



# Identifying Sanctions Evasion Through Name Alteration: Checklist for TFS, CFT & CPF Compliance



## 1. Introduction

Name Alteration Detection is a critical component of Customer Due Diligence (CDD) and Sanctions Screening in the AML Compliance Framework. It helps FIs, DNFBPs, and VASPs to identify whether their potential or existing customer has altered or edited their name in order to evade detection of their names during Sanctions Screening for TFS, CTF, and CPF Compliance.

**Also known as:** Name Variation Screening, Alias Detection, Name Manipulation Monitoring.

**Used for:** Identifying changes or variations in customer names to evade detection or screening systems.

**Abuse in ML/TF/PF:** Criminals may use slightly altered names, misspellings, translations, or aliases to bypass controls and mask identities for money laundering, terrorism financing, or proliferation financing.



## 2. Applicability

### Virtual Asset Service Providers (VASPs) Financial Institutions (FIs)

- Banks
- Payment Institutions
- Money Services Businesses (MSBs)
- Insurance Companies
- Fintech Firms

### Designated Non-Financial Businesses and Professions (DNFBPs)

- Real Estate Agents & Brokers
- Lawyers, Notaries and other Legal Professionals
- Trust and Company Service Providers
- Auditors and Accountants
- Dealers in Precious Metals and Stones

## 3. How to Use This Checklist

- Compliance Officers: Validate that customer onboarding and monitoring systems incorporate name variation logic.
- Frontline Teams: Ensure correct customer name entry and flag potential inconsistencies.
- MLROs: Review alerts generated due to name alterations and verify appropriate resolution.
- Transaction Monitoring Teams: Correlate flagged names with suspicious activity or watchlist matches.

## 4. Sanctions Evasion Through Name Alteration: Checklist for Testing TFS, CFT & CPF Compliance Efficacy

Yes

No

### A. Customer Profiling

Has the customer declared any aliases or former names?

 

Are name changes supported by authentic documentation?

 

Is the name structure consistent with the customer's origin and profile?

 

### B. Onboarding Controls

Is there logic to detect use of initials or name truncations?

 

Are phonetic and fuzzy matching algorithms in place for name screening?

 

Is there an alert if the same name structure appears with multiple identifiers (e.g., DOB, address)?

 

### C. Screening and Monitoring

Does the screening system detect variations, misspellings, and transliterations?

 

Are lists configured with alias data or alternate spellings?

 

Is there integration between watchlists and onboarding/KYC systems?

**D. Technical Safeguards**

Yes No

Are there NLP or ML models trained on name alteration typologies?

Is manual override audit trailed and reviewed?

Are test scenarios executed to validate detection of manipulated names?

**E. Alerts and Case Handling**

Are name-based alerts prioritized appropriately?

Are alert resolutions documented and reviewed?

Are false positives due to legitimate name variations analyzed?

**F. Audit and Quality Assurance**

Are QA checks periodically reviewing name field integrity?

Are staff trained on name input practices?

Are audit findings used to refine detection parameters?

**G. Training and Oversight**

Are transaction monitoring staff trained on name alteration typologies?

Is there oversight to prevent overrides without review?

Are periodic refreshers given on alias and false-name risks?

Worried about the Next Steps or Name Alteration consequences? Speak to us for tailored TFS Compliance support and clarity.

**Call Us Now!**

## 5. How a RACI Matrix Enables Task Delegation and Role Clarity

- Ensures responsible teams handle name alteration detection at onboarding and monitoring stages
- Clarifies oversight from compliance and escalation to MLRO where risks are detected
- Helps Frontline, Screening and KYC Analysts, Senior Management, AML Compliance Officers, IT and data teams stay aligned on fuzzy logic or NLP model improvements
- Prevents gaps in screening, escalation, or training responsibilities

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## 6. RACI Chart for Detecting, Escalating, & Reporting Name Alteration Red Flags

A RACI chart is a responsibility delegation matrix used by businesses to chart individual roles and responsibilities within teams. RACI stands for and defines who is “Responsible”, “Accountable”, “Consulted”, and “Informed” in the context of specific tasks.

## How the RACI Framework Helps?

- Assigns clear accountability for each control step
- Prevents overlaps and ensures coverage of key risks
- Supports cross-team alignment for system configuration, training, and governance

Sanctions Evasion Detection Activities	Frontline Team	Screening Analyst/ KYC Analyst	AML Compliance Officer/ MLRO	Senior Management
Capture customer full name correctly	R	A	I	I
Configure fuzzy/phonetic matching	-	C	R/A	I
Review alerts on name variation	I	R	A	I
Test system against alias/misspelling cases	I	C	R/A	I
Conduct staff training on name alterations	I	C	R/A	I
Audit and QA on name detection	I	R	A	I

Role confusion can lead to reporting delays under UAE FIU expectations. We help you build clarity with a bespoke RACI.

[Book Your UAE Sanctions Compliance Process Review](#)

## 7. Action Points for Businesses to Enhance Sanctions Evasion Detection Measures

### In-House Compliance Department Setup

- Implement name variation detection at onboarding and transaction stages
- Embed name alteration scenarios in internal audit scope.

### Role-Specific AML Training

- Provide examples of common name manipulation methods
- Train screening teams on resolving name-based alerts.

## 8. Best Practices: Checklist + RACI-Driven Implementation

- Use fuzzy logic, Soundex, or NLP models for name matching
- Require customer declaration of aliases or name changes
- Integrate KYC and screening systems for alias recognition
- Conduct QA checks on name inputs and alert handling
- Align audit, IT, and compliance teams via RACI model

**Build your in-house compliance, map roles clearly, and upskill teams to identify settlement red flags.**

**Call Us Now!**

## AML Compliance Simplified!

AML UAE is an Anti-Money Laundering (AML) consulting firm with decades of experience supporting businesses across the UAE.

We have expertise in providing various AML services to DNFBPs, such as Lawyers, Real Estate Agents, Accountants and Auditors, Dealers in Precious Metals and Stones, and Company Service Providers. We also provide AML consultancy services to Virtual Asset Service Providers.

We are equipped to help you register on the goAML portal. We conduct Enterprise-Wide Risk Assessments and align your AML/CFT policies and procedures in line with them. We design customized forms and templates for carrying out KYC, Customer Risk Assessment, and Enhanced Due Diligence for your customers. We help you prepare and submit reports like SAR, STR, CNMR, PNMR, HRC, HRCA, DPMSR, etc. We ensure that your employees are well-trained from an AML perspective.

Not just this, we assist regulated entities with decoding the Remedial Action Plan and effectively implementing the authority's recommendations around the AML program.

AML UAE is your go-to partner for handling all your compliance-related requirements.

Once we enter the picture, AML compliance is ensured. With that, you can continue to be a highly reputed business, actively striving to counter money laundering, terrorist financing, and proliferation financing.

## Our Team



### Pathik Shah

*Founder*

CAMS, FCA, CISA, CS, DISA (ICAI), FAFP (ICAI)

Pathik is a Chartered Accountant with proven experience in governance, risk, and compliance. He helps companies with end-to-end AML compliance services, from conducting Enterprise-Wide Risk Assessments to implementing robust AML compliance frameworks. He has played a pivotal role as a functional expert in developing and implementing RegTech solutions for streamlined compliance.



### Jyoti Maheshwari

*Partner*

CAMS, ACA

Jyoti is a Chartered Accountant and Certified Anti-Money Laundering Specialist (CAMS), with extensive hands-on experience in regulatory compliance, legal advisory, policy-making, tax consultation, and technology project implementation. Jyoti holds experience with Anti-Money Laundering regulations prevalent across various countries. She helps companies with risk assessment, designing and deploying adequate mitigation measures, and implementing the best international practices to combat money laundering and other financial crimes.

## Our Team



### Dipali Vora

*Partner*

CAMS, ACS

Dipali is an Associate member of ICSI and a Certified Anti-Money Laundering Specialist (CAMS). She has a strong background in the compliance domain, including Anti-Money Laundering, due diligence, secretarial audit, and managing scrutiniser functions. She currently assists clients by advising and helping them navigate through all the legal and regulatory challenges of Anti-Money Laundering Law. She helps companies to develop, implement, and maintain effective AML/CFT and sanctions programs.



### Purva Buch

*Senior Consultant*

CAMS, LLB

Purva is a Certified Anti-Money Laundering Specialist (CAMS) and a Lawyer. She has substantial knowledge of Anti-Money Laundering Laws, Rules, Regulations, and AML Compliance Processes. Purva has been instrumental in drafting RegTech processes, corporate policymaking, and fulfilling various legal research and drafting requirements arising from AML laws and regulatory technology.

## Service Matrix

Service	Common Drivers							Value Proposition
	Ensure legal compliance	Save time and costs	Need expert support	Automate compliance processes	Implement best practices	Crisis management	Change AML/CFT consultant	
goAML Registration	✓		✓					Streamlines the process of registering with the UAE FIU goAML portal. Ensures compliance and reduces administrative burden.
Enterprise-Wide Risk Assessment	✓	✓	✓		✓		✓	Identifies risk factors, gross risk, controls deployed and their effectiveness, residual risk, and need for additional controls.
AML/CFT Policy Drafting	✓	✓	✓		✓		✓	Provides tailored AML/CFT policy frameworks that are up-to-date with current laws, enhancing regulatory compliance.
In-house Compliance Department Set-up	✓		✓		✓		✓	Establishes a robust internal compliance structure, helps recruit the right resources and ensures ongoing compliance efficiency.
KYC Managed Services	✓	✓	✓		✓	✓		Outsourced KYC processes that speed up customer onboarding and maintain high compliance standards.
Ongoing AML/CFT Consulting	✓	✓	✓	✓	✓	✓	✓	Continuous expert advice tailored to address specific challenges, enhancing overall compliance strategies.
AML/CFT Health Check	✓		✓		✓	✓	✓	Conducts comprehensive reviews and assessments to pinpoint vulnerabilities and recommend improvements.
AML Training	✓	✓	✓		✓		✓	Offers comprehensive training programs that enhance the compliance skills of employees at all levels.
AML Software Selection	✓	✓	✓	✓	✓			Helps choose the best AML software that fits the company's needs, improving efficiency and cost-effectiveness.
Screening Software Validation	✓		✓	✓	✓			Tests and validates screening tools to ensure they meet regulatory requirements and operational needs.
Regulatory Reporting	✓	✓	✓		✓		✓	Streamlines the process of creating and submitting SAR, STR, PNMR, FFR, DPMSR, REAR, HRC, and HRCA reports accurately and on time.

# AMLVerse

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