



Strasbourg, 16 February 2012

MONEYVAL(2011)34rev

**COMMITTEE OF EXPERTS ON THE EVALUATION
OF ANTI-MONEY LAUNDERING MEASURES
AND THE FINANCING OF TERRORISM
(MONEYVAL)**

37th PLENARY MEETING OF MONEYVAL

Strasbourg, 13-16 December 2011

MEETING REPORT

Memorandum
prepared by the MONEYVAL Secretariat

EXECUTIVE SUMMARY

During the 37th plenary meeting, held in Strasbourg from 13-16 December 2011, the MONEYVAL Committee:

- elected for a mandate of two years its President, Mr Vladimir Nechaev (Russian Federation), its Vice-President, Mr Anton Bartolo (Malta), and three bureau members, Mr Alexandru Codescu (Romania), Mr Nicola Muccioli (San Marino) and Ms Elzbieta Frankow-Jaskiewicz (Poland);
- had the pleasure of hearing an intervention by the FATF President, Mr Giancarlo Del Bufalo and by Mr Jan Kleijssen, Director, Information Society and Action against Crime;
- examined and adopted the second 3rd round progress reports of Monaco, Azerbaijan, Israel, Estonia, and Romania.
- examined under step (i) of the Compliance Enhancing Procedures (CEPs) the report of Albania and decided to apply step (ii) in the procedures, which involves a letter from the MONEYVAL Chairman to the Secretary General of the CoE, and requested Albania to report back on progress made before the next Plenary meeting;
- examined under step (i) of the Compliance Enhancing Procedures (CEPs) the report of Bosnia and Herzegovina and maintained step (i) of the CEPs;
- examined measures taken by countries on identified important deficiencies as a result of the process regarding the state of compliance on all NC and PC ratings in the 3rd Round in respect of 6 countries (Azerbaijan, Croatia, Georgia, “the former Yugoslav Republic of Macedonia”, the Republic of Moldova and Ukraine) and requested them to report back before the next Plenary meeting;
- endorsed the template for the 4th assessment visit progress reports and agreed to establish a small group of experts to finalise the statistics part of the template by January 2012;
- mandated the Bureau to endorse the final version of the annual report and its content in view of its submission to the Committee of Ministers;
- heard the information from the Secretariat on its participation in the FATF meetings as well as in the on-going FATF initiatives on Associate Membership;
- had an exchange of view with the European Commission on the EU Member States’ common understanding on the procedure for the recognition of third countries equivalence;
- heard and discussed the IMF request to review the burden sharing arrangements in MONEYVAL’s 4th round evaluation;
- took note of the information from the Europe/Eurasia Regional Review Group (EERG) Co-chair;
- heard an update on the status of work on typologies in MONEYVAL and in other forums;
- took note of information on AML/CFT initiatives in MONEYVAL countries and in other forums (tour de table);
- took note of developments in relation to signing and ratification of the Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS 198);
- heard an update on progress of the review of FATF standards;
- noted that the Rapporteur country in March 2012 is Slovakia (Montenegro);
- noted the call for applications for secondment to MONEYVAL Secretariat;
- thanked warmly Mr Fabio Baiardi, seconded by the Swiss Government, for his work and contribution to MONEYVAL.

SUMMARY ACCOUNT OF THE MONEYVAL PROCEEDINGS

Items 1, 2 and 3 – Opening of the plenary meeting, adoption of the agenda and information from the Chairman

1. The Chairman, Mr Vladimir NECHAEV (Russian Federation) opened the meeting and welcomed the new participants from Mexico, France and Germany at the plenary, following which the Committee adopted the agenda as it appears in Appendix I. The list of participants appears at Appendix II.

3.1 Chairman's correspondence

2. The Chairman drew attention to the correspondence he had with the FATF President in respect of appointing France as a second country representing FATF for a term of two years replacing the United Kingdom. Austria had agreed to continue representing FATF.
3. The Chairman also informed the plenary on the correspondence he had received in respect of the compliance enhancing procedures for the countries that are going to be discussed during the plenary week.
4. The plenary was also informed by the Chairman about his final response to the European Commission in respect of the SR.IX issue.

3.2 Bureau Meeting on 12 December 2011

5. The Chairman briefly informed the plenary on the issues discussed at the Bureau meeting on Monday 12 December 2011, particularly on countries under the Compliance Enhancing Procedures, on EU States' common understanding on the procedure for the recognition of third countries equivalence, on the template for questionnaire of Regular follow up reports (4th round), on FATF Associate membership – peer review process, etc. The plenary was informed that there would be discussions on these issues under the various agenda items.

Item 4 – Intervention of Mr Giancarlo Del Bufalo, President of the FATF

6. MONEYVAL had the pleasure of hosting a visit by the FATF President, Mr Giancarlo del Bufalo. He highlighted the important role that MONEYVAL plays in the global AML/CFT network as one of the senior and consistently well-performing FATF associated members. He congratulated MONEYVAL for its work and positively noted the strong action taken when implementation shortcomings are identified in its members. The speech is available on MONEYVAL's website.

Item 5 - Information from the Secretariat

5.1 Information on the new structure in the Council of Europe Secretariat

7. The Secretariat briefly informed the plenary, that according to the new structure of the Council of Europe, the MONEYVAL Secretariat is situated in the Directorate of Information Society and Action against Crime. It was also noted by the Secretariat that on Wednesday the new Director Mr Jan Kleijssen, to whom the MONEYVAL Secretariat reports, would intervene in the meeting.

5.2 Agenda of evaluations and meetings for 2011 and 2012

8. The Secretariat informed the plenary on the long term planning and on the future activities in 2012. In 2012 there will be 6 on-site missions: Lithuania (April); Poland (May – June); Bulgaria (September); Monaco, Croatia and Liechtenstein (November).
9. It was also noted that during the course of 2012 several new 4th round mutual evaluation reports will be adopted as well as the 3rd round report of Holy See.
 - In March – Malta and Andorra;
 - In July – Holy See, Georgia and Latvia;
 - December – the Republic of Moldova and Lithuania.
10. The Executive Secretary also reminded delegations that at the 40th plenary meeting in December 2012 the Committee will be celebrating its 15th anniversary.

5.3 Elections: information from the Secretariat

11. The Executive Secretary presented the procedures to follow in respect of elections for Chairman, Vice-Chairman and Bureau members, as their terms expire at the end of 2011 and invited delegations to submit proposals to the Secretariat in writing before the end of December 13, 2011. Elections shall be held on December 14, 2011 (under agenda item 14). A request was made for a secret ballot.

5.4 Template for 4th Assessment visits follow up reports

12. The Secretariat referred the plenary to the information Document INF5.2 and presented the main elements of the template for the 4th round follow up reports, which would replace progress reports for the 4th round. The follow up template could be used for countries in regular or enhanced follow up, or biennial updates. All countries reporting back in 2012 in the 4th round will be in regular or expedited follow up.
13. It was explained that the template is based on the experience that has been gained from the use of the progress report questionnaires in previous rounds, as well as the feedback received from delegates.

Decision taken

14. The plenary endorsed the template for the 4th assessment visit follow up reports and agreed to establish a small group of experts led by the Bureau, which would involve scientific experts and other delegates, to finalise the statistics part of the template by January 2012 for use in discussions on Slovenia in March.

5.5 and 5.6 Participation in FATF meeting and other forums

15. The Executive Secretary informed the plenary on the Secretariat's participation in the discussion of Associate membership – peer review process document, which took place at the FATF last plenary. The Secretariat noted that it had originally suggested that a peer review process might be instituted where there were identified and justified concerns about a particular Associate Member. It was underlined that MONEYVAL was not advocating a wholesale review process, which would be very resource intensive, particularly for those bodies still doing evaluations.
16. The Secretariat's approach was supported and it was agreed that MONEYVAL would be very concerned if any proposed review might cause MONEYVAL resources to be diverted from its core evaluation work.

5.7 Report to the Committee of Ministers

17. The Executive Secretary informed the plenary that Article 10 of the MONEYVAL Statute requires the Chairman and the Executive Secretary to present an annual report to the Committee of Ministers, including information on the state of compliance with the AML/CFT standards in the states that have been evaluated by MONEYVAL in the previous year. It was also noted by the Executive Secretary that the timetable for finalising this report is quite tight, since the first meeting of one of the Council of Europe committees where this report will be discussed, will take place in the middle of February 2012.

Decision taken

18. The plenary agreed to delegate responsibility to the Bureau for the endorsement of the final version of the annual report before submission to the Committee of Ministers.

Item 6 – Discussion on the Second 3rd Round Progress Report of Monaco

19. The Secretariat presented its analysis of the Progress report on the core Recommendations. The full progress report was subject to peer review by the plenary, assisted by the Rapporteur country (Liechtenstein), which acknowledged the progress made by Monaco and raised a number of clarifications, together with other delegations.

Decisions taken

20. The plenary was satisfied with the information provided and the progress being undertaken and adopted the progress report together with the Secretariat analysis on the core Recommendations, subject to modifications as agreed during the discussions. Monaco was invited, in accordance with the Rules of Procedure, to provide an update every two years between evaluation visits (i.e. December 2013), though the plenary could decide to fix an earlier date at which an update should be presented. The progress report is subject to automatic publication in accordance with the Rules of Procedure.

Item 7 Update on progress of the review of FATF standards

21. The Executive Secretary reminded the plenary of the circulated FATF document WGEI/WD(2011)95 on compilation of the proposed revisions to the 40+9 Recommendations, which also provides the new proposed numbers for the revised FATF Recommendations. The Executive Secretary informed the plenary that there is still a possibility to raise issues prior to or at the upcoming FATF special plenary in January 2012.
22. The FATF Secretariat confirmed the possibility of submitting comments and stated that FATF is planning to finalise the revision of the FATF Recommendations during the special plenary in January and adopt these updated Recommendations in February.

Important issues raised

23. MONEYVAL countries addressed several important issues for clarification and comments related to the large cash transaction regime, lists of domestic PEPs and the FIU functions. These issues were taken note of by the FATF Secretariat.

Item 8 – ICRG process - update

8.1 Update from the Europe/Eurasia Regional Review Group (EERG) Co-chair

24. The Co-Chairman of the ERRG informed the plenary of recent FATF developments. In particular, it was noted that Ukraine is no longer subject to FATF's monitoring process under its ongoing global AML/CFT compliance process.

8.2 Responses to the FATF Public statements

25. Attention was drawn to MONEYVAL INF-8.2 (the responses received from MONEYVAL countries as to action taken under the FATF public statements). MONEYVAL countries which had not yet responded were encouraged to do so before the full compilation of responses is sent to the FATF.

Item 9 – Report from Albania under Step (i) of the Compliance Enhancing Procedures and discussion of any next steps

26. By the decision of the 33rd plenary, Albania was placed in compliance enhancing procedures at Step (i) in respect of any country which had identified important deficiencies in at least 4 Recommendations, as a result of the analysis of the state of progress on all NC/PC ratings in the 3rd round. Albania presented its report under Step (i), presented the steps taken since the 36th plenary to address the important deficiencies (R.5, SR.II and SR.VIII). The Secretariat presented its analysis of the progress made and highlighted the remaining issues of concern. It was noted that there remained a number of outstanding issues in respect of R.5, SR.II and SR.VIII, though some concrete measures were taken regarding several aspects of SR.VIII.

Decisions taken

27. The Committee concluded that overall, one year after the implementation of Compliance Enhancing Procedures, Albania has not demonstrated having taken sufficient action to resolve in a timely manner the important deficiencies identified in September 2010 in respect of R.5, SR.II and SR.VIII. Considering the remaining concerns, it decided to apply step (ii) in the procedures, which involves a letter from the MONEYVAL Chairman to the Secretary General of the CoE, and to request Albania to report back on progress made before the next plenary meeting.

Item 10 – Report of Bosnia and Herzegovina under Step (i) of the Compliance Enhancing Procedures and discussion of any next steps

28. Bosnia and Herzegovina was placed under Step (i) of the Compliance Enhancing Procedures by the decision of the 33rd plenary. The important deficiencies, which were identified at the 33rd Plenary, under some core and key Recommendations (R.1, R.5, R.26, SR II and SR III), and also under other Recommendations (SR VIII and SR IX). The MONEYVAL Secretariat presented to the plenary the analysis of the current situation and the action taken by the Bosnia and Herzegovina authorities in the CEPs process.
29. The plenary examined the report and was informed that the Action Plan produced by the Bosnia and Herzegovina authorities in response to the MONEYVAL third round mutual evaluation report, as required at the 35th plenary, had been endorsed at Ministerial level.

Decisions taken

30. The Committee decided to adopt and publish the compliance report prepared by the Secretariat, and to maintain step (i) in the procedures, which requires a member

concerned to provide a report or regular reports on its progress in implementing the reference documents.

31. The plenary also noted that the short term issues in the Action Plan, on which steps are required, are due to be completed by 10 April 2012. The Committee agreed to retain step (i) until the 39th plenary in July 2012 and to ask authorities to present a full report to the Secretariat as soon as possible after 10 April. However, an interim report should be provided to the Secretariat in advance of the 38th plenary in March and a brief report will be submitted to the plenary.

Item 11 – Further discussion of measures taken by Ukraine on identified important deficiencies as a result of the process regarding the state of compliance on all NC and PC ratings in the 3rd round mutual evaluation report and next steps

32. One year after the adoption of the preliminary analysis of the state of compliance of Ukraine on all NC/PC ratings in the third round mutual evaluation report in December 2010, the Plenary examined the report presented by Ukraine in respect of measures taken to address the identified important deficiencies (R.3 (Confiscation), SR.III (Freezing and confiscation of terrorist assets) and SR.IX (Cross border declaration or disclosure)) and the Secretariat analysis.
33. As a result of the discussion of these three issues, the Plenary noted that Ukraine had made substantive progress in addressing the important deficiencies in respect of SR.III. There remain a number of outstanding issues as regards the other two important deficiencies.

Decision taken

34. The Plenary decided to invite Ukraine to report back in March 2012 on progress made in respect of adopting the draft legislation amending the confiscation provisions of the Criminal Code and of the Criminal Procedure Code (R. 3), as well as on other measures to implement the requirements of SR.IX.

Item 12 – Publication “Dirty money”

35. The author of the book “Dirty money” Professor William C. GILMORE briefly presented this publication, which is now available at the Council of Europe bookshop¹.

Item 13 – Intervention of Mr Jan Kleijssen, Director, Information Society and Action against Crime

36. The Committee heard the intervention of Mr Jan Kleijssen, Director of Information Society and Action against Crime Department. Previously the MONEYVAL Secretariat had been in the Directorate of Monitoring in the Directorate General of Human Rights and Legal Affairs. Now, since 1st October 2011, MONEYVAL is within the Action Against Crime Department within his Directorate, which itself is within the Directorate General of Human Rights and Rule of Law. Under the new structure MONEYVAL and Economic Crime are brought together in one division, and the Executive Secretary of MONEYVAL has responsibility as head of division for both the MONEYVAL monitoring and economic crime and anti corruption assistance programs. A new organigramme would be circulated.

¹ <http://book.coe.int/EN/>

Item 14 - Election of Chair, Vice-Chair and Bureau members

37. The ballot papers were distributed to the 28 Council of Europe member states evaluated by MONEYVAL and to the two Council of Europe states nominated by FATF, Austria and France. It was explained that to be elected on the first ballot would require a 2/3 majority.
38. In respect of Chairman and the vice-Chairman uncontested elections were held, since only one nomination was received for each of those posts. Mr Nechaev (Russian Federation) was elected as the Chairman of MONEYVAL and Dr. Bartolo (Malta) was elected as vice-Chairman.
39. The Secretariat informed the plenary that there were 6 people nominated for the Bureau, however 1 candidate withdrew before the elections. The result of the first round of voting for the Bureau members was 25 votes for Mr Alexandru Codescu (Romania), 22 votes for Mr Nicola Muccioli (San Marino), 16 votes for Ms Hasmik Musikyan (Armenia), 13 votes for Mrs Elzbieta Frankow-Jaskiewicz (Poland) and 13 votes for Mr Milovan Milovanovic (Serbia). Since Mr Alexandru Codescu and Mr Nicola Muccioli both received a 2/3 majority they were elected as Bureau members on the first ballot.
40. A second ballot was required, which required only a simple majority, a one place was still available on the Bureau. The plenary proceeded to a second ballot. Mrs Elzbieta Frankow-Jaskiewicz (Poland) received 11 votes, Mr Milovan Milovanovic (Serbia) – 10 votes and Ms Hasmik Musikyan (Armenia) – 9 votes. Mrs Elzbieta Frankow-Jaskiewicz (Poland) was declared elected to the Bureau.

Item 15 – Discussion on the Second 3rd Round Progress Report of Azerbaijan

41. The Secretariat presented its analysis of the Progress report on the core Recommendations, which set out the developments since the adoption of the 1st Progress report. The full progress report was subject to peer review by the plenary, assisted by the Rapporteur country (Poland), which acknowledged the progress made by Azerbaijan and raised a number of clarifications, together with other delegations.

Decisions taken

42. As a result of the discussions held in the context of the examination of this second progress report, the plenary was satisfied, considering the amendments made to R.10, with the information provided and the progress being undertaken and thus approved the progress report and the analysis of the progress on the core Recommendations. Pursuant to Rule 41 of the Rules of procedure, the progress report will be subject to an update every two years between evaluation visits (i.e. December 2013), though the plenary may decide to fix an earlier date at which an update should be presented. The progress report is subject to automatic publication in accordance with the Rules of Procedure.

Item 16 – Further discussion of measures taken by Azerbaijan on identified important deficiencies as a result of the process regarding the state of compliance on all NC and PC ratings in the 3rd round mutual evaluation report and next steps

43. The Secretariat introduced the analysis of the current situation in Azerbaijan in respect of identified important deficiencies related to R.3, R.2 and SR.II and thanked the Azerbaijani authorities for their co-operation in the preparation of this review. The Secretariat noted that steps are being taken by Azerbaijan to address these important deficiencies by introducing amendments to the Criminal Code. However no concrete legal provision had been adopted. In this respect deficiencies related to R.3, R.2 and SR.II still remain.

Decision taken

44. The plenary agreed with the proposal of the Bureau to invite the Chairman to write a letter to Azerbaijan and to request them to report back in March on the progress with the legislation.

Items 17 – Discussion on the Second 3rd round Progress Report of Israel

45. The Secretariat presented its analysis of the Progress report on the core Recommendations, which showed the developments since the adoption of the 1st Progress report. The full progress report was subject to peer review by the plenary, assisted by the Rapporteur country (Russia), which acknowledged the progress made by Israel and raised a number of clarifications, together with other delegations.

Decisions taken

46. As a result of the discussions held in the context of the examination of this second progress report, the plenary was satisfied, considering the amendments made so far, with the information provided and the progress being undertaken and thus approved the progress report and the analysis of the progress on the core Recommendations. Pursuant to Rule 41 of the Rules of procedure, the progress report will be subject of an update in every two years between evaluation visits (i.e. December 2013), though the plenary may decide to fix an earlier date at which an update should be presented. The progress report is subject to automatic publication in accordance with the Rules of Procedure.

Item 18 – Further discussion of measures taken by Georgia on identified important deficiencies as a result of the process regarding the state of compliance on all NC and PC ratings in the 3rd round mutual evaluation report and next steps

47. The plenary heard the analysis of the Secretariat of the current situation and the steps taken by Georgia to address the identified important deficiencies in R.12 & 16 relating to lawyers, accountants and auditors. The Secretariat noted that progress on CDD obligations in respect of accountants and auditors had been taken. Although lawyers remained outside the scope of the amendments.

Decision taken

48. Following the proposal made by the Bureau the plenary agreed to ask the Chairman to write a letter to Georgia and to request them to report back in March on the progress with the DNFBP amendments, including the issue of the AML/CFT obligations of lawyers.

Item 19 - Discussion on the Second 3rd round Progress Report of Estonia

49. The Secretariat presented its analysis of the Progress report on the core recommendations. The representative of the delegation of Estonia introduced the members of the delegation and provided an overview of the main developments and measures implemented since the adoption of the mutual evaluation report in December 2008 and the first progress report in December 2009. The full progress report was subject to peer review by the plenary, assisted by the Rapporteur country (San Marino), which acknowledged the progress made by Estonia and raised a number of clarification questions, together with other delegations.

Decision taken

50. As a result of the discussions held in the context of the examination of this second progress report, the plenary was satisfied, considering the amendments made so far, with the information provided and the progress being undertaken and thus approved the progress report and the analysis of the progress on the core Recommendations, with amendments in the text as proposed by the financial scientific expert. Pursuant to Rule 41 of the Rules of procedure, the progress report will be subject of an update in every two years between evaluation visits (i.e. December 2013), though the plenary may decide to fix an earlier date at which an update should be presented. The progress report is subject to automatic publication in accordance with the Rules of Procedure.

Item 20 - Further discussion of measures taken by the Republic of Moldova on identified important deficiencies as a result of the process regarding the state of compliance on all NC and PC ratings in the 3rd round mutual evaluation report and next steps

51. The Secretariat introduced the analysis of the current situation in the Republic of Moldova in respect of identified important deficiencies related to R.6 and R.17. The Secretariat noted the improvements to R.6 in respect of banks, though other financial institutions and DNFBPs are not included in guidance. In respect of R.17 the progress made by the Republic of Moldova was limited.

Decision taken

52. The plenary supported the proposal of the Bureau to ask the Chairman to write a letter to the authorities of the Republic of Moldova requesting to report back on the developments in relation to R.17, supported by all relevant legal documents, in the March plenary.

Items 21 & 30 - Typologies work (On-going projects, status of implementation) and Information on other typologies projects in other forums

Items 21.1 The use of internet gambling for ML and TF purposes

53. The project leader (Cyprus) of the typologies project on “**the use of internet gambling for ML and TF purposes**” informed the plenary of the recent developments in respect of this project. The elaboration of the report is at its final stages and now integrates the information gathered through the second questionnaire. It is expected that the report will be presented for consideration at the forthcoming plenary meeting in March 2012.

Item 21.2 - MONEYVAL 10th Typologies meeting (Tel Aviv, 31 Oct - 2 Nov 2011) – update

54. The Executive Secretary informed the plenary of MONEYVAL’s 10th Typologies meeting that was held in Tel Aviv in 31 October – 2 November and two typologies projects that were discussed (**Trade based money laundering in cash intensive economies** and **Postponement of financial transactions and the monitoring of bank accounts**). The Secretariat also thanked the Israeli authorities for the splendid organisation of this meeting and their hospitality.

Trade based money laundering in cash intensive economies

55. Romania, as a project leader jointly with Ukraine, presented the current situation in this project to the plenary. The case study presented at the Typologies meeting and the following discussion confirmed that the research itself is not limited to cash intensive economies, since jurisdictions considered as non-cash intensive economies have the

same problems with cash intensive industries within the economy. Romania also noted that there is a need to link this subject of research to other closely related issues, like supervision of DNFBP whenever cash is used in this sector, the use of shell companies, alternative remittance systems, and other payment means when cash is used.

56. The project leader from Romania informed the plenary that the questionnaire is about to be sent off and parallel work in respect of establishing a core team of experts is being conducted. This team will be involved in drafting the final report, and delegations interested in participating in this core-group were invited to inform the Secretariat.

Postponement of financial transactions and the monitoring of bank accounts

57. The project leader of this typologies research is Estonia. The project leader briefly informed the plenary about outcomes and key findings of the Tel Aviv meeting. Similarly to the TBML project, the questionnaire shall be circulated to delegations in the first two months of 2012. A separate core-group of experts is envisaged to be formed and delegations interested in contributing to the project were invited to communicate their intention to MONEYVAL Secretariat.

Information on other typologies projects in other forums

58. The plenary heard an update from the FATF Secretariat about the recent developments, such as the network of contact points of FATF-FSRBs secretariat members on typologies, aimed at improving information exchange and coordination, as well as the work that has been done in respect of creation of a database of all typologies reports and cases to date.
59. The FATF Secretariat also informed the Committee of the joint FATF/APG annual typologies meeting which took place in Korea in December 2011 and on the results that were achieved in accordance with the discussion of several topics: corruption, illicit tobacco trading, trade based ML (APG) and operational issues.
60. The EAG Secretariat informed the plenary on the 4 typologies projects that were conducted by EAG during 2011 and on their status as well as providing details about the new projects for 2012. All information in respect of EAG typologies work is available on their web-site.

Item 22 - Information from the European Union

22.1 European Commission

61. The European Commission informed the plenary that it is in the process of reviewing the 3rd EU Directive, and is expected to propose new legislation by October 2012. This revised work will not only be based on the FATF standards, but also on the EU experience. Another initiative that will be conducted by the EU Commission is the review of Regulation 1781 (2006) on fund transfers.

Item 23 - EU Member States' common understanding on the procedure for the recognition of third countries equivalence

62. The Secretariat introduced the letter received from Cyprus regarding the EU Member State 3rd Country Equivalence list. The representative from the EU Commission informed the plenary on efforts taken by the Committee for the Prevention of Money Laundering and Terrorist Financing (CPMLTF) to update the 3rd countries equivalence list. The last revision of the list took place in June 2011. The EU Commission also noted that

MONEYVAL countries will be considered for inclusion onto the list. Such countries will be treated on a priority basis by the CPMLTF.

Important issues raised

63. Cyprus stated that this equivalence list is not developed to override the need for FIs to apply a risk-based approach and they offered to act intermediaries in the process in respect of interested MONEYVAL countries.
64. The Secretariat noted that it is ready to provide assistance with up to date information that is available in respect of MONEYVAL countries. The Secretariat had been invited to attend a meeting of the CPMLTF in January to discuss the modalities of application by MONEYVAL countries
65. The plenary urged that MONEYVAL 4th round assessments should be considered in the CPMLTF plenaries and the Secretariat agreed to raise this issue.

Decision taken

66. States that considered they meet the criteria were invited to indicate to Mrs Eva Rossidou-Papakyriacou (Cyprus) and the Secretariat their interest in applying for equivalence status in advance of the meeting on 20 January 2012. The plenary agreed to the Secretariat assisting in the process on behalf of MONEYVAL countries.

Item 24 - Request by the IMF to review the burden sharing arrangements in MONEYVAL's 4th round evaluations

67. The representatives of IMF informed the plenary of the proposal to increase the current number of MONEYVAL countries being assessed by the IMF and indicated that it could now use the MONEYVAL procedures for the 4th round to conduct mutual evaluations.

Decision taken

68. The Committee invited the newly elected Bureau to examine the IMF proposal.

Item 25 - Information on AML/CFT initiatives in other fora

69. The following bodies presented their new or ongoing initiatives:
 - The IMF informed the MONEYVAL plenary about several ongoing projects of technical assistance with MONEYVAL countries (Armenia, Azerbaijan, Croatia and Ukraine). The IMF also stated that it has just launched a preliminary risk-assessment project in co-operation with the Organisation for Security and Co-operation in Europe (OSCE).
 - The World Bank (WB) would assist in conducting national risk-assessments in Serbia as part of the Council of Europe's MOLI-Serbia project. They had also received a request from San Marino to conduct a similar project. The WB also informed the plenary about a joint study with the Egmont Group on FIU powers to postpone or suspend STRs. which was of relevance in the context of MONEYVAL's typologies project on postponement.
 - The plenary heard the representative from the Group of International Financial Centre Supervisors (GIFCS), who briefly presented the group's activities and its participation in the work of FATF. The GIFCS also informed the plenary that 2 jurisdictions are about to join the group.
 - The OSCE informed the plenary of the AML/CFT awareness raising, capacity building and training activities that had recently taken place, which were related to national risk assessment, trafficking in human beings, financing of terrorism and new payments

methods. There is a specific project conducted by the OSCE that is currently underway: Guidebook on the AML/CFT national risk assessment.

- The FATF informed the plenary on their ongoing work on guidance on doing national level risk-assessment and briefly described the main goals and objectives of this work. It also noted that since other organisations are also conducting surveys on risk assessment a coordination is needed in order to avoid duplication.
- The EAG Secretariat informed the plenary that EAG recently has created 2 two groups: one is focused on effectiveness of national AML/CFT systems and the other one is focused on development of national risk-assessments. The EAG also informed the plenary that it held its plenary meeting in China at the end of November.

Item 26 - The Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the proceeds from Crime and on the Financing of Terrorism (CETS No. 198)

70. The MONEYVAL Executive Secretary presented the up-to-date situation on signatures and ratifications to the plenary.
71. The plenary was also informed about the next Conference of the Parties meeting that is scheduled to be a 3 day meeting 2012 where a second report will be considered. The report that is under preparation is on Romania.

Item 27 - Discussion on the Second 3rd Round Progress Report of Romania

72. The Secretariat presented its analysis of the Progress report on the core Recommendations, which highlighted the developments since the adoption of the 1st Progress report. The full progress report was subject to peer review by the plenary, assisted by the Rapporteur country (Montenegro), which acknowledged the progress made by Romania and raised a number of clarifications, together with other delegations.

Decisions taken

73. As a result of the discussions held in the context of the examination of this second progress report, the plenary was satisfied with the information provided and the progress being undertaken and thus approved the progress report and the analysis of the progress on the core Recommendations. Pursuant to Rule 41 of the Rules of procedure, the progress report will be subject to an update every two years between evaluation visits (i.e. December 2013), though the plenary may decide to fix an earlier date at which an update should be presented. The progress report is subject to automatic publication in accordance with the Rules of Procedure.

Item 28 - Further discussion of measures taken by « the former Yugoslav Republic of Macedonia » on identified important deficiencies as a result of the process regarding the state of compliance on all NC and PC ratings in the 3rd round mutual evaluation report and next steps

74. The Secretariat introduced the analysis of the current situation and the steps taken by «the former Yugoslav Republic of Macedonia» to address the identified important deficiencies. The Bureau welcomed the introduction of the Law on International Restrictive Measures and also the amendment to the AML/CFT Law and the Law on Games of Chance. Nonetheless, the Bureau would like to be reassured on the effectiveness of Recommendation 24 and accordingly request “the former Yugoslav Republic of Macedonia” authorities to provide statistics (on-site visits, sanctions, trainings, etc.) which may demonstrate this.

75. The Secretariat informs the plenary that on SR.II, there is no progress and, on SR.III, the Bureau would welcome further clarification as to how UNSCR 1373 has been incorporated into the Law on International Restrictive Measures.

Decision taken

76. The plenary heard the information from the Secretariat and agreed with the proposal of the Bureau to ask the Chairman to write a letter to «the former Yugoslav Republic of Macedonia» and to request them to report back in March in respect of SR.II, SR.III and R.24 providing statistics (on-site visits, sanctions, trainings and etc.) and provide further clarifications on the measures taken to address the identified important deficiencies.

Item 29 - Further discussion of measures taken by Croatia on identified important deficiencies as a result of the process regarding the state of compliance on all NC and PC ratings in the 3rd round mutual evaluation report and next steps

77. After the adoption of the preliminary analysis in April 2011 on the state of compliance of Croatia on all NC/PC ratings in the third round mutual evaluation report, the Plenary examined the report presented by Croatia in respect of measures taken to address the identified important deficiencies (SR.II - criminalisation of financing of terrorism and SR.III - Freezing and confiscation of terrorist assets) and the Secretariat analysis.
78. As a result of the discussion of these two issues, the Plenary noted that Croatia had made substantive progress in addressing the important deficiencies in respect of criminalisation of financing of terrorism, though the new Criminal Code provisions would only enter into force in 2013. There remained a few deficiencies in relation to the implementation of SR.III.

Decision taken

79. The Plenary decided to invite Croatia to report back in March 2012 on progress made in respect of adopting the draft Government decision and related guidance on the implementation of restrictive measures in order to address the above-mentioned deficiency under SR.III.

Item 31 - Information on AML/CFT initiatives in MONEYVAL countries (tour de table)

80. The representatives of Andorra, Armenia, Austria, Bulgaria, Cyprus, Czech Republic, France, Holy See, Hungary, Latvia, Liechtenstein, Lithuania, Malta, Montenegro, Poland, Russia, San Marino, Serbia, Slovenia informed the plenary on their respective AML/CFT initiatives.

Item 32 - Ad Hoc Review Group of Experts for the next plenary meeting

81. The Ad-Hoc Review Group of Experts for the next plenary meeting will be constituted by Georgia for the 4th round mutual evaluation report on Malta and Israel for the 4th round mutual evaluation report on Andorra.
82. The intervening countries for Malta will be: on legal aspects – Bosnia and Herzegovina, on law enforcement – the Holy See, on financial aspects – Lithuania.
83. The intervening countries for Andorra will be: on legal aspects – Hungary, on law enforcement – Armenia, on financial aspects – Cyprus.

Item 33 - Rapporteurs for March 2012

84. The Rapporteur country for the next plenary will be Slovakia (Montenegro 2nd 3rd round progress report).

Item 34 - Future representation in FATF meetings

85. An invitation letter will be sent to delegations, who would like to participate in the two upcoming FATF plenaries in January and February 2012.

Item 35 - Financing and staffing

86. The Executive Secretary made a brief report to the plenary on financial matters. He stated that MONEYVAL now has proper financing for its activities in 2012, including the necessary financing for the Conference of the Parties meeting.
87. Mr Ringguth welcomed back John Baker and informed the plenary that unfortunately Mr Fabio Baiardi's secondment to MONEYVAL was coming to an end in December 2011 and thanked him warmly for his commitment and work with MONEYVAL for the last 2 years. He also thanked in this context the Swiss authorities for this secondment.
88. The plenary was also informed that a new member of the Secretariat from Spain will soon join the Secretariat and that it is anticipated that a further vacancy will be available by the end of January 2012.

Item 36 – Miscellaneous

89. The Secretariat informed the plenary on the updated dates of the on-site visits to Lithuania (23-28 April) and Croatia (19-23 November).
90. The Executive Secretary informed the plenary that unfortunately Mr Herbert Zammit Laferla was stepping down from the position of the scientific expert to MONEYVAL and thanked him most warmly for his invaluable work with MONEYVAL for the last 15 years. He also noted that MONEYVAL will miss him very much. The plenary joined the Chairman and Bureau in wishing Mr Laferla well in the future. Mr Laferla thanked the Executive Secretary for his words and expressed his regret at leaving MONEYVAL, the work of which he would continue to follow at a distance.

Appendix I – Agenda (MONEYVAL-PLEN37(2011)OJ3-prov3)

Day 1: Tuesday 13 December 2011 / 1er jour: mardi 13 décembre 2011

Morning 9h30 / matin 9h30

- 1. Opening of the Plenary Meeting (at 9h30) / Ouverture de la réunion plénière (à 9h30)**
- 2. Adoption of Agenda / Adoption de l'ordre du jour**
- 3. Information from the Chairman / Informations communiquées par le Président**
 - 3.1 Chairman's correspondence / Correspondance du Président**
 - 3.2 Bureau Meeting on 12 December 2011 / Réunion du Bureau du 12 décembre 2011**
- 4 Intervention of Mr Giancarlo Del Bufalo, President of the FATF (at 10h00) / Intervention de M. Giancarlo Del Bufalo, Président du GAFI (à 10h00)**
- 5. Information from the Secretariat / Informations communiquées par le Secrétariat**
 - 5.1 Information on the new structure in the Council of Europe Secretariat / Informations sur la nouvelle structure du Secrétariat du Conseil de l'Europe**
 - 5.2 Agenda of evaluations and meetings for 2012 / Calendrier des évaluations et réunions en 2012**
 - 5.3 Elections : information from the Secretariat / Elections : Informations du Secrétariat**
 - 5.4 Template for 4th Assessment visits progress reports / Format des rapports de progrès relatifs aux procédures de suivi dans le cadre des visites d'évaluation du 4^e cycle**
 - 5.5 Participation in FATF meetings / Participation aux réunions du GAFI**
 - 5.6 Participation in other forums / Participation à d'autres réunions**
 - 5.7 Report to the Committee of Ministers / Rapport au Comité des Ministres**
- 6. Discussion on the Second 3rd Round Progress Report of Monaco / Discussion du deuxième rapport de progrès de 3^e cycle de Monaco**
- 7. Update on progress of the review of FATF standards / Progrès sur la modification des standards du GAFI**
- 8. ICRG process - update / Processus du Groupe d'examen des questions de coopération internationale (ICRG) – état des lieux**
 - 8.1 Update from the Europe/Eurasia Regional Review Group (EERG) Co-chair / Actualisation par le co-Président du Groupe d'examen régional Europe / Eurasie (EERG)**
 - 8.2 Responses to the FATF Public statements / Réponses aux Déclarations publiques du GAFI**

Afternoon 14h30 / après-midi 14h30

- 9. Report from Albania under Step I of the Compliance Enhancing Procedures and discussion of any next steps / Rapport de l'Albanie au titre de l'étape I des procédures de conformité renforcée et discussion des suites à donner**
- 10. Report of Bosnia and Herzegovina under Step I of the Compliance Enhancing Procedures and discussion of any next steps / Rapport de la Bosnie-Herzégovine au titre de l'étape I des procédures de conformité renforcée et discussion des suites à donner**

11. Further discussion of measures taken by Ukraine on identified important deficiencies as a result of the process regarding the state of compliance on all NC and PC ratings in the 3rd round mutual evaluation report and next steps / *Discussion sur les mesures prises par l'Ukraine sur les lacunes importantes identifiées dans le cadre du processus concernant l'état de conformité relatif aux notations NC et PC du rapport d'évaluation de 3e cycle et suite à donner*

12. Publication of "Dirty Money" / *Publication "L'argent sale"*

Day 2: Wednesday 14 December 2011 / 2e jour: mercredi 14 décembre 2011

Morning 9h30 / matin 9h30

13. Intervention of Mr Jan Kleijssen, Director, Information Society and Action against Crime / *Intervention de M. Jan Kleijssen, Directeur, Société de l'Information et de la Lutte contre la Criminalité*

14. Election of Chair, Vice-Chair and Bureau members / *Election des Président, Vice-président et membres du Bureau*

15. Discussion on the Second 3rd Round Progress Report of Azerbaijan / *Discussion du deuxième rapport de progrès de 3^e cycle d'Azerbaïdjan*

16. Further discussion of measures taken by Azerbaijan on identified important deficiencies as a result of the process regarding the state of compliance on all NC and PC ratings in the 3rd round mutual evaluation report and next steps / *Discussion sur les mesures prises par l'Azerbaïdjan sur les lacunes importantes identifiées dans le cadre du processus concernant l'état de conformité relatif aux notations NC et PC du rapport d'évaluation de 3e cycle et suite à donner*

Afternoon 14h30 / après-midi 14h30

17. Discussion on the Second 3rd round Progress Report of Israel / *Discussion du deuxième rapport de progrès de 3^e cycle d'Israël*

18. Further discussion of measures taken by Georgia on identified important deficiencies as a result of the process regarding the state of compliance on all NC and PC ratings in the 3rd round mutual evaluation report and next steps / *Discussion sur les mesures prises par la Géorgie sur les lacunes importantes identifiées dans le cadre du processus concernant l'état de conformité relatif aux notations NC et PC du rapport d'évaluation de 3e cycle et suite à donner*

Day 3: Thursday 15 December 2011 / 3e jour: jeudi 15 décembre 2011

Morning 9h30 / matin 9h30

19. Discussion on the Second 3rd round Progress Report of Estonia / *Discussion du deuxième rapport de progrès de 3^e cycle d'Estoinie*

20. Further discussion of measures taken by Moldova on identified important deficiencies as a result of the process regarding the state of compliance on all NC and PC ratings in the 3rd round mutual evaluation report and next steps / *Discussion sur les mesures prises par Moldova sur les lacunes importantes identifiées dans le cadre du processus concernant l'état de conformité relatif aux notations NC et PC du rapport d'évaluation de 3e cycle et suite à donner*

21. Typologies work - on-going projects, status of implementation / *Travaux sur les typologies - projets en cours, état des travaux*

- 21.1 The use of internet gambling for ML and TF purposes / L'utilisation des jeux en ligne aux fins du BC et FT**
- 21.2 MONEYVAL 10th Typologies meeting (Tel Aviv, 31 Oct - 2 Nov 2011) – update / 10^e Réunion sur les typologies de MONEYVAL (Tel Aviv, 31 octobre – 2 Novembre 2011)- état des travaux**
- **Trade based money laundering in cash intensive economies / Le blanchiment d'argent fondé sur les transactions commerciales dans les économies fortement axées sur les paiements en espèces**
 - **Postponement of financial transactions and the monitoring of bank accounts / Le report des transactions financières et la surveillance des comptes bancaires**

Afternoon 14h30 / après-midi 14h30

22. Information from the European Union / Informations de la part de l'Union Européenne

22.1 European Commission / Commission européenne

22.2 Secretariat General of the Council of the European Union / Secrétariat Général du Conseil de l'Union européenne

23. EU Member States' common understanding on the procedure for the recognition of third countries equivalence / Mémoire commun des Etats membres de l'UE sur la procédure de reconnaissance de l'équivalence des pays tiers

24. Request by the IMF to review the burden sharing arrangements in MONEYVAL's 4th round evaluations / Demande du FMI d'examiner l'entente concernant le partage des évaluations du 4^e cycle de MONEYVAL

25. Information on AML/CFT initiatives in other fora / Informations sur les initiatives LAB/CFT dans d'autres institutions

25.1 IMF / FMI

25.2 World Bank / Banque Mondiale

25.3 EBRD / BERD

25.4 GIFCS

25.5 OSCE

25.6 Council of Europe Development Bank / Banque de développement du Conseil de l'Europe

25.7 Eurasian Group on Combating Money Laundering and Terrorist Financing (EAG) / Groupe Eurasie sur le blanchiment de capitaux et le financement du terrorisme (EAG)

25.8 FATF / GAFI

26. The Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the proceeds from Crime and on the Financing of Terrorism (CETS No. 198) / Convention du Conseil de l'Europe relative au blanchiment, au dépistage, à la saisie et à la confiscation des produits du crime et au financement du terrorisme (STCE no.198)

Day 4: Friday 16 December 2011 / 4^e jour: vendredi 16 décembre 2011

Morning 9h30 / matin 9h30

27. Discussion on the Second 3rd Round Progress Report of Romania / Discussion du deuxième rapport de progrès de 3^e cycle de la Roumanie

- 28. Further discussion of measures taken by « the former Yugoslav Republic of Macedonia » on identified important deficiencies as a result of the process regarding the state of compliance on all NC and PC ratings in the 3rd round mutual evaluation report and next steps / Discussion sur les mesures prises par « l'ex-République Yougoslave de Macédoine » sur les lacunes importantes identifiées dans le cadre du processus concernant l'état de conformité relatif aux notations NC et PC du rapport d'évaluation de 3e cycle et suite à donner**
- 29. Further discussion of measures taken by Croatia on identified important deficiencies as a result of the process regarding the state of compliance on all NC and PC ratings in the 3rd round mutual evaluation report and next steps / Discussion sur les mesures prises par la Croatie sur les lacunes importantes identifiées dans le cadre du processus concernant l'état de conformité relatif aux notations NC et PC du rapport d'évaluation de 3e cycle et suite à donner**
- 30. Typologies work (continuation) / Travaux sur les typologies (suite)**
 - 30.1 Information on other typologies projects in other forums / Information sur d'autres projets sur les typologies dans d'autres organisations**
 - 30.2 FATF/ FRSBs co-operation and coordination / Coopération et coordination entre le GAFI et les organismes régionaux de type GAFI**
 - 30.3 FATF's on-going typologies projects / Les projets du GAFI relatifs aux typologies**
 - 30.4 Information on other bodies' projects / Informations sur les projets d'autres organisations**

Afternoon 14h30 / après-midi 14h30

- 31. Information on AML/CFT initiatives in MONEYVAL countries (tour de table) / Informations sur les initiatives LAB/CFT dans les pays membres de MONEYVAL (tour de table)**
- 32. Ad Hoc Review Group of Experts for the next plenary meeting / Groupe Ad Hoc d'experts pour la prochaine réunion plénière**
- 33. Rapporteurs for March 2012 / Rapporteurs pour mars 2012**
- 34. Future representation in FATF meetings / Représentations futures dans les réunions du GAFI**
- 35. Financing and staffing / Financement et questions de personnel**
- 36. Miscellaneous / Divers**

Appendix II – List of participant (MONEYVAL-PLN36(2011)LIST2)

Delegations / Délégations

ALBANIA / ALBANIE

Ms Brikena KASMI
HEAD OF DELEGATION
Deputy Minister of Justice

Mr Agim MUSLIA
Director of Analysis and IT Dept (GDPML)

Ms Entela PRIFTI
Court of Appeal TIRANA

ANDORRA / ANDORRE

Mr Carles FIÑANA PIFARRÉ
CHEF DE DELEGATION
Directeur de l'Unité d'Intelligence Financière, Ministère de la Présidence

Mrs Claudia CORNELLA-DURANY
Head of International Relations, Ministry of Finance

Mrs Tanjit SANDHU
Legal Adviser, Financial Intelligence Unit

ARMENIA / ARMENIE

Mr Daniel AZATYAN
HEAD OF DELEGATION
Head, Financial Monitoring Center, Central Bank of Armenia

Ms Hasmik MUSIKYAN
Methodologist-Legal Advisor, Legal Compliance Department, FMC, Central Bank of Armenia

Ms Astghik KARAMANUKYAN
Head, International Relations Department, Financial Monitoring Center, Central Bank of Armenia

AUSTRIA / AUTRICHE

Mr Stefan WIESER
Policy Advisor, Federal Ministry of Finance

Mrs Karin ZARTL
Financial Markets Authority (FMA), International Affairs and European integration,

AZERBAIJAN / AZERBAÏDJAN

Mr Rufat ASLANLI
HEAD OF DELEGATION
Chairman of the State Committee for Securities

Mr Nurlan BABAYEV
Head of Legal and Methodology Unit of the Financial Monitoring Service under the Central Bank of the Republic of Azerbaijan

Mr Azer ABBASOV

Senior legal advisor of Legal and Methodology Unit of the Financial Monitoring Service under the Central Bank of the Republic of Azerbaijan

Mr Adishirin GASIMOV

Director of the Financial Monitoring Service under the Central Bank of the Republic of Azerbaijan

Mr Sevinj NOVRUZOVA

Senior legal advisor of Legal and Methodology Unit of the Financial Monitoring Service under the Central Bank of the Republic of Azerbaijan

Mr Anar SALMANOV

Deputy Director, Member of the Experts Group on AML/CFT Measures under the auspices of the Cabinet of Ministers, Financial Monitoring Service, Central Bank of the Republic of Azerbaijan

Mr Jeyhun SHADLINSKIY

Head, AML/CFT Department, Ministry of National Security

Mr Gabil HASANOV

Head, Currency Control Department, State Customs Committee

Mr Zaka MIRZAYEV

Head, Sector of Regulation Financial and Insurance Markets, Ministry of Finance

Mr Rashid MAHMUDOV

Senior Prosecutor, Anti-Corruption Department

BOSNIA AND HERZEGOVINA / BOSNIE-HERZÉGOVINE

Mr Mijo GOLUB

HEAD OF DELEGATION

Deputy Chief and Acting Chief of the Financial Intelligence Department- State Investigation and Protection Agency

Ms Sanela LATIC

Department- State Investigation and Protection Agency

Mr Samir OMERHODZIC

Director Insurance Agency, Ul. Obala Kulina Bana 4/11, 71000 SARAJEVO

Mr Jovanic VLADO

MUP RS

BULGARIA / BULGARIE

Mr Evgeni EVGENIEV

HEAD OF DELEGATION

Head of International Information Exchange Sector, Financial Intelligence Unit, State Agency National Security - SANS

Ms Irena BORISOVA-SERAFIMOVA

Ministry of Justice, International Legal Co-operation and European Affairs

Ms Sonya KLISSARSKA

Director, Directorate "AFCOS", Central Unit for Coordination in the fight against infringements affecting the financial interests of the European Communities, Ministry of the Interior

CROATIA / CROATIE

Mr Tomislav SERTIĆ
HEAD OF DELEGATION
Deputy Director, Anti-Money Laundering Office, Ministry of Finance

Mr Ante BILUŠ
Head of Section for Credit and Financial Institutions, Anti-Money Laundering Office, Ministry of Finance

Ms Marcela KIR
Director, Foreign Exchange Policy Department, Croatian National Bank

Mr Dinko KOVAČEVIĆ
Head of Sector for Criminal Law Legislation, Ministry of Justice

Ms Tatjana KOVAČ KLEMAR
Senior Adviser, Supervision I, Croatian Financial Supervisory Agency (HANFA)

Ms Andreja PAPA
Inspector, Ministry of the Interior, Economic Crime and Corruption Department

Ms Žana PEDIĆ
Head of Department for International Cooperation, Ministry of Finance

Mr Ivan PLEVKO
Deputy District Attorney, District Attorney's Office

CYPRUS / CHYPRE

Mrs Eva ROSSIDOU-PAPAKYRIACOU
HEAD OF DELEGATION
Senior Counsel of the Republic, Head of the Unit for Combating Money Laundering,
Attorney General's Office

Mr Christos IOANNIDES
Banking Supervision, Central Bank of Cyprus

Mr Theodoros STAVROU
Unit for Combating Money Laundering

CZECH REPUBLIC / RÉPUBLIQUE TCHÈQUE

Mr Jaromir NEUZIL
HEAD OF DELEGATION
Head of International Co-operation Department, Financial Analytical Unit, Ministry of Finance

Mr René KURKA
Licensing and Enforcement Department, Czech National Bank

Mr Stanislav POTOČEK
Public Prosecutor, Head of Department of Criminal Proceedings
Supreme Public Prosecutor's Office

ESTONIA / ESTONIE

Mr Andres PALUMAA
HEAD OF DELEGATION
Head of AML Unit, Business Conduct Supervision Division, Estonian Financial Supervision Authority

Mr Raul VAHTRA
Chief Superintendent, Head of Financial Intelligence Unit, Central Criminal Police

Ms Tuuli PLOOM
Legal expert. Adviser, Penal Law and Procedure Division, Criminal Policy Department, Ministry of Justice

Ms Kadri SIIBAK
Adviser, Entrepreneurship and Accounting Policy Department, Ministry of Finance

Ms Linda LELUMEES
Lawyer, Entrepreneurship and Accounting Policy Department, Ministry of Finance

Ms Kadri ELIAS
Acting Director of European Union Law Division, Legal Department, Ministry of Foreign Affairs

FRANCE

Mr Alexis ZAJDENWEBER
CHEF DE DELEGATION

Chef du Bureau, Investissement, lutte contre la criminalité financière et sanctions - Multicom 3
Politique commerciale et investissement - Service des Affaires multilatérales et du développement, Direction générale du Trésor, Ministère de l'Economie, des Finances et de l'Industrie

Mme Marie LEON
Adjointe au chef de bureau, Bureau Investissement, lutte contre la criminalité financière, et sanctions - multicom 3, Direction générale du Trésor, Ministère de l'Economie, des Finances et de l'Industrie

Mme Sylvie JAUBERT
Chargée de mission, TRACFIN, 10 rue Auguste Blanqui, 93186 Montreuil Cedex

Mr Franck OEHLERT
Legal expert, AML CFT and Internal control Law Division, Prudential Supervisory Authority

GEORGIA / GEORGIE

Mr Nikoloz GONGLIASHVILI
HEAD OF DELEGATION
Deputy Head, Financial Monitoring Service of Georgia,

Mr Levan MAKHARASHVILI
Office of the Prosecutor General of Georgia, 0133 Tbilisi, Georgia, Gorgasali Str. 24

HUNGARY / HONGRIE

Dr Zsófia PAPP
Senior legal expert, Ministry for National Economy, Department for International Finance,

Mr Gyula KÉRDŐ
Senior Supervisor, Credit Institutions and Financial Enterprises, Inspection Department,
Financial Supervisory Authority

Mr Árpád SZENTES
Head of Section, FIU

ISRAEL / ISRAËL

Mr Yehuda SHAFFER
Advocate, Money Laundering and Terror Financing Prohibition Authority, Ministry of Justice

Mr Paul LANDES
HEAD OF DELEGATION
Advocate, Money Laundering and Terror Financing Prohibition Authority, Ministry of Justice

Mr Avigail SONN

Mr Dror GOLDSTEIN

Mr Yehuda TWERSKY

Ms Maya LEDERMAN

LATVIA / LETTONIE

Mr Viesturs BURKĀNS

HEAD OF DELEGATION

Head of the Office for Prevention of Money Laundering

Ms Indra GRATKOVSKA

Director, Department of Criminal Law, Ministry of Justice

Ms Daina VASERMANE

Head of Financial Integrity Division, Financial and Capital Market Commission

LIECHTENSTEIN

Mr René BRULHART

HEAD OF DELEGATION

Director, Financial Intelligence Unit

Mr Philipp RÖSER

Head International Affairs, Banking and Securities Supervision, FMA Financial Market Authority

Mr Daniel THELESKLAFF

Head FIU, Operations

LITHUANIA / LITUANIE

Mr Liutauras ZYGAS

HEAD OF DELEGATION

Chief Legal Adviser, Legal Division, Bank of Lithuania,

Mr Vilius PECKAITIS

Head of the Second Subdivision, Money Laundering Prevention Division,
Financial Crime Investigation Service, Ministry of Interior

Mr Paulius VERSEKYS

Chief Specialist, Division of Criminal Justice, Administrative and Criminal Justice Department, Ministry of Justice

MALTA / MALTE

Dr Anton BARTOLO

ACTING HEAD OF DELEGATION

Director, Enforcement Unit, Malta Financial Services Authority (MFSA), Notabile Road, MLT

Mr Michael CASSAR

Assistant Commissioner of Police, Malta Police Force, Police General Headquarters

Dr Manfred GALDES

Director, Financial Intelligence Analysis Unit
manfred.galdes@fiumalta.org

Dr Jason GRIMA

Office of the Attorney General

MOLDOVA / MOLDOVA

Ms Stela BUIUC
Deputy Director, Center of Harmonization of the Legislation, Ministry of Justice

Mr Viorel CHETRARU
Director of CCECC

Mr Valeriu SIRCU
Head of FIU Moldova

Mr Mihail GOFMAN
Deputy Head of FIU Moldova

Mr Iurie STOIAN
Chief of Department of CCECC

Mr Andrian CORCIMARI
FIU Moldova

Ms Emma TABIRTA
Deputy Governor of National Bank of Moldova

Mr Andrei BURCIU
Chief of Department within National Bank of Moldova

Mr Eduard VARZAR
Anti-corruption Prosecutor's Office

MONACO

Mme Marie-Pascale BOISSON
HEAD OF DELEGATION
Directeur, Service d'Information et de Contrôle sur les Circuits Financiers (SICCFIN)

Mr Frederic COTTALORDA
Chef de Division, SICCFIN

Mme Danielle MEZZANA-GHENASSIA
Conseiller technique SICCFIN, Service d'Information et de Contrôle sur les Circuits Financiers
Ministère d'Etat

MONTENEGRO

Mr Vesko LEKIĆ
HEAD OF DELEGATION
Deputy Director, Administration for the Prevention of Money Laundering and Terrorist Financing

Mr Drazen BURIC
Deputy of Special prosecutor

Miss Ana BOSKOVIC
Prosecutors office

Mr Ivan MASULOVIC
Security adviser to Prime Minister

Mr Dalibor MEDOJEVIC
Head inspector, Police Administration

Mr Pradrag MITROVIC
Director, APMLTF

Mrs Hedija REDZEPAGIC
Head of compliance Dept, Central bank

POLAND / POLOGNE

Mrs Elzbieta FRANKOW-JASKIEWICZ
HEAD OF DELEGATION
Ministry of Finance

Mr Jacek LAZAROWICZ
Prosecutor, Ministry of Justice

Mr Przemyslaw RABCZUK
Acting Head of AML Unit, Polish Financial Supervision Authority (UKNF),
Enforcement Department

ROMANIA / ROUMANIE

Mr Marius BULANCEA
counsellor of General Prosecutor of Romania

Mrs Alina CATANA
Bureau for Implementation of International Sanctions, Ministry of Foreign Affairs

Mr Alexandru CODESCU
Director of Supervision and Control Directorate
National Office for the Prevention and Control of Money Laundering (NOPCML)

Mr Adrian CUCU
President of the National Office for the Prevention and Control of Money Laundering

Mrs LAURA LICA-BANU
Head of International Relations Department, law enforcement expert, National Office for Prevention and Control of Money Laundering

Mr Sorinel Ionut GABOR-JITARIU
Head of International relations Department, National Office for Prevention and Control of Money Laundering

Mr Bogdan GREBLESCU
Head of Service within the Inspection Department, Romanian National Securities Commission

Mr Doru MAZALU
Specialist Officer, Department of Combating Terrorism Financing and Money Laundering, Directorate of Combating Organized Crime, General Inspectorate of Romanian Police, Ministry of Administration

Mr Marius MIHAI
Head of Service within the Inspection Department, Romanian National Securities Commission

Mr Sorin TANASE
Legal Adviser, Unit for Crime Prevention and Cooperation with EU Asset Recovery Offices
Ministry of Justice

Mr Marcel TEODORESCU
Head of Service within the Regulation and Authorization Directorate, Commission of Private Pensions System Supervision

Mr Daniel VLASE
Romanian Intelligence Service, Head of the Analysis and Cooperation Group within the Antiterrorist Operative
Coordination Center

RUSSIAN FEDERATION / FÉDÉRATION DE RUSSIE

Mr Vladimir NECHAEV
CHAIRMAN OF MONEYVAL / PRESIDENT DE MONEYVAL
Adviser of the First Vice-Chairman of the Government of the Russian Federation

Mr Yury CHIKHANCHIN
HEAD OF DELEGATION
Federal Financial Monitoring Service (Rosfinmonitoring), Head

Ms Anna DESHKO
Financial Monitoring Department of the Central Bank of Russia

Ms Tatyana GREKOVA
Bank of Russia, Head of Division

Ms Tatiana GUREEVA
Ministry of Foreign Affairs of the Russian Federation

Ms Nataliya LUKYANOVA
Federal Financial Monitoring Service (Rosfinmonitoring)

Ms Ksenia PANEVKINA
International Training Center for Financial Monitoring, Interpreter

Mr Alexey PETRENKO
Federal Financial Monitoring Service (Rosfinmonitoring), Head of Department

Ms Nadezhda PRASOLOVA
Federal Financial Monitoring Service (Rosfinmonitoring), Head of Division

Mr Anatoly PRIVALOV
Federal Financial Monitoring Service (Rosfinmonitoring), Head Assistant

Mr Dmitry PUTYATIN
Federal Financial Monitoring Service (Rosfinmonitoring), Expert

Mr Andrey SELEZNEV
Federal Financial Monitoring Service (Rosfinmonitoring)

Mr Andrey SHIKHOV
Anti-corruption Legislation Department of the General Prosecutor's Office of the Russian Federation

Mr Stanislav SMOLYAR
Federal Financial Monitoring Service (Rosfinmonitoring), Head Assistant

Mr Alexey VALZIMOV
Federal Financial Monitoring Service (Rosfinmonitoring)

Ms Ekaterina ZUEVA
Federal Financial Monitoring Service (Rosfinmonitoring)

SAN MARINO / SAINT-MARIN

Mr Nicola MUCCIOLI
HEAD OF DELEGATION
Vice – Director of the Financial Intelligence Agency

Mr Alberto BURIANI
Law Commissioner of the Single Court,(Sector: Judicial Authority)

Ms Giorgia UGOLINI
Financial Intelligence Agency, Strada di Paderna, 2

SERBIA / SERBIE

Mr Aleksandar VUJICIC
HEAD OF DELEGATION
Director, Directorate for Prevention of Money Laundering, Ministry of Finance

Ms Jovan GRUJIC
Adviser, Ministry of Justice Republic of Serbia

Ms Silvija Duvancic GUJANICIC
Director in the National Bank of Serbia

Ms Zorica KRNJEVIC MISKOVIC
National Bank of Serbia

Mr Goran KUPRESANIN
Inspector in the Securities Commission

Ms Jelena MESTROVIC
National Bank of Serbia

Mrs Milunka MILANOVIC
Ministry of Finance
Mr Milovan MILOVANOVIC
Head of the Division for International Co-operation
Administration for the Prevention of Money Laundering, Ministry of Finance

Ms Jelena PANTELIC
Counselor in the Department for Money Laundering

Mr Mladen SPASIC
Advisor to the Minister of Interior, Kabinet Ministra, Ministry of the Interior

SLOVAKIA / SLOVAQUIE

Mrs Izabela FENDEKOVÁ
HEAD OF DELEGATION
Supervisor, Financial Market Supervision Division, Regulation and Financial Analysis Department, National Bank of Slovakia

Mr Andrej LAZAR
Head of International Co-operation Department, Financial Intelligence Unit,

Mr Jozef SZABO
Director of International Department, Prosecutor's General Office

SLOVENIA / SLOVÉNIE

Ms Maja CVETKOVSKI
HEAD OF DELEGATION

Head of International Cooperation Service, Office for the Prevention of Money Laundering, Ministry of Finance of the Republic of Slovenia

Mr Simon GOLUB

Head of Financial Crime and Money Laundering Section, Criminal Police Directorate, Ministry of the Interior of the Republic of Slovenia

Ms Jelena MILOSEVIC

Inspector Advisor, Banking Supervision Department, Bank of Slovenia

"THE FORMER YUGOSLAV REPUBLIC OF MACEDONIA" / "L'EX-RÉPUBLIQUE YOUGOSLAVE DE MACÉDOINE"

Mr Vladimir ATANASOVSKI

HEAD OF DELEGATION

Acting Director, Office for prevention of money laundering and terrorism financing

Mr Toni JANKOSKI

Ministry of Interior

Ms Mimoza KIKOVSKA

Ministry of Justice

Ms Iskra DAMCHEVSKA

Office for Prevention Money Laundering and Financing of Terrorism

UKRAINE

Mr Oleksiy FESHCHENKO

HEAD OF DELEGATION

Deputy Head of the State Committee for Financial Monitoring of Ukraine,

Mr Oleksii BEREZHNYI

Head of Department for Financial Monitoring of the National Bank of Ukraine

Mrs Kateryna SAKHARENKO

Head of International Co-operation Department, State Committee for Financial Monitoring

Council of Europe Observers / Etats observateurs auprès du Conseil de l'Europe

HOLY SEE / SAINT-SIEGE

Dr. Avv. Francesco DE PASQUALE

Director, FIU

Mr Alfredo PALLINI

Deputy Director, FIU

Mr Tommaso DI RUZZA

Legal Adviser, FIU

Mr Alessio PECORARIO

Legal Adviser, FIU

Mr Jeffrey LENA
FIU

Mr Carlo CAPELLA
FIU

MEXICO / MEXIQUE

Mrs Lydia MADERO GARCIA
Observateur Permanent, Représentation du Mexique auprès du Conseil de l'Europe

UNITED STATES OF AMERICA / ETATS-UNIS D'AMERIQUE

Mr Christopher BURDICK
HEAD OF DELEGATION
Policy Advisor, Office of Terrorist Financing and Financial Crimes,

Other members of the FATF / Autres membres du GAFI

GERMANY / ALLEMAGNE

Ms Tatjana LEONHARDT
Federal Financial Supervisory Authority, Anti-Money-Laundering Department, Section GW 1
International, legal and policy issues

Mr Thomas MESSING
Federal Financial Supervisory Authority, Anti-Money-Laundering Department, Section GW 1
International, legal and policy issues

**Council of Europe bodies and mechanisms /
Organes et mécanismes suivants du Conseil de l'Europe**

**COUNCIL OF EUROPE DEVELOPMENT BANK /
CEB – BANQUE DE DÉVELOPPEMENT DU CONSEIL DE L'EUROPE**

Apologised / Excusé

**International organisations and bodies /
Organisations et organismes internationaux**

COUNCIL OF THE EUROPEAN UNION / CONSEIL DE L'UNION EUROPEENNE

Mr Peter NATH
National Expert, Council of the European Union,
Division Judicial Co-operation, General Directorate for Justice and Home Affairs, DG H 2 B,

EUROPEAN COMMISSION / COMMISSION EUROPÉENNE

Mr Tobias MACKIE
European Commission
DG Internal Market and Services

FINANCIAL ACTION TASK FORCE (FATF) / GROUPE D'ACTION FINANCIÈRE (GAFI)

Mr Giancarlo Del Bufalo
President of the FATF

Mr Vincent SCHMOLL
Administrateur Principal, FATF Secretariat,

INTERNATIONAL MONETARY FUND (IMF)

Mr Giuseppe LOMBARDO
Senior Counsel, Legal Department, International Monetary Fund

UNITED NATIONS / NATIONS UNIES (UNODOC)

Mr Klaudio STROLIGO
Senior Financial Sector Specialist and World Bank / UNODC AML/CFT Mentor for Central Asia

WORLD BANK / BANQUE MONDIALE

Mr Klaudio STROLIGO
Senior Financial Sector Specialist and World Bank / UNODC AML/CFT Mentor for Central Asia

Ms Cari VOTAVA
The World Bank, Senior Financial Sector Specialist, FFSFI, Financial Market Integrity Dept

GIFCS / GSCFI

Mr Paul HECKLES
Director of Enforcement, Isle of Man Financial Supervision Commission, Enforcement Division,
GIFCS (Group of International Finance Centre Supervisors)

ORGANISATION FOR SECURITY AND CO-OPERATION IN EUROPE (OSCE)

Ms Nina LINDROOS-KOPOLO
Senior Economic Officer, Office of the Coordinator of OSCE Economic and Environmental Activities,
OSCE

Mr Alexey STUKALO
Deputy Coordinator of OSCE Economic and Environmental Activities

UNITED NATIONS COUNTER-TERRORISM EXECUTIVE DIRECTORATE (CTED)

Ms Delphine SCHANTZ
Legal Officer, UN Counter-Terrorism Committee Executive Directorate, CH-5153, New York

Scientific Experts / Experts Scientifiques

Professor William C. GILMORE
Professor of International Criminal Law, Faculty of Law, University of Edinburgh

Mr Giovanni ILACQUA
Director, Bank of Italy, Unita di Informazione Finanziaria, Head of International Co-operation Division

Mr Andrew STRIJKER
Senior Coordinator Financial Markets Integrity, Financial Markets Policy Directorate
Ministry of Finance

Mr Boudewijn VERHELST
Deputy Director CTIF-CFI, Scientific Expert Law Enforcement, Attorney General,

Secretariat of the Council of Europe /
Secrétariat du Conseil de l'Europe

Mr Jan KLEIJSEN
Director, Information Society and Action against Crime
Directorate General of Human Rights and Rule of Law – DGI

Mr John RINGGUTH
EXECUTIVE SECRETARY TO MONEYVAL / *SECRÉTAIRE EXÉCUTIF DE MONEYVAL*
Administrator, Directorate General of Human Rights and Rule of Law (DG-1), Council of Europe

Ms Livia STOICA-BECHT, Administrator, MONEYVAL, Directorate General of Human Rights and Rule of Law

Mr Fabio BAIARDI, Administrator, MONEYVAL, Directorate General of Human Rights and Rule of Law

Ms Irina TALIANU, Administrator, MONEYVAL, Directorate General of Human Rights and Rule of Law

Mr Dmitry KOSTIN, Administrator, MONEYVAL, Directorate General of Human Rights and Rule of Law

Mr John BAKER, Administrator, MONEYVAL, Directorate General of Human Rights and Rule of Law

Mrs Marie-Louise FORNES, Administrative Assistant

Mrs Catherine GHERIBI, Administrative Assistant

Mrs Danielida WEBER, Administrative Assistant to MONEYVAL Committee

Interpreters / *Interprètes*

Ms Sally BAILEY-RAVET

Ms Julia TANNER

Mr Grégoire DEVICTOR