



Strasbourg, 19 October 2007

MONEYVAL (2007) 27

**EUROPEAN COMMITTEE ON CRIME PROBLEMS
(CDPC)**

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

24th PLENARY MEETING OF MONEYVAL

Strasbourg, 10 – 14 September 2007

MEETING REPORT

Secretariat Memorandum
prepared by
the Directorate General of Human Rights and Legal Affairs

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EXECUTIVE SUMMARY

During the 24th Plenary meeting of MONEYVAL, held in Strasbourg from 10 to 14 September 2007, the plenary

- Invited delegations to confirm to the Secretariat that the proposed dates for the 2008 schedule were acceptable;
- Discussed and adopted the draft 3rd round reports as amended (and subject to consequential editorial changes by the Secretariat) on Liechtenstein, the Czech Republic, Moldova, Malta and Andorra, and draft summaries;
- Adopted the progress report on Slovakia;
- Agreed not to move at this meeting beyond step 4 of the Compliance Enhancing Procedures in respect of Azerbaijan, but that a detailed report on progress should be submitted to the next plenary meeting;
- Welcomed some of the legislative changes to the Moldovan Tax Amnesty Law but authorised the Bureau to examine whether the National Bank Instructions were sufficient for the lifting of the Compliance Enhancing Procedures between Plenary meetings.
- Considered the Horizontal Review of 2nd round reports prepared by the legal scientific expert and agreed to submit any factual corrections to Professor Gilmore by 15 October 2007 with a view to publication before the end of the year.
- Heard information on AML/CFT initiatives in other fora.
- Heard a report on progress in respect of the two Typologies projects by the Chairman of the Working Group on Typologies
- Agreed the composition of the MONEYVAL delegation to the October FATF Plenary meeting.

SUMMARY ACCOUNT OF THE MONEYVAL PROCEEDINGS

Items 1, 2 and 3 – Opening of the Plenary Meeting, Adoption of the Agenda and Information from the Chairman

1. The meeting was opened by the Chairman, following which the Committee adopted the agenda as it appears in Appendix II.

2. The Chairman, Dr. Vasil KIROV (Bulgaria), began by congratulating Mr. Ringguth on his appointment as Executive Secretary of MONEYVAL. He then announced that the Bureau had appointed Mrs. Izabela FENDEKOVA (Slovakia) under A. 12(c) Res. 2005/47 (in the absence of the Vice Chairman) to take the Chair on Tuesday 11th and Thursday 13th as the Chairman had commitments on both days as an evaluator of Malta. The Chairman also advised the Committee that all delegations were invited to attend the opening of an exhibition “The National Bank of Serbia – National and European Institutions” by Mr. Radovan Jelasic, Governor of the National Bank of Serbia during the lunch break. The Chairman extended MONEYVAL’s appreciation of this initiative, organised in the framework of the Serbian Presidency of the Committee of Ministers and which included a part dedicated to the 10th Anniversary of MONEYVAL.

The Chairman also referred to his letter to the Secretary General of the 23 July 2007 in respect of the Compliance Enhancing Procedures taken under step 3 against Moldova in connection with the tax amnesty legislation. The Bureau would discuss the issues with the Moldovan delegation and would present their proposals to the plenary later in the week.

Item 4 – Information from the Secretariat

3. The Secretariat reported on the progress with the new terms of reference. They had also been considered by CDPC and GR-J and were due to be considered by the Committee of Ministers on 26/9/07.

4. The Secretariat drew attention to the Room document containing the proposed schedule of evaluations for 2008. The Secretariat asked if delegations could confirm that the proposed dates were acceptable. The Secretariat gave a brief account of the last FATF meeting in Paris in June (where Moneyval was represented by the Chairman, the Executive Secretary and representatives of Cyprus, Malta, Moldova, Poland and Ukraine). Reference was made to the work being undertaken by FATF to produce guidance in respect of UN Resolutions dealing with the freezing of assets etc in respect of persons and entities (including banks) suspected of financing or supporting weapons of mass destruction proliferation. 3 reports were adopted (UK, Greece, and China). China subsequently became a full member of FATF.

Item 5 – Horizontal Review of 2nd Round Reports

5. Professor Gilmore gave a brief overview of the document which had been circulated. He invited delegations to respond with any factual comments on the issues raised in the report (especially

statistical data) by 15 October after which he would consider what could or could not be accepted. The Chairman thanked him for his work.

Item 6 – Discussion on the Draft Third Mutual Evaluation Report of Liechtenstein

6. This onsite mission was conducted by the IMF with Mr. Boudewijn Verhelst (MONEYVAL Law Enhancement Scientific Expert) participating and evaluating the implementation of the relevant European Union Directives.

7. An amended version of the draft report was circulated immediately before the Plenary debate. The evaluators introduced the report and the Liechtenstein authorities thanked the team for a comprehensive and detailed report.

Discussions

8. The three intervener countries were: Bulgaria (legal); Cyprus (financial); Croatia (law enforcement).

9. Further clarification was sought on the delays of the execution of mutual legal assistance requests caused by bringing cases before the Constitutional Court.

10. Questions were raised about the tipping off provision which applies only for a maximum period of 20 days and the rating of R. 14 as P/C. The Liechtenstein authorities indicated that they are on the way to bringing the prohibition on tipping off fully into line with international standards by an amendment of the Penal Procedure Code to extend tipping off to a non-determined time. The rating of P/C remained unchanged, but the plenary considered that more of the underlying explanations in respect of the rating should be reflected in the report, otherwise the rating might be misunderstood.

11. The plenary considered that there needed to be reference in the report to the need for proper AML/CFT training for external auditors involved in supervision on an agency basis.

Important issues raised

- Questions were raised as to whether the Liechtenstein requirement for verification of Customer identification data based on “documentation with probative value” is sufficient to satisfy the FATF requirement for verification of identity by using “reliable, independent, source documents, data, or information” (Criteria 5.3). Specifically the question whether the presentation of a single document like a passport was sufficient for a verification of identity (including the customer’s address) was raised. Several delegations intervened on this. The FATF representative indicated that obviously a passport is reliable for name and date of birth but that a passport may not necessarily be good for verifying an address – for this you may need additional information, like utilities bills or income tax demands. The Chair asked the Secretariat to check how the matter had been dealt with in other reports. In the Cyprus report verification of identification was under the Banking Law by an official identity card or passport, which was accepted by the evaluators. In the Georgia report, documents to be

used in identifying clients were set out in the law as ID cards or passports or other official documents. The evaluators in Georgia had accepted that these documents can cover a “first level” verification obligation as they are in accordance with the international standards in Footnote 5 of the Methodology. However, they were only detailed at one level and there were no provisions for enhanced verification measures for cases/clients which present higher risks. Therefore, depending on the facts of the case further measures may be necessary. In the light of this the plenary considered, in the Liechtenstein case, that a passport was acceptable for first level verification, but supported the Liechtenstein evaluators’ assessment that further measures need to be taken in response to the higher-risk nature of some of the business.

- It was difficult to judge the effectiveness of the whole system in the absence of overall figures for seizures and confiscations.

12. The Plenary decided after discussions that none of the amended ratings presented by the evaluators to the Plenary should be altered.

Decisions taken

- Adopted the draft report, annex on the EU Directives, and summary as amended and subject to consequential editorial changes.
- Invited the IMF to include in the finalised version a section on progress since the last MONEYVAL mutual evaluation.

Items 7 and 8 - Discussion of the Draft 3rd Mutual Evaluation Report of Czech Republic

13. At the beginning of the debate the Secretariat circulated a paper with amendments agreed on 10/9/07 at a further pre-meeting between the evaluators and the country, which had considered comments from the Consistency Review Group and the IMF. The evaluators introduced the draft report. The criminal legal framework had not changed significantly since the 2nd evaluation. On the financial side, the banking sector comprised more than 95% of the financial sector. The financial evaluator indicated that the AML Law does not use the term Customer Due Diligence but uses the term identification throughout. Generally a risk based approach was yet to be introduced. He emphasised that they had rated R. 9 as partially compliant because some reliance was placed on third parties. The Czech authorities thanked the evaluators and emphasised that a new law was in the process of being prepared since the on-site mission.

Discussions

14. The intervener countries were: Armenia (legal); Azerbaijan (law enforcement); and Bosnia and Herzegovina (financial).

- Further discussions took place to confirm the position of 3rd parties and introduced business. The Czech authorities considered this was not allowed, even though it is not uncommon for foreign companies to establish first contacts by lawyers; the country intends to allow in the near future - and to provide in legislation - explicitly for introduced business. The plenary

agreed that for the time being, “not applicable” was more appropriate under R.9 than a rating for the level of compliance as such.

- On SR VII, there was a discussion on the reasoning behind the “partially compliant” rating and it was finally decided to upgrade the rating given by the examiners.
- Concerning R. 13, the plenary also agreed that certain gaps could hardly be considered as minor (e.g. need to widen the scope of the reporting duty to include also “those who finance terrorism”, need for feedback arrangements) and therefore a down-rating was necessary
- On R. 18, the plenary considered that the level of compliance with the diligence measures for shell banks was satisfactory enough to justify a better rating
- On SR VIII there was a discussion on the rating given. It was found that the essential requirement of SR VIII (i.e. to “review the legal framework”) had not been implemented as such and the rating was downgraded even though several other measures are in place in the Czech Republic.

15. The Plenary decided after discussions:

- That the rating for R.9 should be “not applicable”
- That the rating for R.13 should be downgraded to “largely compliant”
- That the rating for R.18 should be upgraded to “largely compliant”
- That the rating for SR VII should be upgraded to “largely compliant”
- That Special Recommendation VIII should be downgraded to “partially compliant”.

Decisions taken

- Adopted the draft report + summary, as amended (and subject to consequential editorial changes).

Item 9 - Progress Report – Slovakia

16. The Head of the Slovak delegation presented the progress report. It was emphasised that:

- Amendments were being prepared to make financing of terrorism an autonomous offence.
- The new draft AML law included account opening; the main details of the draft AML law had been provided in the written report.
- There had been no changes since 2004 in the management of the FIU
- A more assets-based approach was now being pursued – in the past investigations had largely focused on the predicate offence.
- An interagency group has begun working informally and will now be formally appointed by Ministers.

17. The plenary sought and received various clarifications. The plenary emphasised that for future progress reports it was imperative that accurate statistics were provided so progress could be properly monitored.

Decisions taken

- The plenary adopted the Progress report.

Item 10 - Compliance Procedures Azerbaijan

18. A Room Document had been circulated which contained the Secretary General's letter under step 4 to the Azerbaijani authorities and the written response. The Chairman proposed that at this meeting the plenary should not move beyond step 4 to allow the Azerbaijan Parliament time to take on board the Secretary General's concerns. By the next plenary progress towards meeting those concerns would be expected. Cyprus endorsed the Chairman's proposal and the plenary agreed not to move to further steps at this meeting, but a detailed report back would be required from Azerbaijan at the next plenary.

Item 11 - Information on AML/CFT Initiatives in Other Fora

The Council of the European Union

19. The Council of the European Union reported on progress on the issues regarding SWIFT and the Terrorist Financing Tracking Programme.

20. The representative began by recalling that in the summer of 2007, press coverage in the European and US media questioning the role and responsibilities of SWIFT in relation to transfer of personal data to the Office of Foreign Assets Control (OFAC) of the US Treasury had generated EU involvement in this matter.

21. SWIFT is well known as the worldwide financing messaging service, which facilitates international money transfers. As the information processed by SWIFT concerns messages on financial transactions of hundreds of thousands of EU citizens as well as personal data, the EU had asked the Belgian authorities whether the conditions under which SWIFT processes personal data was in compliance with Belgian and EU data protection legislation.

22. The relevant issue was that SWIFT, having two operating centres (one within the EU and one in the US) complied with subpoenas of the US Treasury to provide access to message information held in the US. There was a limitation connected to terrorism.

23. After intensive discussions between the EU Presidency, the Commission and the US Treasury a solution agreed upon in July 2007, namely Unilateral representations, listing the conditions for transmitting data to the US – accompanied by an exchange of letters. The representations provide for oversight by an eminent European. The procedure is still ongoing and it is expected that at the beginning of October 2007 the matter will be discussed with COREPER and the European Parliament. The exchange of letters was circulated to the plenary.

European Commission

24. The European Commission indicated that there was final agreement now on common criteria for identifying 'equivalent' countries. The Secretariat invited the Commission to explain and discuss the process for equivalence once the decision is formally adopted, and to share it with the

MONEYVAL Secretariat as soon as it is available, as it will have an impact on many MONEYVAL members.

25. Attention was drawn to the European Court of Justice reference for a preliminary ruling under A 234 EC from the Court of Arbitrage (Belgium). The Grand Chamber had ruled that advice and assistance given by lawyers in financial and real estate transactions that had no links with judicial proceedings were not exempt from the duty to co-operate in combating money laundering. The obligations of information provision and of cooperation with the authorities responsible for combating money laundering laid down by A.6(1) of Directive 91/308/EEC, as amended, and imposed on lawyers by A.2 a(5) did not infringe the right to a fair trial as guaranteed by A.6 of the European Convention on Human Rights. MONEYVAL delegations were encouraged to read the full judgement.

The Egmont Group

26. A report was heard. The new Executive Secretary of Egmont had been appointed. The Egmont Group had now formalised itself. The FIU of Bolivia had been suspended. While it remains an FIU, it no longer has access to the Egmont Secure Web.

The Eurasian Group on Combating Money Laundering

27. The Eurasian Group reported on their current membership level and their participation in the evaluation of China with FATF and their current participation in the joint evaluation of Russia with FATF and MONEYVAL. Their typologies report on Narcotics trafficking was published after their June plenary. They suggested the priority of joint typologies research with MONEYVAL. This offer was very welcome and would be considered further.

World Bank

28. Ms Cari Votava presented her report. Her detachment in Central Asia would end in March 2008. the EAG report on Kyrgyzstan is available. In Tajikistan there is no AML law yet and anti corruption legislation had been drafted. The World Bank is preparing a package of training to help countries prepare for an evaluation mission.

European Bank of Reconstruction and Development

29. The Strategic Plan of the Bank's activities in Southern and Eastern Europe was described. More than one third of it covers AML/CFT activities. Training would be held in Ukraine and EBRD had joined the EAG as observer.

Item 12 - Discussion on the Draft Third Updating Report on Moldova

30. The Secretariat explained that the draft report was last before the plenary in July 2006, when further clarification of the text was required, particularly in respect of R.5 (insurance and securities), PEPs, R.8, R. 10 and SR VII. A questionnaire had been drawn up after the last discussion

identifying issues for a brief updating mission. The Moldovan authorities were thanked for their responses and organisation of the updating mission which was conducted by Mr. Boudewijn Verhelst (law enforcement and legal), Mr. Oleksiy Berezhnyi (financial); the Executive Secretary and Ms. Livia Stoica-Becht from the Secretariat in December 2006. The updated report had been circulated with new text in bold.

Discussions

- After the evaluators introduced the changes to the report, the Moldovan authorities responded. They emphasised that they had recently submitted articles of ratification of the new Council of Europe Convention on Laundering, Search, Seizure, Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS 198) and adopted a new AML/CFT law and strategy.
- The intervener countries were Lithuania (legal); San Marino (law enforcement) and Romania (financial). In discussions on the draft report, the interveners and the Plenary sought further clarifications and information on several issues, including:
 - the implementation of the requirements of R. 33
 - the grounds of refusal for MLA requests
 - the legal basis or mechanisms for converting designations by UN resolutions into Moldovan law
 - the process for the analysis of STRs/CTRs and the differentiation between the role of the Center (CCCEC) and the Office (OPCML)
 - the legal framework for applying sanctions by the National Bank of Moldova for breaches of AML/CFT legislation by banks and the competences of the National bank with respect to KYC procedures.

- None of the amended ratings were altered by the plenary.

Decision taken

- The amended report and draft summary were adopted (subject to consequential editorial changes).

Item 13 - Discussion on the Draft Third Mutual Evaluation Report on Malta

31. The Secretariat thanked the Maltese delegation for their hospitality in Malta and their cooperation. The Secretariat explained the background of the on-site visit and introduced the experts involved in the evaluation. The evaluators presented an overview of their findings and after that major changes to the draft report between the version sent out before the plenary meeting and the version brought to the plenary discussion were presented. The Secretariat informed that the Ad Hoc Review Group had submitted comments for consideration. Its expertise and advice were highly

appreciated and most comments were endorsed by the examiners. Then the Maltese authorities expressed their gratitude to the assessment team and introduced the members of the delegation.

32. The three intervener countries were: Georgia (legal), Hungary (law enforcement) and Latvia (financial). In discussions on the draft report on Malta, the interveners and the Plenary sought further clarification on various issues.

Discussions

33. The Plenary sought more information:

- Concerning the impact of effectiveness on ratings (text was added which covered some of the preventive recommendations); and
- Concerning the issue of consistency, particularly in relation to Rec. 22

Important issues raised

- The Plenary decided in the context of Recommendation 7 that internal policies should not be considered as “other enforceable means” although the source might be OEM. The same is true for the CDD document issued by the Basel Committee (which of itself would not comprise ‘other enforceable means’).
- Recommendation 22 should not be treated for the future as N/A simply because there are no subsidiaries/branches at present. The plenary considered that rating N/A requires branches/subsidiaries to be forbidden.
- Future MERs should in general focus more on effectiveness when addressing preventive measures.
- In the context of Recommendation 22 and 18, although there might be practice which indicates some effective implementation, the Plenary decided that it was not possible to increase a rating from Non Compliant on the basis of some effective implementation if there is no legal basis for the requirement itself. This principle is of general application beyond Recommendations 18 and 22 (subject to further clarification by the WGEI in FATF). (FATF precedent – UK report).

34. The Plenary decided after discussions

- that Recommendation 18 (which was rated as “Largely Compliant”) should be rated as “Partially Compliant”.
- To maintain the rating on Recommendation 7 as “Non Compliant”.
- To maintain the rating on Recommendation 22 as “Non Compliant”.
- To maintain the rating on Recommendation 5 as “Largely Compliant”.
- To maintain the rating on Special Recommendation III as “Largely Compliant”.

Decisions taken

- Adopted the draft report and summary, as amended (and subject to consequential editorial changes).

Items 14/15 - Discussion on the Draft Third Mutual Evaluation Report on Andorra

35. The Secretariat introduced the evaluation team and the amended version of the report that had been circulated after the pre-meeting during the plenary week. The Andorra evaluators introduced their report and the Andorra authorities thanked the evaluators for their work.

Discussions

36. The three intervener countries were Poland (financial); Andorra (law enforcement) and “the former Yugoslav Republic of Macedonia” (legal).

37. There was a discussion on self-laundering which had been removed as a possible criminal offence. The Andorran authorities considered that as they were a Roman law country the ‘non bis in idem’ principle should preclude self laundering. It was pointed out by Mr Verhelst that the FATF did not accept that the principle that ‘non bis in idem’ prevented the criminalisation of self laundering in their recent report on China. The plenary also noted that several Roman law countries have criminalised self laundering and, given that it appeared to have been criminalised before it was difficult to accept now that it was contrary to fundamental principles of domestic law. It was agreed that the report should reflect this view more strongly. It was noted that the same attitude had been taken to corporate criminal liability and the plenary considered that this backward development should be more strongly articulated in the report.

38. Questions were raised about the ratings under Recommendation 5 and Recommendation 23. In particular clarification was sought as to what constituted enforceable means in Andorra since the technical communiqués issued by the Andorran FIU cover important AML/CFT aspects (e.g. reporting of operations linked with possible terrorist financing, politically exposed persons). The Andorran authorities indicated that although these communiqués are generally followed in practice, there is no legal basis in place to ensure compliance with their content (unlike the clearly enforceable provisions of the AML Law and its implementing regulation).

- on Recommendations 5, the plenary found that the level of implementation in domestic provisions of CDD measures – was further undermined by the various lacuna observed in practice (e.g. “name lenders” are quite common despite being strictly prohibited, existence of an omnibus account and intermediaries refusing occasionally to disclose the identity of their clients to the financial institutions); this justified an overall lower rating than “partially compliant” – also taking into account the issue of effectiveness;
- on Recommendation 23, the plenary found that the gaps were too important to justify a “partially compliant” rating (in particular heavy reliance on control functions performed by audit companies on behalf of the authorities, apparent lack of AML/CFT commitment of the INAF – the financial regulatory authority, insufficient measures to prevent criminals from infiltrating the financial sector).

Decisions taken

- The plenary decided that the rating on Recommendations 5 and 23 should be downgraded from P/C to N/C.
- The report and draft summary were adopted subject to consequential editorial changes.

Item 16 - Compliance Enhancing Procedures : Moldova

39. In July 2007 the Chairman had written to the Secretary General under step 3 drawing the plenary's concerns about the Moldovan Tax Amnesty law to his attention. The Moldovan authorities had moved quickly to remove some of the major concerns, though it was important to see how the National Bank's Instructions addressed the practical issues of the application of the KEY principle in the context of a tax amnesty. The Plenary granted the Bureau authority between Plenary meetings to examine whether the National Bank Instructions were sufficient in this regard and to decide whether Compliance Enhancing Procedures should be confirmed or lifted. The Bureau would study the National Bank Instructions to this end.

Item 17 - Typologies

40. The Chairman of the Typologies Working Group gave a report on the progress of the 2 projects. It was confirmed that the Typologies meeting would be held in Montenegro on 30 and 31 October 2007.

Item 18 - Further discussion on the Horizontal Review

41. Comments and corrections were to be submitted to the Secretariat by 15 October for transmission to Professor Gilmore.

Item 19 - MONEYVAL Participation in FATF Events

42. It was agreed that the MONEYVAL delegation to the FATF Plenary in October would comprise as well as the Chairman and Executive Secretary, representatives from:

- Poland
- Romania
- Latvia
- Monaco
- Andorra.

Item 20 - Finance and Staffing

43. The Vacancy notice for 2 secondments to MONEYVAL was circulated with a closing date for applications via Permanent Representations of Friday 12th October.

Item 21 - Miscellaneous

44. There were no further items discussed.

APPENDIX I / ANNEXE I

24th PLENARY MEETING / 24^e SESSION PLENIERE

Strasbourg, 10 - 14 September 2007
Strasbourg, 10 -14 septembre 2007

AGENDA / ORDRE DU JOUR

Day 1: Monday 10 September 2007 / 1^e jour: lundi 10 septembre 2007

Morning / matin

3. **Opening of the Plenary Meeting at 9h00 / Ouverture de la Réunion Plénière à 9h00**
4. **Adoption of Agenda / Adoption de l'Ordre du Jour**
5. **Information from the Chairman / Informations communiquées par le Président**
6. **Information from the Secretariat / Informations communiquées par le Secrétariat**
 - 4.1 **Agenda of evaluations and meetings for 2007-2008 / Agenda des évaluations et réunions en 2007-2008**
 - 4.2 **Participation in other events / Participation à des activités diverses**
7. **Horizontal review of 2nd round reports – Report from Scientific Expert / Examen horizontal du rapport du 2^e cycle - Rapport par l'Expert scientifique**
8. **Discussion on the draft third mutual evaluation report on Liechtenstein / Discussion du projet de troisième rapport d'évaluation mutuelle sur Liechtenstein**

Afternoon / après-midi

9. **Continuation of the discussion on the draft third mutual evaluation report on Liechtenstein / Poursuite de la discussion du projet de troisième rapport d'évaluation mutuelle sur Liechtenstein**

Day 2: Tuesday 11 September 2007 / 2^e jour: mardi 11 septembre 2007

Morning / matin (opening of the session at 9h30 / début de la séance à 9h30)

10. **Discussion on the draft third mutual evaluation report on Czech Republic / Discussion du projet de troisième rapport d'évaluation mutuelle sur la République tchèque**

Afternoon / après-midi

11. **Continuation of the discussion on the draft third mutual evaluation report on Czech Republic / Poursuite de la discussion du projet de troisième rapport d'évaluation mutuelle sur la République tchèque**

Bureau meeting at conclusion of business / Réunion du Bureau après la fin de la séance

Day 3: Wednesday 12 September 2007 / 3^e jour: mercredi 12 septembre 2007

Morning / matin (opening of the session at 9h30 / début de la séance à 9h30)

12. **Progress report – Slovak Republic / Rapport de progrès – République slovaque**
13. **Compliance Enhancing Procedures – Azerbaijan / Procédures visant à promouvoir la conformité - Azerbaïdjan**
14. **Information on AML/CFT initiatives in other fora / Information sur les initiatives LAB/CFT dans d'autres institutions**

Afternoon / après-midi

15. **Discussion on the draft third updating evaluation report on Moldova** / *Discussion du projet de troisième rapport d'évaluation mis à jour sur la Moldova*

Day 4: Thursday 13 September 2007 / 4^e jour: jeudi 13 septembre 2007

Morning / matin (opening of the session at 9h30 / début de la séance à 9h30)

16. **Discussion on the draft third mutual evaluation report on Malta** / *Discussion du projet de troisième rapport d'évaluation mutuelle sur Malte*

Afternoon / après-midi

17. **Continuation of the discussion on the draft third mutual evaluation report on Malta** / *Poursuite de la discussion du projet de troisième rapport d'évaluation mutuelle sur Malte*

Day 5: Friday 14 Septembre 2007 / 5^e jour: vendredi 14 septembre 2007

Morning / matin (opening of the session at 9h30 / début de la séance à 9h30)

18. **Discussion on the draft third mutual evaluation report on Andorra** / *Discussion du projet de troisième rapport d'évaluation mutuelle sur l'Andorre*

Afternoon / après-midi

19. **Continuation of the discussion on the draft third mutual evaluation report on Andorra** / *Poursuite de la discussion du projet de troisième rapport d'évaluation mutuelle sur l'Andorre*

20. **Compliance Enhancing Procedures –Moldova** / *Procédures visant à promouvoir la conformité - Moldova*

21. **Typologies : update on the status of work** / *Typologies : état de l'avancement des travaux*

22. **Further discussion on the Horizontal review of 2nd round reports (as necessary)** / *Continuation de la discussion sur l'Examen horizontal du rapport du 2^e cycle (si nécessaire)*

23. **MONEYVAL participation to FATF events** / *Participation du MONEYVAL aux événements du GAFI*

24. **Finance and Staffing** / *Financement et personnel*

25. **Miscellaneous** / *Divers.*

LIST OF PARTICIPANTS
LISTE DES PARTICIPANTS

24th PLENARY MEETING / 24^e RÉUNION PLÉNIÈRE

10-14 September/*septembre 2007*

ALBANIA / ALBANIE

Mr Arben DOCI
Financial Intelligence Unit (FIU)
Ministry of Finance

Head of Delegation

Mr Arben KRAJA
Prosecutor, Prosecutor General's Office
Organised Crime Department

Mr Besnik MUÇI
Chief of Sector for Fighting Money Laundering and Financial Crimes
Directorate of Organised Crimes and Witness Protection
Ministry of the Interior

ANDORRA / ANDORRE

M. Jordi PONS LLUELLES
Directeur, Unité de Prévention du Blanchiment (UPB),
Unitat de Prevenció del Blanqueig (UPB)

Chef de Délégation

M. Jordi TORRES
Commissaire de Police, Ministère de l'Intérieur
Unitat de Prevenció del Blanqueig (UPB)

Mr Alfons ALBERCA
Procureur adjoint

Mr Jesus JIMENEZ
Avocat et expert juridique

Mr Marc VILALLONGA
Avocat et représentant de l'Association de Banques Andorranes (ABA)

Mr Lluís VIÑUALES
Avocat et représentant de l' Association de Banques Andorranes (ABA)

Mr Josep M^a FRANCINO
Représentent du Ministère de Finances

ARMENIA / ARMENIE

Mr Daniel AZATYAN
Head of Financial Monitoring Center of the Central Bank of Armenia

Head of Delegation

Mr Armen KROYAN
Senior Prosecutor of Anti-Corruption Department
Prosecutor General's Office

Mr Arakel MELIKSETYAN
Deputy Head of the Financial Monitoring Center
Central Bank of Armenia

AZERBAIJAN / AZERBAÏDJAN

Mr Adishirin GASIMOV
Diretor, National Bank of Azerbaijan
Banking Supervision Department

Mr Mehti MEHTIYEV
Cabinet of Ministers of Azerbaijan
Commission combating money laundering and terrorism Financing
Ministry of National Security

Mr Anar SALMANOV
Senior Adviser
Department of Legislation
Ministry of Justice

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Mr Sinisa KARAN **Head of Delegation**
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Ministry of Security
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Ms Sandra MALESIC
Head of Department for European Integration
Ministry of Justice

Mr Samir OMERHODZIC
Director
Insurance Agency

BULGARIA / BULGARIE

Dr Vasil KIROV **CHAIRMAN / PRÉSIDENT**
Director General
Financial Intelligence Agency **Head of Delegation**

Mr Petar RASHKOV
Evaluator for Czech Republic

Ms Sonia KLISSARSKA
Chief Expert
Central Unit for coordinating the fight against offences affecting EU financial interests
Ministry of the Interior

Ms Mitka ZAHARLIEVA
Legal Expert
International Co-operation and European Integration Directorate
Ministry of Justice

CROATIA / CROATIE

Mr Damir BOLTA
Deputy Director, Anti-Money Laundering Department
Ministry of Finance

Head of Delegation

Mr Damir DEAK
Chief Inspector
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Mr Ivan PLEVKO
Deputy District Attorney, District Attorney's Office
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Mr Denis OŠTRIĆ
Financial Services Supervision Agency

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