



Strasbourg, 10 March 2011

MONEYVAL(2010)39

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

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

34th PLENARY MEETING OF MONEYVAL

Strasbourg, 7 – 10 December 2010

MEETING REPORT

Memorandum
prepared by the MONEYVAL Secretariat
Directorate General of Human Rights and Legal Affairs (DG-HL)

EXECUTIVE SUMMARY

During the 34th plenary meeting, held in Strasbourg from 7 to 10 December 2010, the MONEYVAL Committee:

- took note that CoE's Committee of Ministers adopted the Resolution CM/Res(2010)12 on MONEYVAL's Statute and that this new statute will elevate MONEYVAL as from 1 January 2011 to an independent monitoring mechanism within the Council of Europe answerable directly to the Committee of Ministers;
- hosted a visit by the FATF President, Mr Luis URRUTIA CORRAL, who addressed the MONEYVAL plenary and stressed the need to reinforce the global AML/CFT network;
- examined the first 3rd Round progress report submitted by Bosnia and Herzegovina and invited the country to provide a fuller report before a decision is taken on adoption;
- examined the second progress report submitted by Moldova and invited the country to provide further information in the next plenary before a decision is taken on adoption;
- examined and adopted the first 3rd Round progress report submitted by Serbia and the second 3rd Round progress reports submitted by Andorra, Liechtenstein and Malta;
- examined under step (i) of the CEPs reports in respect of Albania and Bosnia and Herzegovina and maintained step (i) of the CEPs in both cases;
- examined the state of compliance in respect of Moldova. The Plenary granted the Chairman a mandate to institute CEPs between plenary meetings in the event that a reported decision of the Constitutional Court of Moldova of 25 November 2010 was confirmed and published;
- continued the review of the state of compliance, commenced at the 33rd Plenary in September 2010 of the three remaining countries (Croatia, "the former Yugoslav Republic of Macedonia" and Ukraine) out of 9 countries which had more than 30 NC and PC ratings in the 3rd Round reports. Croatia has been requested to provide further information to the next plenary before a final decision is taken. The Chairman has written to the Heads of Delegation of the other 2 countries outside Compliance Enhancing Procedures (CEPs) drawing attention to the ongoing important deficiencies;
- adopted a horizontal review of MONEYVAL's 3rd Round of mutual evaluation reports;
- discussed the recent developments in international law and European jurisprudence related to Special Recommendation III (SR.III);
- heard progress on responses to the non-conviction based confiscation questionnaire;
- took note of the current status of work on typologies in the context of the projects on (1) The use of Internet gambling for ML and TF purposes, and (2) Criminal money flows on the internet: methods, trends and multi-stakeholder counteraction; and heard a report on the joint EAG/MONEYVAL meeting held in Moscow on 9 and 10 November 2010;
- discussed MONEYVAL's participation to the Council of Europe Conference on "Prevention of terrorism: prevention tools, legal instruments and their implementation" (Istanbul, 16 - 17 December 2010);
- noted that the Training Seminar for Assessors will be held from 25 to 29 July 2011;
- took note of information on AML/CFT initiatives in MONEYVAL countries and heard information on anti-money laundering issues in other fora;
- took note of developments related to the entry into force of the Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS No. 198).

SUMMARY ACCOUNT OF THE MONEYVAL PROCEEDINGS

Items 1, 2 and 3 – Opening of the plenary meeting, Adoption of the Agenda and Information from the Chairman

1. The Chairman, Mr Vladimir NECHAEV (Russian Federation) opened the meeting, following which the Committee adopted, with amendments, the agenda as it appears in Appendix I. The list of participants appears at Appendix II.
2. The Chairman firstly welcomed FATF's President, Mr Luis URRUTIA CORRAL, who was present at MONEYVAL's plenary during the first two days and intervened in the afternoon of the first day.
3. The Chairman also welcomed all delegates and informed delegations that meetings of the Bureau with Delegations of Croatia, "the former Yugoslav Republic of Macedonia" and Ukraine will be held before the discussions on the state of compliance on all NC and PC ratings in Plenary.

3.1 Chairman's correspondence

4. The Chairman informed the Plenary about the letters sent following the last plenary to countries currently subject to the Compliance Enhancing Procedures, and to countries in respect of which on-going important deficiencies had been identified, and the replies received from Azerbaijan, Georgia and Moldova. All the concerned countries had expressed commitment to take action as soon as possible. Further details appear under items 11, 15 and 20.

3.2 Bureau meeting on 6 December 2010

5. The Chairman informed the plenary about the outcome of the Bureau meeting of 6 December 2010. The Chairman also referred to the new MONEYVAL Statute and plans for reinforcing the global AML/CFT structure in the light of discussions held with the FATF President at the last FATF plenary.

3.3 Joint EAG/MONEYVAL Typologies meeting (Moscow, 9-10 November 2010)

6. The Chairman informed the plenary about the Typologies meeting where EAG and MONEYVAL members, observers, international organisations and private sector representatives gathered for the first time in a joint typologies exercise in the context of its typologies project on "Criminal money flows on the internet: methods, trends and multi-stakeholder counteraction", which was held in Moscow from 9 to 10 November 2010.
7. The meeting was opened with addresses from the MONEYVAL Chairman and Mr Yury Chikhanchin, Head of Rosfinmonitoring. During the two day meeting, participants from 29 countries examined a number of emerging money laundering and terrorist financing methods and trends in the context of the following typology research projects:
 - Criminal Money Flows on the Internet (led by the Russian Federation, the Cybercrime project and MONEYVAL);
 - Risks of misuse of E-money in ML/FT schemes (led by the Russian Federation);

- Risks of misuse of non-traditional financial institutions in ML schemes (led by the Russian Federation and Belarus);
 - ML/FT using Alternative Remittance Systems (led by the United States);
 - Risks of money laundering via foreign trade operations (led by Ukraine).
8. The final report on “Criminal Money Flows on the Internet” is expected to be finalised in the first half of 2011.

Item 4 – Information from the Secretariat

4.1 Information on the new Statute for MONEYVAL

9. The Executive Secretary informed the plenary that, at their meeting of 13 October 2010, the Committee of Ministers of the Council of Europe adopted the Resolution CM/Res(2010)12 on the Statute of the Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL). This new statute would come into force on 1 January 2011 and elevates MONEYVAL to a permanent independent monitoring mechanism within the Council of Europe, answerable directly to the Committee of Ministers.

4.2 Agenda of evaluations and meetings for 2011

10. The Executive Secretary informed the plenary about the agenda of evaluations and meetings in 2011.
11. The Executive Secretary also informed on 2011 MONEYVAL’s upcoming 4th Round evaluation visits in Andorra (March), Latvia (May), Malta (May), Moldova (November), Georgia (November, IMF led) and Lithuania (November).
12. It was noted that Israel had offered to organise in Tel-Aviv the 2011 Typologies.
13. It was agreed that a Training Seminar for assessors will be held from 25 to 29 July 2011. The venue is still to be determined and a call to delegations interested to host this event was made.

4.3 Participation in FATF meetings

14. The Executive Secretary gave a report on the MONEYVAL participation in the last FATF Plenary.

4.4 Council of Europe Conference “Prevention of Terrorism: Prevention Tools, legal instruments and their implementation” – Istanbul, 16 – 17 December 2010

15. The Executive Secretary advised the Plenary of the Council of Europe Conference on “Prevention of Terrorism: Prevention Tools, Legal Instruments and Their Implementation” which will be co-organised by MONEYVAL and CODEXTER in the framework of the Turkish Chairmanship of the Committee of Ministers. The event will be held on 16 and 17 December 2010 in Istanbul, Turkey.
16. The Conference will bring together national and international experts to share their experience in the prevention of terrorism, in particular, the prevention tools, legal instruments and their implementation.

17. During the session on financing of terrorism, the relevant provisions of the Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS No.198) in relation to the fight against terrorist financing and the findings of the horizontal review of MONEYVAL's 3rd Round of mutual evaluation reports will be presented by the MONEYVAL scientific expert on legal issues, Professor William Gilmore, and by MONEYVAL's Executive Secretary, John Ringguth. The Executive Secretary also called for expression of interest from delegations in participating in the Conference.

Item 5 – International Co-operation Review Group - ICRG process - Update

5.1 Azerbaijan

18. The Executive Secretary informed the Plenary about the high level mission in early September. Azerbaijan is no longer subject to FATF's monitoring process under its on-going global AML/CFT compliance process.

5.2 Europe/Eurasia Regional review Group (ERRG)

19. The Co-Chairman of the ERRG, Dr. Anton Bartolo (Malta), informed the plenary about the two day meeting planned for the 13 and 14 January 2011.

5.3 FATF Public statements October 2010

20. Referring to the FATF public statement dated 22 October 2010, the Executive Secretary invited the countries which had not yet provided information on action taken to respond before the next FATF Plenary in February 2011.

5.4 Options for dealing with ICRG monitored jurisdictions not making sufficient progress

21. There was a discussion on the proposals set out in the FATF Secretariat's paper. It was agreed that MONEYVAL's position is that there should be no presumption that, after one year in the FATF's second public document "Improving Global Compliance", a country which had not exited the ICRG should automatically be transferred to the public list of countries which raised concerns for the global financial system. The progress on each country which had been in the second category should be reviewed on a case by case basis.

Item 6 – Report on participation in Joint FATF/Egmont typologies meeting (Cape Town 16-18 November 2010)

22. The Plenary heard a report from Mr Evgeni EVGENIEV (Bulgaria) on the outcome of this meeting and his participation on behalf of MONEYVAL to the workshop on money laundering and human trafficking.

Item 7 – Special recommendation III – Recent developments in international law and European jurisprudence – further update from the MONEYVAL Secretariat

23. The Secretariat updated the plenary on developments in respect of the UN sanctions regime and its implementation since the 32nd Plenary meeting of March 2010.
24. The plenary heard, on 30 July 2010, the UNSCR 1267 Sanctions Committee concluded the review of its Consolidated List of individuals and entities subject to sanctions measures to ensure that this List as updated is as accurate as possible and to confirm that

listings remain appropriate. Furthermore, the current Ombudsperson was appointed by the UN Secretary General on 3 June 2010.

25. The plenary further heard that the European Court of Justice, on 30 September 2010, had annulled the Commission Regulation (EC) No. 1190/2008 of 28 November 2008 so far as it concerns to Mr Kadi.
26. The Secretariat further informed the plenary of the referral of the Case Youssef Moustafa NADA v. Switzerland (Application No. 10593/08 related to implementation of UNSCR 1267 by the Swiss authorities) by the Chamber of European Court of Human Rights to the Grand Chamber on 20 October 2010.

Decision taken

27. The plenary took note of the Secretariat's report, and instructed the Secretariat to follow future developments and continue to update the plenary, when necessary.

Item 8 - Discussion on the Second 3rd Round Progress report of Malta

28. Dr Bartolo (Vice-Chairman) introduced the members of the Delegation and provided an overview of the main developments and measures implemented since the adoption of the mutual evaluation report in September 2007 and the last progress report in December 2008.
29. The Secretariat presented its review on the Progress report on the core recommendations pointing out weak and strong points. Steps had been taken to address the issues raised by the evaluators in respect of R.5. There was welcome progress on the development of jurisprudence on autonomous money laundering cases. The financing of terrorism reporting obligation needed clarifying.
30. Slovenia, in its capacity as rapporteur country, highlighted several positive measures which had been taken by Malta in order to address the recommendations formulated in the mutual evaluation report. A number of questions were asked by Slovenia, followed by additional clarifications sought by delegations and the Secretariat on the following issues:
 - R.1 on Changes in the Penal Code;
 - R.5 on CDD procedures;
 - R. 6 on PEP's definition and identification procedure;
 - Definition and listing of reputable jurisdictions;
 - SR.III on Freezing assets.

Decision taken

31. As a result of the discussions held in the context of the examination of this second progress report, the Plenary was satisfied with the information provided and the progress being undertaken and thus approved the progress report and the analysis of the progress on the core Recommendations. Pursuant to Rule 41 to the Rules of procedure, the progress report will be subject of an update every two years between evaluation visits (i.e. December 2012), though the Plenary may decide to fix an earlier date at which an update should be presented. The Plenary agreed to publish the Secretariat's analysis.

Item 9 – Intervention of Mr Luis URRUTIA CORRAL, President of the FATF and discussion

32. MONEYVAL had the pleasure of hosting a visit by the FATF President, Mr Luis URRUTIA CORRAL. He addressed the MONEYVAL plenary and stressed the need to reinforce the global AML/CFT network. Moreover, he noted in particular that MONEYVAL has strong processes for monitoring progress in implementing AML/CFT measures (including its compliance enhancing procedures) which are not only applied but are also continuously refined over time. The speech is available on MONEYVAL's website.

Item 10 – Discussion on the First 3rd Round Progress Report of Bosnia and Herzegovina (BiH)

33. The Secretariat presented its written analysis in relation to core FATF recommendations and highlighted the main findings of it. In the light of the analysis paper it was pointed out that notwithstanding the existence of some draft legislation, no tangible and real progress had yet been achieved in respect of R.1, SR.II, R.10, R.13 and SR IV. While one deficiency appears to have been addressed fully and one partially under R.5, overall BiH has made slow and little progress to deal with the majority of the deficiencies related to the FATF Core Recommendations.
34. The Head of Delegation of Bosnia and Herzegovina introduced the members of the Delegation and presented developments since the adoption of the first progress report in December 2009. There were no legal and law enforcement experts present among the Delegation of Bosnia and Herzegovina at the Plenary, therefore the Delegation expressed their unreadiness to answer legal and law enforcement questions to be raised.
35. The United Kingdom, as rapporteur country, acknowledged the significant gaps in and substantial incompleteness of the PR and suggested the resubmission of the PR at the next plenary. It did not raise any questions to the Delegation of Bosnia and Herzegovina.
36. Latvia raised a question relating to statistics on STRs, but this question could not be answered by BiH because of the absence of any law enforcement expert in the Delegation.
37. The plenary discussed extensively whether the PR had simply the lack of sufficient information (Rule 42 of the Rules of Procedure) or whether it raised significant concerns about the extent of progress of or speed of progress (Rule 43 of the Rules of Procedure).

Decision taken

38. As a result of the discussions held in the context of the examination of this first progress report, the Plenary concluded that the report raised significant concerns about the extent of progress of or speed of progress overall to rectify deficiencies identified in the mutual evaluation report. Pursuant to Rule 43 of the Rules of Procedure, Bosnia and Herzegovina was invited to provide a fuller report to the next Plenary. Furthermore, it opened Compliance Enhancing Procedure for BiH at step (i) and decided to merge the existing CEP process with this procedure at the same level. It also decided that the PR report to be submitted to the next plenary will be a merged one that will contain replies to the 7 Recommendations having important deficiencies identified at the September 2010 plenary.

Item 11 – Report from Bosnia and Herzegovina under step I of the Compliance Enhancing Procedures and discussion of the next steps

39. The Secretariat presented the table that indicated the steps undertaken by BiH authorities in respect of 7 Recommendations (R.1, 5, 13, 26, SR III, SR VIII and SR IX) with important deficiencies (asterisked) and the brief analysis of those steps. In the light of the Bureau's conclusion and proposal, the Secretariat pointed out that BiH made little progress on any of the important deficiencies identified at the 33rd Plenary and all the initiatives commenced since the last plenary should be expedited through concrete action plans with the time scales to achieve quick and tangible results.

Decision taken

40. Recalling the decision of the previous agenda item, the plenary decided that BiH will remain in the Compliance Enhancing Procedure at step (i) and will report to the next plenary about the steps undertaken to address those identified important deficiencies.

Item 12 – Discussion and adoption of the amended 3rd Round Horizontal Review

41. The Executive Secretary introduced the review in the light of the latest changes and information. He thanked all the experts that worked on the review.
42. The experts intervened in respect of their specific sectors, recognising particularly lack of statistics as a general weakness. In this regard, it has to be noted that only one country could disaggregate third party money laundering and stand alone money laundering offences in its statistics. Overall while much progress has been made on the legislative side, concern is expressed in the review about the overall results on the law enforcement side. The review concludes that there still remains much work to do in many countries to entrench a culture that practically goes after criminal proceeds as a priority.

Decision taken

43. The 3rd Horizontal Review was adopted and will be published subject to some editorial changes. The report will be available on MONEYVAL's website. The analysis will be published in hard copy form and will be sent to all relevant stakeholders.

Item 13 – Discussion of the state of compliance on all NC and PC ratings in the 3rd Round report in respect of Ukraine

44. The Secretariat presented its review, as amended after the Bureau's meeting, on the preliminary analysis of the state of compliance of Ukraine, highlighting the areas of concern where important deficiencies were noted in respect of compliance with the FATF Recommendations. The Ukrainian delegation gave their opinion on the analysis and brought forward additional information on the implementation of these Recommendations. The plenary examined the preliminary analysis and following discussions, decided that the analysis should maintain a reference only to three important deficiencies, namely R.3 (Confiscation and provisional measures), SR.III (Freezing and confiscation of terrorist assets and SR.IX (Cross border Declaration & Disclosure).

Decision taken

45. The plenary decided that no compliance enhancing procedures should be instituted at this time in respect of Ukraine. On the basis of the procedure agreed for this process, the

Ukrainian authorities shall be notified with a letter drawing their attention to the ongoing important deficiencies identified and inviting them to take further remedial action.

Item 14 – Discussion on the First 3rd Round Progress Report of Serbia

46. The Secretariat presented its written analysis in relation to core FATF recommendations and highlighted the main findings in respect of R.1, SR.II, R.5, R.10, R.13 and SR IV. The representative of the delegation of Serbia introduced the members of the delegation and provided an overview of the main developments and measures implemented since the adoption of the mutual evaluation report in December 2009.
47. The Secretariat recalled in this context that the evaluation had concluded that Serbia had reached a good level of compliance with most of the core recommendations. One year after the adoption of the mutual evaluation report, Serbia has demonstrated that it has commenced action in several areas in order to address the deficiencies identified in respect of the core Recommendations, including in those where Serbia was rated largely compliant.
48. In relation to R.1, the amendments to the criminal legislation appear to have successfully addressed the deficiencies identified in respect of the scope of property and the proposed draft legislation, once adopted, should address the deficiencies related to the criminalization of market manipulation and insider trading. On SR. II, the amendments introduced in September 2009 do not address all of the shortcomings identified in respect of the criminalization of terrorist financing.
49. The Secretariat also noted though that very positive steps have been taken in the preventive area, and the existing AML/CFT law has been consolidated by the adoption of several guidelines, supported by trainings. Hence efforts are being made to strengthen the implementation of the CDD requirements. Also, Serbia was able to show positive developments in respect of the measures aimed at strengthening the STR reporting system and the implementation of the obligation by reporting entities. Further progress is required to demonstrate the implementation of the reporting obligations by the non-banking financial institutions and other reporting entities and enhance the effectiveness of its STR system, and in particular in relation to terrorist financing.
50. Ukraine, as rapporteur country, acknowledged the progress made by Serbia and raised a number of clarifications, together with other delegations.

Decision taken

51. As a result of the discussions held in the context of the examination of this first progress report, the Plenary was satisfied, considering the amendments made so far, with the information provided and the progress being undertaken and thus approved the progress report and the analysis of the progress on the core Recommendations. Pursuant to Rule 41 to the Rules of procedure, the progress report will be subject of an update in every two years between evaluation visits (i.e. December 2012), though the Plenary may decide to fix an earlier date at which an update should be presented. The progress report is subject to automatic publication in accordance with the Rules of Procedure.

Item 15 – Report from Albania under step (i) of the Compliance Enhancing Procedures and discussion of the next steps

52. The Secretariat presented the table that indicated the steps undertaken by the Albanian authorities in respect of 4 Recommendations (R.5, R.6, SR.I and SR.VIII) with important deficiencies (asterisked) and the brief analysis of those steps. In the light of the Bureau's

conclusion and proposal, the Secretariat pointed out that though the steps undertaken relating to R.5, R.6 and SR.VIII could not be verified, it seems there is a political will in place to address all the deficiencies and with this political will and support, Albanian authorities have commenced various legislative and other steps to rectify all the important deficiencies identified at the 33rd plenary meeting, and Albania should be encouraged to continue its work and be invited to provide a timescale for finalisation of these steps.

53. The Head of the Delegation of Albania presented the steps undertaken by Albania to rectify those important deficiencies since the last plenary. He pointed out that the comments raised in the table with regard to the draft law amending the definition of terrorism and financing of terrorism will be conveyed to the Ministry of Justice and written information in respect of these comments will be sent to the Secretariat as soon as possible. Furthermore, he stated that the English translation of the draft law amending the AML/CFT Law will be provided to the Secretariat. He asked the plenary for the removal of Albania from the CEPs.

Decision taken

54. Given that all the legislative initiatives were not yet final, in the light of Bureau's proposal, the plenary decided to keep Albania in the CEPs at step (i) and invited Albania to report to the next plenary about the steps undertaken to address those identified important deficiencies.

Item 16 – Discussion of the Second 3rd Round Progress report of the Principality of Liechtenstein

55. The Secretariat presented its review of the Progress report, on the core recommendations, and the various amendments introduced.
56. In the view of the Secretariat, the Liechtenstein authorities have done what they indicated they were proposing to do by way of legislative enhancements to their system at the time when the first 3rd Round progress was adopted. Overall there have been incremental improvements to the legal structure in Liechtenstein on CDD issues. The awaited further guidance should build on what has already been provided for in Statute and unequivocally clarify that the other high risk areas the evaluators pointed to in the 3rd Round report should be subject to enhanced due diligence. The effectiveness of the new preventive measures can only be assessed in the 4th Round evaluation.
57. Moreover, the criminal provisions on money laundering have been enhanced in the last 2 years, though conspiracy may still need revisiting. A significant number of money laundering charges have been filed with the public prosecutor's office and the conviction for an autonomous money laundering offence in Liechtenstein is a welcome step in the creation of Liechtenstein's own jurisprudence. The SR.IV obligation still needs further precision as outlined above.
58. The representative of the Delegation of Liechtenstein introduced the members of the Delegation and provided an overview of the main developments and measures implemented since the adoption of the mutual evaluation report in September 2007 and the last progress report in December 2008.
59. Cyprus, in its capacity as rapporteur country, highlighted several positive measures which have been taken by Liechtenstein in order to address the recommendations formulated in the mutual evaluation report fully agreeing with and supporting Secretariat's analysis.

60. A number of questions were asked followed by additional clarifications sought by the Secretariat on the following issues:
- R.1 on the scope of the criminal offence in ML fully considered by the authorities;
 - R.2 on financing of terrorist for any other purpose;
 - R.5 on CDD and new law into force since 2009;
 - R.22 on external auditors;
 - R.34/35 on private trustees;
 - R.36 on Mutual legal assistance.

Decision Taken

61. As a result of the discussions held in the context of the examination of this second progress report, the Plenary was satisfied, considering also the amendments made, with the information provided and the progress being undertaken and thus approved the progress report and the analysis of the progress on the core Recommendations. Pursuant to Rule 41 to the Rules of procedure, the progress report will be subject of an update in every two years between evaluation visits (i.e. December 2012), though the Plenary may decide to fix an earlier date at which an update should be presented. The progress report is subject to automatic publication in accordance with the Rules of Procedure.

Item 17 – Enforcement of Civil Confiscation Orders – Discussion of responses and next

62. The Secretariat presented its analysis of the results of the survey commenced in December 2009.
63. The Secretariat pointed out that the results of the survey do not as yet indicate a major issue but the lack of practice may also indicate practical obstacles which could be addressed at the normative level. It, however, stated that the lack of practice could prevent the articulation of real issues to address in a recommendation at this stage and expressed its preference, at this stage, to wait until there have been several discussions on the implementation of Article 23(5) of the CETS 198 by the COP. Delegations were invited to provide information about the obstacles or problems they may face in practice in the enforcement of non-conviction based confiscation orders.
64. The Secretariat's approach was supported by the delegations.
65. The Delegation of Cyprus and the World Bank expressed their readiness to contribute to a possible future event or seminar that can be organised to share experiences in relation to that issue.

Decision taken

66. The plenary took note of the Secretariat analysis and in the light of Secretariat's first option, to consider further future actions, it decided to wait until there have been several discussions on the implementation of Article 23(5) of the CETS 198 by the COP. The analysis and responses are made available on MONEYVAL's restricted access website.

Item 18 – Discussion of the state of compliance on all NC and PC ratings in the 3rd Round report in respect of Croatia

67. The Secretariat presented its review, as amended after the Bureau's meeting, on the preliminary analysis of the state of compliance of Croatia, highlighting the areas of

- concern where important deficiencies were noted in respect of compliance with the FATF Recommendations. The Croatian delegation gave their opinion on the analysis and brought forward additional information on the implementation of these Recommendations.
68. During the discussion it became clear that some provisions may not have been translated accurately and that there was a need for further information before taking a decision on the important remaining deficiencies.

Decision taken

69. The plenary agreed with the proposal to postpone taking a decision on the two deficiencies identified (SR.II and SR.III) until fuller information is provided on the implementation of these two recommendations. The Secretariat was requested to provide a revised analysis on these two Recommendations for consideration by the next Plenary.

Item 19 - Discussion of the state of compliance on all NC and PC ratings in the 3rd Round report in respect of “the former Yugoslav Republic of Macedonia”

70. The Secretariat presented its preliminary analysis of the state of compliance of “the former Yugoslav Republic of Macedonia”, after discussion by the Bureau. In the light of the Secretariat analysis, MONEYVAL noted that “the former Yugoslav Republic of Macedonia” had taken a number of measures to improve its AML/CFT system, thus making progress to remedy several deficiencies identified in the 3rd MER. The following deficiencies were discussed:

- **SR.II on Criminalisation of terrorist financing (important deficiency):** i) not all terrorist acts under art. 2 (1) (a) of the FT Convention and art. 2 (1) (b) of the FT Convention are fully covered; ii) it is unclear how criterion II.1 (c) and II.3 are covered and iii) there is no provision for collection of funds for an individual terrorist for any purpose;
- **SR.III on freezing and confiscating terrorist assets (important deficiency):** a comprehensive system for freezing without delay by all financial institutions of assets of designated persons and entities, including publicly known procedures for de-listing etc. is not yet in place;
- **R.24 on DNFBP’s regulation, supervision and monitoring (important deficiency):** i) the new law of the Games of Chance is not yet in force, ii) no fit and proper requirements for casino owners and managers are in place; iii) no enquiries into origin of funds for casinos are made and iv) it is unclear how adequate supervisory powers are for professional bodies.

Decision taken

71. The plenary decided that no compliance enhancing procedures should be instituted at this time in respect of “the former Yugoslav Republic of Macedonia”. On the basis of the procedure agreed for this process, the authorities shall be notified with a letter drawing their attention to the ongoing important deficiencies identified and inviting them to take further remedial action.

Item 20 - Discussion on the Second 3rd Round Progress report of Moldova

72. In his introduction, the Chairman informed the Plenary of the decision of the Constitutional Court of Republic of Moldova, dated 25 November 2010 which was announced in a press release posted on the website of the Constitutional Court. According to the press release, the Constitutional Court adopted a decision declaring unconstitutional Articles 8 (1) and 8

(2) of the Law on the Prevention of Money Laundering and the Financing of Terrorism N°190-XVI of 26 July 2007 and article 7(1) indent h) and n) of the Act on the Center for Combating Economic Crimes and Corruption. The Chairman underlined that if the terms of the decision were confirmed, it could raise issues as to the implementation of the requirements of R.13 and other FATF Recommendations.

73. The Chairman specified that it was not clear from the press release which provisions of the Constitution were deemed to be violated nor was it clear when this decision would enter into force. He also indicated that this decision could have implications for Moldova's compliance with the commitments undertaken when ratifying the Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS N° 198), to which Moldova is party. The Chairman stated that, with the agreement of the members of the Bureau, he had sent a letter to the Moldovan authorities seeking clarifications on the issue.
74. The Secretariat presented its review of the implementation of the Core Recommendations under the Progress report. Moldova appears to have made some progress on the normative front on R.5 and R.10 though the effectiveness in practice cannot be determined. The only two ML convictions appear to be self-laundering and effective implementation of R.1 appears still questionable. The STR system for TF appears to be based largely on terrorist list designations, and it is still not clear enough to cover SR IV in all its characteristics. Thus R.1 and SR IV appear still to raise significant problems.
75. The Delegation of Moldova presented an overview of the main developments since the adoption of the MER (September 2007 and the last progress report (December 2008).
76. Azerbaijan, in its capacity as rapporteur country, highlighted several positive measures which have been taken by Moldova in order to address the recommendations of the MER. A number of questions were posed and additional clarifications were sought by the Secretariat on the following issues:
 - R.1 on the scope of the criminal offence in ML;
 - R.13 on STR reporting ;
 - SR.IV on STR reporting related to terrorism.

Decision taken

77. A substantial debate took place. Some delegations, namely Lithuania, Romania and Ukraine expressed the view that the Report should be adopted, as the issue of the recent decision of the Constitutional Court should not call into question the efforts of the authorities, whereas the majority of delegations were of the opinion that the report should not be adopted. Eventually the plenary decided under Rule 42 of the Rules of Procedure not to adopt the progress report since the progress report did not contain sufficient information and requested Moldova to re-submit a fuller progress report at the next meeting.
78. A mandate was granted by the Plenary to the Bureau to institute, as appropriate, Compliance Enhancing Procedures at either Step (iii) or Step (iv) between plenary meetings as necessary if the reported decision of the Constitutional Court was confirmed and published.

Item 21 - Discussion on the Second 3^d Round Progress report of the Principality of Andorra

79. The Secretariat presented its review of the Progress report on the core recommendations, and the various amendments introduced pointing out weak and strong points.
80. The Secretariat presented its written analysis in relation to core FATF recommendations and highlighted the main findings in respect of R.1, SR.II, R.5, R.10, R.13 and SR IV. The representative of the delegation of Andorra introduced the members of the delegation and provided an overview of the main developments and measures implemented since the adoption of the mutual evaluation report in September 2007 and the last progress report in December 2008.
81. Compared with the situation during the 3rd evaluation round, it was noted positively that several changes had been made by the Principality of Andorra to its anti-money laundering system, which now also covers the anti-terrorist financing aspects. New obligations have been introduced reinforcing the preventive measures and customer due diligence requirements. The Andorran authorities' amendments to the Criminal Code of October 2008 meet the recommendations made at the time of the previous evaluation; although a number of inadequacies remain regarding the definition of the money laundering and terrorist financing offences in the light of the relevant international standards. The available statistics also appear to indicate that the authorities have stepped up their efforts to prosecute cases of money laundering, since there has been steady growth in the number of investigations and prosecutions, as well as in money laundering convictions.
82. All of the measures taken by the Principality of Andorra in AML/CFT matters as well as the effectiveness of these arrangements and their implementation will be evaluated in depth during MONEYVAL's on-site visit, scheduled for March 2011.
83. Armenia, in its capacity as rapporteur country, highlighted several positive measures which have been taken by Andorra in order to address the recommendations formulated in the mutual evaluation report fully agreeing and supporting Secretariat's analysis.
84. A number of questions were asked followed by additional clarifications sought by the Secretariat on the following issues:
- R.1 on the ML offence ;
 - SR.II on criminalisation of terrorist financing
 - R.5 on CDD applicable for financial institutions;
 - R.10 on record keeping requirements applicable to financial institutions;
 - R.13 on STR by financial institutions;
 - SR.IV on reporting by financial institutions of suspicious of terrorist financing;

Decision taken

85. As a result of the discussions held in the context of the examination of this second progress report, the Plenary was satisfied, considering also the amendments done, with the information provided and the progress being undertaken and thus approved the progress report and the analysis of the progress on the core Recommendations. Pursuant to Rule 41 to the Rules of procedure, the progress report will be subject of an update in every two years between evaluation visits (i.e. December 2012), though the Plenary may decide to fix an earlier date at which an update should be presented. The progress report

is subject to automatic publication in accordance with the Rules of Procedure.

Item 22 - Information on AML/CFT initiatives in MONEYVAL countries (tour de table)

86. The Chairman informed the delegations which had not yet sent any information that in accordance with the new procedure, they could still do so in the week following the meeting.
87. The Secretariat had received responses from 13 out of 28 delegations before the meeting. The Executive Secretary advised the Plenary that the final compilation of information from the Tour de Table received from delegations would be available for consultation on the restricted area website of MONEYVAL.
88. The representatives of Azerbaijan, Bulgaria, Cyprus, Czech Republic, Estonia, Georgia, Hungary, Latvia (written document), Monaco, Montenegro, Poland, Romania, Russian Federation, San Marino, Slovakia, Slovenia, UK and Austria informed the plenary on their respective AML/CFT initiatives.

Item 23 - Compliance Enhancing Procedures – further discussion as necessary of the next steps

23.1 Countries (Croatia, “the former Yugoslav Republic of Macedonia”, Ukraine)

89. The decisions on each country have been recorded in the relevant paragraphs of this report above.

Item 24 – Typologies work

24.1 Joint EAG/MONEYVAL Typologies meeting (Moscow, 9-10 November 2010)

90. The Chairman informed delegations that several room documents were circulated on MONEYVAL’s typologies work and particularly on the Joint EAG/MONEYVAL Typologies meeting held in Moscow on 9-10 November 2010.

24.2/3 – On-going projects: status of implementation

91. Project leaders and the Secretariat provided the Committee with an update on the progress made on their projects since September 2010 as well as the next steps to be taken:
 - Criminal money flows on the internet: methods, trends and multi-stakeholder counteraction: The plenary heard a presentation by the project leaders on the findings of the draft report. The final document will be presented after approval at the next EAG and MONEYVAL plenaries.
 - The use of internet gambling for ML and TF purpose (led by Cyprus): Work has been initiated on the literature review and the analysis of the responses to the questionnaire; however the work plan timelines will require adjusting and extending to 2011.

24.4 – Future activities

92. Update on the 2011 MONEYVAL Typologies meeting: It was noted that the annual meeting would be organised in Israel late October 2011. The draft agenda and the further practical information for the annual meeting will be circulated in due course.

93. MONEYVAL Working Group on Typologies: Delegations were reminded that nominations for the Chair and membership of the working group are expected before further work can be initiated. Also, a call for proposals for new projects will shortly be circulated.
94. France/OGBS FATF Typology project on human trafficking and other projects: The plenary was informed on the status of this joint France/OGBS/FATF project and the invitation that was made to MONEYVAL to participate actively in the work of this project team. Considering the Committee's previous typologies work on the topic, the plenary endorsed the principle that MONEYVAL should participate in this project, and subject to resources available, to the FATF Typologies meetings in 2011.

Decision taken

95. The Plenary decided to accept Israel's offer to host the 2011 Typologies meeting. Delegations were invited to submit nominations for the Chair and membership of the working group before further work on typologies can be initiated and also to submit new proposals for typologies projects for 2011.

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

25.1 FATF

96. The FATF representative gave further information on the work of the expert groups reviewing the FATF standards. Although the standards review is still going on, a first document in this regard has been posted last October on the FAFT website. When the "full package" of the standards reviews is complete, a final decision will be taken by the FATF plenary on the amendments to be made.
97. The FATF representative, after giving some additional information on the other ongoing FATF activities, transmitted also the compliments to MONEYVAL from the FATF President for the welcome he had received.

25.3 World Bank

98. The representative from the World Bank presented a report on WB activities, reporting on World Bank's involvement in the FAFT/Egmont Group work related to R.26, to training on FIU analysis due to start next April or May, and the training for prosecutors planned for 2011 in Azerbaijan and Armenia.

25.5 OGBS

99. The representative of the OGBS presented a report on OGBS activities, in relation to trust and company services (R. 33 and R.34) and typologies work on ML and Human Trafficking.

25.7 Council of Europe Development Bank - CEB

100. The Chief Compliance Officer of the CEB, attending the MONEYVAL plenary for the first time, presented their activities on internal regulations in line with the European banks standards adopted last year. He also gave some explanation of projects and field activities financed by the CEB as well as on training organised internally for AML/CFT for operators, and expressed his intention for a closer co-operation between the Bank and MONEYVAL.

25.8 Eurasian Group on Combating ML and TF (EAG)

101. A report was heard on EAG activities, on the recent on-site evaluations of Turkmenistan and Kazakhstan as well as on the Joint MONEYVAL / EAG Typologies meeting in Russia.

Item 26 – Information from the European Union

102. The representative of the EC presented a report on activities in the field of AML/CFT.

Item 27 - Information on the Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the proceeds from Crime and on the Financing of Terrorism (CETS No. 198)

103. The Executive Secretary informed the plenary about the latest developments on the Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the proceeds from Crime and on the Financing of Terrorism (CETS No. 198) since the last plenary. In 2011 the Conference of the Parties will meet on 7 and 8 March 2011, and possibly also in October 2011.
104. To date, there are 21 ratifications, and 12 signatures not yet followed by ratification, of CETS 198.

Item 28 - Ad Hoc Review Group of Experts for the next plenary meeting

105. The Ad Hoc Review Group of Experts for the Czech Republic would be Estonia, for Albania would be Georgia and for Cyprus would be Latvia.

Item 29 – Rapporteurs for 2011

106. The Rapporteur countries for the progress reports for the 35th Plenary will be notified in advance of the meeting. These are: for Bosnia and Herzegovina, United Kingdom; for Bulgaria, Israel; for Croatia, Bosnia and Herzegovina; for Moldova, Azerbaijan.

Item 30 – Future representation in FATF meetings

107. The Secretariat called for expressions of interest in attending the forthcoming Working Group meetings (21 - 25 February 2011) and FATF plenary meeting in Mexico (20 - 24 June 2011).

Item 31 – Financing and staffing

108. The Executive Secretary made a brief report to the plenary on the budget for 2011, informing also about the on-going procedure for an additional secondment.

Item 32 – Miscellaneous

109. The Secretariat informed delegations that as of January 2011 the access to the MONEYVAL restricted website area will be modified and further information will be sent to delegations in due course.

ANNEX I



Strasbourg, 7.12.2010

MONEYVAL-PLEN34(2010)OJ3

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

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

MONEYVAL

AGENDA / ORDRE DU JOUR

34th PLENARY MEETING / 34^e SESSION PLENIERE

Strasbourg, 7 – 10.12.2010

Palais de l'Europe Room 1 / salle 1

Day 1: Tuesday 7 December 2010 / 1^e jour: mardi 7 décembre 2010

Morning 9h30 / matin 9h30

1. **Opening of the Plenary Meeting at 9h30 / Ouverture de la Réunion Plénière à 9h30**
2. **Adoption of Agenda / Adoption de l'Ordre du Jour**
3. **Information from the Chairman / Informations communiquées par le Président**
 - 3.2 **Chairman's correspondence / Correspondance par le Président**

[MONEYVAL34\(2010\)INF3.1-CEPs](#)
[MONEYVAL34\(2010\)INF3.1](#)

 - **Countries in compliance enhancing procedures (Albania and Bosnia and Herzegovina) / Pays sous procédure de conformité renforcée (Albanie et Bosnie-Herzégovine)**
 - **Azerbaijan / Azerbaïdjan**
 - **Georgia / Géorgie**
 - **Moldova**
 - 3.3 **Bureau Meeting on 6 December 2010 / Réunion du Bureau de 6 décembre 2010**
4. **Information from the Secretariat / Informations communiquées par le Secrétariat**
 - 4.1 **Information on the new Statute for MONEYVAL / Informations sur le nouveau statut de MONEYVAL**

[MONEYVAL34\(2010\)INF4.1](#)
 - 4.2 **Agenda of evaluations and meetings for 2011 / Agenda des évaluations et réunions en 2011**

[MONEYVAL34\(2010\)INF4.2](#)
 - 4.3 **Participation in FATF meetings / Participation aux réunions du GAFI**
 - 4.4 **Council of Europe Conference "Prevention of Terrorism: Prevention Tools, legal instruments and their implementation" – Istanbul, 16 - 17 December 2010 / Conférence organisée par le Conseil de l'Europe « La prévention du terrorisme : les instruments de prévention, les instruments juridiques et leur mise en œuvre » - Istanbul, 16 - 17 Décembre 2010**
5. **ICRG process - update / Processus du Groupe d'examen des questions de coopération internationale (ICRG) – mise à jour**
 - 5.1 **Azerbaijan / Azerbaïdjan**
 - 5.2 **Europe/Eurasia Regional Review Group / Groupe d'examen régional Europe / Eurasie**
 - 5.3 **FATF Public statements October 2010 / Déclarations publiques par le GAFI en Octobre 2010**

[MONEYVAL34\(2010\)INF5.3](#)
 - 5.4 **Options for dealing with ICRG monitored jurisdictions not making sufficient progress / Options pour le traitement des juridictions suivies pas le groupe ICRG dont les progrès sont insuffisants**

[MONEYVAL34\(2010\)INF5.4](#)
6. **Report on participation in Joint FATF/Egmont Typologies meeting (Cape Town, 16-18 November 2010) / Rapport sur la participation à la réunion jointe GAFI/Egmont sur les Typologies (Cape Town, 16-18 Novembre 2010)**

7. **Special Recommendation III (SR.III) – Recent developments in international law and European jurisprudence– further update from the MONEYVAL Secretariat / Recommandation Spéciale III (RS.III) – développements récents en droit international et dans la jurisprudence européenne – mise à jour par le Secrétariat de MONEYVAL**

[MONEYVAL34\(2010\)INF7](#)

8. **Discussion on the Second 3rd round Progress report of Malta / Discussion du deuxième rapport de progrès de 3^e cycle de Malte**

[MONEYVAL\(2010\)29](#)
[MONEYVAL\(2010\)29ANN](#)
[MONEYVAL\(2010\)29-ANALYSIS](#)

Afternoon 14h30 / après-midi 14h30

9. **Intervention of Mr Luis URRUTIA CORRAL, President of the FATF and discussion / Intervention de Mr Luis URRUTIA CORRAL, Président du GAFI, suivie par un échange de vues**

10. **Discussion on the First 3rd round Progress report of Bosnia and Herzegovina / Discussion du premier rapport de progrès de 3^e cycle de la Bosnie-Herzégovine**

[MONEYVAL\(2010\)28](#)
[MONEYVAL\(2010\)28ANN](#)
[MONEYVAL\(2010\)28-ANALYSIS](#)

11. **Report from Bosnia and Herzegovina under Step I of the Compliance Enhancing Procedures and discussion of the next steps / Rapport par la Bosnie-Herzégovine au titre de l'étape I des procédures de conformité renforcée et discussion des étapes à venir**

[MONEYVAL34\(2010\)INF11](#)

12. **Discussion and adoption of the amended 3rd Round Horizontal Review / Discussion et adoption du Rapport horizontal sur le 3^e cycle d'évaluation révisé**

[MONEYVAL\(2010\)12rev2](#)

(Bureau meeting with the Delegation of Ukraine)

Day 2: Wednesday 8 December 2010 / 2^e jour: mercredi 8 décembre 2010

Morning 9h30 / matin 9h30

13. **Discussion of the state of compliance on all NC and PC ratings in the 3rd Round report in respect of Ukraine / Discussion sur l'état de conformité de l'Ukraine concernant les notations NC et PC du rapport d'évaluation de 3^e cycle**

[MONEYVAL\(2010\)25](#)

14. **Discussion on the First 3rd round Progress report of Serbia / Discussion du premier rapport de progrès de 3^e cycle de la Serbie**

[MONEYVAL\(2010\)33](#)
[MONEYVAL\(2010\)33ANN](#)
[MONEYVAL\(2010\)33-ANALYSIS](#)

15. **Report from Albania under Step I of the Compliance Enhancing Procedures and discussion of the next steps / Rapport par l'Albanie au titre de l'étape I des procédures de conformité renforcée suivi par discussion des étapes à venir**

[MONEYVAL33\(2010\)INF15](#)

(Bureau meeting with the Delegations of Croatia and "the former Yugoslav Republic of Macedonia")

Afternoon 14h30 / après-midi 14h30

16. Discussion of the Second 3rd round Progress report of Liechtenstein / *Discussion du deuxième rapport de progrès de 3^e cycle de Liechtenstein*

MONEYVAL(2010)30

17. Enforcement of Civil Confiscation Orders – Discussion of responses and next steps / *Exécution des décisions de confiscation sans condamnation pénale – état des réponses et suivi*

MONEYVAL34(2010)INF17-Note Secretariat

MONEYVAL34(2010)INF17- Part 1

MONEYVAL34(2010)INF17 – Part 2

Day 3: Thursday 9 December 2010 / 3^e jour: jeudi 9 décembre 2010

Morning 9h30 / matin 9h30

18. Discussion of the state of compliance on all NC and PC ratings in the 3rd Round report in respect of Croatia / *Discussion sur l'état de conformité de la Croatie concernant les notations NC et PC du rapport d'évaluation de 3^e cycle*

MONEYVAL(2010)20

19. Discussion of the state of compliance on all NC and PC ratings in the 3rd Round report in respect of “the former Yugoslav Republic of Macedonia” / *Discussion sur l'état de conformité de et « l'ex-République yougoslave de Macédoine » concernant les notations NC et PC du rapport d'évaluation de 3^e cycle*

MONEYVAL(2010)24

20. Discussion on the Second 3rd round Progress report of Moldova / *Discussion du deuxième rapport de progrès de 3^e cycle de Moldova*

MONEYVAL(2010)34

MONEYVAL(2010)34ANN

MONEYVAL(2010)34-ANALYSIS

Afternoon 14h30 / après-midi 14h30

21. Discussion on the Second 3rd round Progress report of Andorra / *Discussion du deuxième rapport de progrès de 3^e cycle de l'Andorre*

MONEYVAL(2010)35_fr

MONEYVAL(2010)35_en

MONEYVAL(2010)35ANN

MONEYVAL(2010)35-ANALYSIS

22. Information on AML/CFT initiatives in MONEYVAL countries (tour de table) / *Informations sur les initiatives LAB/CFT dans les pays membres de MONEYVAL (tour de table)*

MONEYVAL34(2010)INF22

Day 4: Friday 10 December 2010 / 4^e jour: vendredi 10 décembre 2010

Morning 9h00 / matin 9h00

23. Compliance Enhancing Procedures – further discussion as necessary of the next steps / *Procédures de conformité renforcée – poursuite de la discussion des étapes à venir*

- Ukraine
- Croatia / *Croatie*
- “the former Yugoslav Republic of Macedonia” / « l'ex-République yougoslave de

24. Typologies work / Travaux sur les typologies

- 27.1 Joint EAG/MONEYVAL Typologies meeting (Moscow, 9-10 November 2010) / Réunion jointe EAG/MONEYVAL sur les Typologies (Moscou, 9-10 Novembre 2010)**
[MONEYVAL34\(2010\)INF24.1](#)
- 27.2 Criminal money flows on the internet: methods, trends and multi-stakeholder counteraction - update / Les flux de capitaux d'origine criminelle sur Internet: méthodes, tendances, et actions conjuguées des parties prenantes - état des travaux**
- 27.3 The use of internet gambling for ML and TF purposes- update / L'utilisation des jeux en ligne aux fins du BC et FT- Etat des travaux**
- 27.4 Future MONEYVAL Typologies activities / Activités futures dans le domaine des Typologies**

Afternoon 14h30 / après-midi 14h30

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

- 25.1 FATF / GAFI**
- 25.2 IMF / FMI**
- 25.3 World Bank / Banque Mondiale**
- 25.4 EBRD / BERD**
- 25.5 OGBS**
[MONEYVAL34\(2010\)INF25.5](#)
- 25.6 OSCE**
- 25.7 Council of Europe Development Bank / Banque de développement du Conseil de l'Europe**
- 25.8 Eurasian Group on Combating Money Laundering and Terrorist Financing (EAG) / Groupe Eurasie sur le blanchiment de capitaux et le financement du terrorisme (EAG)**

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

- 26.1 European Commission / Commission européenne**
- 26.2 Secretariat General of the Council of the European Union / Secrétariat Général du Conseil de l'Union européenne**

27. Information on the Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the proceeds from Crime and on the Financing of Terrorism (CETS No. 198) / Information sur la 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)

29. Ad Hoc Review Group of Experts for the next plenary meeting / Groupe Ad Hoc d'experts pour la prochaine réunion plénière

30. Rapporteurs for 2011 / Rapporteurs pour 2011

31. Future representation in FATF meetings / Représentations futures dans les réunions du GAFI

32. Financing and staffing / Financement et questions de personnel

33. Miscellaneous / Divers.

ANNEX II

34th PLENARY MEETING / 34^e RÉUNION PLÉNIÈRE

7 - 10 December 2010 / 7 - 10 décembre 2010

LIST OF PARTICIPANTS / LISTE DES PARTICIPANTS

MONEYVAL MEMBERS / MEMBRES DE MONEYVAL

ALBANIA / ALBANIE

Mr Agim MUSLIA *financial expert*
HEAD OF DELEGATION
Head of Inspection Department, Ministry of Finance, General Directorate for the Prevention of Money

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Ministry of Justice

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ANDORRA / ANDORRE

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

Mr Jesus GARCIA
Avocat

Mr Albert HINOJOSA
Chef du registre des sociétés

Mr Tanjit SANDHU
Legal Adviser, Financial Intelligence Unit

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Mr Zelimir DURSUN
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LIECHTENSTEIN

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Mr Wilhelm UNGERANK, Dr. iur., LL.M., judge,
Princely Cour

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MALTA / MALTE

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Registrar of Companies and Director Corporate Services
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Assistant Commissioner of Police, Malta Police Force, Police General Headquarters

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