[DISCUSSION DRAFT — NOT FOR INTRODUCTION]

119th CONGRESS · 2d SESSION

S. _____ / H.R. _____

A BILL

To establish a single, one-time, and strictly retrospective program for the disclosure, remediation, and repatriation of assets derived from corruption affecting the nations of Atlantic-facing Africa committed before the effective date of the Africa Anti-Kleptocracy and Asset Recovery Act of 2026; to provide narrow and conditional clemency under the law of the United States in exchange for full disclosure of the facilitating infrastructure, remediation, and a binding pledge of future conduct; to enable the United States to dismantle that infrastructure retroactively; to provide for the recovery of such assets, their conditional return to qualifying countries of origin, and the application of assets not so returned to anti-kleptocracy enforcement and to infrastructure development in Africa; to direct in perpetuity a share of the returns generated by such assets to the implementation of the Africa Anti-Kleptocracy and Asset Recovery Act of 2026; and for other purposes.

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Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

SECTION 1. SHORT TITLE.

This Act may be cited as the "Africa Asset Repatriation and Clemency Act of 2026."

SEC. 2. FINDINGS AND PURPOSE.

(a) Findings.—Congress finds the following:

(1) Corruption, embezzlement, and the diversion of public resources have removed extraordinary sums of wealth from the nations of Atlantic-facing Africa, depriving their citizens of investment, infrastructure, and opportunity.

(2) A substantial share of that wealth has been moved abroad through opaque corporate structures, nominee arrangements, and complicit financial intermediaries, and now sits in jurisdictions where it is neither transparently governed nor productively employed.

(3) The Africa Anti-Kleptocracy and Asset Recovery Act of 2026 establishes permanent, forward-looking enforcement against such conduct and, through its distributed-ledger system of record, a tamper-evident account of covered transactions occurring on and after the date that Act takes effect.

(4) Forward-looking enforcement, however robust, cannot by itself reach wealth that was concealed before that enforcement existed; a separate, one-time, and strictly retrospective

mechanism is required to recover what was already taken and to identify the networks that enabled it.

(5) Experience with voluntary-disclosure and conditional-leniency programs demonstrates that a narrow, one-time, and time-limited incentive can induce the holders of concealed wealth to disclose not only their assets but the entire infrastructure of intermediaries that moved and hid them.

(6) Wealth recovered through such a program is appropriately returned to the country of origin where that country can be identified and demonstrates the governance necessary to safeguard it against renewed theft, and is otherwise applied to the enforcement of anti-kleptocracy measures and to the development of infrastructure in Africa.

(7) The United States dollar is a principal currency of international trade and finance, and transactions denominated in dollars depend upon, and are cleared through, the financial system of the United States; the United States has a sovereign interest in the integrity of its currency and acts, of its own initiative, to identify and remedy the criminal misuse of dollar-denominated transactions wherever such transactions occur.

(8) The recovery of assets under this Act is undertaken by the United States in the exercise of that interest, and at its own initiative and expense, and does not arise from, and is not limited by, any obligation owed by the United States or its taxpayers to any other nation to recover or to return such assets.

(9) Where the United States, in safeguarding the integrity of dollar-denominated transactions, recovers assets derived from covered corruption, the conditional return of those assets is a lawful and proportionate means of encouraging the country of origin to bring its laws, regulations, and enforcement into closer alignment with those of the United States, and thereby to reduce the recurrence of such theft.

(b) Purpose.—The purpose of this Act is to establish a single, one-time, and strictly retrospective program under which the beneficial owner of assets derived from covered corruption committed before the Anti-Kleptocracy Effective Date may disclose and remediate those assets, and disclose the facilitating infrastructure that enabled their concealment, in exchange for conditional clemency under the law of the United States; to enable the United States to dismantle that infrastructure retroactively; to recover such assets in the exercise of the sovereign interest of the United States in the integrity of dollar-denominated transactions, and to return them conditionally to countries of origin that bring their laws, regulations, and enforcement into closer alignment with those of the United States; to apply assets not so returned to anti-kleptocracy enforcement and to infrastructure development in Africa; and to direct, in perpetuity, a share of the returns generated by those assets to the implementation of the Africa Anti-Kleptocracy and Asset Recovery Act of 2026. This Act provides no clemency for conduct occurring on or after the Anti-Kleptocracy Effective Date, which conduct is governed exclusively by that Act.

SEC. 3. DEFINITIONS.

In this Act:

(1) Anti-Kleptocracy Effective Date.—The term "Anti-Kleptocracy Effective Date" means the date on which the Africa Anti-Kleptocracy and Asset Recovery Act of 2026 takes effect and its distributed-ledger system of record commences operation.

(2) Beneficial owner.—The term "beneficial owner" means the natural person or persons who, directly or indirectly, own, control, or receive the economic benefit of covered assets.

(3) Covered assets.—The term "covered assets" means funds, securities, real property, business interests, and other property that the Interagency Committee determines, more likely than not, constitute or derive from the proceeds of covered corruption.

(4) Covered corruption.—The term "covered corruption" means bribery, embezzlement, the misappropriation or diversion of public funds, extortion under color of office, or the laundering of the proceeds thereof, in connection with the government or public resources of a country of origin, and committed before the Anti-Kleptocracy Effective Date.

(5) Country of origin.—The term "country of origin" means a nation of Atlantic-facing Africa from which covered assets were, in whole or in part, derived.

(6) Facilitating entity.—The term "facilitating entity" means any bank, financial institution, law firm, accounting firm, corporate-formation agent, trustee, broker, investment adviser, or other person that knowingly or recklessly assisted in the transfer, concealment, layering, or disguise of covered assets.

(7) Interagency Committee.—The term "Interagency Committee" means the Interagency Asset Repatriation Oversight Committee established under section 6.

(8) Program.—The term "Program" means the Voluntary Asset Repatriation and Clemency Program established under section 5.

(9) Qualified financial institution.—The term "qualified financial institution" means a United States financial institution or registered investment adviser that is subject to Federal regulation and to the Bank Secrecy Act and that is designated as eligible by the Secretary of the Treasury.

(10) Implementation Fund.—The term "Implementation Fund" means the Africa Anti-Kleptocracy Implementation Fund established under section 15.

(11) Retained share.—The term "retained share" means the beneficial interest in the covered assets, not exceeding 15 percent of their gross value, that the beneficial owner retains under section 13 in recognition of voluntary disclosure.

(12) Surrendered assets.—The term "surrendered assets" means the covered assets other than the retained share.

(13) Clemency.—The term "clemency" means the conditional forbearance from prosecution and the conditional safe harbor provided under section 9, and does not mean a pardon, an absolution of liability under the law of any other jurisdiction, or the conferral of clean or unconditional title to any asset.

SEC. 4. RETROACTIVE SCOPE AND ONE-TIME CHARACTER OF THE PROGRAM.

(a) Retrospective Application Only.—The Program applies solely to covered corruption committed, and to covered assets derived from such corruption, before the Anti-Kleptocracy Effective Date.

(b) No Application to Subsequent Conduct.—Clemency under this Act is not available for any conduct occurring on or after the Anti-Kleptocracy Effective Date. Such conduct is subject exclusively to the Africa Anti-Kleptocracy and Asset Recovery Act of 2026 and to all other applicable law, and is met with the full force of that Act.

(c) Single, Non-Recurring Event.—The Program is a one-time program. The commencement of the distributed-ledger system of record under the Africa Anti-Kleptocracy and Asset Recovery Act of 2026 establishes a permanent and tamper-evident demarcation between the period addressed by this Act and the period of prospective enforcement. It is the intent of Congress that the Program not be repeated, reauthorized, or extended to conduct occurring on or after the Anti-Kleptocracy Effective Date.

(d) Bright-Line Date.—Whether conduct occurred before or after the Anti-Kleptocracy Effective Date shall be determined by reference to the distributed-ledger record where available, and otherwise by the best available evidence, with the burden on the applicant to establish that the conduct and the covered assets fall within the retrospective scope of this Act.

SEC. 5. ESTABLISHMENT OF THE VOLUNTARY ASSET REPATRIATION AND CLEMENCY PROGRAM.

(a) In General.—Not later than 180 days after the date of enactment of this Act, the Secretary of the Treasury, acting in coordination with the Attorney General and the Secretary of State, shall establish the Voluntary Asset Repatriation and Clemency Program.

(b) Voluntary Participation.—Participation in the Program shall be voluntary and shall be initiated solely by the beneficial owner of covered assets or an authorized representative of the beneficial owner.

(c) No Entitlement.—Acceptance into the Program, and the grant of clemency under this Act, are discretionary determinations of the Interagency Committee. No applicant has an entitlement to participation in the Program or to clemency.

SEC. 6. INTERAGENCY ASSET REPATRIATION OVERSIGHT COMMITTEE.

(a) Establishment.—There is established an Interagency Asset Repatriation Oversight Committee.

(b) Membership.—The Interagency Committee shall consist of senior officials designated, respectively, by the Attorney General, the Secretary of State, and the Secretary of the Treasury.

(c) Chair.—The designee of the Attorney General shall serve as Chair of the Interagency Committee.

(d) Functions.—The Interagency Committee shall—

(1) review applications submitted under the Program;

(2) determine the eligibility of applicants, the retrospective scope of the conduct disclosed, and the value of covered assets;

(3) approve, condition, or deny clemency;

(4) set remediation payments and the retained share within the limits established under sections 10 and 13;

(5) refer facilitating entities for resolution under section 11;

(6) conduct the country-of-origin assessments and the monitoring required under section 16; and

(7) monitor compliance with the conditions of clemency.

(e) Concurrence Required.—An application may be approved, and clemency granted, only upon the concurrence of the designees of all three member agencies.

(f) Record of Determinations.—The Interagency Committee shall maintain a written record of the basis for each determination, which shall be available for the oversight and audit conducted under section 18.

SEC. 7. ELIGIBILITY AND EXCLUSIONS.

(a) Eligible Persons.—Subject to subsection (b), the beneficial owner of covered assets may apply to the Program.

(b) Mandatory Exclusions.—Clemency may not be granted, and an application shall be denied, where the Interagency Committee finds that—

(1) the applicant is a person designated under any sanctions program administered by the Office of Foreign Assets Control;

(2) the covered assets constitute or derive from terrorism, the financing of terrorism, narcotics trafficking, human trafficking, the proliferation of weapons of mass destruction, or violent crime;

(3) the applicant has been credibly implicated in gross violations of internationally recognized human rights;

(4) the applicant has engaged in covered corruption, or in the concealment of its proceeds, on or after the Anti-Kleptocracy Effective Date, in which case the matter shall be referred for enforcement under the Africa Anti-Kleptocracy and Asset Recovery Act of 2026;

(5) the applicant is, at the time of application, a sitting head of state or head of government of a country of origin;

(6) the application contains a material misrepresentation or omission; or

(7) the grant of clemency would be contrary to the foreign-policy or law-enforcement interests of the United States.

(c) Effect of Exclusion.—The denial of an application, or the exclusion of an applicant, does not limit the authority of the United States to pursue any civil or criminal enforcement otherwise available.

SEC. 8. APPLICATION AND MANDATORY DISCLOSURE.

(a) Contents of Application.—A complete application under the Program shall include—

(1) the identity of every beneficial owner of the covered assets;

(2) a full and verified accounting of all covered assets, their location, and their form;

(3) a complete disclosure of every facilitating entity, of the role each such entity played, and of the methods, structures, accounts, and instruments used to transfer, conceal, layer, or disguise the covered assets;

(4) all supporting documentation in the possession or control of the applicant, including any evidence bearing on the country of origin of the covered assets;

(5) a written and irrevocable consent to the sharing of application information among the member agencies and, as appropriate, with a country of origin; and

(6) the conduct pledge required under section 12.

(b) Purpose of Disclosure.—The disclosure required under this section is intended to enable the United States to identify and dismantle, retroactively, the infrastructure of intermediaries and instruments that enabled covered corruption.

(c) Truthfulness.—The disclosure required under subsection (a) shall be complete and truthful. A material misrepresentation or omission—

(1) voids any clemency granted in reliance on the application; and

(2) exposes the applicant to prosecution, including for the making of false statements to the United States.

(d) Use of Disclosed Information.—Information disclosed in a complete application may not be used against the applicant with respect to the covered conduct so disclosed for so long as clemency is granted and remains in effect, but may be so used if clemency is denied, revoked, or voided.

SEC. 9. TERMS OF CONDITIONAL CLEMENCY.

(a) Grant.—Upon the approval of an application and the satisfaction of all conditions of this Act, the United States shall grant the applicant conditional clemency, consisting of—

(1) forbearance from the prosecution of the applicant by the United States for the covered corruption fully and truthfully disclosed in the application; and

(2) a conditional safe harbor permitting the covered assets to be admitted to the United States financial system and placed under management under section 13.

(b) Limitations.—Clemency granted under this Act—

(1) extends only to covered corruption committed before the Anti-Kleptocracy Effective Date and fully and truthfully disclosed in the application;

(2) does not absolve the applicant of liability under the law of any country of origin or of any other jurisdiction;

(3) does not bind any foreign government or international body;

(4) does not confer title to the surrendered assets, in which the beneficial owner has no economic interest, and confers only the retained share under section 13, which remains subject to the clawback under section 12; and

(5) is conditional and revocable in accordance with this Act.

SEC. 10. REMEDIATION PAYMENT.

(a) Requirement.—As a condition of clemency, the applicant shall pay to the Treasury a remediation payment with respect to the covered assets.

(b) Amount.—The remediation payment shall be not less than 20 percent of the gross value of the covered assets, as determined by the Interagency Committee, subject to the following adjustments:

(1) Reduction.—The Interagency Committee may reduce the remediation payment, to not less than 12 percent, in recognition of application within the first year of the application period and of the complete and verified disclosure of all facilitating entities.

(2) Increase.—The Interagency Committee shall increase the remediation payment, to as much as 35 percent, in recognition of delayed application, of partial disclosure later cured, or of other aggravating circumstances.

(c) Form and Schedule.—The remediation payment shall be made in cash, and may be made on a schedule approved by the Interagency Committee and secured against the covered assets.

(d) Distribution.—After payment of any whistleblower award under section 14, remediation payments and facilitation penalties collected under this Act shall be distributed as follows:

(1) 50 percent to the Implementation Fund;

(2) 30 percent to country-of-origin restitution under section 16(f); and

(3) 20 percent to the general fund of the Treasury, to offset the costs of administering the Program.

SEC. 11. TREATMENT OF FACILITATING ENTITIES.

(a) Referral.—Every facilitating entity disclosed in an application shall be referred by the Interagency Committee to the Attorney General and the Secretary of the Treasury for the purpose of dismantling the infrastructure that enabled covered corruption.

(b) Resolution.—With respect to the disclosed conduct, each facilitating entity shall either—

(1) enter into a settlement with the United States and pay a facilitation penalty in an amount reflecting the gravity of its conduct; or

(2) be subject to civil enforcement or criminal prosecution as otherwise provided by law.

(c) Self-Reporting Leniency.—A facilitating entity that, before being identified to the United States, voluntarily discloses its own conduct and cooperates fully may receive a reduced facilitation penalty.

(d) No Derivative Clemency.—Clemency granted to a beneficial owner does not extend to any facilitating entity.

SEC. 12. CONDUCT PLEDGE AND CLAWBACK.

(a) Conduct Pledge.—As a condition of clemency, the beneficial owner shall execute a binding and legally enforceable pledge that the beneficial owner shall not, on or after the Anti-Kleptocracy Effective Date, directly or indirectly engage in covered corruption or in the concealment of the proceeds thereof, and shall acknowledge in that pledge that any such conduct is subject to the full force of the Africa Anti-Kleptocracy and Asset Recovery Act of 2026, with no clemency available.

(b) Clawback.—If, after the grant of clemency, the Interagency Committee or a court of competent jurisdiction finds that the beneficial owner has—

(1) breached the conduct pledge;

(2) made a material misrepresentation or omission in the application; or

(3) failed to satisfy a condition of clemency,

then the clemency shall be revoked, the retained share, together with all returns accrued thereon, shall be subject to seizure and forfeiture to the United States, and the surrendered assets shall remain subject to section 16.

(c) Procedure.—A revocation or forfeiture under this section shall be made only after notice to the beneficial owner and an opportunity to be heard, and shall be subject to judicial review.

SEC. 13. MANAGEMENT OF REPATRIATED ASSETS; RETAINED SHARE AND SURRENDERED ASSETS.

(a) Placement.—Covered assets admitted under the Program shall be placed with one or more qualified financial institutions selected by the beneficial owner from a list of institutions designated as eligible by the Secretary of the Treasury, and shall be held in a managed-account structure subject to the Bank Secrecy Act and all applicable reporting and recordkeeping requirements.

(b) Retained Share.—The Interagency Committee shall determine a retained share, not exceeding 15 percent of the gross value of the covered assets, which the beneficial owner shall retain in recognition of voluntary disclosure. The Interagency Committee may set the retained share toward the upper end of that limit in recognition of application within the first year of the application period and of the complete and verified disclosure of all facilitating entities. The beneficial owner is entitled to the returns generated on the retained share, net of fees and taxes, and the retained share remains subject to the clawback under section 12.

(c) Surrendered Assets.—The covered assets other than the retained share constitute surrendered assets. The beneficial owner has no economic interest in the surrendered assets, and the disposition of the surrendered assets and their proceeds is governed by section 16.

(d) Restrictions on the Corpus.—The corpus of the covered assets may not be withdrawn, encumbered, or transferred outside the United States except as provided in this Act or as approved by the Interagency Committee.

SEC. 14. WHISTLEBLOWER AWARDS.

(a) In General.—The Interagency Committee shall pay an award to a whistleblower who voluntarily provides original information that leads to a successful disclosure, remediation, or recovery under the Program, or to the resolution of a facilitating entity under section 11.

(b) Amount.—An award under this section shall be not less than 10 percent and not more than 30 percent of the remediation payments and facilitation penalties collected as a result of the original information provided.

(c) Source.—Awards under this section shall be paid from the remediation payments and facilitation penalties collected as a result of the original information, before the distribution under section 10(d).

(d) Protection From Retaliation.—A whistleblower under this section shall be afforded protection from retaliation consistent with other Federal whistleblower law.

(e) Exclusions.—A person who is excluded under section 7(b), or who is convicted of a criminal offense in connection with the conduct that is the subject of the information, is not eligible for an award under this section.

SEC. 15. AFRICA ANTI-KLEPTOCRACY IMPLEMENTATION FUND.

(a) Establishment.—There is established in the Treasury of the United States a separate fund, to be known as the Africa Anti-Kleptocracy Implementation Fund.

(b) Deposits.—There shall be deposited into the Implementation Fund—

(1) the share of remediation payments and facilitation penalties directed to the Fund under section 10; and

(2) the proceeds of surrendered assets directed to the Fund under section 16(d).

(c) Use of Funds.—Amounts in the Implementation Fund shall be available to the Secretary of State and the Attorney General, without fiscal-year limitation, solely to carry out the Africa Anti-Kleptocracy and Asset Recovery Act of 2026.

(d) Perpetual Contribution.—The contribution of surrendered-asset proceeds to the Implementation Fund under section 16(d) continues for so long as surrendered assets, or any successor assets, remain under management, notwithstanding any change in beneficial ownership.

SEC. 16. DISPOSITION OF SURRENDERED ASSETS; CONDITIONAL RETURN TO COUNTRY OF ORIGIN.

(a) Ongoing Determination of Origin.—The Interagency Committee, in coordination with the Secretary of State, shall seek to determine the country of origin of surrendered assets, both at the time of admission to the Program and on a continuing basis thereafter.

(b) Surrendered Assets of Determined Origin.—Where the country of origin of surrendered assets is established, whether by proof available at admission or developed afterward—

(1) the surrendered assets shall continue to be managed by a qualified financial institution;

(2) the net profit generated on the surrendered assets shall be paid to the treasury of the country of origin;

(3) a monitoring period of 10 years shall run, during which the Secretary of State and the Interagency Committee shall assess whether the country of origin has established and maintained measures against kleptocracy that are effective and that meet, at a minimum, standards comparable to those applied within the United States;

(4) if, at the conclusion of the monitoring period, the country of origin is determined to have met that standard, the surrendered assets shall be returned to the country of origin in their totality, less a reasonable management fee retained by the qualified financial institution, in the form of a United States dollar-denominated sovereign debt instrument of the United States recorded on a distributed ledger; and

(5) if the country of origin is not determined to have met that standard, the surrendered assets shall remain under management and their proceeds applied under subsection (d), and the country of origin may be reassessed in successive monitoring periods of 10 years.

(c) Surrendered Assets of Undetermined Origin.—Where the country of origin of surrendered assets cannot be established, including by reason of the death of the perpetrator and of co-conspirators or the absence of attainable proof, the surrendered assets shall continue to be managed by a qualified financial institution until the origin is established or another resolution is reached, whereupon subsection (b) shall apply; pending such resolution, the proceeds of management shall be applied under subsection (d).

(d) Application of Proceeds Pending Return.—For surrendered assets the proceeds of which are applied under this subsection — being surrendered assets of undetermined origin, or surrendered assets of determined origin where the country of origin has not met the standard under subsection (b) — the net proceeds of management shall be applied—

(1) first, to the Implementation Fund, to finance the implementation of the Africa Anti-Kleptocracy and Asset Recovery Act of 2026; and

(2) thereafter, the balance shall be retained by the qualified financial institution and applied to the financing of infrastructure projects in Africa.

(e) Condition on Return to Any Nation.—Surrendered assets shall not be returned to any nation except upon a determination, made over a monitoring period of not less than 10 years, that the nation has demonstrated substantive and sustained measures against kleptocracy meeting, at a minimum, standards comparable to those applied within the United States. Absent such a determination, the surrendered assets shall remain under the management of qualified financial institutions and their proceeds shall be applied under subsection (d).

(f) Restitution Share of Remediation Payments.—The share of remediation payments directed under section 10(d)(2) shall be applied to verified restitution, development, or anti-corruption use benefiting the people of the country of origin.

(g) Consultation and International Obligations.—The Secretary of State shall consult with the government of each country of origin regarding surrendered assets, and this section shall be carried out in a manner consistent with the obligations of the United States under the United Nations Convention against Corruption.

SEC. 17. RELATIONSHIP TO OTHER LAW.

Except as expressly provided in this Act, nothing in this Act limits or supersedes—

(1) any sanctions authority administered by the Office of Foreign Assets Control;

(2) the Bank Secrecy Act or the anti-money-laundering obligations of financial institutions;

(3) the Foreign Corrupt Practices Act of 1977;

(4) any civil or criminal forfeiture authority of the United States;

(5) the Africa Anti-Kleptocracy and Asset Recovery Act of 2026; or

(6) any obligation of the United States under a treaty.

SEC. 18. OVERSIGHT, AUDIT, AND REPORTING.

(a) Audit.—Not less frequently than every 2 years, the Comptroller General of the United States shall audit the Program, the Implementation Fund, and the management and disposition of surrendered assets, and report the results to Congress.

(b) Independent Review.—An Inspector General designated by the Interagency Committee shall review approval determinations and country-of-origin assessments for consistency and integrity, and shall report findings to Congress.

(c) Annual Report.—The Interagency Committee shall submit to Congress an annual report stating the number of applications received, approved, and denied; the value of covered assets admitted; the remediation payments collected; the facilitating entities referred and resolved; the whistleblower awards paid; the surrendered assets returned to countries of origin; and the deposits made to the Implementation Fund.

(d) Judicial Review.—A determination of the Interagency Committee, including a country-of-origin assessment under section 16, is subject to judicial review for whether it was arbitrary, capricious, or otherwise contrary to law.

(e) Public Transparency.—The Interagency Committee shall publish an annual public summary of the operation of the Program, consistent with law-enforcement sensitivity.

SEC. 19. APPLICATION PERIOD AND SUNSET.

(a) Application Period.—The Program shall accept applications beginning on the date the Program is established and ending on the date that is 3 years after that date.

(b) One-Time Sunset.—Upon the close of the application period, the authority to accept applications terminates permanently. It is the intent of Congress that the Program, being a single and non-recurring response to conduct that preceded the Anti-Kleptocracy Effective Date, not be reauthorized or revived; the distributed-ledger system of record under the Africa Anti-Kleptocracy

and Asset Recovery Act of 2026 stands as the permanent demonstration that the Program was a singular event.

(c) Continuing Effect.—The obligations attaching to covered assets admitted before the sunset under subsection (b), including the management and disposition of surrendered assets under section 16, the contribution to the Implementation Fund, and the clawback under section 12, continue in effect notwithstanding that sunset.

SEC. 20. AUTHORIZATION OF APPROPRIATIONS.

There are authorized to be appropriated such sums as may be necessary to carry out the administration of this Act, to be offset, to the extent available, by the share of remediation payments directed to the general fund of the Treasury under section 10(d)(3).

Discussion draft prepared for Tenet Ventures Group. Not legal advice. The constitutional, treaty, and financial-regulatory provisions herein require review by qualified counsel before any use.