

Strasbourg, 12 May 2021

C198-COP(2021)5

CONFERENCE OF THE PARTIES

Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS No. 198)

Extraordinary Plenary meeting, Strasbourg

12 May 2021

MEETING REPORT

SUMMARY ACCOUNT OF THE PROCEEDINGS

1. The Conference of the Parties to the Council of Europe's Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS no. 198, hereafter: 'the Convention') held its Extraordinary Plenary meeting on 12 May 2021, under the Chairmanship of its President Mr Ioannis Androulakis (Greece). The agenda of the meeting, the decisions taken, and the list of participants are annexed to the present report.
2. This report summarises the discussions on each agenda item and the decisions made by the Plenary.

Opening of the Meeting

3. The President opened the meeting and welcomed the participants. All State Parties to the Convention were present.

Item 1 - Adoption of the Agenda

4. The agenda was adopted as it appears in Appendix I.

Item 2 - Statement by Mr Jan Kleijssen, Director, Information Society and Action against Crime Directorate

5. In his opening remarks, Director Kleijssen welcomed the Austrian delegation as it was their first participation in a COP Plenary meeting.
6. Mr Kleijssen also welcomed the significant visibility that the COP and the Warsaw Convention attained in recent months. He reiterated the importance of the COP activities and initiatives (e.g. a joint statement with Moneyval with regard to 'FinCEN files', PACE Resolution on 'Urgent need to strengthen financial intelligence units as an important standard about FIUs' and the related Recommendation, which both made references to the Convention and its added value in fighting ML, etc.), and underlined the fact that there is a continuous interest expressed by non-member states, such as those from the Central Asia region, to join the Warsaw Convention. Mr Kleijssen reflected on good results achieved by the COP since the new monitoring methodology ('horizontal reviews') has been applied.
7. Finally, he recalled the importance of implementing synergy and coordination with other Council of Europe bodies, such as the Council of Europe Committee on Counter-Terrorism (CDCT), GRECO, Cybercrime Committee and the COP on Convention 108.

Item 3 - Statement by the President

8. The President also welcomed the Austrian delegation, reminding the plenary that the Convention entered into force for that jurisdiction in November 2020. He also informed the Plenary about the letter sent to UK as per decision of the 12th plenary meeting, inviting the country delegation to attend the COP plenaries and calling them to submit missing inputs on UK application of Articles 3(4) and 7(2c)/19(1). Responses to this letter were received and the UK delegation expressed its readiness to continue taking an active part in the COP. In addition, on 22 April 2021 the UK inputs to the Art.3(4) and 7(2c)/19(1) were received. The COP Bureau and the President welcomed these developments.

9. The President then briefed the plenary about the exchange of views he had with the Committee of Ministers through their Rapporteur Group on Legal Co-operation (GR-J), and the COP activity report that he presented at that occasion. During the discussion at the GR-J, four minister's deputies (UK, Greece, the Netherlands, Germany) took the floor and commended the COP for its work, expressing their support to the horizontal monitoring methodology applied since 2018.
10. Another issue underscored by the President was the possibility to invite other member states to ratify the Convention. The President called the Plenary to encourage non-member states to take part, i.e. be proactive in promoting the Convention among non-members of the Council of Europe.
11. Finally, the President referred to the recent PACE Recommendation 2195 (2021) and related Recommendation, suggesting the States Parties to consider what would be an appropriate follow up on these developments. This subject will be further discussed under the item 5 of the agenda (see below).

Item 4 - Communication by the Executive Secretary

12. The Executive Secretary informed the COP about the staff changes in the Secretariat since October 2020: Ms Ana Boskovic, former Vice-President of the COP (Montenegro) and Ms Stela Buiuc (Republic of Moldova) were seconded to the MONEYVAL/COP Secretariat whilst Mr Lado Lalicic was appointed as a Deputy Executive Secretary. Furthermore, he informed the COP on the state of play with regard to the preparation of the 2021 Thematic Monitoring Report (Article 10 pars 1 and 2), emphasizing that all countries but one submitted their inputs. The remaining country is currently preparing its inputs and is expected to send them soon. In addition, the Executive Secretary also announced that Lithuania has sent responses to all the questionnaires on the previous Thematic Monitoring and the analysis on these inputs will be presented at the next plenary meeting. As for the 'selected follow up process' inputs were also received from the Russian Federation and the corresponding analysis will be discussed at the next plenary.
13. He further informed that Hungary sent additional information as regards Article 46 of the Convention, whilst Austria and Lithuania have already submitted all reservations and declarations and have also filled in the MLA template.
14. The Executive Secretary briefed the plenary on a continuous communication, which is held at the level of the Council of Europe with Morocco on their possible accession to the Convention. In addition, he updated the plenary on recent efforts in promoting the work of the Convention and invitations received by various interlocutors.

Item 5 - Position on Recommendation 2195 (2021) of the Parliamentary Assembly of the Council of Europe "Urgent need to strengthen financial intelligence units"

15. Before going into the substance of this agenda item, the President thanked the Secretariat for its extensive work which resulted in all State Parties having submitted their inputs for the 2021 Thematic Monitoring report.
16. The President then discussed the recent developments at the Parliamentary Assembly of the Council of Europe, i.e. the Resolution "Urgent need to strengthen financial intelligence units - Sharper tools needed to improve confiscation of illegal assets" and

PACE Recommendation 2195 (2021). He also informed the Plenary about the Committee of Ministers request to MONEYVAL/COP to send information and comments on the initiative at stake. The response, which was agreed with the COP Bureau, and which emphasises the relevant elements of the Convention (i.e. its Article 14 and the way its implementation could strengthen the FIUs' capacities), was also presented to the plenary.

17. Given that the PACE Recommendation also refers to the activities and standards of the FATF, the President invited the States Parties which are also FATF member states to liaise with their FATF delegations and promote discussion on how the standard embedded in Article 14 of the Convention could be considered globally and then be eventually included in the revised FATF standards. In view of that, the President proposed that a letter be prepared for the heads of the States Parties delegations on this subject matter.
18. States Parties accepted this proposal, and the Russian Federation suggested additionally that the COP President write directly to the FATF President and suggest that consideration be given by the FATF on inclusion of the provision of Art.14 of the Convention in the revised FATF standards.
19. Armenia and the Netherlands asked for the floor supporting the COP initiatives related to the PACE Recommendation. Armenia delegation supported the idea to reach out a global audience, while the Netherlands delegation informed the plenary on initiatives in their jurisdiction where amendments have been developed to better address the issues discussed in Article 14.
20. The FATF Secretariat took the floor and also underlined the importance of provisions of Art.14 and its impact on effective asset recovery. Whilst the percentages of assets recovered worldwide are very low, a postponement of suspicious transaction is one of the tools which could further strengthen the asset recovery framework. In view of that, the FATF Secretariat is ready to support this COP initiative.
21. The Plenary adopted the proposals by the COP President to address the COP/FATF member states with regard to the issues raised in the Resolution. The Plenary also approved the proposal of the Russian Federation that the COP President also write a letter to the FATF President.

Item 6 - Terms of Reference for implementation of p.1.5 of the Council of Europe Counterterrorism Strategy "Financing of Terrorism"

22. The Co-secretary to the Council of Europe Committee on Counter-Terrorism (CDCT), Ms Jelena Jolic, presented the Terms of Reference for implementation of Activity 1.5 of the Council of Europe Counterterrorism Strategy - "Financing of Terrorism (FT)". She explained that Activity 1.5 of the Strategy refers to the need to examine the possibility to update the existing Council of Europe/international standards on FT. The terms of reference, which the Plenary was called to agree upon, propose the setting up of a group of experts who would then examine the existing standards and propose a way forward – either to amend what is already in place or to simply confirm that no further changes are needed. In addition, the experts could propose a soft law instrument to be introduced or any other option that they deem convenient. Ms Jolic suggested that the first draft report by the experts would be prepared by the end of October and then presented to the COP, MONEYVAL and CDCT plenaries.
23. The Executive Secretary informed the COP that the MONEYVAL plenary adopted the terms of reference and that they were generally supported by the delegations. The

Russian Federation asked for confirmation that the outcome of the expert group is in no way predetermined – which was confirmed – and expressed some concerns whether these efforts might overlap with the work carried out by other international organizations. In view of that, the Russian Federation delegation asked about the procedure of experts' appointments.

24. The Secretariat specified that COP, MONEYVAL and CDCT are expected to nominate one expert. In view of that, the COP will ask its scientific expert to join the group. In case he is not available to undertake this task, the COP will then launch a call for experts and the delegations will be allowed to nominate their candidate(s). It was agreed that more than one expert may represent the COP in the Joint Experts Group.

Item 7 - Presentation of the Revised Interpretative Note on Art. 3(4) of the Convention, Doc C198-COP(2017)9rev

25. The President summarised the discussion on this issue held during the 12th Plenary with regard to the Thematic Monitoring Report on Article 3(4). He reiterated the fact that the rapporteurs had different views than some States Parties on the meaning of 'serious offence' as envisaged by Art.3(4). In essence, the discussion was about the relation between the mandatory confiscation regime as regulated in Art. 3(2) and the reversal of the burden of proof as foreseen Art. 3 (4) vis-à-vis the notion of 'serious offence'. As a consequence, the 12th plenary decided to postpone the adoption of the Thematic Monitoring Report on Art.3(4) until this issue is resolved. Consequently, the COP Bureau decided to ask the scientific expert to revise the Interpretative Note on Art.3(4) and focus on the issue of notion of a serious offence. The revised Note was prepared by the scientific expert a month before the plenary and was sent to all States Parties prior to the meeting.
26. The scientific expert explained the reasons behind the revisions he made – the material scope of application of the provision in Article 3, par. 4, is based, i.e., on a notion of "serious offence" which is referred to in the same paragraph but not included in the list of definitions in Article 2 of the Convention. This reference is separate, and therefore different in principle, from that of "categories of offences" in Article 3, paragraph 2, as subject to the general mandatory confiscation regime. In order to properly qualify the notion of "serious offence" for the purposes of Article 3(4), it is important to underscore that the confiscation mechanism based on the reversal of the burden of proof is more rigorous and stringent than the ordinary confiscation regime stipulated in Article 3, paragraphs 1 and 2. The two may be considered to be in a relation of special to general. This explains the differences, under several important respects, between the legal regimes applicable under the Convention. As a consequence, Parties are not bound under Art. 3(4) by the categories of offences listed in the Appendix to the Convention as a minimum that should be covered, but can apply the special confiscation regime to one or more "serious offences", as defined by national law.
27. Upon a question raised by Cyprus and then by San Marino, whether or not it is necessary to define or name the offences to be regarded as serious in the national laws, the scientific experts clarified that the States Parties should provide a possibility to identify serious offences in advance, whereas it is not necessary to have a specific list of such offences in the legislation. The legislation in place in Cyprus and San Marino was regarded in line with the Convention.

28. Hungary supported the changes made in the Interpretative Note, and agreed with the views expressed by the scientific expert.
29. The Netherlands raised the question whether the definition of a serious offence in Art. 3(4) can also entail all criminal offences as it is the case in NL. The plenary confirmed this was correct.
30. The Plenary agreed to include several additional clarifications in the Note, as proposed by the President and the scientific expert. The revised Interpretative Note was then adopted by the plenary.

Item 8 - Amendments on the Draft Thematic Monitoring Report on Art. 3(4), Doc. C198-COP (2021)2prov2HR

31. The Secretariat introduced the revised text of Thematic Monitoring Report on Art. 3(4), ("reversal of burden of proof"). The revised Interpretative Note on Art. 3(4) was the basis for revisions made in the report. Additions and alterations to the text were then presented one by one and successively approved by the Plenary.
32. As regards the country specific part of the referenced document, Romania suggested to include in the specific part of the report covering that country, the amendments introduced in their Criminal Code following the implementation of the 5th EU AML Directive. Since these changes were very recent and not communicated to the COP Secretariat in writing, it was suggested that they would be taken into account during the follow up process. This proposal was accepted by the Romanian delegation.
33. The Secretariat also informed the plenary that similar comments were received in writing from Italy and these will also be treated equally as those from Romania. However, an amendment related to the specific text on Italy, to better express what the recommendation aims at, was inserted in the text.
34. Textual amendments on the civil confiscation regime provided in the Moneyval MER of Ukraine were approved upon request of the country. There were no other interventions on the content of the report.
35. The President concluded that the Thematic Monitoring Review of the COP to CETS No. 198 on Art. 3(4) was adopted in the version discussed and approved by the Plenary. The document in its final form will be circulated to all delegations in due course after the meeting.

Item 9 - Interpretative Note on Art. 9(3), Doc C198-COP(2021)4

36. The Secretariat presented the draft Interpretative Note on Art. 9(3) of the Warsaw Convention. The presentation started with the issue related to the level of knowledge (mens rea) which needs to be proved in order to achieve a conviction for ML (i.e. that the offender knew about the illicit nature of the proceeds of crime). As this is increasingly difficult particularly in complex ML cases where professional money launderers and third parties are involved, Art. 9(3) of the Convention suggests the countries to consider adopting legislative measures which would hold liable those who a) suspected or b) ought to have assumed that the property was proceeds when they deal with this property in a manner the ML offence stipulates.

37. The Secretariat explained that the EU, in its 6th ML directive, followed the approach developed by the Warsaw Convention and introduced negligent ML in its provisions. In addition, relevant observations on other international instruments were made.
38. The key document for developing the Interpretative Note on Article 9(3) was the thematic Monitoring report on Art.9(3) adopted by the COP in 2019. Good practice examples from this report were properly reflected in the Note. In addition, the Note specifies details of criminal legislation and practice applied in several States Parties, which may help other jurisdiction in their efforts to properly apply either one or both principles (a) or b)) of Art.9(3).
39. The scientific expert clarified the importance of distinguishing the mechanisms available to infer the knowledge (i.e. the fact that it can be inferred 'from objective factual circumstances') on the one hand and the level of knowledge (knew, suspected or ought to have assumed that the proceeds were of a criminal origin) on the other.
40. There was no discussion or disagreement by the Plenary with the text of the Interpretative Note as it stands, so the President concluded that the Note was adopted.

Item 10 - Questionnaire on virtual assets

41. As the last item, the Plenary heard the presentation by the rapporteur, Mr Branislav Bohacik, on the questionnaire on virtual assets (VA). The rapporteur informed the plenary that several countries have already provided their responses to the draft questionnaire. He also reiterated the conclusions of the discussions on virtual assets held during the 9th Plenary in 2017.
42. The rapporteur presented some general trends with regard to the VA, specifically the broader use of VA both by the public and private sectors, as well as the way criminals use them to hide proceeds. This led to new challenges in the AML/CFT world. He also pointed out that the number and value of cryptocurrencies are changing swiftly. Currently the crypto currencies market is significant in terms of financial assets involved, and it is sometimes abused for illicit activities.
43. The rapporteur then presented the structure of the questionnaire, which is composed of six questions: i) the first one aims to understand the legal systems of different countries, i.e. if these systems provide any provision regarding virtual assets and if yes, how these assets are defined; ii) the second question concerns the powers to seize cryptocurrencies by competent authorities; iii) the third question concerns international cooperation - whether there is legislation that allows the MLA request concerning investigation/seizure of VA to be filed; 4) the fourth question refers to confiscation - if a jurisdiction specifically allows competent authorities to confiscate VA; 5) the fifth question is about requests for confiscation at an international level and how they could be executed; 6) finally, the last question calls the States Parties to provide some examples/cases where they dealt with virtual assets in the criminal law area.
44. Further to this presentation, the plenary agreed that delegations which have not responded to this questionnaire already, are invited to do so by 15th September 2021, upon which Mr Bohacik will prepare the analysis and present it at the next plenary meeting in November 2021.

Item 17 - Close of the meeting

45. The President thanked all participants and the interpreters and closed the meeting at 17:00h.

Appendix I

C198-COP(2021)OJ1

AGENDA

ORDRE DU JOUR

Monday, 10 May 2021 (15:00 – 17:30)	Lundi, 10 mai 2021 (15h00 – 17h30)
C198-COP Bureau Meeting	Réunion du Bureau de la C198-COP
Wednesday, 12 May 2021 (9:00 – 12:30; 13:30 – 17:00)	Mercredi, 12 mai 2021 (9h00 – 12h30; 13h30 – 17h00)
1. Adoption of the agenda	1. Adoption de l'ordre du jour
2. Statement by Mr Jan Kleijssen, Director of the Information Society and Action against Crime	2. Intervention de M. Jan Kleijssen, Directeur de la société de l'information et de la lutte contre la criminalité
3. Communication by the President	3. Communication de la Présidence
4. Communication by the Executive Secretary	4. Communication du Secrétaire Exécutif
5. Position on the Recommendation 2195 (2021) of the Parliamentary Assembly of the Council of Europe "Urgent need to strengthen financial intelligence units"	5. Avis sur la Recommandation 2195 (2021) de l'Assemblée Parlementaire du Conseil de l'Europe « Nécessité de renforcer d'urgence les cellules de renseignement financier »
6. Terms of Reference for implementation of p.1.5 of the Council of Europe Counterterrorism Strategy "Financing of Terrorism"	6. Mandat pour la mise en œuvre de p.1.5 du Conseil de l'Europe Stratégie antiterroriste « financement du terrorisme »
7. Presentation of the revised Interpretative Note on Art.3(4) of the Convention - <i>Presentation by the scientific expert</i> - <i>Discussion with States Parties</i>	7. Présentation de la note interprétative révisée sur l'art.3(4) de la Convention - <i>Présentation par l'expert scientifique</i> - <i>Discussion avec les Etats parties</i>
8. Amendments to the draft thematic monitoring report on Art.3(4) - <i>Presentation by the Secretariat</i> - <i>Discussion with States Parties</i>	8. Amendements au projet de rapport de suivi thématique sur l'art.3(4) - <i>Présentation par le Secrétariat</i> - <i>Discussion avec les Etats parties</i>
9. Interpretative Note on Art.9(3) - <i>Presentation by the Secretariat</i> - <i>Discussion with States Parties</i>	9. Note interprétative sur l'art.9(3) - <i>Présentation par le Secrétariat</i> - <i>Discussion avec les Etats parties</i>
10. Questionnaire on virtual assets - <i>Presentation by the rapporteur, Mr Branislav Bohacik</i>	10. Questionnaire sur les actifs virtuels - <i>Présentation par le rapporteur, M. Branislav Bohacik</i>
11. Close of the meeting	11. Fin de la réunion

LIST OF DECISIONS

Strasbourg, 12 May 2021

The Conference of the Parties (COP) to the Council of Europe's Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS no. 198, hereafter: 'the Convention') held its C198-COP extraordinary Plenary Meeting on 12th May, under the Chairmanship of its President Mr Ioannis Androulakis (Greece). The COP took the following decisions:

1. Heard the introductory remarks by Mr Jan Kleijssen, Director of the Information Society and Action against Crime.
2. Heard the presentation made by the COP President on the developments at the Parliamentary Assembly of the Council of Europe, i.e. the Resolution "Urgent need to strengthen financial intelligence units - Sharper tools needed to improve confiscation of illegal assets" and PACE Recommendation 2195 (2021). The Plenary strongly welcomed the PACE initiative and adopted the proposals by the COP President to address the COP States Parties which are also FATF member states in order to promote the discussions in the FATF on the power to temporarily suspend suspicious transactions by FIUs, including upon request of a foreign counterpart, as foreseen by Art.14 and 47 of the Warsaw Convention with a view of introducing these principles in the global standards;
3. Approved the initiative of the Russian Federation that the COP President also write a letter to the FATF President on this matter as well as to update the PACE with regard to initiative to promote the PACE Recommendation at the FATF level;
4. Heard the presentation held by the Co-secretary to CDCT Ms Jelena Jolic and approved the Terms of Reference for implementation of activity 1.5 of the Council of Europe Counterterrorism Strategy "Financing of Terrorism". The Plenary also welcomed the point raised by Russian Federation about the need to avoid duplication with other existing international standards and to envisage more representatives to take part in the review exercise for the terrorism financing standards;
5. Heard the presentation by the scientific expert Mr Paolo Costanzo on the revised Interpretative Note on Art.3(4) of the Convention. The COP approved the Interpretative note as amended during the discussion;
6. Adopted the report on Thematic Monitoring Review on Article 3 (4) as amended further to the interventions by Italy and Ukraine. Suggestions made by Romania and Italy will be further discussed in the course of the follow up process;
7. Adopted the Interpretative Note on Article 9 (3) further to the presentations held by the Secretariat and the Scientific Expert;
8. Heard the presentation by the rapporteur, Mr Branislav Bohacik on the draft questionnaire on virtual assets, agreed on its contents and its circulation among States Parties, and invited countries to respond to this questionnaire by 15th September 2021, upon which Mr Bohacik will prepare the analysis on this matter.

LIST OF PARTICIPANTS

STATE PARTIES

Ioannis ANDROULAKIS Greece	PRESIDENT Assistant Professor of Criminal Law & Criminal Procedure Athens, Greece
Dr. Alexander MANGION Malta	BUREAU MEMBER Head of Legal Affairs Financial Intelligence Analysis Unit
Ani GOYUNYAN Armenia Head of Delegation	BUREAU MEMBER Head, International Relations Division, Financial Monitoring Center of the Central Bank of Armenia
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Aram KIRAKOSSIAN Armenia	Senior international relations specialist, Financial Monitoring center, Central Bank of Armenia

Dr. Fritz ZEDER Austria	Fed. Min. of Justice, unit IV.2 (international cooperation)
Mag. Sara SAILER Austria	Fed. Min. of Justice, unit IV.2 (international cooperation)
Nazim SAFARLI Head of delegation Azerbaijan	Legal specialist/ Financial Monitoring Service
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Tamerlan BAIRAMOV Azerbaijan	State Security Service
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Cvetelina STOYANOVA Bulgaria	Head of Department in FID-SANS (Bulgarian FIU)
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Maria KYRMIZI Cyprus	Senior Counsel of the Republic of Cyprus/ Unit for Combating Money Laundering (FIU) Cyprus
Antroniki ODYSSEOS Cyprus	Counsel of the Republic of Cyprus/ Unit for Combating Money Laundering (FIU) Cyprus
Elodie LANDAT France	Ministère De La Justice
Clémence OLIVIER France	Magistrat Adjoint au chef du pôle juridique Agence de gestion et de recouvrement des avoirs saisis et confisqués
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Giorgi METREVELI Georgia	Investigator of Extraordinary Cases The General Prosecutor's Office of Georgia
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<p>Mark MÉSZÁRICS Hungary</p>	<p>Assistant of the HOD</p>
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<p>Nicola PIACENTE Italy</p>	<p>Chief Prosecutor Como Designated by the Ministry of Justice Roma Italy</p>
<p>Dr. Aleksejs LOSKUTOVS Head of Delegation Latvia</p>	<p>Head of Strategic Analysis Division, Financial Intelligence Unit of Latvia (FIU Latvia)</p>
<p>Indra GRATKOVSKA Latvia</p>	<p>Director of the Criminal Law Department, Ministry of Justice</p>
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<p>Jūratė RADISAUSKIENE Lithuania</p>	<p>Prosecutor of the Department of Prosecution, Prosecutor General's Office of the Republic of Lithuania</p>
<p>Cinzia AZZOPARDI ALAMANGO Head of Delegation Malta</p>	<p>Lawyer Office of the Attorney General</p>
<p>Jonathan PHYALL Malta</p>	<p>Head – Legal Affairs Financial Intelligence Analysis Unit</p>
<p>Robert GELLI Chef de délégation Monaco</p>	<p>Secrétaire d'Etat à la Justice, Directeur des Services Judiciaires/Direction des Services Judiciaires</p>

Pierre-Erige CIAUDO Monaco	Administrateur/ Direction des Services Judiciaires
Michel HUNAUT Monaco	Directeur/ Service d'Information et de Contrôle sur les Circuits Financiers (SICCFIN)
Sasa CADJENOVIC Montenegro	Special Prosecutor's Office Special Prosecutor
Danijela MILICEVIC Montenegro	Police Directorate - Department Financial Intelligence Affairs (FIU Montenegro) Senior Police Advisor 1st Class
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Carlijn de KUIJPER Netherlands	Policy advisor, Ministry of Justice and Security the Netherlands
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Răzvan BOȘTINARU Romania	Legal counsellor
Alexey LYZHENKOV Head of Delegation Russian Federation	Deputy Director Department on the Issues of New Challenges and Threats MFA Russia
Petr LITVISHKO Russian Federation	Deputy Director General Department of International Legal Cooperation Head of Department of Legal Assistance Prosecutor General's Office of the Russian Federation
Giorgia UGOLINI San Marino	Magistrate

Aurora FILIPPI San Marino	Magistrate
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Dragan MARINKOVIĆ Head of Delegation Serbia	Assistant Director, Administration for the Prevention of Money Laundering, Ministry of Finance of the Republic of Serbia
Branislav BOHACIK Head of Delegation Slovakia	Prosecutor, head of delegation General Prosecutor's Office of the Slovak Republic International Department
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Eldon WARD United Kingdom	Money Laundering Policy Lead, Home Office

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Maroldt JACKIE Luxembourg	Premier substitut – Directeur adjoint Cellule de renseignement financier
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Robert NORFOLK WHITTAKER	FATF / GAFI

SCIENTIFIC EXPERT

Paolo COSTANZO Italy	Head Analysis and Institutional Relations Directorate Financial Intelligence Unit, Banca d'Italia
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Hanne JUNCHER	Head of Department Action against Crime
Jelena JOLIC	Co-secretary to the Council of Europe Committee on Counter-Terrorism
Gillian WAKENHUT Didier JUNGLING Amanda BEDDOWS Rémy JAIN	INTERPRETERS

C198-COP SECRETARIAT

Igor NEBYVAEV	Executive Secretary of the COP
Lado LALICIC	Head of Unit COP
Ana BOSKOVIC	Administrator
Stela BUIUC	Administrator
Uwe WIXFORTH	Administrator

Danielida WEBER	Administrative assistant of the COP
Irma DZANKOVIC-ARSLAN	Administrative assistant