



ENFORCEMENT ACTION

ALEMAN, CORDERO, GALINDO & LEE TRUST (BVI) LIMITED

Enforcement Summary:

1. Administrative penalties in the aggregate amount of \$125,000.00 were imposed against ALEMAN, CORDERO, GALINDO & LEE TRUST (BVI) LIMITED for its contraventions of the Anti-Money Laundering Terrorist Financing Code of Practice, 2008 (the "AMLTF Code of Practice"):
 - Section 20 of AMLTF Code of Practice (Requirements of Enhanced Customer Due Diligence); and
 - Section 21 of the AMLTF Code of Practice (Requirement to review and keep up-to-date CDD).

Enforcement Action: Imposition of Administrative Penalties in the total amount of \$125,000.00

Action Date: 21st November 2025

Matter ID: 112125/060