**COUNTRY A**

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| --- | --- |
| 1 | Country A does not have a central register of beneficial ownership information, so you have to find out in which bank Unscrupulous LLC has an account. |
| 2 | After, asking every bank in the country for information, and overcoming bank secrecy restrictions, 8 months later, Shay-D Bank provides you information on the Account for Unscrupulous LLC.  |
| 3 | Shady-D Bank tells you that the accounts have been cleared 2 months ago but you can go after the owner of the account who is….  |
| 4 | …Got-Ya LLC! No information is available on who is the owner of Got-Ya LLC as it is incorporated in another country, but you know the Managing Director is called Mr. Ghost. The bank only has what seems to be a fake ID for Mr. Ghost. |

**COUNTRY B**

|  |  |
| --- | --- |
| 1 | Country B has a register of beneficial ownership information that is open only to national law enforcement agencies. You draft an international cooperation request which takes you 5 months to get the necessary approvals.  |
| 2 | You’ve received a positive response from County B’s government regarding access to their beneficial ownership register. However, it is one of many request that need to be processed, so it will take a little time. |
| 3 | 5 months later, you get access to the register for country B and find out that the real person that owns Unscrupulous LLC is….. |
| 4 | …a trust fund! As it turns out, country B does not require to hold information on beneficial owners of trusts.  |

**COUNTRY C**

|  |  |
| --- | --- |
| 1 | Country C has an open and freely accessible central register of beneficial ownership. The information is verified by an independent government institution and there are strict regulations on professions that establish legal entities.  |
| 2 | You access the BO register of Country C and find out that there is a chain of 5 companies and 2 trusts that own Unscrupulous LLC. |
| 3 | You find that that the ultimate owner of all 5 companies, who controls the 5 companies and two trusts is Minister Crook!  |
| 4 | Congratulations – you have the evidence to convict Minister Crook and recover the €100 million that were embezzled. |

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