



FINANCIAL INTELLIGENCE AGENCY

★

STRATEGIC PLAN 2026–2031

*Protecting Liberia's Financial System From
Abuse of Financial Crimes*



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MONROVIA, LIBERIA

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Foreword

The Financial Intelligence Agency (FIA) of Liberia stands at an unprecedented and critical crossroads in our nation's economic history. We exist for a singular, unyielding purpose: we follow the money so that the institutions of the Republic can protect our sovereign wealth, secure our financial systems, and enforce the rule of law. Sitting dynamically between reporting entities, commercial banks, mobile money operators, casinos, real estate firms, and downstream law enforcement agencies, the FIA serves as the supreme analytical engine, tasked with turning raw financial data into actionable intelligence. When we execute our mandate effectively, corruption becomes impossible to hide, illicit financial flows are disrupted, and the proceeds of crime are completely starved from the Liberian economy.



This Strategic Plan 2026–2031 arrives at a time of severe domestic and international urgency. It is not a generic administrative template, nor is it a bureaucratic exercise in box-checking. Instead, it is an aggressive, proactive operational blueprint engineered to confront immediate institutional crises and systemic economic threats. The stark revelations from the May 2026 General Auditing Commission (GAC) compliance audit, which exposed hundreds of millions of dollars in untraceable, transitory funds and rampant violations of the Public Financial Management Act, demonstrate that our state frameworks are acutely vulnerable to state capture by sophisticated financial actors. Simultaneously, regional estimates indicating that West Africa loses US\$50 billion annually to illicit financial flows, heavily driven by public procurement fraud, dictate that the FIA can no longer maintain a passive or manual posture. To aggressively neutralize these threats, this strategy completely anchors the FIA within Pillar 4 (Governance and Anti-Corruption) of the Republic's ARREST Agenda for Inclusive Development. Over the next five years, backed by an expanded and realistic financial envelope of US\$23.99 million, the Agency will deliver on three foundational pillars: Strengthening our internal systems, aligning seamlessly with domestic anti-corruption bodies, and forging unbreakable international collaboration.

We will systematically eliminate our historical technological deficits by fully deploying the United Nations Office on Drugs and Crime (UNODC) goAML platform and transitioning the FIA into a fully digitized, high-speed intelligence hub. We will unmask the ultimate human beneficiaries of fraudulent state contracts by mandating and enforcing absolute transparency in beneficial ownership across the Liberia Business Registry and offshore networks. Crucially, we will bridge broken feedback loops with law enforcement, ensuring that the specialized financial footprints we track are actively used to lead to asset forfeitures, freezes, and criminal convictions. Our timelines are unyielding. With our entry as the 177th member of the prestigious Egmont Group of Financial Intelligence Units, we now flow. We must leverage this power immediately to prepare our jurisdiction for the GIABA Third Round Mutual Evaluation in early 2029. The stakes could not be higher: achieving full regulatory compliance is an existential requirement to preserve Liberia's economic sovereignty and protect our banking sectors from the catastrophic impacts of international grey-listing.

This plan was forged through rigorous, honest institutional self-assessment, exhaustive macro-environmental analysis, and direct consultation with senior leadership across all functional sectors of the Agency. It represents our collective operational commitment to the state and our international donors. The time for reactive containment has passed. The work of executing an impenetrable financial defense for the Republic of Liberia begins today.

A handwritten signature in blue ink, appearing to read 'Mohammed A. Nasser'.

Mr. Mohammed A. Nasser
Officer-In-Charge
Financial Intelligence Agency of Liberia

NATIONAL LEADERSHIP

Strategic Direction for Financial Integrity, Rule of Law, and Anti-Corruption



**His Excellency Joseph Nyuma Boakai, Sr.
President
Republic of Liberia**

NATIONAL LEADERSHIP

Strategic Direction for Financial Integrity, Rule of Law, and Anti-Corruption



Cllr. Natu Oswald Tweh, Sr.

Minister of Justice and Attorney General of the
Republic of Liberia

CHAIRMAN, NATIONAL INTER-MINISTERIAL COMMITTEE - AML/CFT/PF



Hon. Augustine Kpehe Ngafuan
Minister

Ministry of Finance and Development Planning
Republic of Liberia

VICE CHAIRMAN, NATIONAL INTER-MINISTERIAL COMMITTEE - AML/CFT/PF

“This Strategic Plan is anchored in Liberia’s national commitment to strengthening governance, protecting the integrity of the financial system, and advancing the rule of law. It reflects the Government of Liberia’s determination to confront illicit financial flows, combat corruption, promote accountable public financial management, and safeguard the Republic’s economic sovereignty.

As Liberia continues its journey toward sustainable development and institutional transformation, the fight against financial crime remains central to protecting public resources, fostering investor confidence, and strengthening citizen trust in government institutions. A resilient anti-money laundering and counter-terrorism financing framework is essential not only for national security but also for economic growth, financial stability, and international credibility.

Guided by national leadership and strengthened through inter-agency coordination, the Financial Intelligence Agency will continue to serve as a critical pillar in detecting, disrupting, and deterring financial crimes. Through intelligence-led action, strategic partnerships, and unwavering commitment to accountability, the Agency will support efforts to protect Liberia’s financial system from abuse and ensure that illicit gains do not undermine national progress.

Together, we reaffirm our commitment to transparency, integrity, justice, and the responsible stewardship of the nation’s resources. Through collective action and institutional excellence, Liberia will continue to build a safer, stronger, and more prosperous future for all its citizens.”

Protecting Liberia’s Financial System from Abuse of Financial Crimes.

Acronyms

Financial & Regulatory Intelligence Agencies / Networks

- ECOFEL: Egmont Center of FIU Excellence and Leadership (a training and certification program mentioned within the Egmont framework)
- Egmont Group: Egmont Group of Financial Intelligence Units (an international network of FIUs enabling secure intelligence exchange)
- FIA: Financial Intelligence Agency (of Liberia)
- FIU: Financial Intelligence Unit (the legally constrained predecessor to the FIA)

Domestic Anti-Corruption & Law Enforcement Agencies (Liberia)

- CAs: Competent Authorities
- GAC: General Auditing Commission
- IMC: Inter-Ministerial Committee on AML/CFT/PF (the supreme policy-coordinating entity chaired by the Minister of Justice)
- LACC: Liberia Anti-Corruption Commission
- LDEA: Liberia Drug Enforcement Agency
- LEAs: Law Enforcement Agencies
- LIS: Liberia Immigration Service
- LNP: Liberia National Police
- LRA: Liberia Revenue Authority
- MFDP: Ministry of Finance and Development Planning
- PPCC: Public Procurement and Concessions Commission

International & Regional Bodies

- AfDB: African Development Bank
- FATF: Financial Action Task Force (the global money laundering and terrorist financing watchdog)
- GIABA: Inter-Governmental Action Group against Money Laundering in West Africa
- IMF: International Monetary Fund
- UNODC: United Nations Office on Drugs and Crime
- UNSCRs: United Nations Security Council Resolutions
- USAID: United States Agency for International Development

Legal, Regulatory, & Policy Frameworks

- AAID / ARREST Agenda: ARREST Agenda for Inclusive Development (Liberia's socio-economic national transformation blueprint)
- AML/CFT: Anti-Money Laundering/Countering the Financing of Terrorism
- MER: Mutual Evaluation Report
- MLAT: Mutual Legal Assistance Treaty (or Mutual Legal Assistance Act)
- PF: Proliferation Financing
- PFM Act: Public Financial Management Act of 2009
- PPCA: Public Procurement and Concessions Act of 2010

Financial Crimes, Risks, & Operational Concepts

- BO: Beneficial Ownership
- CDD / EDD: Customer Due Diligence / Enhanced Due Diligence
- CTRs: Currency Transaction Reports
- DNFBPs: Designated Non-Financial Businesses and Professions (e.g., casinos, real estate firms, lawyers)
- IFFs: Illicit Financial Flows
- ML / TF / WMD: Money Laundering / Terrorist Financing / Weapons of Mass Destruction
- NPOs: Non-Profit Organizations
- NRA: National Risk Assessment
- PEPs: Politically Exposed Persons
- STRs: Suspicious Transaction Reports
- TBML: Trade-Based Money Laundering
- VASPs: Virtual Asset Service Providers (cryptocurrency-related businesses)

Systems, Software, & National Registries

- ASYCUDA: Automated System for Customs Data
- goAML: The specialized, UNODC-developed digital software platform used by FIUs to collect and analyze financial intelligence data
- LBR: Liberia Business Registry
- LISCR: Liberia International Ship and Corporate Registry
- LITAS: Liberia Integrated Tax Administration System
- MTEF: Medium-Term Expenditure Framework (used in state baseline budgeting projections)
- PESTLE: Political, Economic, Sociocultural, Technological, Legal, and Environmental Analysis
- Q / FY: Quarter / Fiscal Year
- RAG Matrix: Red / Amber / Green project monitoring status indicators
- SMT: Senior Management Team
- SWOT: Strengths, Weaknesses, Opportunities, and Threats Analysis
- TAS: Tax Administration System
- TBAs / GRA: Transitory Bank Accounts / General Revenue Account

Executive Summary

The Financial Intelligence Agency (FIA) of Liberia operates at the critical intersection of national security, macroeconomic stability, and international regulatory compliance. Tasked with safeguarding the Republic's financial system from abuse, the FIA serves as the supreme analytical engine that tracks illicit financial flows (IFFs), disrupts money laundering (ML), and counters the financing of terrorism and proliferation (CFT/PF). This Strategic Plan 2026–2031 provides a comprehensive, actionable, and exhaustive roadmap for the Agency. It is engineered to address the structural deficiencies identified in the Inter-Governmental Action Group against Money Laundering in West Africa (GIABA) Second Round Mutual Evaluation Report (MER2), while simultaneously neutralizing domestic governance crises that threaten the state's fiscal survival.

Beyond mere regulatory compliance, this strategic framework responds directly to immediate and severe domestic exigencies that have crystallized in the first half of 2026. In May 2026, a landmark compliance audit published by the General Auditing Commission (GAC) revealed systemic accounting misreporting across government channels, identifying hundreds of millions of dollars in untraceable funds in transitory bank accounts, along with unauthorized withdrawals and blatant, persistent violations of the Public Financial Management (PFM) Act of 2009. Simultaneously, regional assessments spearheaded by GIABA highlight that West Africa loses an estimated US\$50 billion annually to illicit financial flows, with public procurement acting as the primary conduit for criminal exploitation. In a domestic landscape where public debt has ballooned, and 88% of audited domestic debt claims have been classified as invalid or unverified, the threat of state capture by sophisticated financial criminals is acute.

To systematically dismantle these threats, the Strategic Plan is anchored in Pillar 4 of 'Liberia's ARREST Agenda for Inclusive Development (Governance and Anti-Corruption). The strategy explicitly incorporates exhaustive macro-environmental (PESTLE) and institutional (SWOT) analyses to ground its strategic objectives in operational and political reality. The plan commits the FIA to a projected US\$23.99 million, five-year financial envelope designed to deliver three core Strategic Goals: Strengthened Systems, Alignment with Anti-Corruption Agencies, and Strong Collaboration. Read in full, this is a matter of economic governance, not enforcement alone. Sound AML/CFT systems protect the revenue base, strengthen public financial management, and support the domestic resource mobilization on which Liberia's development depends.

Through the deployment of the United Nations Office on Drugs and Crime (UNODC) goAML platform, the aggressive enforcement of the 2026 Joint CBL/FIA Directive on Enhanced Customer Due Diligence, and the deepening of ties with the Egmont Group of Financial Intelligence Units, the FIA will transition from a reactive posture to a proactive intelligence node. By the time of the GIABA Third Round Mutual Evaluation scheduled for 2029, this blueprint ensures that Liberia will have graduated from the Enhanced Follow-Up regime and will function as a technologically integrated, legally fortified, and fully compliant global financial partner capable of defending the Republic's treasury.

1. Institutional Context and the Strategic Imperative

1.1 The Legal and Regulatory Architecture

Liberia's anti-money laundering and countering-terrorism financing architecture has undergone profound modernization over the past half-decade, culminating in the passage of the Anti-Money Laundering and Countering Financing of Terrorism (AML/CFT) Act of 2021 and the Financial Intelligence Agency Act of 2021. These companion statutes effectively dissolved the former, legally constrained Financial Intelligence Unit (FIU) and reconstituted it as an autonomous, intelligence-led Agency. The FIA's mandate grants it expansive authority to request, receive, analyze, and disseminate Suspicious Transaction Reports (STRs) and Currency Transaction Reports (CTRs) to designated Law Enforcement Agencies (LEAs) and Competent Authorities (CAs).

Furthermore, the Agency serves as the primary supervisor and regulator of Designated Non-Financial Businesses and Professions (DNFBPs), non-profit organizations (NPOs), and virtual asset service providers (VASPs). The FIA does not operate in an institutional vacuum. It is deeply embedded within the Inter-Ministerial Committee on AML/CFT/PF (IMC), the Republic's principal policy-coordinating body for AML/CFT/PF matters. This body is chaired by the Minister of Justice and co-chaired by the Ministry of Finance and Development Planning (MFDP). The MFDP is responsible for fiscal policy, public financial management, domestic resource mobilization, revenue integrity, debt management, and development financing, and serves as the Republic's supreme policy-coordinating entity, anchoring the Republic's coordinated response to illicit finance. The IMC is strictly responsible for overseeing the implementation of the National AML/CFT & PF Action Plan 2024–2028. FIA disseminates intelligence to competent authorities, which independently determine investigative and prosecutorial actions, ensuring that the FIA's intelligence outputs are seamlessly translated into prosecutorial action by the Liberia Anti-Corruption Commission (LACC), the Liberia National Police (LNP), the Liberia Revenue Authority (LRA), and the Liberia Drug Enforcement Agency (LDEA), amongst others.

1.2 The GIABA Mutual Evaluation and Global Compliance

Rigorous international assessments strongly dictate the strategic trajectory. The May 2023 GIABA Second Round Mutual Evaluation Report (MER2) exposed profound vulnerabilities within Liberia's financial safeguards. The assessment resulted in three Non-Compliant (NC) ratings, nineteen Partially Compliant (PC) ratings, fifteen Largely Compliant (LC) ratings, and only three Compliant (C) ratings. Across the eleven measures of effectiveness, GIABA rated Liberia as having a "Low" level of effectiveness in ten categories and "Moderate" in one, resulting in the jurisdiction's placement in the stringent Enhanced Follow-Up regime.

GIABA specifically cited weak financial sector supervision, the absence of mechanisms to freeze criminal assets without delay in accordance with United Nations Security Council Resolutions (UNSCRs) 1267 and 1373, and severe vulnerabilities in the transparency of beneficial ownership (BO). The urgency of this Strategic Plan is amplified by two converging international timelines. First, the Republic must amend the Targeted Financial Sanctions Against Terrorist Act to comprehensively address Proliferation Financing

(FATF Recommendation 7), the sole NC rating within the FIA's direct mandate, by a hard deadline of December 2026.

Second, the Agency is leading the ongoing Second National Risk Assessment (NRA), launched in March 2026, to map out emerging ML/TF threats. This NRA is the prerequisite for preparing the jurisdiction for the GIABA Third Round Mutual Evaluation, which involves an on-site evaluation planned for the first quarter of 2029. Failure to implement robust, demonstrable mitigating measures by this date risks placing Liberia on the FATF "grey list." Such a designation would have significant macroeconomic consequences, severely restricting the country's access to global financial markets, severing correspondent banking relationships, and jeopardizing access to international development capital.

1.3 The ARREST Agenda for Inclusive Development

At the domestic level, the FIA's operational directives are explicitly subordinated to the ARREST Agenda for Inclusive Development (AAID) 2025–2029, the overarching blueprint for Liberia's socio-economic transformation. Pillar 4 of the AAID focuses strictly on "Governance and Anti-Corruption," mandating the construction of accountable institutions capable of preventing corruption, ensuring value for money in public service delivery, and deepening decentralized governance.

The FIA's operational role within Pillar 4 is distinctly upstream. The Agency cannot prosecute graft directly; instead, it generates the highly specialized financial intelligence necessary for downstream actors—such as the LACC, the Ministry of Justice, and the newly established Office of Asset Recovery (established via Executive Orders 126/2024 and 145/2025)- to detect and disrupt the intricate financial flows that sustain public sector corruption.

2.0 The 2026 Governance Crisis Landscape: Confronting Systemic Vulnerabilities

A strategic plan cannot exist in an academic vacuum; it must confront and neutralize the prevailing realities of its specific operational environment. In 2026, an interlocking triad of systemic vulnerabilities threatens Liberia's financial integrity: industrial-scale accounting misreporting, rampant illicit financial flows routed through public procurement, and the willful, systematic violation of legal financial statutes. The FIA's intelligence apparatus is a critical component of Liberia's response to these sophisticated financial threats.

2.1 Accounting Misreporting and the 2026 GAC Audit Fallout

In May 2026, the General Auditing Commission (GAC) released a compliance audit detailing the government's revenue collection and reconciliation processes for the prolonged period of July 1, 2018, to December 31, 2024. The findings of this audit represent an important development in strengthening public financial management oversight, a watershed moment in Liberian public financial management, revealing weaknesses in financial controls that may increase exposure to money laundering risks.

The GAC audit exposed that a staggering USD 257,512,276 *and* LRD 23,633,186,485 could not be traced from transitory bank accounts (TBAs) to the General Revenue Account (GRA) held at the Central Bank of Liberia (CBL). The audit documented a complete breakdown in systems integration, citing irreconcilable discrepancies between bills and payments across the Automated System for Customs Data (ASYCUDA), the

Liberia Integrated Tax Administration System (LITAS), and the overarching Tax Administration System (TAS).

Beyond mere software discrepancies, the GAC uncovered active human interference indicative of sophisticated financial crime. The auditors documented unauthorized withdrawals from state transitory accounts totaling US\$59,786 and LR\$551,773, executed under the opaque classification of "other debits" without any defined institutional authorization. Furthermore, the audit revealed highly irregular reversal transactions and the alarming fact that rural customs and tax collectors were holding massive sums of state revenue in cash for extended periods, effectively bypassing the formal banking sector entirely and eliminating any electronic audit trail.

Second-Order Strategic Implications: *The inability to fully reconcile public revenue flows poses a significant financial integrity and money-laundering risk. Corrupt actors and syndicates exploit the opacity of unmonitored transitory accounts to siphon public funds into private offshore networks or domestic real estate. Under this Strategic Plan, the FIA must fundamentally redefine public financial management systems as high-risk nodes within its AML matrix. The Agency will leverage its supervisory mandate to monitor large, unusual, or highly structured cash transactions originating from or directed to state-linked accounts, and to enforce uncompromising Suspicious Activity Report (SAR) requirements on the commercial banks that manage these public funds.*

2.2 Illicit Financial Flows (IFFs) and the Exploitation of Public Procurement

Illicit Financial Flows (IFFs) severely hemorrhage African economies, stripping them of the domestic capital required for infrastructure, healthcare, and education. During a high-level regional workshop held in Monrovia in June 2026, the Director General of GIABA explicitly warned that West Africa loses an estimated US\$50 billion annually to IFFs. Crucially, the Director General identified public procurement, which typically accounts for up to 12% of Gross Domestic Product (GDP) across West African states, as the single most vulnerable corridor for criminal exploitation.

In Liberia, some procurement-related corruption schemes may involve the misuse of corporate structures and beneficial ownership arrangements. Some entities routinely over-invoice the government, fail to deliver the contracted public goods, and subsequently launder the illicit proceeds through the largely unregulated domestic real estate sector or via international wire transfers to offshore jurisdictions. The scale of this threat prompted the President of Liberia, during the 44th GIABA Plenary, to reaffirm the Government's commitment to taking decisive action against shell companies and the professional enablers (lawyers, accountants, and notaries) who facilitate these crimes.

Second-Order Strategic Implications: *To disrupt this vector, the FIA must support and facilitate the implementation of FATF Recommendations 24 and 25, which demand absolute transparency regarding the beneficial ownership of legal persons and arrangements. The FIA will systematically integrate its intelligence databases with the Liberia Business Registry (LBR) and the Liberia International Ship and Corporate Registry (LISCR). Recent amendments to the Liberian Associations Law mandate that entities file an Annual Declaration of Beneficial Ownership with the LISCR Trust Company. By accessing this data, the FIA will enhance transparency regarding the beneficial ownership of legal persons and disseminate actionable intelligence required to void fraudulent contracts, freeze illicitly obtained assets, and secure criminal convictions.*

2.3 The Systematic Violation of Legal Statutes and International Rules

The structural integrity of Liberia's economy is continuously threatened by the systemic circumvention of established legal frameworks, most notably the Public Financial Management (PFM) Act of 2009 and the

Public Procurement and Concessions Act (PPCA) of 2010. Successive audits and World Bank assessments have demonstrated that government entities routinely engage in off-budget spending, fail to prioritize statutory debt service requirements, and bypass competitive bidding mandates. The most egregious manifestation of these statutory violations is found in the government's domestic debt portfolio. A comprehensive 2025 GAC audit reviewed 1,083 domestic debt claims spanning 44 years, totaling US\$ 871.5 million. *The audit concluded that 950 of these claims—amounting to US 769.7 million, or 88% of the total—were entirely invalid or unverified due to insufficient documentation, glaring inconsistencies in records, and unverifiable origination data.* The fact that these fraudulent claims were routinely processed by the Ministry of Finance and Development Planning (MFDP) underscores a severe, systemic failure in debt accountability.

Second-Order Strategic Implications: *The validation and subsequent payout of fraudulent state debt, or the awarding of concessions via bypassed procurement rules, may generate proceeds that could constitute predicate offenses for money laundering. The FIA will coordinate closely with the MFDP, the Central Bank, and the Office of Asset Recovery to ensure that the financial footprints of these statutory violations are tracked in real time. By enforcing stringent Customer Due Diligence (CDD) and Enhanced Due Diligence (EDD) for domestic PEPs attempting to move or integrate these funds, the FIA will strengthen its monitoring and intelligence processes to identify suspicious fund movements.*

To ensure that the 2026–2031 Strategic Plan is insulated against external shocks and precisely calibrated to the operational environment, an exhaustive PESTLE (Political, Economic, Sociocultural, Technological, Legal, and Environmental) analysis has been conducted. This macro-environmental diagnostic maps the systemic forces shaping Liberia's AML/CFT landscape.

Table 1: Macro-Environmental Diagnostic: PESTLE Analysis

Analytical Dimension	Systemic Factors, Risks, and Institutional Implications
Political	<i>Executive Will vs. Legislative Delays: At the highest levels of the Executive branch, political commitment to anti-corruption is palpable, evidenced by the President's endorsement of the National Action Plan and the IMC's public pledges of technical backing. However, a deep structural friction exists between Executive intent and Legislative execution. The FIA does not legislate; it provides technical leadership in drafting laws related to AML/CFT and relies entirely on the Ministry of Justice and the Law Reform Commission to draft amendments and on the Legislature to pass them. Delays in the Legislature—particularly regarding the critical FATF Recommendation 7 amendment on Proliferation Financing—pose the most severe political threat to the Agency's 2026 compliance deadlines. The FIA must engage in continuous, high-level political lobbying to ensure its legislative agenda is prioritized over partisan gridlock.</i>
Economic	<i>Macro-Fiscal Vulnerability and the Contraction of Aid: Liberia's economy is highly constrained. The IMF assesses the Republic as having a moderate risk of external debt distress but a high risk of overall debt distress. This fragility is severely compounded by the impending permanent cancellation of significant off-budget USAID assistance, which has historically been equivalent to roughly 2% of GDP. This sudden funding shortfall for critical public services creates macroeconomic pressure. Desperate for liquidity, state entities may increasingly bypass PFM regulations to secure short-term financing.</i>

	<i>Furthermore, as legitimate economic opportunities contract, the incentive for public resource diversion and organized financial crime exponentially increases. The FIA must prepare for a surge in sophisticated typologies designed to extract diminishing state resources. Trade-based money laundering and customs fraud sit at the center of this exposure. Mis-invoicing, under-declaration at the border, and the laundering of proceeds through high-value commodity exports directly erode the domestic revenue base, making these typologies priority areas for the Agency's sectoral risk work.</i>
Sociocultural	<i>Cash Reliance and the Erosion of Public Trust: Liberia remains fundamentally a cash-based society, complicating traditional transaction monitoring. Sociocultural norms heavily favor informal financial networks and physical cash hoarding over institutional banking. This vulnerability was starkly highlighted by the GAC finding that rural tax collectors hold state revenues in physical cash for extended periods. Simultaneously, recurrent, high-profile corruption scandals—most notably the "missing quarter billion dollars"—have significantly eroded public trust in state financial institutions. The FIA operates in an environment where financial transparency is often viewed with deep cynicism by the populace. To succeed, the Agency must run targeted public awareness campaigns and awareness initiatives demonstrating that financial intelligence directly leads to the recovery of stolen public wealth.</i>
Technological	<i>Digital Fragmentation and the goAML Imperative: The national financial ecosystem suffers from acute, dangerous technological fragmentation. The deliberate or accidental disconnects among the Tax Administration System (TAS), ASYCUDA, and LITAS are the very mechanisms that enable massive revenue leakages. Concurrently, the FIA rates its own internal technological capability at a critical 2.1 out of 5, relying on outdated, manual processes for intelligence analysis. The rapid transition to the UNODC goAML platform is a strategic necessity. Without a secure, automated data integration system capable of cross-referencing disparate government databases in real-time, the FIA will face challenges in responding effectively to evolving financial crime risks.</i>
Legal	<i>Statutory Evasion and Regulatory Arbitrage: While Liberia possesses relatively robust legal frameworks on paper (e.g., the PFM Act, PPCA, AML/CFT Act 2021, FIA Act 2021), the enforcement of these laws is chronically weak. Criminal networks excel at regulatory arbitrage—exploiting the gaps between competing jurisdictions or under-resourced supervisory bodies. The legal environment requires targeted legislative and regulatory reforms to address deficiencies flagged by GIABA, particularly the Mutual Legal Assistance Act (to include foreign predicate offenses), the targeted financial sanctions regime, and the specific regulations governing VASPs and DNFBPs.</i>
Environmental	<i>Resource Exploitation and Climate Finance Vulnerabilities: Liberia is endowed with vast, high-value natural resources, including timber, gold, diamonds, and iron ore. The extraction and export of these commodities are highly susceptible to trade-based money laundering (TBML) and illicit financial flows, often characterized by severe environmental degradation. Furthermore, as the government actively seeks international climate finance (such as grants from the Green Climate Fund to combat deforestation), there is a rapidly growing risk that corrupt actors could target these massive financial inflows. The FIA must develop specific typologies and risk indicators to protect environmental and climate-related capital from misuse.</i>

4.0 Institutional Diagnostic: SWOT Analysis

A highly participatory situational analysis, involving FIA personnel across analytical, legal, supervisory, technical, and international relations functions, provides a candid, unvarnished assessment of the Agency's internal capabilities and external positioning heading into the strategic period.

4.1 Capability Self-Assessment Benchmarks

Staff rated the Agency's current functional capacities on a strict 1-to-5 scale, revealing clear operational fault lines:

- i. Coordinating with partner agencies: 3.7 (Relative Strength)
- ii. Disseminating intelligence to LEAs: 3.6 (Relative Strength)
- iii. Receiving and analyzing financial intelligence: 3.1 (Moderate)
- iv. Legal and regulatory drafting: 3.0 (Moderate)
- v. Supervising reporting entities (DNFBPs/NPOs/VASPs): 2.3 (Severe Weakness)
- vi. Technology and digital systems: 2.1 (Critical Weakness)

4.2 The SWOT Matrix and Narrative Synthesis

Table 2: Institutional Diagnostic: SWOT Matrix and Narrative Synthesis

	STRENGTHS (Internal) 1. Unprecedented International Standing: Liberia's admission to the Egmont Group of Financial Intelligence Units as the 177th member in 2024 is a monumental institutional strength. It grants the FIA direct, secure access to the Egmont Secure Web, enabling encrypted intelligence exchange with counterparts globally to trace offshore asset flights. 2. Robust Statutory Autonomy: The FIA Act of 2021 structurally insulates the Agency from political interference, granting it broad, independent authority to demand records from any reporting entity. 3. High Inter-Agency Goodwill: Decades of foundational work have yielded strong, collaborative relationships with the CBL, the LRA, and the overarching IMC.	WEAKNESSES (Internal) 1. Technological Deficits: The reliance on fragmented, manual systems severely limits analytical throughput. The current turnaround time for analyzing a Suspicious Transaction Report is an unacceptable 10 to 14 days, providing launderers ample time to move funds. 2. Broken LEA Feedback Loops: Intelligence disseminated by the FIA to law enforcement frequently vanishes into an operational void. The lack of feedback regarding investigations or prosecutions prevents the FIA from refining its analytical typologies. 3. Supervisory Blind Spots: The Agency lacks the trained personnel and technological reach to effectively supervise high-risk DNFBPs, particularly the booming real estate sector, casinos, and emerging Virtual Asset Service Providers (VASPs).
	OPPORTUNITIES (External) 1. Influx of Donor Technical Assistance: International partners (AfDB, UNODC, IMF, World Bank) demonstrate a high willingness to fund critical capacity building and capital-intensive infrastructure, such as the goAML deployment. 2. Aggressive Regulatory Modernization: The successful implementation of the February 2026 Joint Directive on Enhanced CDD, combined with upcoming integrations with the LISCR beneficial ownership registries, provides the FIA with enhanced regulatory tools. 3. Unprecedented Anti-Corruption Momentum: Public outrage following the 2026 GAC audit revelations provides the FIA with the political leverage necessary to enforce strict compliance and demand accountability from recalcitrant state and private actors.	THREATS (External) 1. Legislative Delays: Delays in passing critical statutory amendments (especially R.7 on Proliferation Financing) by a divided or slow-moving Legislature threaten the outcomes of the 2029 MER3. 2. Accelerating Criminal Sophistication: The rapid evolution of procurement fraud typologies, alongside the exponential growth of unregulated mobile money and virtual assets, constantly threatens to outpace the FIA's static regulatory frameworks. 3. Severe Budgetary Volatility: Unpredictable domestic revenue generation and delayed appropriations by the central government threaten operational continuity, risking the loss of highly trained technical staff to the private sector.

5.0 The Strategic Framework 2026–2031: Core Goals and Objectives

5.1 Vision and Mission Statements

Vision: *To build a well-equipped Financial Intelligence Agency dedicated to an effective Anti-Money Laundering and Countering the Financing of Terrorism*

Mission: *Protecting Liberia's financial system from abuse of financial crimes for the enhancement of national, regional, and global peace and economic stability*

5.2 The Overall Strategic Goal

Over the next five years, the Financial Intelligence Agency of Liberia will deliver ARREST Agenda Pillar 4 outcomes through three strategic priorities:

1. *Total operational alignment with domestic anti-graft agencies to ensure intelligence results in prosecution.*
2. *The deployment of strengthened internal and supervisory systems that efficiently detect and monitor money laundering and terrorist financing.*
3. *Strong, enduring collaboration with local and international partners to support full compliance with the FATF Recommendations before the critical 2029 GIABA Mutual Evaluation.*

6.0 Strategic Initiatives and Milestone Execution

To operationalize the overall goal, the Plan is structured around three Strategic Goals, underpinned by nine time-bound, measurable milestones. Each milestone assigns clear, singular ownership to a specific member of the Senior Management Team (SMT), addressing the specific FATF Recommendations led by the FIA.

Strategic Goal 1: Strengthened Systems

By 2031, the FIA will operate a fully FATF-compliant digital infrastructure for receiving, analyzing, and disseminating financial intelligence; executing rigorous, risk-based supervision of DNFBPs, NPOs, and VASPs; and enforcing strict Customer Due Diligence (CDD), Politically Exposed Person (PEP), and Beneficial Ownership (BO) transparency across all sectors.

This goal directly targets the Agency's lowest-rated capability (Technology at 2.1) and systematically addresses the core compliance deficiencies identified by GIABA in non-financial sector supervision and CDD enforcement.

Table 3: Strategic Goal 1 Milestone Framework

Milestone	Ownership	Target Date	FATF Reg.	Indicator of Success
<i>1.1 Deploy UNODC goAML Digital Infrastructure: Transition entirely from manual processing to a fully automated, cryptographically secure digital system for STR collection, deep data analysis, and inter-agency exchange.</i>	<i>Director General</i>	<i>Q4 2027</i>	<i>R.29</i>	<i>goAML live in production; 100% of reporting entities successfully onboarded; STR analytical turnaround reduced to 14 days or less; secure API data integration with MFDP and CBL established.</i>
<i>1.2 Complete Sectoral Risk Assessments (SRAs): Execute targeted risk diagnostics and issue enforceable regulations for high-risk DNFBPs (real estate, casinos, dealers in precious metals/stones) and emerging VASPs.</i>	<i>Risk Manager</i>	<i>Jan 2026 – Dec 2028</i>	<i>R.8, R.15, R.22, R.26, R.28, R.34</i>	<i>Comprehensive SRAs published; sector-specific risk indicators distributed to reporting entities to improve STR quality; routine, unannounced supervisory auditing cycles initiated for all DNFBPs.</i>
<i>1.3 Operationalize CDD and BO Directives: Aggressively enforce the Joint Directive on Enhanced CDD. Conduct a full BO assessment of all legal persons, linking LBR and offshore LISCRC registries.</i>	<i>Compliance Manager</i>	<i>May 2026 – May 2028</i>	<i>R.10, R.12, R.16, R.24, R.25</i>	<i>Joint Directive fully enforced without exception; PEP regulations amended and gazetted; comprehensive BO registry architecture functioning and instantly accessible to competent authorities.</i>

Narrative Context for Goal 1: The February 2026 Joint Directive issued by the FIA and CBL exemplifies the required regulatory paradigm shift. The directive mandates that financial institutions cryptographically verify residency permits for non-Liberians via the Liberia Immigration Service (LIS) and execute stringent CDD protocols before establishing relationships. While the directive allows for a 90-day deferral period to prevent business interruption, the FIA recognizes this window as a vulnerability; therefore, it mandates immediate cessation of CDD and the filing of an STR if continuing the process risks "tipping off" a suspected launderer. Goal 1 operationalizes this directive by ensuring that institutions conducting occasional transactions exceeding US\$5,000 unequivocally identify the true beneficial owners. By bridging the information gap between domestic businesses registered with the LBR and the offshore entities managed by LISCRC, the FIA will systematically dismantle the shell-company networks that currently dominate Liberia's illicit public procurement systems.

Strategic Goal 2: Alignment with Anti-Corruption Agencies

By 2031, the FIA will operate as the indisputable financial intelligence engine of Liberia's anti-corruption ecosystem. The Agency will formalize operational coordination with the LACC, the GAC, the LNP, and the Office of Asset Recovery, driving measurable, data-backed increases in intelligence-led prosecutions to satisfy ARREST Pillar 4 mandates. This goal rectifies the Agency's most serious internal diagnostic gap: the broken feedback loop with law enforcement. It ensures that complex intelligence disseminations do not disappear into a bureaucratic void but rather actively catalyze convictions, asset freezes, and forfeitures.

Table 4: Strategic Goal 2 Milestone Framework

Milestone	Ownership	Target Date	FATF Reg.	Indicator of Success
<i>2.1 Establish Formal LEA Feedback Mechanisms: Institute legally binding Memoranda of Understanding (MoUs) with LEAs/CAs dictating mandatory quarterly reporting on the investigative status of all FIA disseminations.</i>	<i>Deputy Director General</i>	<i>Q4 2026</i>	<i>R.33</i>	<i>MoUs signed with LACC, LNP, LDEA; quarterly feedback protocols active and enforced; first investigative outcome cycle analyzed and reported to the IMC.</i>
<i>2.2 Achieve Annual Intelligence-Led Prosecution Targets: Jointly establish and meet quantitative, rigorous benchmarks for ML/TF prosecutions, directly feeding the ARREST Pillar 4 monitoring matrix.</i>	<i>Director of Operations</i>	<i>July 2028</i>	<i>R.30</i>	<i>Agreed prosecution targets consistently met or exceeded; quarterly outcome data published transparently; measurable contribution to the Governance Commission baseline (intervention 4.15.27.6) documented.</i>
<i>2.3 Operationalize Asset Recovery & Administrative Sanctions: Formalize protocols with the Office of Asset Recovery for joint unexplained wealth investigations. Develop a highly dissuasive administrative sanctions regime for AML/CFT violations.</i>	<i>Director General</i>	<i>Jan 2026 – May 2027</i>	<i>R.31, R.35</i>	<i>Joint coordination protocol active; draconian administrative sanctions regime gazetted and enforced against at least one major institutional violator to establish deterrence.</i>

Narrative Context for Goal 2: The explosive 2026 GAC compliance audit underscores the absolute urgency of Goal 2. The revelation of massive unauthorized withdrawals, suspicious reversal transactions, and US\$257.5 million in untraceable transitory funds demands an immediate, coordinated response. The FIA will actively use its intelligence capabilities to trace these specific state leakages, supplying the LACC and the Ministry of Justice with the irrefutable financial data required to indict both corrupt public officials and private-sector enablers who have circumvented the PFM Act and PPCA.

Furthermore, the establishment of a dissuasive sanctions regime ensures that the commercial financial institutions facilitating such massive illicit transfers face existential regulatory penalties, shifting their compliance posture from passive to hyper-vigilant.

Strategic Goal 3: Strong Collaboration and International Compliance

By 2031, the FIA will decisively close critical legislative gaps regarding Targeted Financial Sanctions (TFS), Proliferation Financing (PF), and international cooperation. The Agency will aggressively leverage its membership in the Egmont Group to operationalize cross-border information exchange, ensuring Liberia's full readiness for the 2029 GIABA Mutual Evaluation. This goal carries the 'Plan's most demanding legislative dependencies, focusing heavily on mitigating the single Non-Compliant rating (Recommendation 7) residing within the Agency's direct mandate.

Table 5: Strategic Goal 3 Milestone Framework

Milestone	Ownership	Target Date	FATF Reg.	Indicator of Success
<i>3.1 Amend TFS Act for Proliferation Financing: Draft and secure the expedited passage of amendments to the Targeted Financial Sanctions Against Terrorist Act to explicitly cover Weapons of Mass Destruction (WMD) Proliferation Financing.</i>	<i>Director General</i>	<i>Apr 2026 – Dec 2026</i>	<i>R.7 (NC)</i>	<i>Inter-agency endorsed Bill formally submitted to Legislature; public consultation concluded; enactment or active, advanced legislative progression documented.</i>
<i>3.2 Reform Designation and Asset Freezing Protocols: Comprehensively amend the Regulation on TFS and the Targeted Sanctions Trade Act to ensure the immediate designation and freezing of terrorist assets without delay, aligning with UNSCRs.</i>	<i>Legal Affairs Manager</i>	<i>May 2026 – May 2027</i>	<i>R.5, R.6</i>	<i>Amended Regulation and Act drafted; inter-agency consensus achieved; submitted to Legislature with detailed explanatory memoranda.</i>
<i>3.3 Deepen Egmont Integration and Amend MLAT: Conclude bilateral MoUs with priority foreign FIUs, actively participate in Egmont Working Groups, and amend the Mutual Legal Assistance Act to encompass foreign predicate offenses.</i>	<i>International Relations Manager</i>	<i>Jan 2026 – May 2027</i>	<i>R.30, R.37, R.40</i>	<i>Six new bilateral MoUs signed; active, documented Egmont Working Group participation; MLAT amendment explicitly addressing foreign predicates submitted to Legislature.</i>

Narrative Context for Goal 3: Membership in the Egmont Group is 'Liberia's most potent weapon against transnational financial crime. By deeply integrating the Egmont Strategic Plan (2022–2027) best practices—which emphasize secure information exchange, exploring engagement with non-traditional partners, and leveraging the ECOFEL certification program—the FIA will exponentially enhance its capacity to track funds moved offshore by corrupt domestic actors. Concurrently, amending the Mutual Legal Assistance in Criminal Matters Act of 2012 to include foreign predicate offenses will eliminate the jurisdictional barriers that have historically shielded criminal syndicates operating across West Africa's porous borders. The December 2026 deadline for the Recommendation 7 amendment remains the most politically sensitive deliverable in the entire plan, requiring intense, coordinated lobbying by the IMC to compel swift legislative action.

7.0 Resourcing, Budgeting, and the Financial Envelope

A strategic plan of this magnitude is merely an aspirational document without sustained, predictable capital allocation. The five-year execution of this plan requires a total financial envelope of **US\$23,997,784**.

The Agency's budget is anchored in recurrent appropriations from the Government of Liberia's national budget, which fund the operating base across all five years. Capital and technical support from international development partners supplements this base for specific investments: the African Development Bank (AfDB) toward the goAML system, technical assistance grants from UNODC, and operational co-financing for regulatory rollouts from the Central Bank of Liberia (CBL). The figures in Table 6 reflect the Government of Liberia appropriation. Partner contributions are treated as a modest supplementary line, projected conservatively at under US\$100,000 annually, and confirmed against signed commitments as they are secured. This framework distinguishes the appropriated base from projected external support and keeps the Plan aligned with national budgeting and the Medium-Term Expenditure Framework.

7.1 Five-Year Budget Allocation Profile

Table 6: Five-Year Budget Allocation Profile

Fiscal Year	Projected Budget (USD)	Funding Basis	Operational Status
FY 2026	4,713,567	Approved	Live
FY 2027	4,800,666	Projection	MTEF Baseline
FY 2028	4,700,775	Projection	MTEF Baseline
FY 2029	4,788,544	Projection	Validation Required via MFDP
FY 2030	4,994,232	Projection	Validation Required via MFDP
Total	23,997,784		

7.2 Allocation Logic by Strategic Goal

Resource distribution accurately reflects the operational labor, technological demands, and capital intensity of the respective goals:

- **Strengthened Systems (39% | ~US\$9.35M):** Represents the largest financial tranche. This allocation is dedicated to the heavy capital expenditures of deploying, maintaining, and training staff on the goAML platform, securing servers, and funding the recurring travel and personnel costs of conducting continuous SRAs and strict DNFBP supervision across all counties.
- **Anti-Corruption Alignment (30% | ~US\$7.19M):** Funds the highly labor-intensive requirements of inter-agency coordination. This includes convening the IMC, managing the constant LEA feedback loop, building specialized data portals for the LACC, and dedicating personnel to execute joint investigations with the Office of Asset Recovery.

- **Strong Collaboration (31% | ~US\$7.43M):** Finances the highly specialized legal drafting required for complex statutory amendments, continuous engagement with the Egmont Group, necessary international travel for bilateral MoU negotiations, and the subscription and maintenance costs associated with the Egmont Secure Web.

8.0 Governance, Accountability, and Risk Mitigation

8.1 Executive Governance and Accountability

The execution of this Plan relies on strict, singular accountability mechanisms. The Plan intentionally avoids creating new, convoluted reporting structures; instead, it leverages the Agency's existing hierarchy. Each of the nine milestones is formally assigned to a specific named role within the FIA Senior Management Team (SMT), including the Director General, Deputy Director General, Director of Operations, Compliance Manager, Risk Manager, and International Relations Manager.

The SMT meets every Monday (with the first Monday of each month chaired directly by the Director General) to assess operational momentum, surface immediate bottlenecks, and agree on rapid tactical adjustments. The Director General retains ultimate accountability for the Plan's success, reporting quarterly to the IMC on progress toward milestones, budget execution, and systemic risks, which, in turn, briefs the President of the Republic.

8.2 The Monitoring Rhythm

The Plan employs a rigorous, multi-tiered monitoring framework to ensure continuous forward momentum:

Table 7. Monitoring Rhythm Framework

Monitoring Frequency	Lead Mechanism	Monitoring Activity and Requirements
Monthly	SMT Evaluations	SMT evaluations utilizing a strict Red/Amber/Green (RAG) status matrix for all deliverables within a 90-day horizon. Any milestone dropping to Amber requires an immediate mitigation plan.
Quarterly	IMC Progress Reporting	Formal, comprehensive progress reports submitted to the IMC. These reports explicitly track the granular data that feeds into the Governance 'Commission's ARREST Pillar 4 indicators, specifically intervention 4.15.27.6 concerning the investigation and prosecution of corruption cases.
Annually	Strategic Plan Review	A comprehensive, Plan-wide strategic review conducted each January. This review is utilized to adjust budget requests, update the risk register, and align internal protocols with newly published FATF typologies or shifting domestic legislative realities.

8.3 Stakeholder Engagement and Communication Strategy

The FIA's mandate depends on the cooperation of reporting entities, partner agencies, and the public. The Agency will maintain structured engagement and communication throughout the Plan period. Reporting entities receive regular guidance, feedback on reporting quality, and advance notice of regulatory changes. Partner agencies within the IMC receive scheduled briefings on typologies, risks, and the status of shared intelligence. Public awareness is advanced through targeted outreach on the Agency's role and the obligations of regulated sectors. The Communications, Awareness, and Public Education function coordinates this engagement and reports its rhythm to the Senior Management Team, ensuring that stakeholder relationships are managed deliberately rather than reactively.

8.4 Risk Management and Mitigation Strategy

The operational landscape in Liberia is inherently volatile. The FIA has proactively identified and categorized the primary existential risks to this Strategic Plan, alongside rigorous, pre-planned mitigation protocols.

Table 8: Strategic Risk Register and Mitigation Framework

Identified Risk	Severity	Proactive Mitigation Strategy
<i>Legislative Delay on R.7 Amendment: Failure of the Legislature to pass the Proliferation Financing amendments by the Dec 2026 deadline, triggering an FATF Public Statement or immediate sanctions.</i>	<i>Critical / High</i>	<i>Active deployment of the IMC for aggressive political lobbying. Early, sustained engagement with the Speaker of the House and the Senate President Pro Tempore. Pre-emptive technical drafting by the FIA and Law Reform Commission to eliminate any technical drafting bottlenecks before the bill reaches the floor.</i>
<i>Missing GIABA Deadlines/Follow-Up Targets: Slipping timelines for the submission of Enhanced Follow-Up Reports, failing to secure re-ratings before the 2029 MER3.</i>	<i>High</i>	<i>Total integration of GIABA reporting schedules into the SMT's monthly RAG matrix. Setting highly conservative milestone deadlines that align strictly with the National Action Plan rather than relying on optimistic political assumptions.</i>
<i>Funding Shortfalls / Delayed Appropriations: Government cash flow crises leading to delayed staff salaries, loss of morale, or the inability to fund critical goAML software licensing.</i>	<i>Medium</i>	<i>Maintaining a heavily diversified funding architecture, relying on AfDB and UNODC grants for heavy capital outlays. Applying quarterly budget execution pressure directly through the IMC to ensure the MFDP prioritizes FIA disbursements.</i>
<i>Coordination Breakdown with LEAs/CAs: Partner agencies</i>	<i>Medium</i>	<i>Enforcement of Milestone 2.1 via legally binding MoUs. Immediate escalation of</i>

<i>(LACC, LNP) failing to investigate disseminations or refusing to provide feedback, effectively neutralizing Strategic Goal 2.</i>		<i>institutional non-compliance to the Minister of Justice (acting in the capacity of IMC Chair) during quarterly reviews to force LEA compliance.</i>
<i>Emerging Technology Risks (Mobile Money/Crypto): Criminal syndicates migrating entirely to unregulated digital channels, bypassing traditional banking and blinding the FIA.</i>	<i>Medium</i>	<i>Aggressive, fast-tracked execution of Milestone 1.2 (VASPs Sectoral Risk Assessment). Deepening the strategic regulatory partnership with the Liberia Telecommunications Authority (LTA) to aggressively monitor and regulate telecom-adjacent financial services.</i>

9.0 Conclusion

The Financial Intelligence Agency of Liberia stands at a critical historical juncture. The execution of the next five years of strategy requires a fundamental paradigm shift from building foundational capacity to executing aggressive, technology-driven, and inter-agency-coordinated law enforcement.

This Strategic Plan 2026–2031 explicitly recognizes that compliance with the FATF Recommendations is not merely a bureaucratic exercise in checking boxes for the upcoming 2029 GIABA Mutual Evaluation; it is a fundamental, existential requirement for the survival of the 'Republic's economic sovereignty. The staggering, unprecedented revelations of the 2026 GAC audit—documenting hundreds of millions in untraceable transitory funds and rampant, systemic statutory violations—coupled with the multi-billion-dollar hemorrhage of illicit financial flows routed through West African public procurement, dictate a harsh reality. The FIA can no longer operate as a passive, manual recipient of financial data. It must become the apex predator of the illicit financial ecosystem.

Through the uncompromising, rigorous implementation of Strengthened Systems, total Alignment with Anti-Corruption Agencies, and Strong International Collaboration, the FIA will build an impenetrable, digital intelligence architecture.

By 2031, supported by the full integration of the goAML platform, the enforcement of absolute beneficial ownership transparency, and an unbroken, prosecutorial feedback loop with law enforcement, the Agency will have decisively fulfilled its statutory mandate: Protecting Liberia's Financial System from Abuse of Financial Crimes.