opacity in real estate transactions and improve asset tracing.
- Launch public awareness campaigns on professional misconduct. Educate citizens and clients about the roles and responsibilities of gatekeepers, including how to report suspicious behavior or unethical practices.
- Establish an integrity index for gatekeeper professions. Track compliance levels and enforcement actions across firms and sectors to incentivize good conduct and discourage regulatory arbitrage.
- Incentivize civil society watchdog functions. Build partnerships with NGOs, academic institutions, and investigative journalists to support public oversight, data analysis, and whistleblowing support infrastructure.

Together, these recommendations form a roadmap toward a more accountable, transparent, and resilient gatekeeping ecosystem in Belize. By bridging regulatory gaps, modernizing institutional tools, and engaging stakeholders across sectors, Belize can enhance its ability to prevent illicit finance, recover lost revenues, and fulfill its broader commitments to sustainable development, environmental stewardship, and democratic governance.

7. Conclusion

This scoping report has underscored the pivotal role that professional gatekeepers play in either facilitating or preventing IFFs in Belize. From lawyers, registered agents, and real estate professionals to public officers stationed at regulatory and enforcement frontlines, these actors hold discretionary authority and technical expertise that can be leveraged for financial integrity or exploited for illicit gain.

The analysis reveals that while Belize has taken important steps to align its legal and regulatory frameworks with international AML/CFT standards, key vulnerabilities remain. These include gaps in supervision and enforcement, inconsistencies in training and compliance practices across sectors, and limited transparency in land ownership and corporate structures. Notably, both private and public gatekeepers often operate without the full resources, guidance, or oversight required to detect and disrupt complex financial crimes.



The analysis, interviews, and survey responses offered a general view of how professionals perceive their responsibilities, challenges, and opportunities within the current system. While many gatekeepers demonstrate a clear commitment to compliance, others pointed to structural barriers, such as unclear regulations, insufficient feedback from authorities, and a lack of sector-specific tools, that hinder effective implementation. In parallel, evidence from environmental and law enforcement stakeholders highlighted how routine corruption and resource mismanagement intersect with financial crimes, particularly in natural resource sectors.

What emerges is a gatekeeping ecosystem that is functionally fragmented, unevenly supervised, and occasionally exploited. But it is also one with significant potential. With targeted reforms, ranging from legal clarification and institutional coordination to digital modernization and professional capacity-building, Belize can harness the role of gatekeepers to reinforce rather than erode financial integrity.

Ultimately, strengthening gatekeeper accountability is not merely a technical exercise. It is foundational to protecting public assets, deterring organized crime, and preserving the trust and legitimacy of Belize's institutions. In addressing the gaps identified in this report and pursuing the strategic recommendations offered, Belize can move toward a more transparent, resilient, and equitable financial system, one that serves the public good and upholds the country's development priorities.

