

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

Strasbourg, 19 January 2016

MONEYVAL(2015)46

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

MONEYVAL

49th PLENARY MEETING
Strasbourg, 8-11 December 2015

MEETING REPORT

MEMORANDUM

Prepared by the MONEYVAL Secretariat

Executive Summary

During the 49th plenary meeting, held in Strasbourg from 8-11 December 2015, the MONEYVAL Committee:

- adopted the second 3rd round progress report of the Holy See;
- took note of the Republic of Moldova's interim follow-up report, asked the country to submit further interim follow-up reports for the 50th and 51st Plenaries in April and September 2016 respectively, and encouraged it to seek removal from the follow-up process in December 2016;
- adopted the follow-up report of Malta, decided to remove the country from regular follow-up and ask it to submit a biennial report;
- took note of Israel's 4th round expedited follow-up report, and suggested that the country introduces another interim follow-up report in December 2016 while seeking removal from the 4th round follow-up process;
- received updated information regarding Israel's and Albania's VTC programmes, and decided that the authorities of both countries should continue updating the Plenary in the framework of the *tour de table* procedure in respect of any future developments on their respective programmes;
- adopted the follow-up report of Georgia, decided to remove the country from regular follow-up and ask it to submit a biennial report;
- took note of Latvia's interim follow-up report and encouraged the country to seek removal from the regular follow-up process no later than September 2016;
- adopted the 4th round MER and executive summary on the UK Crown Dependency of Jersey and decided to place the jurisdiction under the biennial follow-up procedure;
- adopted the 5th round MER and executive summary of Armenia, decided to place the country in regular follow-up and requested it to report back to the Plenary within two years and a half of the adoption of the MER. Armenia was also requested to report back on the progress made to implement the first recommended action under Immediate Outcome 11 at MONEYVAL's 52nd Plenary in December 2016;
- took note of the follow-up report submitted by Poland and asked the country to provide a further interim follow-up report at the 50th Plenary in April 2016;
- took note of the follow-up report submitted by the Slovak Republic;
- adopted the 2nd biennial follow-up report of Cyprus and decided not to request the country to report back further under the 4th round biennial follow-up procedures in view of the scheduled 5th round evaluation visit;
- took note of the progress achieved by Cyprus since the 45th Plenary meeting (September 2014) in relation to the "Special Assessment of the Effectiveness of Customer Due Diligence Measures in the Banking Sector in Cyprus" of 24 April 2013; and in light of the progress made, decided to terminate the follow-up process with respect to the special assessment. However, the country was requested to continue informing the Plenary, through *the tour de table* procedure, on progress achieved in relation to the imposition of administrative sanctions;
- took note of the first expedited follow-up report of Azerbaijan, and decided that the country should seek to exit the regular follow-up process by no later than December 2017;
- elected Mr Daniel Thelesklaf (Liechtenstein) as Chair, Ms Elzbieta Franków-Jaskiewicz (Poland) as Vice-Chair, as well as Mr Nedko Krumov (Bulgaria), Mr Franck Oehlert (France) and Mr Alexey Petrenko (Russian Federation) as Bureau members, for a term of office of two years;
- appointed Ms Maja Cvetkovski (Slovenia) as gender equality rapporteur of MONEYVAL.

The Committee of Experts on the evaluation of anti-money laundering measures and the financing of terrorism (MONEYVAL) held its 49th plenary meeting from 8 to 11 December 2015 in Strasbourg under the chairmanship of Dr Anton Bartolo (Malta) and Mr Daniel Thelesklaf (Liechtenstein).

Day 1: Monday 14 September 2015

Agenda item 1 – Opening of the Plenary Meeting at 9h30 by Jan Kleijssen, Director of Information Society and Action against Crime

1. The Chairman, Dr Anton Bartolo, opened the Plenary. Upon his initiative, the Plenary held a minute of silence in remembrance of the victims of the recent terrorist attacks. The Chairman welcomed the representative for the United Kingdom Overseas Territory of Gibraltar upon his first attendance of the Plenary. Subsequently, the Chairman announced that he would only be able to chair the Plenary for the first day due to commitments at home, and that the Vice-Chair, Mr Daniel Thelesklaf, would preside over the remainder of the meeting. The Chairman also regretted the fact that, due to his professional commitment in his home country, he had decided not to stand for re-election. At the end of the first day, the Plenary warmly thanked the Chairman for his involvement in the MONEYVAL Bureau in various functions over many years and gave him a standing ovation.

1.1 Address by Mr Je-Yoon Shin, President of the Financial Action Task Force (FATF)

2. The Chairman welcomed Mr Je-Yoon Shin, President of the FATF, for his annual address of the FATF Presidency to the Plenary. Mr Shin praised the longstanding cooperation between the FATF and MONEYVAL, which had arrived at an important milestone with the beginning of a new round of evaluations. He stressed that the evaluations under the new 5th round methodology will be very demanding in terms of resources, and encouraged members to continue to support the Secretariat and to submit enough experts to act as evaluators. Mr Shin further informed the Plenary that the FATF had summoned a special plenary meeting on terrorist financing in Paris on 13-14 December, in order to discuss the most appropriate way to ensure that countries improve their respective systems as quickly as possible. He expressed his expectation that regional bodies will play an integral role in this process. Mr Shin also informed the Plenary on the training institute that is to be launched in Korea in June 2016 in order to respond to the global need to have more training and expertise building, and welcomed any suggestions of MONEYVAL members on this initiative.

1.2 Address by Mr Jan Kleijssen, Director, Directorate of Information Society and Action against Crime

3. The Director of Information Society and Action against Crime, Mr Jan Kleijssen, informed the Plenary on recent developments in the Council of Europe relating to MONEYVAL's work, notably the opening for signature of the additional Protocol to the Council of Europe Convention on the Prevention of Terrorism, which addresses the foreign terrorist fighter phenomenon. Mr Kleijssen also updated the Plenary on a hearing on cloud evidence organised by the Council of Europe's Cybercrime Convention Committee (T-CY) with representatives of the private sector, on the Action Plan on transnational organised crime by the European Committee on Crime Problems, as well as on a recent meeting held by the Pompidou Group with representatives from Europol and Interpol on the financial aspects of drug trade (including cryptocurrencies). With regards to the Secretariat, he informed the Plenary about the departure of Ms Livia Stoica-Becht to a new function in the Directorate General for Democracy, and warmly thanked her for her work within MONEYVAL over many years. He also informed the Plenary that, following the adoption of the next budget by the Committee of Ministers, an additional post would be created within the MONEYVAL Secretariat as of April 2016.

Agenda item 2 – Adoption of the agenda

4. The Committee adopted the agenda as circulated (see Appendix I).

Agenda item 3 – Information from the Chairman

3.1 Chairman's correspondence

5. The Plenary was informed about the Chairman's correspondence with MONEYVAL jurisdictions since the 48th Plenary in September 2015.

3.2 Report from the official lunch by the Secretary General with the Chairs of the Council of Europe monitoring bodies

6. The Chairman reported about this event which took place on 23 November 2015. In line with the general ideas from the Secretary-General to make the monitoring procedures of the organisation more flexible and understandable, the Chairman remarked that he had raised a number of points, such as the introduction of a special rule for emergency situations in MONEYVAL's Rules of Procedure and the practice to produce a brief summary with every report.

Agenda item 4 – Information from the Secretariat

7. The Executive Secretary informed the Plenary of the Committee of Ministers Resolution CM/Res(2015)26 on the evaluation of the UK Overseas Territory of Gibraltar by MONEYVAL of 14 October 2015, and warmly welcomed the representative of that jurisdiction. The Secretariat has been in touch with the Gibraltar authorities, and is envisaging (as practiced with the three UK Crown Dependencies in 2012) to schedule a "scoping visit" in the first half of 2016 to allow MONEYVAL to get an overview of the AML/CTF situation and see how the jurisdiction can be integrated in the 5th round schedule.
8. The Plenary was informed about the calendar of activities.
9. The Executive Secretary reported on the FATF Plenary meeting in October 2015, in particular the Terrorist Fact-Finding Initiative which was also scheduled for discussion at a later stage of the meeting. He encouraged all jurisdictions which did not yet send submissions in order to rectify facts about their legal systems or other responses, to do so through the MONEYVAL Secretariat as soon as possible in light of the deadline given by the FATF of 31 December 2015. He also reported about the main decisions of the FATF Plenary, notably the adoption of the MER of Italy, for which Mr John Ringuth had been involved as one of the external reviewers.
10. The Executive Secretary gave an account of the MONEYVAL evaluators training which took place in Liechtenstein from 23 to 27 November 2015 with 25 participants from 23 MONEYVAL jurisdictions, who were trained on the 5th round standards and methodology. He warmly thanked all trainers, as well as the delegation of Liechtenstein for their kind cooperation and hospitality.

Agenda item 5 – second progress report of the Holy See

11. The 3rd round MER of the Holy See/Vatican City State (HS/VCS) has been adopted by MONEYVAL at its 39th Plenary in July 2012. The HS/VCS submitted a first 3rd round progress report at the 43rd plenary meeting in December 2013. As a result of the discussions held in the context of the examination of this first progress report, the Plenary was satisfied with the information provided and the progress being undertaken. Pursuant to Rule 41 of the Rules of procedure, the progress report is subject to an update every two years between evaluation visits. The HS/VCS has provided the Secretariat and the Plenary with a report on its further progress since 2013. The full progress report is subject to peer review by the Plenary, assisted by the rapporteur country (Lithuania) and the Secretariat.
12. The Secretariat analysis concludes that HS/VCS has addressed most of the technical deficiencies in its legislation and regulations. The main legislative development is Regulation No. 1 on "Prudential Supervision of the Entities Carrying out Financial Activities on a Professional Basis", which came into effect on 13 January 2015, and as a result of which the Institute for Works of Religion (IOR) is now a supervised financial institution which has been authorised by the AIF (as

prudential supervisor) since July 2015. Similarly the Administration of the Patrimony of the Apostolic See (APSA), where applicable, has been authorised by the AIF since July 2015. In October 2015, a systematic screening process of all existing customer records in HS/VCS that had started in 2013, has been completed, which generated a large number of SARs, and customer relations were ended if needed. Work on a domestic national AML/CFT risk assessment by the Committee on Financial Security has begun, applying the Methodology of the World Bank for national risk assessments.

Decision taken

13. Upon recommendation of the rapporteur country, the Plenary concluded that it was satisfied with the information provided and progress achieved, and adopted the progress report and the analysis. However, the Plenary underlined that there is a need for the AML/CTF system to deliver effective results in terms of prosecutions, convictions and confiscation. HS/VCS expressed itself to be willing to keep the Plenary updated on this.

Agenda item 6 – Fourth round follow up: interim follow up report by Moldova

14. Following the adoption of the 4th round MER in December 2012, the Republic of Moldova was placed into regular follow-up and was requested to submit an interim report in December 2014 on the progress and actions taken. Furthermore, the Republic of Moldova was encouraged to seek removal from the follow-up process in December 2015 or very soon thereafter.
15. Based on the results of the discussion of the first follow-up report in December 2014, the Plenary considered that the Republic of Moldova is making satisfactory progress, but that it was too early to consider its removal from the regular follow-up process. The Republic of Moldova was thus requested to provide a progress report at the 49th plenary in December 2015.
16. The results of the Secretariat's analysis of the Republic of Moldova second follow-up report have shown that the overall situation concerning the progress made in respect of the FATF key/core Recommendations has mainly remained unchanged since the time of the first follow-up report. The Plenary agreed that the continued lack of significant progress achieved in relation to R.5, R.13, R.23, SR.I, SR.III and SR.IV, three years after the adoption of the 4th round MER, gives rise to concern. The authorities were strongly recommended to adopt and bring into force, as soon as possible, the draft law on application of international restrictive measures and draft amendments to the Criminal Code, as well as the new provisions of the AML/CFT Law.

Decision taken

17. Following the Plenary decision, the Republic of Moldova was encouraged to seek removal from the follow-up process in December 2016. In the interim period, the Republic of Moldova should continue to report to the Plenary regularly on progress achieved in relation to key and core Recommendations. Interim reports should be submitted ahead of the 50th Plenary in April 2016 and ahead of the 51th Plenary in September 2016.

Agenda item 7 – Fourth round follow up: application by Malta to be removed from regular follow up

18. The 4th round MER on Malta was adopted in April 2012 and, as a result, Malta was placed in regular follow-up, requiring it to report back two years after the evaluation, and was encouraged to seek removal from the follow-up process within three years. A first follow-up report was presented in April 2014. Malta presented interim reports to the Plenary in December 2014 and April 2015. At the 48th Plenary meeting (September 2015), it was agreed that Malta will fully report and make a request for removal from the regular follow-up at the 49th Plenary in December 2015. Malta submitted its full fourth follow-up report on 28 October 2015. In order to be removed from the regular follow-up process, Malta was required to demonstrate that it had reached a level of or essentially equivalent to “compliant” or “largely compliant” on Core Recommendations R.13 and SR.IV and Key Recommendations R.3 and SR.III.
19. The Secretariat presented its analysis of the fourth follow-up report of Malta. The country has

substantially addressed the majority of the deficiencies related to R.13, SR.IV, R.3 and SR.III, and has brought the level of technical compliance with these recommendations up to a level of LC. Most notably, Malta adopted amendments to the Prevention of Money Laundering and Funding of Terrorism Regulations, the Prevention of Money Laundering Act and the Criminal Code, which addressed the shortcomings identified in the 2012 MER. An important development in the context of R.3 is the recent establishment of an Asset Recovery Bureau responsible for the tracing, freezing, management and confiscation of criminal assets.

Decision taken

20. The Plenary concluded that Malta has made adequate progress in respect of all Core and Key recommendations. It adopted the fourth follow-up report of Malta and the analysis of the Secretariat, which are subject to automatic publication in accordance with the Rules of Procedure. Malta was instructed to keep the Plenary updated on progress made in the effective application of asset freezing mechanisms to EU internal terrorists. The Plenary decided to remove Malta from regular follow up and ask the country to submit a biennial report.

Agenda item 8 – Fourth round follow up: expedited follow up report of Israel

21. The Secretariat presented its analysis on Israel's 4th round expedited follow up report stating that, although the authorities have taken some steps to address the deficiencies identified in the 4th Round MER in respect of R.5 and R.10, only partial progress appears to have been achieved since the adoption of the MER in 2013. The Secretariat proposed that Israel provides another interim follow up report in 2016. Israel informed the Plenary on the progress achieved and requested to provide an interim follow up report at the 52nd Plenary in December 2016.

Decision taken

22. The Plenary required Israel to provide an interim follow-up report at the 52nd Plenary in December 2016 on progress with regard to core recommendations and on progress in applying the AML/CFT regime to all categories of DNFBPs and to money service bureau. The 52nd Plenary would then consider the progress achieved and envisage a date for exit from the 4th round follow-up.

Agenda item 9 – Voluntary Tax Compliance Schemes

23. The Plenary received updated information regarding Israel's VTC programme from the Israeli authorities. It agreed that the Israeli authorities should continue updating the Plenary on Israel's VTC programme under the MONEYVAL's *tour de table* procedure in respect of any future developments on the programme.
24. The Plenary received updated information from the Albanian delegation regarding the country's VTC programme which will end by the end of 2015. It was agreed that the Albania authorities should continue updating the Plenary under the MONEYVAL's *tour de table* procedure in respect of any future developments on the programme.

Agenda item 10 – Global data exercise to ascertain the level of preparedness of states and territories to deal with terrorist financing and terrorism

25. The Secretariat informed the Plenary about the forthcoming Special Plenary Session of the FATF (13-14 December 2015) which was devoted to combatting the financing of ISIL, their affiliates, and other terrorist groups. It also informed about a joint FATF/Egmont Group meeting on 12 December 2015 which will bring together operational experts from financial intelligence units, law enforcement, security and intelligence agencies, to share information and lessons from the investigation of recent terrorist attacks, including the challenges they face in identifying and cutting off terrorists' financial support. The Secretariat circulated and gave a brief overview of the working documents which the FATF had prepared in view of the meeting. The Plenary agreed that it would come back to this item at its 50th Plenary in April 2016 and devote more time to the matter, given the urgency of cutting the sources of ISIL and other terrorist groups.

Agenda item 11 – Fourth round follow up: application by Georgia to be removed from regular follow up

26. Following the adoption of the 4th round MER in July 2012, Georgia was placed in regular follow-up and requested to report back to the plenary after two years. The first progress report was adopted at MONEYVAL's 45th Plenary in September 2014. On that occasion, the Plenary requested Georgia to provide an interim follow-up report at the 47th Plenary in April 2015, since significant progress had only been achieved with respect to one of the core and key 2003 FATF Recommendations (SR.II).
27. At the 47th Plenary, the Committee agreed that progress had been made to address some of the deficiencies identified with regard to several core and key recommendations rated PC or NC in the 4th round (R.5, R.23 and R.26). However, the authorities were encouraged to address remaining deficiencies underlying SR.V, to adopt the draft amendments as soon as possible in order to address the technical deficiencies under SR.III and seek removal from the regular follow-up process in September 2015.
28. At the 48th Plenary, in view of the result of the discussions on the report, the Committee agreed that Georgia has taken positive steps to remedy many of the identified deficiencies. However, given the current threats faced by the international community in relation to the financing of terrorism, especially in the context of ISIL, the absence of appropriate measures to freeze terrorist assets under SR.III continues to raise concern. Following the Plenary decision, Georgia was requested to adopt the draft amendments to the Administrative Procedure Code without any further delay. It was also proposed that Georgia should seek to exit the regular follow-up process in December 2015.
29. Overall, the 49th Plenary concluded that since the adoption of the 4th round MER in 2011, Georgia has made significant progress in addressing many of the identified deficiencies. The most serious concern raised during the last plenary on the lack of progress in relation to SR.III, which prevented Georgia from exiting the regular follow-up process, has been successfully addressed with the adoption of the new legislation on targeted financial sanctions.

Decision taken

30. The Plenary agreed that Georgia has taken sufficient steps to be removed from the regular follow-up process. Georgia was therefore required to submit a biennial update in December 2017.

Agenda item 12 – Fourth round follow up: interim follow up report by Latvia

31. The 4th MER on Latvia was adopted in 2012. The country was placed into regular follow-up and was requested to submit a progress report by September 2014. Furthermore, Latvia was encouraged to seek removal from the follow-up process in September 2015 or very soon thereafter.
32. In September 2014, the Plenary decided that progress achieved by the Latvian authorities on the law enforcement and financial sections was on the right track. However, it was underlined that no significant development was reported on the technical side of SR.III and, in order for Latvia to achieve enough progress to seek removal from the follow-up process by September 2015, the deficiencies identified under SR.III should be addressed.
33. In September 2015, given the fact that the legislative process aimed to improve the national legal framework for applying targeted financial sanctions was still on-going, Latvia was not in the position to seek removal from the follow-up at that point. Following the Plenary decision, Latvia was requested to inform the Plenary on further steps that have been taken on SR.III in December 2015, and to seek removal from the regular follow-up process once the deficiencies under SR.III are rectified, but no later than September 2016. The information provided by Latvia to the Secretariat for this Plenary indicated that the legislative work on adoption of the new draft law concerning targeted financial sanctions is on the right track.

Decision taken

34. Latvia was therefore invited to complete the introduction of the law on sanctions and related regulations and seek removal from the regular follow-up process once the deficiencies under SR.III are rectified, but no later than September 2016.

Agenda items 13 – 15 Information on AML/CFT initiatives in MONEYVAL states and territories (tour de table), the European Union and other international fora

35. The Plenary held a *tour de table* with regard to recent AML/CFT developments in its jurisdictions (for more information on the *tour de table*, see document MONEYVAL-Plenary 49(2015)INF13 of 4 January 2016). It also heard information about recent initiatives from the European Commission, the Egmont Group, the Eurasian Group on Combating Money Laundering and Terrorist Financing (EAG), the Financial Action Task Force (FATF), the Group of International Financial Center Supervisors (GIFCS), the United Nations Office on Drugs and Crime (UNODC) and the World Bank.

Day 2: Wednesday 9 December 2015

Agenda items 16 and 17 – Discussion on the draft Mutual Evaluation Report on the UK Crown Dependency of Jersey

36. The Plenary examined the draft 4th round evaluation report on Jersey. The Secretariat introduced the evaluation team, acknowledged the progress made by Jersey since the IMF evaluation and provided an overview of the main findings of the report. The changes made to the report as a result of issues raised by the ad hoc review group (France) and the scientific experts during the pre-meeting with the Jersey authorities were presented. The intervener countries were Albania (legal aspects), Italy (financial aspects) and Armenia (law enforcement aspects).

Important issues raised

37. **Provisional Measure and Confiscation (R.3):** The scientific expert proposed to include information on the confiscation outside the context of ML cases. It was agreed to include in the report that similar comprehensive statistics figures were not available in relation to confiscation outside the specific ML offence, though this matter was fully considered by the evaluation team. Bulgaria pointed out that, as non-conviction based confiscation has not been used by the authorities, this should be reflected in the effectiveness bullet point. In this respect, it was concluded that a recommendation would be inserted in the report which recommended that, with a view to increasing effectiveness in this area, the Jersey authorities might consider introducing a non-conviction based confiscation scheme.
38. **Ratification and implementation of UN instruments (SR.I):** The Russian Federation asked clarifications on the bullet point under SR.I which relate to effectiveness related issues and pointed out that effectiveness related issues should not be reflected under SR.I. The evaluator clarified that focus is not only on effectiveness. The plenary agreed to change the language of the bullet point and not make a reference on effectiveness.
39. **Intermediaries/ Introduced business (R.9):** The Jersey delegation and the evaluation team had diverging views and positions as to whether effectiveness concerns with respect to R.5 could and should be considered for the purpose of the rating of R.9, also taking into account that this issue has not been considered in a number of 4th round reports. Guernsey, Croatia, Cyprus, Hungary, Isle of Man, Liechtenstein, Malta, Monaco, Poland, Romania, the Russian Federation and the scientific expert supported the position of Jersey. France, Italy, the FATF, the European Commission and the World Bank supported the position of the evaluation team. In the absence of consensus, the report remained unchanged. With respect to the second deficiency underlying the rating, Jersey stressed that this was not an effectiveness issue because of the requirement to

consider the risk that information or evidence would not be provided by each obliged person, and received support from Guernsey, the Isle of Man and Poland. France and Italy supported the position expressed by the evaluation team. Although Jersey has invited the Plenary to consider upgrading the rating of R.9 to Largely Compliant, the plenary retained the original rating proposed.

40. **Financial Intelligence Unit (R.26):** The World Bank expressed concern about the fact that the Chief Officer of Police has the option to re-deploy officers from the JFCU, and that can have an impact on the operational independence of the FIU. The evaluator clarified that the concerns of the impact of redeployment of resources has been considered, in line with previous reports, under R.30, and that the practice did not lead to concluding that this has impacted on the independence of the FIU, but rather on the FIU's implementation of its core functions. The FATF supported the position of the World Bank. The assessment team agreed to expand the first factor underlying the rating to refer to rotational practice. The World Bank suggested a downgrade of the rating to Partially Compliant, which was supported by France. As no other delegation supported the proposal, the rating remained unchanged.
41. **Transparency of Legal Persons (R.33) and Legal Arrangements (R.34):** Jersey's proposal to include in the report additional information on Jersey's leading position and measures in place for ensuring transparency of beneficial ownership and control information was accepted. France proposed to include an additional factor underlying the rating on effectiveness under R.34 on consideration of exemptions relating to TCSPs, given the significant amount of assets held through trusts in Jersey. The evaluation team and Jersey agreed with the proposal.
42. **International Cooperation and Exchange of Information (R.40):** The scientific expert asked clarifications on procedure involving the consent of the Attorney General for the FIU to disseminate information. Jersey clarified that the FIU engages directly in international co-operation with Egmont Group members and does not consult with the Attorney General, whereas the 13 cases referred to in the report related to co-operation with non-Egmont member FIUs. In those cases, the Attorney General concurred with the recommendation of the FIU. The plenary agreed that the report could include further text to clarify the role of the Attorney General in the context of exchanges of information and the practice, as well as the standard and enhanced share of information.

Decision taken

43. As a result of the discussion, the Plenary decided to amend the draft report and the executive summary to reflect the decisions taken during the discussions and the amendments set out in the room document.
44. The Plenary adopted the 4th round assessment visit report and the executive summary on Jersey, with the agreed amendments and subject to consequential editorial changes. The executive summary and report as adopted are subject to automatic publication in accordance with the revised Rules of Procedure.
45. Pursuant to Rule 13 of the revised Rules of Procedure, Jersey was placed under the biennial follow-up procedure. This process requires the jurisdiction to provide, no later than two years after the adoption of the report (i.e. December 2017), a succinct update describing the new measures that have been adopted and implemented to deal with the identified deficiencies in relation to any of the 40+9 Recommendations that are rated PC or NC and relevant updated data or statistics under the 2003 FATF Recommendation 32.
46. Since the item closed the last day of the attendance of Ms Livia Stoica-Becht, who had taken up functions in the Council of Europe Directorate General for Democracy as of 1 December 2015, the Chair thanked her warmly for her contributions to MONEYVAL over many years. The Plenary gave her a standing ovation.

Agenda items 18 and 19 – Discussion on the draft 5th round Mutual Evaluation Report on Armenia

47. The Chairman provided an overview of the main steps involved in the discussion and adoption of 5th Round Mutual Evaluation Reports (MER). He explained that the procedure included the submission of comments by delegations two weeks before the Plenary, the selection of a list of key issues by the Secretariat and the evaluation team together with the Co-Chairs of the Working Group on Evaluations (WGE) based on comments submitted by delegations in relation to the MER, the discussion of key issues in the meeting of the WGE and the revision of the key issues document by the Secretariat and the Co-Chairs of the WGE following the discussion of the WGE. The Chairman underlined the fact that the discussion during the Plenary would focus mainly on the revised key issues document. Time permitting, delegations would be given the opportunity to raise any other issues of a substantial nature. It was pointed out that the submission of comments by delegations in advance of the WGE would be crucial in shaping the discussion and adoption of the MER. Delegations were therefore strongly encouraged to submit comments. It was also pointed out that the Secretariat would draft rules of procedure for the WGE, which would be circulated to the plenary for comments in advance of the 50th Plenary meeting.
48. Turning to the discussion of the 5th Round MER of Armenia, the Chairman invited the Secretariat to introduce the evaluation team and provide an outline of the key findings and the priority actions recommended by the evaluation team to Armenia. One of the Co-Chairs of the WGE presented the decisions taken by the WGE and a discussion on each key issue ensued. The main issues and decisions taken by the plenary in relation to the key issues were the following:

Key issue 1 – Immediate Outcome 1/Recommendation 1

49. The Plenary agreed that Armenia had not failed to identify any fundamental risks but the degree to which some threats and vulnerabilities assessed had been insufficient. The conclusions on the ML threat would have been more accurate had the authorities considered other information on the criminal environment in Armenia, in addition to information on the convictions for predicate crime. The FATF clarified that it is not mandatory for a country to involve the private sector in the NRA process. However, the country should carefully consider whether, in the light of the specificities of the country, private sector involvement would enhance the final outcome of the NRA. The FATF also clarified that it is not necessary that exemptions or simplified measures permitted by a country are specifically dealt with in the country's national risk assessment (NRA), as long as they do not contradict the findings of the NRA and the country carries out some form of assessment. This assessment could even be carried out by the private sector with the endorsement of the relevant authorities. It was also agreed that a country should not automatically include within its AML/CFT law any of the lower risk examples under the interpretive note to Recommendation 10 in relation to which simplified measures may be applied, unless some form of assessment is carried out, which takes into consideration the specific context of the country. The FATF indicated that supervisory authorities should not be required to conduct a formal sectorial risk assessment, in addition to the NRA, as a basis for the application of risk-sensitive supervision. It is sufficient for supervisory authorities to determine (1) the exposure of each sector/financial institution to the risks identified in the NRA; (2) the risk posed by each financial institution as a result of its clients, products and services, etc.

Key issue 2 – Immediate Outcome 3

50. The Co-Chair of the WGE explained that the Working Group had not agreed with a proposal to lower the 'moderate' rating for Immediate Outcome 3, since Armenia had a functioning licensing and monitoring supervisory system in place for financial institutions, despite the fact that the system was not risk-based. Additionally, although the supervision of DNFBPs was found to be limited, it was accepted that the supervisory effort in this area was commensurate with the limited role and significance of the DNFBPs in the country's social and economic life. The Plenary agreed with the decision of the WGE.

Key issue 3 – Immediate Outcome 4

51. The Plenary also agreed with the decision of the WGE not to lower the rating of Immediate Outcome 4 from 'substantial' to 'moderate', which had been proposed by some delegations mainly due the ineffective application of preventive measures by the DNFBP sector. Based on supplementary information provided by the authorities, the Plenary was satisfied that the materiality of the DNFBP sector in Armenia was indeed limited and should not be given significant weight in determining the rating. Nevertheless, in light of the risk emanating from the real estate sector, where cash is substantially used to settle transactions, it was proposed to include a recommendation in the MER requiring Armenia to take specific measures aimed at restricting the use of cash in commercial transactions.

Key issue 4 – Immediate Outcome 5

52. Questions were raised as to whether banks unduly rely on beneficial ownership information maintained by the company registry in order to determine who the beneficial owner(s) of a legal person is. The evaluation team explained that in Armenia the transparency and beneficial ownership of legal persons is ensured by banks, which conduct independent checks as part of their customer due diligence procedures, in addition to obtaining information from the company registry. It was also explained that all legal persons must open at least one bank account with an Armenian bank, which further guarantees that beneficial ownership information on legal persons is available within the country. Given that the Central Bank had not identified any major shortcomings in the application of beneficial ownership requirements by banks, the evaluation team concluded that this mechanism worked effectively in practice. The Plenary was satisfied with the explanation provided by the evaluation team.

Key issue 5 – Immediate Outcome 6

53. The Co-chair outlined the discussion held during the WGE on whether financial institutions should be criticised when they rely on indicators in meeting their reporting requirement. He explained that, during the on-site visit, the evaluation team had noted that in Armenia banks unduly rely on typologies and pre-defined indicators issued by the FIU. Therefore, as stated in the report, it was concluded that certain suspicious transactions or business activities were not reported since insufficient attention was given to suspicions which were not in the list of pre-defined indicators. This, in turn, had an impact on the analysis and dissemination functions of the FIU. The Co-Chair pointed out that there had been no consensus on this matter between the members of the WGE and, therefore, the position of the evaluators prevailed. The Plenary agreed with the conclusions of the evaluation team.

Key issue 6 – Immediate Outcome 9

54. During the plenary some delegations questioned whether a 'substantial' rating for Immediate Outcome 9 was appropriate given that there were no investigations, prosecutions or convictions of FT in Armenia. The evaluation team indicated that the assessment of Immediate Outcome 9 had started from an assessment of the authorities' understanding of the FT risk. It was found that the authorities had considered FT risk from a number of angles, as set out in paragraphs 16 to 20 of the MER. This included, among others, an assessment of the risks arising both in relation to the raising and movement of funds in and through Armenia, the vulnerability of the non-profit sector to FT risk, the strength of the preventive system to withstand the FT threat and the controls at the border to ensure that cash is not transported in or out of Armenia for FT purposes. It was also explained that the authorities undertook ongoing operational intelligence work to detect any indicia of potential terrorism or FT activity. In addition, the evaluation team was assured that should any cases of terrorism be identified, the law enforcement authorities would carry out an investigation into the financial components of the case. It was pointed out that the lack of parallel financial investigations in proceeds-generating cases should not be considered as conclusive on the issue as to whether financial investigations would be conducted in terrorism cases. It was also noted that, in light of the fact that the authorities had adequately assessed the risk of FT and concluded that it was very low, the resources allocated to the investigation of FT and the degree of operational activity carried out appeared to be commensurate with the level of risk. The Plenary was satisfied with the explanation provided by the evaluation team and agreed that the

conclusions on Immediate Outcome 9 in the MER appeared reasonable.

Key issue 7 – Immediate Outcome 10

55. In relation to the non-profit organisations (NPOs), it was pointed out that the ‘substantial’ rating for Immediate Outcome 10 appeared to be contradictory to the findings of the NRA, which concluded that the regulatory framework dealing with NPOs was deficient. The evaluation team explained that the authorities’ assessment of the risk posed by NPOs and the gaps in supervision of NPOs (in the context of the NRA) was based on the requirements and interpretation of Special Recommendation VIII, which required countries to take measures in relation to all those NPOs which accounted for (i) a significant portion of the financial resources under control of the sector; and (ii) a substantial share of the sector’s international activities (whether or not these actually posed a higher risk). While these measures have been maintained under the new Recommendation 8, the revised best practices paper on NPOs (and eventually the proposed revised interpretive note to Recommendation 8) places emphasis on the fact that Recommendation 8 should not necessarily apply to NPOs which control a significant portion of the financial resources of the sector and those that have a substantial share of the sector’s international activities if these do not pose a higher risk. According to the evaluation team the deficiencies identified in the NRA were not related to NPOs which pose a higher risk of FT and therefore the ‘substantial’ rating was not contradictory to the findings of the NRA.
56. Additionally, one delegation enquired whether, in considering the rating of Immediate Outcome 10, the assessment team had given sufficient weight to the absence of a domestic review of the NPO sector by the authorities (paragraph 212 of the MER). The evaluation team confirmed that this had been carefully considered as demonstrated by the first recommended action under Immediate Outcome 10 and the deficiency reflected in the technical compliance analysis of Recommendation 8. However, during the WG discussion, it was pointed out that under Criterion 8.1(b), it is enough that countries have the capability to obtain timely information on the activities size and other relevant features in order to identify the features and types of NPOs which could be misused for FT, without having to undertake a domestic review of the NPO sector. The Plenary agreed with the position of the evaluation team as discussed during the WGE.

Key issue 8 – Immediate Outcome 11

57. The Co-Chair referred to the discussion during the WGE in relation to the ‘substantial’ rating of Immediate Outcome 11, which was not deemed to be appropriate by some delegations due to (1) the lack of a proper legal basis for proliferation-financing (PF) financial sanctions and (2) the fact that the effectiveness of the mechanism implemented by Armenia in effecting a freeze against a positive match could not be demonstrated because no assets had been frozen. During the plenary, the evaluation team expressed the view that, although the legal basis for the targeted financial sanctions in relation to PF could be open to legal challenge, it was clear that the private sector strictly observed PF-related requirements. Moreover, despite the fact that no assets had been frozen, the evaluation team derived comfort from the fact that an algorithm had been installed by the authorities within financial institutions’ electronic systems to automatically capture those persons listed in the relevant UNSCRs. The Plenary was satisfied with these explanations and the rating given by the evaluation team.

Decision taken

58. The Plenary adopted the 5th round MER and executive summary of Armenia, with the agreed amendments and subject to consequential editorial changes. According to Rule 21 and 22 of MONEYVAL’s 5th Round Rules of Procedure, Armenia was placed in regular follow-up and requested to report back to the Plenary within two years and a half of the adoption of the MER. Armenia was also requested to report back on the progress made to implement the first recommended action under Immediate Outcome 11 at MONEYVAL’s 52nd Plenary in December 2016.

Agenda item 20 – Fourth round follow up: interim follow up report by Poland

59. The Secretariat presented its analysis on Poland’s second follow-up report. With regard to the

criminalisation of ML and TF, the Secretariat stressed that, although the amendments to the Criminal Code which will come into force on 13 February 2016 address some deficiencies identified in the 4th round MER, several significant technical deficiencies remain valid. No additional steps have been reported by the authorities to address the deficiencies in relation to confiscation and terrorist-freezing regime. Although the 4th EU AMLD has meanwhile been adopted, the Secretariat stated that no measures appear to have been taken to address the deficiencies identified in the 4th round MER with regard to preventive measures and ML/FT reporting requirements.

Decision taken

60. The Plenary asked Poland to provide a further interim follow-up report at the 50th Plenary in April 2016, to satisfy itself that further progress has been achieved, especially on the deficiencies concerning preventive measures, reporting requirements and remaining deficiencies in relation to the legal aspects. On account of this information, the Plenary would then be in a position to make a decision on the further follow-up procedures to be applied.

Agenda item 21 – Fourth round follow up: interim follow up report by the Slovak Republic

61. The Slovak Republic presented to the Plenary an interim follow-up report on the steps undertaken to remedy the deficiencies identified in the 4th round MER. The Secretariat recalled that the Slovak Republic, at the 48th Plenary in September 2015, was invited to seek removal from the regular follow-up process in April 2016.

Decision taken

62. The Plenary took note of the follow-up report submitted by the Slovak Republic.

Agenda item 22 – Presentation by the FATF of the “Best Practices Paper on Combatting the Abuse of Non-Profit Organisations”

63. The Plenary took note of a presentation by the representative of the FATF, Mr Sergey Teterukov, on its best practices paper to combat the abuse of non-profit organisations. The paper has been fully revised from its original 2002 version to take into account the findings of the 2014 typologies report on the ‘Risk of Terrorist Abuse in Non-Profit Organisations’ as well as input from governments and the private sector. Its purpose is to facilitate the charitable work of non-profit organisations and to protect the integrity and reputation of the NPO sector by providing examples of ways that government and the NPO sector can work together towards protecting the global NPO sector from terrorist abuse. The paper further offers guidance on the set of measures that countries should implement under Recommendation 8, and focuses on measures to identify and mitigate risks.

Agenda item 23 – Presentation of the new “Additional Protocol to the Council of Europe Convention on the Prevention on Terrorism”

64. The Plenary heard a presentation by Mr Kristian Bartholin, Deputy Head of the Counter-Terrorism Division and Co-Secretary of CODEXTER, about the new additional Protocol to the Council of Europe Convention on the Prevention of Terrorism, which addresses the foreign terrorist fighter phenomenon. Mr Bartholin focused his presentation in particular on the financing of foreign terrorist fighters, and possible implications for MONEYVAL jurisdictions in combatting the financing of terrorism in this respect.

Agenda item 24 - Election of Chairman and Vice-Chairman

65. The Plenary elected unanimously Mr Daniel Thelesklaf (Liechtenstein) as Chair, and Ms Elzbieta Franków-Jaskiewicz (Poland) as Vice-Chair, for a term of office of two years.

Agenda item 25 - Election of the Bureau members

66. The Plenary elected Mr Nedko Krumov (Bulgaria), Mr Franck Oehlert (France) and Mr Alexey Petrenko (Russian Federation) as Bureau members, for a term of office of two years. They received each a two-third majority of votes by the Plenary. On behalf of the Plenary, the Chair warmly thanked Mr Nicola Muccioli for his successful conclusion of his term of four years as a Bureau member.

Agenda item 26 – Follow-up process and reports submitted by Cyprus

26.1 Fourth round follow up: second biennial report

67. The Rules of Procedure do not envisage an analysis by the Secretariat with respect to a biennial update. Cyprus was invited to provide a brief overview of the new measures adopted to deal with the deficiencies identified in relation to the Recommendations rated partially compliant in the 4th round MER of Cyprus. The biennial update was subject to peer review by the Plenary, assisted by the Rapporteur country (Malta), which requested a number of clarifications.

Decision taken

68. The Plenary adopted the 2nd Biennial Follow-up Report of Cyprus. As decided at the 46th Plenary meeting (Strasbourg, 8-12 December 2014), 4th round biennial follow-up procedures shall be terminated in respect of MONEYVAL States and territories one year prior to the 5th round on-site evaluation. Given that the assessment of Cyprus under the 2012 FATF Recommendations is expected to take place towards the end of 2017 or in early 2018, the Plenary decided not to request Cyprus to report back further under the 4th round biennial follow-up procedures.

26.2 Report by Cyprus on action taken in response to the MONEYVAL Special Assessment on the Effectiveness of Customer Due Diligence Measures in the Banking Sector in Cyprus and Biennial Update

69. The Secretariat and the Cypriot authorities provided an overview of the progress achieved by Cyprus since the 45th Plenary (September 2014) in relation to the Special Assessment of the Effectiveness of Customer Due Diligence Measures in the Banking Sector in Cyprus dated 24 April 2013 (the Special Assessment).

Decision taken

70. In light of the progress made by Cyprus, especially the fact that all credit institutions that had been inspected by the Special Assessment team in 2013 had been subject to an on-site inspection and were in the process of discussing any necessary corrective measures with the Central Bank of Cyprus (CBC), it was agreed that Cyprus should not be requested to provide any further progress reports in relation to the Special Assessment. However, Cyprus was requested to continue informing the Plenary, through *the tour de table* procedure, on any sanctions or other administrative actions imposed on credit institutions as a result of the on-site inspections carried out by the CBC.

Agenda item 27 – Fourth round follow up: 1st expedited follow up report of Azerbaijan

71. Following the adoption of the 4th round MER in December 2014, Azerbaijan was requested to submit an expedited follow-up report on actions taken to address certain significant shortcomings

concerning Recommendations 1, 5 and SR. III by December 2015.

72. The results of the Secretariat's analysis of the Republic of Azerbaijan expedited follow-up report have shown that clear progress appears to have been achieved by the country in addressing deficiencies in relation to R.1 and 5 as well as SR. III. Important amendments were introduced to the AML/CFT Law to strengthen and improve the legal framework for applying targeted financial sanctions under SR. III. Amendments to the Criminal Code addressing the concerns of the 4th round evaluation team in relation to the money laundering (ML) offence were adopted and came into force in April 2015. New criminal cases on self-laundering were opened and trainings for investigators, judges and prosecutors were organised to continue increasing awareness and understanding of third-party and stand-alone ML. On the preventive side, a new Regulation on simplified CDD was adopted to provide more clarity regarding the scope of application of simplified CDD measures.

Decision taken

73. Given the progress made, the Plenary agreed that Azerbaijan should not be required to submit another expedited follow-up report and should seek to exit the regular follow-up process by no later than December 2017.

Agenda item 28 – Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS No. 198)

74. The Plenary was informed of the outcomes of the 7th meeting of the Conference of the Parties to CETS No. 198, which took place in Strasbourg from 5-6 November 2015, at which the evaluation report on Bosnia and Herzegovina and the follow-up report on Poland were adopted. Mr Branislav Bohacik (Slovak Republic) was elected as Chair and Mr Jean-Sébastien Jamart (Belgium) as Vice-Chair. Mr Besnik Muci (Albania), Ms Ani Melkonyan (Armenia) and Mr Sorin Tanase (Romania) were elected as Bureau members. Ms Liljana Kaçi (Albania) was appointed as the Conference's gender equality rapporteur. The Executive Secretary warmly thanked the outgoing Chair, Mrs Eva Rossidou-Papakyriacou (Cyprus) for her longstanding involvement as Chair of the Conference of Parties. The activity report of the Committee, which has now been operating for five years, had been adopted by the Committee of Ministers on 14 October 2015 and will be published soon. The Plenary was further informed that amendments to the annex of the Convention, which lists the predicate offences to money laundering, entered into force in October 2015. Lithuania informed the Plenary that it had signed the Convention on 28 October 2015, and France informed about its ratification on 8 December 2015. The total number of ratifications of the Convention is 27, while 12 signatures have not yet been followed by ratifications.

Agenda item 29 – Future representation in FATF meetings

75. The Secretariat invited delegations to express their interest to represent MONEYVAL in the forthcoming FATF Plenary in Paris (14-18 February 2016).

Agenda item 30 – Typologies work

76. The Plenary took note of an update by Poland on the process and initial findings of the typologies project on money laundering derived from grand corruption. The Polish delegation informed the Plenary of a workshop on this matter that took place in Warsaw in November 2015, which was organised by the Polish FIU. The Plenary invited Poland to continue to make proposals for typology work in this area. It also expressed support for a proposal to initiate a typologies exercise on grand corruption, on the basis of previous preparatory work already conducted by the Secretariat.

Agenda item 31 – Designation of a Gender Equality Rapporteur in MONEYVAL

77. The Plenary heard a report by Ms Maja Cvetkovski (Slovenia) about the training for gender equality rapporteurs that she attended on behalf of MONEYVAL in November in Strasbourg. In the

field of money laundering, she identified several possible areas for gender gaps, such as prosecutions and convictions for financial crimes, financial exclusion of women through banking AML/CTF strategies, and the reliance of women in developing countries on alternative remittance systems. The Plenary subsequently appointed her as gender equality rapporteur for MONEYVAL and asked her to participate in the annual meetings of the Council of Europe gender equality rapporteurs.

Agenda item 32 – Rapporteurs for the next Plenary

78. The Secretariat informed the Plenary that Andorra had kindly volunteered to act as a rapporteur country for the follow-up report of Monaco to be discussed at the 50th Plenary in April 2016.

Agenda item 33 – Financing and staffing

79. The Executive Secretary informed the Plenary that an additional post will be created in the MONEYVAL Secretariat as of April 2016. He further elaborated on the ongoing process for replacing a former Secretariat member, and the joining of a new Secretariat member in February 2016 in the framework of a secondment. He warmly welcomed the proposals by the new Chairman to establish a fund for an additional staff member of the MONEYVAL Secretariat. Finally, he informed the Plenary that Mr John Ringguth has been appointed by the Director of Information Society and Action against Crime as scientific expert to MONEYVAL as of January 2016.

Agenda item 34 – Miscellaneous

80. MONEYVAL will hold its 50th Plenary from 12-15 April 2016.

APPENDIX I – Agenda of the meeting

Day 1: Tuesday 8 December 2015 / 1^{er} jour: mardi 8 décembre 2015

Morning 9.30 a.m. / matin 9h30

1. **Opening of the Plenary Meeting / Ouverture de session plénière**
 - 1.1 **Address by Mr Je-Yoon Shin, President of the Financial Action Task Force (FATF) / Allocution de M. Je-Yoon Shin, Président du Groupe d'action financière (GAFI)**
 - 1.2 **Address by Mr Jan Kleijssen, Director, Directorate of Information Society and Action against Crime / Allocution de M. Jan Kleijssen, Directeur de la Direction de la société de l'information et de la lutte contre la criminalité**
2. **Adoption of the 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 **Report from the official lunch by the Secretary-General with the Chairs of the Council of Europe monitoring bodies / Rapport du déjeuner officiel du Secrétaire Général avec les présidents des organes de suivi du Conseil de l'Europe**
4. **Information from the Secretariat / Informations communiquées par le Secrétariat**
 - 4.1 **Committee of Ministers: Resolution CM/Res(2015)26 on the evaluation of the British Overseas Territory of Gibraltar by MONEYVAL / Comité des Ministres : Résolution CM/Res(2015)26 sur l'évaluation du territoire britannique d'outre-mer de Gibraltar par MONEYVAL**
 - 4.2 **MONEYVAL calendar of activities 2016 / Calendrier des activités en 2016**
 - 4.3 **Report from the Secretariat on the October FATF meeting / Rapport du Secrétariat sur la réunion d'octobre du GAFI**
 - 4.4 **MONEYVAL evaluators training / Séminaire de formation des évaluateurs de MONEYVAL**
 - 4.5 **Reports on further Secretariat activities / Rapports sur autres activités du Secrétariat**
5. **Third round follow up: second progress report of the Holy See / Suivi au titre du troisième cycle : deuxième rapport de progrès du Saint-Siège**
6. **Fourth round follow up: interim follow up report by Moldova / Suivi au titre du quatrième cycle: rapport de suivi intermédiaire de la République de Moldova**
7. **Fourth round follow up: application by Malta to be removed from regular follow up / Suivi au titre du quatrième cycle : demande de Malte de sortir de la procédure de suivi régulier**
8. **Fourth round follow up: expedited follow up report of Israel / Suivi au titre du quatrième cycle : rapport de suivi accéléré d'Israël**
9. **Voluntary Tax Compliance Schemes / Systèmes de régularisation fiscale volontaire**
 - 9.1 **Israel / Israël**
 - 9.2 **Albania / Albanie**

Afternoon 2.30 p.m. / après-midi 14h30

- 10. Global data exercise to ascertain the level of preparedness of states and territories to deal with terrorist financing and terrorism / Exercice global de données sur le niveau de préparation des Etats et territoires pour gérer les questions de financement du terrorisme et de terrorisme**
- 11. Fourth round follow up: application by Georgia to be removed from regular follow up / Suivi au titre du quatrième cycle : demande de la Géorgie de sortir de la procédure de suivi régulier**
- 12. Fourth round follow up: interim follow up report by Latvia / Suivi au titre du quatrième cycle: rapport de suivi intermédiaire de la Lettonie**
- 13. Information on AML/CFT initiatives in MONEYVAL States and territories (tour de table) / Informations sur les initiatives LAB/CFT des Etats et territoires de MONEYVAL (tour de table)**
- 14. Information from the European Union / Information de l'Union européenne**
 - 14.1 European Commission / Commission européenne**
 - 14.2 Secretariat General / Secrétariat Général**
- 15. Information on AML/CFT initiatives in other fora / Informations sur les initiatives LAB/CFT d'autres institutions**
 - 15.1 Council of Europe Development Bank / Banque de Développement du Conseil de l'Europe**
 - 15.2 EBRD / BERD**
 - 15.3 Egmont Group / Groupe Egmont**
 - 15.4 Eurasian Group on Combating Money Laundering and Terrorist Financing (EAG) / Groupe Eurasie sur le blanchiment d'argent et le financement du terrorisme (EAG)**
 - 15.5 FATF / GAFI**
 - 15.6 GIFCS / GSCFI**
 - 15.7 IMF / FMI**
 - 15.8 OSCE**
 - 15.9 UNODC / ONUDC**
 - 15.10 World Bank / Banque Mondiale**

Day 2: Wednesday 9 December 2015 / 2^{ème} jour: mercredi 9 décembre 2015

Morning 9.30 a.m. / matin 9h30

- 16. Discussion on the draft 4th round Mutual Evaluation Report on UK Crown Dependency of Jersey / Discussion du projet de rapport d'évaluation mutuelle du 4^e cycle de la Dépendance de la Couronne du Royaume-Uni Jersey**

Afternoon 2.30 p.m. / après-midi 14h30

- 17. Continuation of the discussion on the draft 4th round Mutual Evaluation Report on UK Crown Dependency of Jersey / Suite de la discussion du projet de rapport d'évaluation mutuelle du 4^e cycle de la Dépendance de la Couronne du Royaume-Uni Jersey**

Day 3: Thursday 10 December 2015 / 3^{ème} jour: jeudi 10 décembre 2015

Morning 9.30 a.m. / matin 9h30

18. Discussion on the draft 5th round Mutual Evaluation Report on Armenia / Discussion du projet de rapport d'évaluation mutuelle du 5^e cycle de l'Arménie

Afternoon 2.30 p.m. / après-midi 14h30

19. Continuation of the discussion on the draft 5th round Mutual Evaluation Report on Armenia / Suite de la discussion du projet de rapport d'évaluation mutuelle du 5^e cycle de l'Arménie

20. Fourth round follow up: interim follow up report by Poland / Suivi au titre du quatrième cycle: rapport de suivi intermédiaire de la Pologne

21. Fourth round follow up: interim follow up report by the Slovak Republic / Suivi au titre du quatrième cycle: rapport de suivi intermédiaire de la République slovaque

22. Presentation by the FATF of the "Best Practices Paper on Combating the Abuse of Non-Profit Organisations" / Présentaton par le GAFI des « Meilleures pratiques pour la lutte contre l'abus d'organisations à but non lucratif »

23. Presentation of the new "Additional Protocol to the Council of Europe Convention on the Prevention of Terrorism" by Mr Kristian Bartholin, Deputy Head of Counter Terrorism Division / Présentation du nouveau "Protocol additionnel à la Convention du Conseil de l'Europe pour la prévention du terrorisme" par M. Kristian Bartholin, Chef adjoint de la Division Anti-terrorisme

Day 4: Friday 11 December 2015 / 4^{ème} jour : vendredi 11 décembre 2015

Morning 9.30 a.m. / matin 9h30

24. Election of the Chairman and Vice-Chairman / Election du Président et Vice-président

25. Election of the Bureau members / Election des membres du Bureau

26. Follow-up process and reports submitted by Cyprus / Procédure de suivi et rapports présentés par Chypre

26.1 Fourth round follow up: second biennial update / Suivi au titre du quatrième cycle : deuxième mise à jour biennale

26.2 Report by Cyprus on action taken in response to the MONEYVAL Special Assessment on the Effectiveness of Customer Due Diligence Measures in the Banking Sector in Cyprus and Biennial update / Rapport de Chypre sur les progrès réalisés vis-à-vis des recommandations formulées dans l'évaluation spéciale de MONEYVAL sur l'efficacité des mesures de vigilance à l'égard des clients dans le secteur bancaire et mise à jour biennale

Afternoon 2.30 p.m. / après-midi 14h30

27. Fourth round follow up: 1st expedited follow up report of Azerbaijan / Suivi au titre du quatrième cycle : 1er rapport de suivi accéléré de l'Azerbaïdjan

- 28. 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)**
- 28.1 Action by Member States towards ratification / Action des Etats Membres en matière de ratification**
- 28.2 Current state of signatures and ratifications / Etat actuel des signatures et ratifications**
- 29. Future representation in FATF meetings / Représentations futures dans les réunions du GAFI**
- 30. Typologies work / Travaux sur les typologies**
- 31. Designation of a Gender Equality Rapporteur in MONEYVAL / Désignation d'un Rapporteur sur l'Egalité des Genres**
- 32. Rapporteurs for next plenary / Rapporteurs pour la prochaine réunion plénière**
- 33. Financing and staffing / Financement et questions de personnel**
- 34. Miscellaneous / Divers**

APPENDIX II – List of participants

Strasbourg, 08/12/2015

MONEYVAL49(2015)LIST1
Restricted / *Restreint*

**COMMITTEE OF EXPERTS ON THE EVALUATION
OF ANTI-MONEY LAUNDERING MEASURES
AND THE FINANCING OF TERRORISM /**

*COMITÉ D'EXPERTS SUR L'ÉVALUATION
DES MESURES DE LUTTE CONTRE LE BLANCHIMENT DES
CAPITAUX ET LE FINANCEMENT DU TERRORISME*

MONEYVAL

49th PLENARY MEETING / 49^e RÉUNION PLÉNIÈRE

7 – 11 December / 7 – 11 décembre 2015

PALAIS DE L'EUROPE
ROOM 1 / *SALLE 1*

**LIST OF PARTICIPANTS /
*LISTE DES PARTICIPANTS***

Evaluated States and Jurisdictions / Etats et juridictions évalués

ALBANIA / ALBANIE

Mr Genti GAZHELI *law enforcement*
HEAD OF DELEGATION
Director, General Directorate for the Prevention of Money Laundering
ggazheli@fint.gov.al

Mr Agim MUSLIA *law enforcement*
Working Group on Evaluations
Director of Compliance and IT Department
General Directorate for the Prevention of Money Laundering
amuslia@fint.gov.al

Ms Adela ZEZA *legal*
Director of Legal and International Relations Department
General Directorate for the Prevention of Money Laundering

Mrs Liljana KAÇI *legal*
Specialist, General Directorate of Codification, Ministry of Justice
liljana.kaci@drejtesia.gov.al

Ms.Mirjana GOXHARAJ *financial*
Head of Compliance Office, Bank of Albania
mgoxharaj@bankofalbania.org

Mr Madrid KULLOLLI *law enforcement*
Prosecutor, General Prosecutor's Office
madrid.kullolli@pp.gov.al

ANDORRA / ANDORRE

Mr Borja AGUADO DELGADO *legal*
Working Group on Evaluations
Expert juridique
Financial Intelligence Unit Principality of Andorra - UFIAND
upb@andorra.ad

Ms Tanjit SANDHU KAUR *legal/financial*
FINANCIAL EVALUATOR FOR JERSEY
Responsible of the Supervision Division
Financial Intelligence Unit Principality of Andorra - UFIAND
upb@andorra.ad

Ms Loredana JORDANA
Operational Division, Financial Intelligence Unit Principality of Andorra – UFIAND

ARMENIA / ARMENIE

Mr Daniel AZATYAN *financial*
HEAD OF DELEGATION
Working Group on Evaluations
Head, Financial Monitoring Center, Central Bank of Armenia
daniel.azatyan@fmc.am; info@fmc.am

Mr Arakel MELIKSETYAN

Working Group on Evaluations

Deputy Head, Financial Monitoring Center, Central Bank of Armenia
arakel.meliksetyan@fmc.am

Ms Ani MELKONYAN

law enforcement

Working Group on Evaluations

Expert, International Relations Department, Financial Monitoring Center, Central Bank of Armenia
ani.melkonyan@fmc.am

Ms Asya KHOJOYAN

legal

Working Group on Evaluations

Methodologist, Legal Advisor, Legal Compliance Division
Financial Monitoring Center, Central Bank of Armenia
asya.khojoyan@fmc.am

Mr Artavazd SARGSYAN

Working Group on Evaluations

Deputy Head, Financial Supervision Department, Central Bank of Armenia

Ms Arpi HARUTYUNYAN

legal

Working Group on Evaluations

Leading specialist, Judicial Commissions Division, International Legal Department
Ministry of Justice, Armenia
arpi.harutyunyan@gmail.com

Mr Armen PANOSYAN

Working Group on Evaluations

Prosecutor, Deputy Head, Department for Cases Investigated by National Bodies
Cybercrime and Illicit Drug Trafficking, Office of the Prosecutor General

Mr Ara MKRTCHIAN

Working Group on Evaluations

Head of Global Security and Non-conventional issues Division
Department of Arms Control and International Security
Ministry of Foreign Affairs
ara.mkrtchian@mfa.am

AZERBAIJAN / AZERBAÏDJAN

Mr Rufat ASLANLI

HEAD OF DELEGATION

Chairman of the State Committee for Securities
rufat.aslanly@scs.gov.az

Mr Javid NAZAROV

Head of Department, State Committee for Securities

Mr Adishirin GASIMOV

Director of the Financial Monitoring Service under Central Bank
adishirin.gasimov@fiu.az

Mr Nurlan BABAYEV

Working Group on Evaluations

Head of Legal and Methodological Department,
Financial Monitoring Service under the Central Bank of Azerbaijan
nurlan.babayev@fiu.az

Mr Azar ABBASOV

Working Group on Evaluations (observer)

Senior Legal Advisor of the Legal and Methodological Department,
Financial Monitoring Service under the Central Bank

azar.abbasov@fiu.az

Mr Mehti MEHTIYEV
Ministry of National Security

BOSNIA AND HERZEGOVINA / BOSNIE-HERZÉGOVINE

Ms Damirka MIOČ
HEAD OF DELEGATION
Chief of the Analytical Section, Financial Intelligence Department
State Investigation and Protection Agency (FID/SIPA)
dmioc@sipa.gov.ba

Mr Edin JAHIĆ
Working Group on Evaluations
Chief of the Section for Combating Organized Crime and Corruption
Ministry of Security of Bosnia and Herzegovina
edin.jahic@msb.gov.ba

Mr Grenko ARAPOVIĆ
Chief of the Unit for education in criminal matters
In front of the Court of Bosnia and Herzegovina
Ministry of Justice of Bosnia and Herzegovina
grenko.arapovic@mpr.gov.ba

BULGARIA / BULGARIE

Mr Evgeni EVGENIEV *financial*
HEAD OF DELEGATION
Working Group on Evaluations
Head of International Information Exchange Sector, Financial Intelligence Unit,
State Agency for National Security (FID-SANS),
fid@dans.bg

Mr Nedko KRUMOV
FINANCIAL EVALUATOR FOR BOSNIA AND HERZEGOVINA
FID-SANS
fid@dans.bg

CROATIA / CROATIE

Mr Tomislav SERTIĆ
ACTING HEAD OF DELEGATION
Working Group on Evaluations
Head of Department for Inter-institutional and International Cooperation
Anti-Money Laundering Office, Ministry of Finance
tomislav.sertic@mfin.hr

Mr Dinko KOVAČEVIĆ
Head of Service for Criminal Law Legislation, Directorate for Criminal Law and Probation,
Ministry of Justice
dinko.kovacevic@pravosudje.hr

Mrs Željka KLJAKOVIĆ-GAŠPIĆ
Service for Economic Crime and Corruption, Police National Office for Suppression of Corruption and
Organised Crime, Ministry of the Interior
zkljakovic@mpu.hr

Ms Marcela KIR *financial*

Chief Advisor, Payment Operations Area, Croatian National Bank
marcela.kir@hnb.hr

CYPRUS / CHYPRE

Mrs Eva ROSSIDOU-PAPAKYRIACOU *legal*
HEAD OF DELEGATION

Attorney, Senior Counsel of the Republic, Law Office of the Republic
Member of the Unit Combating Money Laundering (MOKAS – FIU)
att.gen@law.gov.cy ; mokas@mokas.law.gov.cy

Mrs Elena PANAYIOTOU *law enforcement*
Working Group on Evaluations

Member of the Unit for Combating Money Laundering (MOKAS – FIU)
mokas@mokas.law.gov.cy

Mr Theodoros STAVROU *law enforcement*
Police Investigator, Unit for Combating Money Laundering (MOKAS –FIU)

Mr Marios NEOPTOLEMOU *financial*
Senior Officer, Central Bank of Cyprus

Mr Stelios GEORGAKIS *financial*
Assistant Director, Supervision Department of the Central Bank of Cyprus

Mrs Maria THEMISTOCLEOUS *financial*
Officer III, Central Bank of Cyprus

CZECH REPUBLIC / RÉPUBLIQUE TCHÈQUE

Mr Jaroslav VANEK *law enforcement*
HEAD OF DELEGATION
Division of the Financial Analytical Unit of the Ministry of Finance
jaroslav.vanek@mfcz.cz

Mr Rene KURKA *financial*
International Division, Czech National Bank
rene.kurka@cnb.cz

Mr Stanislav POTOCZEK *legal*
Working Group on Evaluations
International Division, Supreme Prosecutors' Office
potoczek@nsz.bm.justice.cz

ESTONIA / ESTONIE

Ms Ülle EELMAA *financial*
HEAD OF DELEGATION
Working Group on Evaluations
Lawyer, Entrepreneurship and Accounting Policy Department
Ministry of Finance
Ylle.eelmaa@fin.ee

Mr Aivar PAUL *legal*
LAW ENFORCEMENT EVALUATOR FOR JERSEY
Police Major, Head of Financial Intelligence Unit
Central Criminal Police, Estonian Police and Border Guard Board
aivart.paul@potitse.ee

Ms Tuuli PLOOM *law enforcement*

Advisor, Penal Law and Procedure Division, Criminal Policy Department
Ministry of Justice of the Republic of Estonia
tuuli.ploom@just.ee

FRANCE

M. Jérémy GIGLIONE

Working Group on Evaluations

Adjoint au Chef du bureau investissement, criminalité financière et sanctions
Direction Générale du Trésor, Ministère des Finances et des comptes publics
jeremy.giglione@dgtresor.gouv.fr

Mr Franck OEHLERT

legal

Legal expert, AML CFT and Internal control Law Division, Prudential Supervisory Authority
franck.oehlert@acp-banque-france.fr

Mme Solène ROCHEFORT

Chargée de mission, TRACFIN

solene.rochefort@finances.gouv.fr

GEORGIA / GEORGIE

Mr Mikheil ROINISHVILI

financial

ACTING HEAD OF DELEGATION

Head of Financial Monitoring Service of Georgia
gtevdirasgvili@fms.gov.ge

Mr Malkhaz NARINDOSHVILI

financial

Working Group on Evaluations

Head of Division of Methodology, International Relations and Legal Affairs
Financial Monitoring Service of Georgia
mnarindoshvili@fms.gov.ge

Mr Giorgi DZIGUASHVILI

legal

Senior Specialist, Legal Department, Financial Monitoring Service of Georgia

Mr Nikoloz CHINKORASHVILI

law enforcement

Head of the AML Unit, Office of the Prosecutor General of Georgia

Mr Aleksandre MUKASASHVILI

Head of the Unit for Prosecution of Illicit Income Legalisation
Office of the Chief Prosecutor of Georgia

HOLY SEE / SAINT SIEGE

Mgr Antoine CAMILLERI

HEAD OF DELEGATION

Under-Secretary for Relations with States

Mgr Paolo RUDELLI

Permanent Observer of the Holy See to the Council of Europe

Rev. John Baptist ITARUMA

Secretary of the Permanent Observer Mission to the Council of Europe

Mr René BRÜLHART

President, Financial Intelligence Authority

Mr Tommaso DI RUZZA

Director, Financial Intelligence Authority

Pr Roberto ZANNOTTI
Assistant Promoter of Justice of the Tribunal of the Vatican City State

Rev. Carlos Fernando DIAZ PANIAGUA
Officer, Secretariat of State
Section for Holy See's Relations with States

HUNGARY / HONGRIE

Ms Renáta FEJES UJVÁRINÉ *financial*
HEAD OF DELEGATION
Working Group on Evaluations
Senior Expert, Department for International Finance, Ministry for National Economy
renata.fejes@ngm.gov.hu

Mr Péter TÁRNOKI-ZÁCH
Head of Department, Department for International Finance, Ministry for National Economy
Peter.tarnoski-zach@ngm.gov.hu

Mr Balázs GARAMVÖLGYI
Public Prosecutor, Department for International and European Affairs
Office of the Prosecutor General of Hungary
garamvolgyi.balazs@mku.hu

Mr Gábor SIMONKA *law enforcement*
Head of the Hungarian Financial Intelligence Unit, Central Office
National Tax and Customs Administration
simonka.gabor@nav.gov.hu

Mr Peter STEINER *financial*
Senior Integrity Expert, AML Unit, Special Competences Directorate
The Central Bank of Hungary
steinerp@mn.gov.hu

ISRAEL / ISRAËL

Dr Shlomit WAGMAN *legal*
HEAD OF DELEGATION
FINANCIAL EVALUATOR FOR ARMENIA
Acting Head, Israel Money Laundering and Terror Financing Prohibition Authority (IMPA),
shlomitw@impa.justice.gov.il

Ms Maya LEDERMAN
Working Group on Evaluations
Acting General Counsel, Israel Money Laundering and Terror Financing Prohibition Authority
maya@justice.gov.il

Mr Yehuda SHAFFER *financial/law enforcement*
LEGAL EVALUATOR FOR JERSEY
The Deputy State Attorney
Ministry of Justice
yehudaS@justice.gov.il

Mr Shimon BEN-SHUSHAN
Head of Financial Enforcement Department, Israeli Police

Ms Yasmin FRANKEL
Legal Assistant, Investment Department, Securities Authority

Mr Guy DVIR
Legal counsel, Stock Exchange and Trading Platforms Supervision Department
Securities Authority

Ms Sima SPITZER
Head of the Supervision and Risk Compliance Department, Bank of Israel

Mr Dror GOLDSTEIN
Supervision Department, Bank of Israel

Ms Lilach WAGNER
Attorney, Legislation Department (Criminal), Ministry of Justice

ITALY / ITALIE

Ms Maria Rosaria PETTINARI
Working Group on Evaluations
Senior Officer of the Prevention of Financial Crimes DG
Department of the Treasury, Ministry of the Economy and Finance
Mariarosaria.pettinari@tesoro.it

Mr Giuseppe LOMBARDO
Reviewer, Ad-hoc group of experts
Working Group on Evaluations
giuseppe.lombardo70@gmail.com

Mr Italo BORELLO
Italy FIU

Mr Michele CAROFIGLIO
Bank of Italy

LATVIA / LETTONIE

Mr Viesturs BURKĀNS *law enforcement*
HEAD OF DELEGATION
Working Group on Evaluations
Head of the Office for Prevention of Laundering of Proceeds Derived from Criminal Activity
Prosecutor's Office of Latvia Republic
viesturs.burkans@kd.gov.lv

Ms Indra GRATKOVSKA
Head of the Criminal Justice Department under the Ministry of Justice
Indra.gratkovska@TM.GOV.LV

Mr Kristaps MARKOVSKIS *legal*
Senior legal consultant, Financial and Capital Market Commission

LIECHTENSTEIN

Mr Daniel THELESKLAF
HEAD OF DELEGATION
Working Group on Evaluations
Director, Financial Intelligence Unit
Daniel.thelesklaf@llv.li

Mr Amar SALIHODZIC
Working Group on Evaluations (observer)
International Affairs, Financial Intelligence Unit

amar.salihodzic@lv.li

Mr Frank HAUN
Prosecutor, Public Prosecutor's Office

Ms Bianca HENNIG *financial*
FINANCIAL EVALUATOR FOR ARMENIA
Executive Office, Legal and International Affairs
FMA Financial Market Authority Liechtenstein
Bianca.Hennig@fma-li.li

Mr Marc SCHRÖDER *legal*
Legal Advisor, FMA Financial Market Authority
Marc.Schroeder@fma-li.li

LITHUANIA / LITUANIE

Mr Vilius PECKAITIS *law enforcement*
HEAD OF DELEGATION
Working Group on Evaluations
Head of Compliance Unit, Money Laundering Prevention Board
Financial Crime Investigation Service under the Ministry of Interior (Lithuania FIU)
vilius.peckaitus@fntt.lt

Ms Toma MILIEŠKAITĖ *legal*
Chief Specialist, International Law Department, Legal Cooperation Division
Ministry of Justice of the Republic of Lithuania
t.milieskaite@tm.lt

Ms Kotryna FILIPAVIČIŪTĖ *financial*
Chief Specialist, Prudential Supervision Department, Supervision Service
Bank of Lithuania
kfilipaviciute@lb.lt

MALTA / MALTE

Dr Anton BARTOLO *legal and financial*
CHAIRMAN OF MONEYVAL / PRESIDENT DE MONEYVAL
HEAD OF DELEGATION
Co-Chair of the Working Group on Evaluations
Director Enforcement Unit, Malta Financial Services Authority (MFSA)
abartolo@mfsa.com.mt

Dr Manfred GALDES
Working Group on Evaluations
Director, Financial Intelligence Analysis Unit
manfred.galdes@fiumalta.org

Mr Raymond AQUILINA *law enforcement*
Police Inspector, Malta Police Force
Anti-Money Laundering Unit, Malta Police General Headquarters
raymond.a.aquilina@gov.mt

Dr Victoria BUTTIGIEG
Attorney General's Office

MONACO

Mlle Jennifer PALPACUER *legal*

Working Group on Evaluations

Chef de Section, Service d'Information et de Contrôle sur les Circuits Financiers (SICCFIN)
Ministère d'Etat
cfezia@gouv.mc

M. Romain BUGNICOURT
Chef de Section, SICCFIN
cfezia@gouv.mc

MONTENEGRO

Mr Vesko LEKIĆ *financial*
HEAD OF DELEGATION
Director, Administration for the Prevention of Money Laundering and Terrorist Financing
vlekic@uspnc.me

Mr Drazen BURIC *law enforcement*
State Prosecutor, Supreme State Prosecutor's Office
drazen.buric@tuzilastvo.me

Ms Merima BAKOVIC *legal*
Head of the Directorate for Criminal Legislation, Ministry of Justice
merima.bakovic@mpa.gov.me

Ms Kristina BACOVIC
Deputy Director, Administration for the Prevention of Money Laundering and Terrorist Financing
kristina.bacovic@uspncft.gov.me

Ms Ana BOSKOVIC
Working Group on Evaluations
Basic State Prosecutor's Office, Deputy Basic State Prosecutor
anaboskovic@ymail.com

Mrs Hedija REDZEPAGIC
Head of Compliance Department, Central Bank of Montenegro
hedija.redzepagic@cb-cg.org

POLAND / POLOGNE

Mrs Elzbieta FRANKOW-JASKIEWICZ *law enforcement*
HEAD OF DELEGATION
Working Group on Evaluations
Department of Financial Information, Ministry of Finance
elzbieta.frankow-jaskiewicz@mofnet.gov.pl

Mr Jacek LAZAROWICZ *legal*
General Prosecutor's Office
jacek.lazarowicz@pg.gov.pl

Mr Radosław OBCZYŃSKI *financial*
Reviewer, Ad-hoc group of experts
Working Group on Evaluations
Financial Supervision Authority
radoslaw.obczynski@knf.gov.pl

Mr Michal HARA
Polish Ministry of Justice

REPUBLIC OF MOLDOVA / REPUBLIQUE DE MOLDOVA

Mr Vasile SARCO *apologised*
HEAD OF DELEGATION
Head of the Office for Prevention and Fight against money laundering

Mr Viorel CHETRARU *apologised*
Director of National Anticorruption Center
CHISINAU, Moldova

Mr Adrian CORCIMARI
Working Group on Evaluations
Deputy Director, Division on preventing and combating money laundering,
National Anticorruption Center
adrian.corcimari@spsb.cna.md

Mr Andrei BURCIU *financial*
Head of Unit, Department of banking regulation and supervision,
National Bank of Moldova
andrei.burciu@bmn.md

Mrs Stela BUIUC *legal*
Deputy Director to the National Center of Legislation harmonization, Ministry of Justice
buiuc@justice.gov.md

Mr Eduard VARZAR *legal*
Prosecutor of Anticorruption, General Prosecutor Office
eduardvarzari@yahoo.com

ROMANIA / ROUMANIE

Mr Neculae PLĂIAȘU *law enforcement*
HEAD OF DELEGATION
President of the National Office for Prevention and Control of Money Laundering
NOPCML – FIU Romania
neculae.plaiasu@onpcsb.ro

Mr Sorinel GABOR-JITARIU *law enforcement*
LAW ENFORCEMENT EVALUATOR FOR ARMENIA
Working Group on Evaluations
Head of Department, National Office for Prevention and Control of Money Laundering
gabor.sorin@onpcsb.ro

Mr Florin ION
Counselor of the President, National Office for Prevention and Control of Money Laundering
florinunoflor@onpcsb.ro

Mrs Daciana DUMITRU
Director of the Analyses and Processing Information Directorate,
National Office for Prevention and Control of Money Laundering
dacianad@onpcsb.ro

Mrs Steluta Claudia ONCICĂ
Director of the Inter-Institutional Cooperation and International Relations Directorate
National Office for Prevention and Control of Money Laundering
soncica@onpcsb.ro

Mrs Emilia DIMACHE *legal*
Head of Legal Department, National Office for Prevention and Control of Money Laundering
juridic@onpcsb.ro

Mrs Dorina RADU *financial*

Principal Inspector, National Agency for Fiscal Administration
dorinaradu@mfinante.ro

Mrs Dana Cristina BURDUJA
Prosecutor, Directorate for Investigating Organized Crime and Terrorism
General Prosecutor's Office, High Court of Cassation and Justice
burduja_dana@mpublic.ro

Mr Aurelian-Constantin MIHĂILĂ
Prosecutor, General Prosecutor's Office, High Court of Cassation and Justice
mihaila_aurelian_constantin@mpublic.ro

Mrs Anamaria VOICILA *financial*
General Inspector, Supervisory Directorate, National Bank
anamaria.voicila@bnro.ro

RUSSIAN FEDERATION / FÉDÉRATION DE RUSSIE

Mr Vladimir GLOTOV
HEAD OF DELEGATION
Deputy Director, Rosfinmonitoring
ums313@yandex.ru

Mr Alexey PETRENKO
Head of Department, Rosfinmonitoring

Mr Anatoly PRIVALOV
Rosfinmonitoring

Mr Gennady SHUMAEV
Rosfinmonitoring

Mr Dmitry KOSTIN
Working Group on Evaluations
Expert, Rosfinmonitoring

Mrs Natalia LOUKYANOVA
Expert, Rosfinmonitoring
Mr. Kirill KORELIN
Rosfinmonitoring

Ms Ekaterina SILINA
Working Group on Evaluations (observer)
Rosfinmonitoring

Mr Sergey BARINOV
Rosfinmonitoring

Mr Vitaly ANDREEV
Rosfinmonitoring

Ms Svetlana BOGDANOVA
Bank of Russia

Mr Ivan MEDVEDEV
Ministry of Foreign Affairs of Russia

Mr Kirill CHERKALIN
Federal Security Service of Russia

Mr Kirill ELTSOV (interpreter)

SAN MARINO / SAINT-MARIN

Mr Nicola MUCCIOLI

financial

HEAD OF DELEGATION

Co-Chair of the Working Group on Evaluations

Vice – Director of the Financial Intelligence Agency, (Sector: Financial Intelligence Unit)

nmuccioli@aif.sm ; fiu.sanmarino@aif.sm

SERBIA / SERBIE

Mr Milovan MILOVANOVIĆ

law enforcement

HEAD OF DELEGATION

Working Group on Evaluations

Director, Administration for Prevention of Money Laundering (APML)

Ministry of Finance

milovanovicm@apml.org.rs

Ms Silivija DUVANČIĆ-GUJANIČIĆ

financial

Head of Division for Special Supervision, National Bank of Serbia

silvija.duvancic-gujanicic@nbs.rs

Mr Dušan ALEKSIĆ

financial

Senior Supervisor, Division for Special Supervision, National Bank of Serbia

dusan.aleksic@nbs.rs

Mr Vladimir ČEKLIĆ

legal

Deputy Director, Directorate for the Administration of Seized/Confiscated Assets

Ministry of Justice

v.ceklic@mpravde.gov.rs

Mr Mladen SPASIĆ

Advisor to the Minister of Interior

Kabinet Ministra, Ministry of the Interior

mladen.spasic@mup.gov.rs

SLOVAKIA / SLOVAQUIE

Mr Ivo HRÁDEK

law enforcement

HEAD OF DELEGATION

Working Group on Evaluations

Senior police officer of International Cooperation Department, Financial Intelligence Unit of the Slovak Republic, National Criminal Agency

Ivo.hradek@minv.sk

Mr Ladislav MAJERNÍK

legal

LEGAL EVALUATOR FOR ARMENIA

General Prosecution of the Slovak Republic

ladislav.majernik@genpro.gov.sk

SLOVENIA / SLOVÉNIÉ

Ms Maja CVETKOVSKI

law enforcement

HEAD OF DELEGATION

Working Group on Evaluations

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

maja.cvetkovski@mf-rs.si

Ms Barbara TIČ *legal*
Undersecretary, Department for Prevention and Supervision,
Office for Money Laundering Prevention
barbara.tic@mf-rs.si

Mr Boštjan ŠKRLEC *legal*
State Prosecutor, Office of the State Prosecutor General
bostjan.skrlec@dt-rs.si

**“THE FORMER YUGOSLAV REPUBLIC OF MACEDONIA” /
“L’EX-RÉPUBLIQUE YOUGOSLAVE DE MACÉDOINE”**

Mr Vladimir ATANASOVSKI
HEAD OF DELEGATION
Working Group on Evaluations
Director, Financial Intelligence Office
vladimir.atanasovski@ufr.gov.mk

Mr Toni JANKOSKI
Advisor to the Director, Bureau for Public Security, Ministry of the Interior
Toni_Jankoski@moi.gov.mk

Dr Jovan ILIEVSKI
Public Prosecutor, Public Prosecution for combating organized crime and corruption
jilievski@zjorm.org.mk

UKRAINE

Mr Igor GAIEVSKYI *legal*
HEAD OF DELEGATION
Head of Department, Coordination of Financial Monitoring Legal Department,
the State Financial Monitoring Service of Ukraine
gaevskiy@sdfm.gov.ua; sdfm@sdfm@gov.ua

Mrs Victoria KONONENKO
Working Group on Evaluations
Head of Unit, Support National risks assessment and generalization
of administrative Rules, Department of Coordination of Financial Monitoring,
State Financial Monitoring Service of Ukraine
sdfm@sdfm@gov.ua

Mr Ihor BEREZA
Head of Financial Monitoring Department, National Bank of Ukraine
sdfm@sdfm@gov.ua

UNITED KINGDOM CROWN DEPENDENCIES

GUERNSEY CROWN DEPENDENCY OF THE UNITED KINGDOM

Mrs Catherine SWAN *legal*
HEAD OF DELEGATION
Working Group on Evaluations
Crown Advocate, Legislative Counsel, Law Officers of the Crown
kate.rabey@gov.gg

Mr Richard WALKER *financial*
FINANCIAL EVALUATOR FOR ARMENIA
Director of Financial Crime Policy and International Regulatory Advisor
States of Guernsey Policy Council
Richard.walker@gov.gg

Mr Philip HUNKIN *law enforcement*
Head of the Financial Investigation Unit, Guernsey Border Agency
Phil.hunkin@gba.gov.gg

JERSEY CROWN DEPENDENCY OF THE UNITED KINGDOM

Mr Andrew LE BRUN *financial*
HEAD OF DELEGATION
Working Group on Evaluations
Director of Financial Crime Policy, Jersey Financial Services Commission
A.LeBrun@jerseyfsc.org

Mr Hamish ARMSTRONG *financial*
Senior Manager, Financial Crime Policy, Jersey Financial Services Commission
h.armstrong@jerseyfsc.org

Mr Darren BOSCHAT *financial*
Deputy Director, Banking, Jersey Financial Services Commission
d.boschat@jerseyfsc.org

Mr John HARRIS *financial*
Director General, Jersey Financial Services Commission
j.harris@jerseyfsc.org

Mr Julian LAMB *financial*
Director, Registry, Jersey Financial Services Commission
j.lamb@jerseyfsc.org

Mr Dave BURMINGHAM *law enforcement*
Head of FIU
D.Burmingham@jersey.pnn.police.uk

Mr George PEARMAIN
Advocate, Lead Policy Adviser, Private Wealth and Financial Crime
Chief Minister's Department, Government of Jersey
G.Pearmain@gov.je

Mr Robert MACRAE *legal*
Attorney General, Law Officers' Department
r.macrae@gov.je

Mr Steve MEIKLEJOHN *legal*
Advocate, Legal Adviser, Law Officers' Department
s.meiklejohn@gov.je

Mr Colin POWELL
Adviser on International Affairs, Chief Minister's Department
c.powell@gov.je

Mr Jeremy PHILLIPS *Law Enforcement*
Detective Sergeant, FIU
j.phillips@jersey.pnn.police.uk

Mr Mike ENTWISTLE
Deputy Director, External Relations, Chief Minister's Department
m.entwistle@gov.je

ISLE OF MAN CROWN DEPENDENCY OF THE UNITED KINGDOM

Ms Karen RAMSAY
NRA Project Manager, Cabinet Office, Government Office
karen.ramsay@gov.im

Ms Ashley WHYTE *law enforcement*
Working Group on Evaluations
Manager, Anti-Money Laundering, Isle of Man Financial Services Authority
ashley.whyte@fsc.gov.im

Mr Mark BENSON
Acting Director of Prosecutions Attorney General's Chambers

Mr Iain MACMILLAN
Financial Intelligence Unit

UNITED KINGDOM OVERSEAS TERRITORY OF GIBRALTAR

Mr David PARODY
Working Group on Evaluations
Finance Centre Director, Gibraltar Finance, HM Government of Gibraltar
James.tipping@financecentre.gov.gi; david.parody@gmail.com

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

MEXICO

Mr Santiago OÑATE LABORDE
Permanent Observer, Permanent Mission of Mexico to the Council of Europe

Mr Alejandro MARTINEZ PERALTA
Deputy Permanent Observer, Permanent Mission of Mexico to the Council of Europe

Mr José Humberto LÓPEZ PORTILLO
Deputy Attaché for Legal Affairs
Legal Office of the Attorney General of Mexico (PGR) in Europe

UNITED STATES OF AMERICA / *ETATS-UNIS D'AMERIQUE*

Mrs Julia FRIEDLANDER
Working Group on Evaluations
Senior Policy Advisor for Europe, Terrorist Financing and Financial Crimes
US Department of the Treasury
1500 Pennsylvania Avenue, Washington DC 20220
Tel: +202.622.4874 Blackberry: +202.297.1848
Julia.friedlander@treasury.gov

Other members of the FATF / *Autres membres du GAFI*

GERMANY / ALLEMAGNE

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

Mrs Tatjana LEONHARDT
Anti-Money Laundering Department, GW 1 International, legal and policy issues,
Federal Financial Supervisory Authority
Tatjana.leonhardt@bafin.de

REPUBLIC OF KOREA

Mr Jin-Soo LEE
Director of Korea FIU, Korea Financial Services Commission

Ms Minji KANG
International Relations Manager, Korea Financial Services Commission
mjk1224@korea.kr

Ms Jongrhim YI
Deputy Director, Korea Financial Services Commission

Mr Jong Hyeon SEONG
Assistant Director, Korea Financial Services Commission

TURKEY

Mr Alper ERTÜRK
Working Group on Evaluations
Chief of Police, Turkish National Police
alper.erturk@egm.gov.tr

UNITED KINGDOM

Mrs Liam MULROY
Working Group on Evaluations
Policy Advisor, FATF and International Branch, Sanctions and Illicit Finance
HM Treasury
liam.mulroy@hmtreasury.gsi.gov.uk

Council of Europe bodies and mechanisms /

Organes et mécanismes suivants du Conseil de l'Europe

COUNCIL OF EUROPE DEVELOPMENT BANK / BANQUE DE DEVELOPPEMENT DU CONSEIL DE L'EUROPE

Mrs Katherine DELIKOURA Apologized
Chief Compliance Officer of the Council of Europe Development Bank
Office of the Chief Compliance Officer, Council of Europe Development Bank
agnes.cardon@coebank.org

PARLIAMENTARY ASSEMBLY OF THE COUNCIL OF EUROPE (PACE) / ASSEMBLEE PARLEMENTAIRE DU CONSEIL DE L'EUROPE (APCE)

International organisations and bodies /

Organisations et organismes internationaux

EUROPEAN COMMISSION / COMMISSION EUROPÉENNE

Mr David SCHWANDER

Working Group on Evaluations

Policy officer, Anti-Money Laundering, European Commission, Directorate-General for Justice and Consumers, Company Law Unit

david.schwander@ec.europa.eu

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

Mr Je-Yoon SHIN

FATF President

mjk1224@korea.kr

Mr Sergey TETERUKOV

Working Group on Evaluations

Policy Analyst, FATF Secretariat

Sergey.teterukov@fatf-gafi.org

Ms Shana KRISHNAN

Working Group on Evaluations

Administrator, FATF Secretariat

shana.krishnan@fatf-gafi.org

INTERNATIONAL MONETARY FUND (IMF)

UNITED NATIONS / NATIONS UNIES

UNODC

Mr Yevheniy UMANETS

Working Group on Evaluations

UNODC GPML Programme Officer, Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism (GPML)

United Nations Office on Drugs and Crime (UNODC)

yevheniy.umanets@unodc.org

Mr Michael FOWLER

Anti-Money Laundering Advisor for South East Europe

tfsmu@hotmail.com

Mr Igoris KRZECKOVSKIS

GPML Intelligence and Law Enforcement Systems Expert

WORLD BANK / BANQUE MONDIALE

Mr Klaudio STROLIGO

Working Group on Evaluations

Senior Financial Sector Specialist and World Bank / UNODC AML/CFT Mentor for Central Asia, Finance & Markets, WORLD BANK GROUP

kstroligo@worldbank.org

EUROPEAN BANK FOR RECONSTRUCTION AND DEVELOPMENT (EBRD)

Ms Allison SMITH

Working Group on Evaluations

Transaction Advice Manager, Office of the Chief Compliance Officer
European Bank for Reconstruction and Development

smithal@ebrd.com

GIFCS – GROUP OF INTERNATIONAL FINANCE CENTRE SUPERVISORS

Mrs Fiona CROCKER
Working Group on Evaluations
Guernsey Financial Services Commission
john.aspden@gifcs.org

**ORGANISATION FOR SECURITY AND CO-OPERATION IN EUROPE (OSCE) /
ORGANISATION POUR LA SECURITE ET LA COOPERATION EN EUROPE (OSCE)**

**EGMONT GROUP of FINANCIAL INTELLIGENCE UNITS /
GROUPE EGMONT**

**EURASIAN GROUP ON COMBATING MONEY LAUNDERING
AND FINANCING OF TERRORISM (EAG) / GROUPE EURASIEN SUR LA LUTTE CONTRE LE
BLANCHIMENT ET LE FINANCEMENT DU TERRORISME (EAG)**

Mr Vladimir NECHAEV
Working Group on Evaluations
EAG Executive Secretary
info@eurasiangroup.org; vnechaev@inbox.ru

Ms Kuralay IGEMBAYEVA
Working Group on Evaluations
Administrator of the EAG Secretariat
info@eurasiangroup.org ; Igembayeva@eurasiangroup.org

Scientific Experts / Experts Scientifiques

Professor William C. GILMORE
Working Group on Evaluations
Professor of International Criminal Law, Faculty of Law,
bill.gilmore@ed.ac.uk

Mr Giovanni ILACQUA
Director, Bank of Italy, Head of International Co-operation Division
giovanni.ilacqua@bancaditalia.it

apologized

Mr Philipp RÖSER
Working Group on Evaluations
Executive Office, Legal/International Affairs
Financial Market Authority
philipp.roeser@fma-li.li

Mr Andrew STRIJKER
FINANCIAL EVALUATOR FOR JERSEY
Working Group on Evaluations
European Commission, Task Force for Greece
Cluster Coordinator Anti Money Laundering and Anti-Corruption
theo.strijker@ec.europa.eu

Mr Boudewijn VERHELST
Working Group on Evaluations
Deputy Director CTIF-CFI, Scientific Expert Law Enforcement, Attorney General,
boudewijn.verhelst@ctif-cfi.be

Others / Autres

Mr John RINGGUTH
EXPERT FOR ARMENIA AND FOR JERSEY
Working Group on Evaluations
johnringguth@gmail.com

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

Mr Jan KLEIJSSSEN
Director, Information Society and Action against Crime
Directorate General of Human Rights and Rule of Law – DGI
jan.kleijssen@coe.int

Mr Ivan KOEDJIKOV
Head of Department and Anti-terrorism Co-ordinator, Action against Crime Department
Information Society and Action against Crime
Directorate General of Human Rights and Rule of Law – DGI
Ivan.koedjikov@coe.int

Mr Matthias KLOTH
EXECUTIVE SECRETARY TO MONEYVAL / SECRÉTAIRE EXÉCUTIF DE MONEYVAL
- Administrator, Directorate General of Human Rights and Rule of Law - DGI,
- Council of Europe, F – 67075 STRASBOURG Cedex
Tel. +33 3 90 21 49 84 / Fax +33 3 88 41 30 17 matthias.kloth@coe.int

Ms Livia STOICA-BECHT, Head of Unit 1 - AML/CFT Monitoring and External Relations Unit &
Conference of the Parties- MONEYVAL
Tel. +33 3 90 21 4260 / Fax +33 3 88 41 30 17 livia.stoica@coe.int

Mr Michael STELLINI, Head of Unit 2 - AML/CFT Monitoring, Training and Typology Unit - MONEYVAL
Tel: +33 3 88 41 33 59, Fax +33 3 88 41 30 17 michael.stellini@coe.int

Mr Andrey FROLOV, Administrator, MONEYVAL
Tel: +33 3 90 21 52 53, Fax +33 3 88 41 30 17 andrey.frolov@coe.int

Ms Astghik KARAMANUKYAN, Administrator, MONEYVAL
Tel: +33 3 90 21 51 06, Fax +33 3 88 41 30 17 astghik.karamanukyan@coe.int

Mrs Francesca MONTAGNA, Administrator, MONEYVAL
Tel: +33 3 88 41 33 25, Fax +33 3 88 41 30 17 francesca.montagna@coe.int

Ms Veronika METS, Administrator, MONEYVAL
Tel: +33 3 88 41 24.38, Fax +33 3 88 41 30 17 veronika.mets@coe.int

Mr Mehmed YERLIKAYA, Administrator, MONEYVAL
Tel: +33 3 90 21 58.41, Fax +33 3 88 41 30 17 mehmed.yerlikaya@coe.int

Ms Katerina PSCHEROVA, Programme Assistant, MONEYVAL,
Tel: +33 388 41 22 53, Fax +33 3 88 41 30 17 katerina.pscherova@coe.int

Mr Hasan DOYDUK, Administrative Assistant
Tel: +33 390 21 53 08, Fax +33 3 88 41 30 17 hasan.doyduk@coe.int

Mrs Odile GEBHARTH, Administrative Assistant
Tel. +33 3 90 21 40 45, Fax +33 3 88 41 30 17 odile.gebharth@coe.int

Ms Monica PETROVICI, Web Assistant
Tel: +33 3 88 41 24 93, Fax +33 3 88 41 30 17 monica.petrovici@coe.int

Mrs Danielida WEBER, Administrative Assistant
Tel. +33 3 90 21 46 66, Fax +33 3 88 41 30 17 danielida.weber@coe.int

Ms Suzanna VAN ES, Trainee
Tel: +33 3 88 29 56, Fax +33 3 88 41 30 17 suzanna.vanes@coe.int

Interpreters / Interprètes

Sally BAILEY-RAVET
Julia TANNER
Chloé CHENETIER