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9 March 2022

Honorable Burgess Owens, Representative of Utah
Honorable Steve Cohen, Representative of Tennessee
Honorable Tom Malinowski of New York
US House of Representatives
Washington, DC

Dear Honorable Representatives Owens, Cohen and Malinowski,

Please accept greetings from me on behalf of the Government of Antigua and Barbuda and my Embassy accredited to the United States of America.

I write to you concerning the *No Travel for Traffickers Act* which you have introduced into the House of Representatives. My Government fully agrees that measures should be taken against any country whose government abuses its citizenship and residential programmes, such as the US EB-5 Immigrant Investor Program, to allow criminal activity of any kind.

It is because the Government of Antigua and Barbuda strongly opposes the abuse of citizenship and investor programs, that I write to explain and clarify the Citizenship by Investment Programme that we operate, ensuring no abuse by criminals, no opportunity for human trafficking, and no tolerance for any person who may pose a threat to our neighbours, such as the US, or to the global community, or ourselves.

As an example, when the Russian Federation invaded the sovereign state of Ukraine, my Government immediately banned all Russians and Belarusians, whether or not on a list of persons subject to sanctions, from being considered for access to our Citizenship by Investment Programme. That policy position was taken on March 4th and communicated to all agencies concerned with the Programme. It has been strictly enforced by the Police, Immigration Control, and the Citizenship by Investment Unit.

Even before this, my country also denied applications from North Korea, Iran, Somalia, Sudan, Yemen, and Afghanistan. We did so, conscious that nationals of these countries – and even state sponsored organizations within them - have been involved in terrorism.

Beyond the blanket ban on these eight countries, my Government also follows very closely, and acts upon, the list of persons, internationally, who are under sanctions as published by the U.S Treasury. No applications from these designated persons would pass the first hurdle of examination. Additionally, every person who applies for consideration under our Citizenship by Investment scheme is subject to several layers of intense investigation. These include, but are not limited to:

- A police report from their country of origin and their country of residence
- Clearance from INTERPOL that they are not wanted by any country in the world and are not fugitives from justice
- Full review of their financial background, companies and businesses with which they have been associated by international due diligence companies, such as LEXUS-NEXUS
- In particular cases, consultation with the law enforcement and judicial authorities in countries, such as the US.

Therefore, it would not be correct to suggest that the Citizenship by Investment Programme in Antigua and Barbuda “require(s) little vetting” or that it is “abused by human traffickers, international criminals, and corrupt oligarchs”.

Further, the possession of Antigua and Barbuda citizenship and passport does not, in any way, allow for the avoidance of diligence on matters such as opening a bank account or starting a company. If they did, this would be a special global privilege, open to all Citizens and passport holders of Antigua and Barbuda, which they most assuredly do not have, including within Antigua and Barbuda.

It should be noted that, as a jurisdiction, Antigua and Barbuda is not on the list of any authorised agencies such as the Financial Action Task Force (FATF), the Global Forum of the Organization for Economic Cooperation and Development (OECD), or the Commission of the European Union as being uncooperative against organised crime, including financial crimes.

Antigua and Barbuda operates a highly diligent Citizenship by Investment Programme with an acute sense of our global and regional responsibility.

We, therefore, urge you to examine carefully the operations of the Antigua and Barbuda Citizenship by Investment Programme before taking legislative action that would be extremely harmful to a consistent ally of the United States even before the independence of both our countries.

Recently, Antigua and Barbuda led the Declaration in the Organization of American States (OAS), condemning the Russian invasion of Ukraine and cosponsored a similar UN Declaration at the United Nations. We would hardly have done so if we benefitted from corrupt activity of Russian Oligarchs or any other Russians.

I stand ready to provide any further information that might be required.

With assurances of my highest regard.

A handwritten signature in black ink, appearing to read "Ronald Sanders". The signature is fluid and cursive, with a long horizontal stroke at the end.

Sir Ronald Sanders KCMG KCN AM

Ambassador Extraordinary and Plenipotentiary of Antigua and Barbuda