

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

Strasbourg, 31 January 2019

MONEYVAL(2018)27

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

**MONEYVAL**



**57<sup>th</sup> PLENARY MEETING  
Strasbourg, 3-7 December 2018**

**MEETING REPORT**

**MEMORANDUM**

**Prepared by the MONEYVAL Secretariat**

## Executive Summary

**During the 57<sup>th</sup> Plenary meeting, held in Strasbourg from 3-7 December 2018, the MONEYVAL Committee:**

- adopted the 5<sup>th</sup> round mutual evaluation report and its executive summary on the Czech Republic, and decided to subject the country to the enhanced follow-up procedure;
- adopted the 5<sup>th</sup> round mutual evaluation report and its executive summary on Lithuania, and decided to subject the country to the enhanced follow-up procedure;
- adopted the joint FATF/MONEYVAL mutual evaluation report and its executive summary on Israel;
- adopted the follow-up reports by Andorra, Hungary, Serbia and Slovenia under the 5<sup>th</sup> round of mutual evaluations;
- adopted the 4<sup>th</sup> round follow-up reports of Azerbaijan, Liechtenstein and North Macedonia and decided to remove these countries from the follow-up procedure;
- adopted the 4<sup>th</sup> round compliance report of Croatia under its Compliance Enhancing Procedures (CEPs), decided to apply Step 2 of the CEPs (with a final decision to be made in light of legislative progress by February 2019) and invited the country to submit a further report at the 58<sup>th</sup> Plenary in July 2019;
- adopted the 4<sup>th</sup> round compliance report of Romania under the CEPs, and invited the country to submit a further report at the 58<sup>th</sup> Plenary in July 2019;
- adopted the 4<sup>th</sup> round compliance report of Montenegro under the CEPs, decided to lift CEPs with regard the country and invited it to seek removal from the 4<sup>th</sup> round follow-up process at the 58<sup>th</sup> Plenary in July 2019;
- adopted a report on the Voluntary Tax Compliance Programme of the Republic of Moldova;
- adopted a regional operational plan to counter terrorism financing;
- held a panel discussion on countering the laundering of proceeds from human trafficking and modern slavery, with representatives of the FATF, the Egmont Group, the Council of Europe's Group of Experts on Action against Trafficking in Human Beings (GRETA) and the private sector;
- heard various presentations and held discussions on topics such as: recent changes to the FATF standards with regard to the regulation of virtual assets; a presentation of a case by the State Financial Monitoring Service of Ukraine which was awarded the Best Egmont Case Award 2018; terrorist financing disruption strategies; a horizontal review of the sector of designated non-financial businesses and professions (supervision and implementation of preventive measures) in the new round of evaluations; the International Training and Methodology Centre for Financial Monitoring of the Russian Federation; and an introduction to various intelligence and educational tools of the Basel Institute on Governance to counter corruption and financial crimes;
- held an exchange of views with Mr Branislav Bohaçik, President of the Conference of the Parties to the Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds of Crime and on the Financing of Terrorism.

Reports adopted will be made available shortly under each jurisdiction's profile, in accordance with MONEYVAL's publication policy.

The Committee of Experts on the evaluation of anti-money laundering measures and the financing of terrorism (MONEYVAL) held its 57<sup>th</sup> Plenary meeting from 3-7 December 2018 in Strasbourg under the presidency of Mr Daniel Thelesklaf (Liechtenstein). The first day of the Plenary was fully devoted to MONEYVAL's Working Group on Evaluations (WGE). The agenda of the meeting is attached as Appendix I, MONEYVAL's calendar of activities is attached as Appendix II, and the list of participants is attached as Appendix III.

### **Day 1: Tuesday 4 December 2018**

#### **Agenda item 1 – Opening of the Plenary Meeting**

1. The Chair, Mr Daniel Thelesklaf, opened the Plenary by welcoming all participants.
2. Mr Jan Kleijssen, Director of Information Society and Action against Crime, welcomed the participants and noted that this Plenary had a record participation (with almost 300 registered participants, including the Secretariat and interpreters). He updated the Plenary about the overall financial situation of the Council of Europe and the ongoing reform-process within the organisation. Mr Kleijssen also reported on the current external competition for the MONEYVAL Secretariat (see agenda item 4).
3. Mr Kleijssen welcomed in particular the scheduling of a panel discussion on countering the laundering of proceeds from modern slavery and human trafficking, as well as an agenda item on the issue of virtual assets and their potential abuse by terrorist groups or organised crime. He underlined the future importance of artificial intelligence and the manifold legal and ethical questions this would bring along. As the Council of Europe has put the issue of artificial intelligence at the top of its agenda, and seeks to mainstream its work on the issue throughout all its committees and bodies, he invited delegates to discuss how artificial intelligence may shape the AML/CFT field in the long-term future.

#### **Agenda item 2 – Adoption of the agenda**

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

#### **Agenda item 3 – Information from the Chairman**

5. The Chair informed the Plenary about the correspondence he had on behalf of MONEYVAL since the last Plenary, which had been compiled in writing and made available to all delegations in advance of the Plenary. He also informed delegations about the invitation by the Prime Minister of Latvia in August 2018, accompanying the publication of the mutual evaluation report of that country, to discuss the results and its impact at the highest political level. A similar invitation from the Prime Minister of Albania was made for a mission to Tirana in the second half of December, also coinciding with the publication of that country's mutual evaluation report.
6. The Chair presented the overall results of an online survey he had made amongst all Heads of Delegation and observers prior to the Plenary (with the individual answers remaining confidential). Delegations were generally content with the overall quality of the mutual evaluation reports adopted so far in the 5<sup>th</sup> round of mutual evaluation. A very large majority agreed that delegations would be treated equally within MONEYVAL, but there had been a certain minority which considered that this was not always the case during Plenary discussions. Delegations were very content with the way the Secretariat would make itself available to the countries during evaluations. There was also consensus that the resources in the MONEYVAL Secretariat had to be increased in order

to cope with the future workload posed by the global AML/CFT network. Other issues concerned the participation of delegations and observers during Plenary discussions, the improvement of the *tour de table*-procedure, guidance for countries on the evaluation process, possible outreach to the private sector, as well as priorities for the future. The results of the survey would be shared with delegations via MONEYVAL's restricted website. They could also be reflected in an overall strategy for the next three years of MONEYVAL, which can be discussed in a Plenary in 2019. Delegates thanked the Chair for this innovative initiative, in particular for also letting the observers participate.

7. The Chair announced that several Council of Europe member states (notably Andorra, the Czech Republic, France and the United Kingdom) had made voluntary contributions to the MONEYVAL Secretariat. On behalf of MONEYVAL, he warmly thanked those delegations and invited all MONEYVAL delegations to consider making such voluntary contributions. Such contributions would allow the Secretariat to recruit additional staff members which are urgently needed to accelerate the current round of mutual evaluations and address the future workload, in particular in view of the difficult overall financial situation of the Council of Europe and the increasing workload for MONEYVAL as part of the global AML/CFT network. On behalf of MONEYVAL, the Chair also thanked the delegations of Lithuania and Germany for making seconded officials available. Having said that, the Chair however stated that these measures would rather be short-term measures to support the situation of the Secretariat. This could naturally not replace a long-term and sustainable strategy to provide MONEYVAL with sufficient resources.
8. The Chair reported about on-going negotiations with the FATF about a joint FATF/MONEYVAL expert meeting, which will be held in Israel in late March 2019. The event will be divided into several breakout sessions on three on-going RTMG projects, including FT risk assessment, detection/investigation/confiscation of virtual assets, as well as cross-border asset recovery. An additional day would be devoted to a US-led workshop for judges and prosecutors to improve the capacity of FT prosecutions. The Chair thanked the Israeli delegation for hosting this meeting, which is a regular annual event held by the FATF with one of the FATF-style regional bodies. He strongly encouraged all delegations to attend this meeting with their relevant experts, even though the Council of Europe would not be able to fund the attendance. A more detailed draft programme would be circulated in due time.

#### **Agenda item 4 – Information from the Secretariat**

9. The Executive Secretary informed the Plenary about MONEYVAL's calendar of activities for 2019, which is attached as Appendix II to this report, as well as recent activities since the 56<sup>th</sup> Plenary. This concerned in particular: the onsite visits to Moldova (October 2018) and Malta (November 2018), as well as the country trainings for the Slovak Republic (October 2018) and Georgia (December 2018). Moreover, he reported from the assessor training held in Moscow (24-28 September 2018) which was jointly organised with the FATF and the EAG. 43 prospective assessors (25 from MONEYVAL jurisdictions and 18 from FATF/EAG jurisdictions) received training on the 2012 FATF Recommendations and the 2013 FATF Methodology. He extended his gratitude to the EAG, the Russian Federal Financial Monitoring Service (Rosfinmonitoring) and the International Training and Methodology Centre for Financial Monitoring (ITMCFM) for hosting the training. Moreover, on behalf of MONEYVAL, he warmly thanked the trainers, Mr Yehuda Shaffer and Mr Richard Walker.
10. The Executive Secretary then reported from the FATF Plenary in October 2018, in particular about decisions which directly affected MONEYVAL. This concerned, *inter alia*, recent amendments to the FATF recommendations to address the regulation of virtual assets (see agenda item 11) and a discussion to amend of the standards further with

regard to proliferation financing; the discussion by the Joint Group for Europe/Eurasia of the progress report by the UK Crown Dependency of the Isle of Man (see agenda item 5); as well as the discussion and adoption of the joint mutual evaluation report of Israel (see agenda item 8).

11. Moreover, he informed the Plenary that the FATF had considered a particular issue (the rating for Immediate Outcome 4) of the mutual evaluation report for Albania as part of its quality and consistency review. The MONEYVAL Secretariat had made a detailed intervention on how the Plenary had discussed and finally decided on the rating, in light of which there had been no consensus in the FATF's Evaluation and Compliance Group (ECG) to take further action. Hence the report had become final and would be published on 17 December 2018. As five other reports (one by the FATF itself and four other reports by FSRBs) had also been subjected to the quality and consistency review, but no further action was taken absent a consensus, the FATF was currently reviewing the procedures for the quality and consistency process. The MONEYVAL Secretariat was actively participating in this review process.
12. The Executive Secretary informed the Plenary about the attendance of Secretariat staff in other forums. The MONEYVAL Secretariat participated in a workshop on 13-14 September organised by the EAG, the ITMCFM and Rosfinmonitoring on effective supervision as a mechanism for involvement of DNFBPs in the AML/CFT system. The Secretariat was represented by Mr Michael Stellini and Mr Jeremie Ogé, who presented a comparative analysis on the supervision of DNFBPs in all the countries that have been evaluated so far by the global network (see also agenda item 29). The MONEYVAL Secretariat also participated in a workshop in October 2018 organised by the Ukrainian FIU, EUACI and the OSCE on practical challenges in achieving stand-alone ML and FT. The MONEYVAL Secretariat (Mr Michael Stellini) was also invited to intervene in one of the workshops in September at the 36<sup>th</sup> International Symposium on Economic Crime held annually at Cambridge University. The presentation focussed on challenges faced by countries in their evaluations.
13. The Executive Secretary informed the Plenary about the staff situation. He introduced a new administrator, Ms Kotryna Filipaviciute, who had been seconded from Lithuania for one year since September 2018. Germany had volunteered to second a senior official from the Federal Ministry of Finance to the MONEYVAL Secretariat as of January 2019. A new external recruitment competition for the MONEYVAL Secretariat was currently underway and would hopefully be completed by mid-2019.

#### **Agenda item 5 – Report by the Chair on recent progress by the UK Crown Dependency of the Isle of Man and proposal by the Bureau on the follow-up in MONEYVAL**

14. At the present Plenary, MONEYVAL deliberated the situation of the UK Crown Dependency of the Isle of Man on account of a report given by the Chair and on the basis of a proposal by the Bureau for further follow-up. Because of the results of the 5<sup>th</sup> Round Mutual Evaluation Report of the UK Crown Dependency of the Isle of Man, which was adopted in December 2016, the jurisdiction had been referred to the FATF's International Cooperation Review Group (ICRG). Because the UK Crown Dependency of the Isle of Man had made positive and tangible progress within a one year observation-period, the FATF decided in October 2018 to refer the jurisdiction back to the enhanced follow-up process of MONEYVAL, provided that MONEYVAL would closely monitor a few outstanding issues for which the FATF considered that the UK Crown Dependency of the Isle of Man did not yet effectively apply the underlying standards and reference documents. In order to monitor these issues in the most appropriate manner, MONEYVAL decided to apply Step 1 of the Compliance Enhancing Procedures. The issues which continue to raise concern, identified in the 2016 Mutual Evaluation Report, are

as follows:

- With respect to Immediate Outcome 3 (“Supervision”), the UK Crown Dependency of the Isle of Man should continue demonstrating the effective use of dissuasive sanctions in severe cases.
- With regard to Immediate Outcome 4 (“Preventive Measures”), the UK Crown Dependency of the Isle of Man should demonstrate further progress with regard to the first two recommended actions made by MONEYVAL on page 72 of its mutual evaluation report of December 2016. In particular, this concerns the recommendation to further ensure that the private sector, notably banks, take into account and apply corresponding mitigating measures, to the risks posed by business relationships involving intermediaries which are acting on behalf of third parties.

15. The Isle of Man will be expected to report back fully to MONEYVAL on the progress made with respect to the implementation of these recommended actions in July 2019. If no substantive action is undertaken in the meantime, the Committee may consider the application of further steps, as necessary.

## **Agenda item 6 – Compliance Enhancing Procedures (CEPs)**

### **6.1 Report from Croatia under step 1 of the Compliance Enhancing Procedures**

16. Following the adoption of the 4th round MER in September 2013, Croatia was placed in regular follow-up. Since then Croatia has submitted four follow-up reports between 2015 and 2017. At the 54<sup>th</sup> Plenary (26-28 September 2017), the Plenary decided to move Croatia to enhanced follow-up and to apply Step 1 of Compliance Enhancing Procedures (CEPs). At the present Plenary, the country submitted its third compliance report (following the compliance reports of December 2017 and July 2018, respectively).

17. The Plenary noted that Croatia had introduced new legislative amendments (still currently in draft form) to the Criminal Code and to the AML/CFT Law in order to ensure compliance with R.1, R.3, R.5 and R.35. Moreover, the country continued consultations among competent authorities regarding the drafting of the necessary legislative amendments to the *International Restrictive Measures Act* to address the deficiencies with respect to SR.I and SR.III. On the other hand, the country had not taken any particular steps to ensure compliance with R.16. As concerns R.23, Croatia had adopted a number of legal acts aimed at addressing the remaining deficiencies. However, the Secretariat was not in a position to confirm the achieved progress with regard to R.23, due to the fact that the respective acts were not provided by the country sufficiently in advance of the Plenary.

18. The Plenary noted that, although Croatia had taken some steps to make progress since the 56<sup>th</sup> Plenary (July 2018), these did not result in actually remedying the outstanding deficiencies. The Plenary noted that Croatia had still a large number of those deficiencies which relate to R.1, R.3, R.5, R.23, R.35, SR.I, SR.III, R.12 and R.16.

19. The Chair reminded the Plenary of the decision taken at the 56<sup>th</sup> Plenary (July 2018) that, should the remaining significant deficiencies not be addressed by the time of the 57<sup>th</sup> Plenary in December 2018, the Plenary would consider the adoption of Step 2 of CEPs. The Chair observed that Croatia had stated that the country was intending to adopt all the necessary legislation by early 2019, and proposed to adopt a flexible approach to the application of the Step 2 of CEPs. This meant that, in case Croatia would finalise the pending legislation ensuring compliance with the core and key recommendations that have not been yet fully addressed (subject to a preliminary scrutiny by the Secretariat) by February 2019, the high-level mission to Croatia could be suspended for reconsideration

until the next Plenary in July 2019. The Plenary agreed with this proposal.

*Decision taken*

20. Mindful of the fact that the deficiencies were already identified in the MER of 2012, and that progress made by Croatia since the 56th Plenary (July 2018) falls short of the expectation by the Plenary, it decided to apply Step 2 of CEPs. This will entail a high-level mission to Croatia and involve meetings with relevant Ministers and senior officials in order to stress the importance of prioritising actions to address deficiencies identified in the 4<sup>th</sup> round MER. However, should the pending legislation enter into force by the end of February 2019 ensuring compliance with the core and key recommendations that have not yet been fully addressed, the high-level mission to Croatia could be suspended for reconsideration until the 58<sup>th</sup> Plenary in July 2019.

## **6.2 Report from Montenegro under step 2 of the Compliance Enhancing Procedures**

21. The Secretariat introduced the seventh compliance report submitted by the Montenegrin delegation. It was recalled that at its 56<sup>th</sup> meeting in July 2018, the Plenary had taken note of the amendments to the Law on the Prevention of Money Laundering and Terrorist Financing (LPMLTF) adopted on 26 June 2018, which addressed the vast majority of the outstanding deficiencies identified by the Secretariat in the stock-taking exercise. While noting some progress in relation to SR.III, the Law on International Restrictive Measures (LIRM), which was intended to address the most serious deficiencies under SR.III, had not yet been adopted by Parliament by the end of June 2018, despite the political commitment made during the high-level mission in June 2017, indicating that the law would be adopted before the 54th MONEYVAL Plenary in September 2017 and the call upon Montenegro by MONEYVAL at the 55th Plenary to address the most significant deficiencies by the 56th Plenary meeting at the very latest. This raised significant concern and the Plenary urged Montenegro to proceed with the adoption of the new LIRM by 31 July 2018 at the latest, before Parliament's summer recess. Failing the adoption of the LIRM, it was proposed that the Plenary would place Montenegro under Step 3 of CEPs, which would involve the publication of a statement on 1 August 2018. Following the 56th Plenary meeting, the Montenegrin authorities informed the MONEYVAL Secretariat that the Parliament of Montenegro adopted the LIRM on 27 July 2018. As a result, it was decided to maintain Montenegro under Step 2 of the CEPs and not to proceed with the publication of a statement. The decision was communicated by the MONEYVAL Secretariat to all delegations on 31 July 2018.

*Decision taken*

22. The Plenary took note of the fact that, upon the coming into force of the LIRM, Montenegro broadly addressed the deficiencies under SR.III, which were the last remaining serious deficiencies examined under the CEPs. In light of this development, the Plenary decided to remove Montenegro from the CEPs and place the country in regular follow-up. The Plenary invited Montenegro to report back at the 58<sup>th</sup> Plenary (15-19 July 2019) and urged the country to exit the process at that occasion.

## **6.3 Report from Romania under step 1 of the Compliance Enhancing Procedures**

23. MONEYVAL adopted the mutual evaluation report of Romania under the 4<sup>th</sup> round of mutual evaluations at its 44<sup>th</sup> Plenary meeting (April 2014). Romania was placed into regular follow-up and has submitted in total three follow-up reports. In July 2018, the Plenary decided to apply Step 1 of Compliance Enhancing Procedures (CEPs), due to delays in the adoption process of the draft AML/CFT Law, which is expected to address the outstanding deficiencies in relation to R.5, R.13; R.23; R.26 and SR.IV.

24. At the time of the first compliance report in December 2018, the Romanian delegation informed the Plenary about the adoption of the new AML/CFT Law by the Romania Parliament on 24 October 2018. The Secretariat introduced its analysis and concluded that the new Law, once it has entered into force, will rectify a large number of outstanding deficiencies identified in the 4<sup>th</sup> round MER and bring the level of compliance with R.13, 23, 26, and SR.IV to the level equivalent to “largely compliant”. However, the new Law was not yet in force, as an application in relation to its unconstitutionality had meanwhile been submitted to the Constitutional Court. Therefore, Romania was invited to inform the Plenary (through the Secretariat) of any developments with regard to this issue.
25. The Secretariat analysis also concluded that there were no significant developments on R.5, SR.I and SR.III (which thus remained at the level of “partially compliant”). In particular, some deficiencies related to the requirements (d) and (e) of the criterion 5.2 of the methodology and the post-office licensing remained outstanding. Moreover, the Government Emergency Ordinance in relation to the implementation of international sanctions remained in draft form.

#### *Decision taken*

26. In view of the Secretariat analysis and the discussion of the report, the Plenary agreed that Romania had undertaken some important steps to remedy identified deficiencies under core and key recommendations rated PC. Even though the entry into force of the new AML/CFT Law had been suspended by a complaint to the constitutional court (which however fell outside the sphere of influence of the domestic authorities), the Plenary decided to keep Romania under Step 1 of CEPs for the time being. However, the Plenary also noted that significant developments under other recommendations (notably R.5, SR.I and SR.III) had not yet been achieved. Bearing in mind that that the MER was adopted in April 2014, i.e. more than 4 years prior to the 1<sup>st</sup> compliance report, Romania was urged to adopt the legal acts under review, address the outstanding deficiencies and report back to the 58<sup>th</sup> Plenary (15-19 July 2019). At that Plenary, MONEYVAL will review the situation of Romania under its CEPs and decide under which step the country should then be placed.

#### **Agenda item 7 – Voluntary Tax Compliance Scheme of the Republic of Moldova**

27. The Plenary considered the Secretariat’s analysis of the voluntary tax compliance (VTC) programme by the Republic of Moldova. In July 2018, the “Law on Voluntary Disclosure and Fiscal Incentives” (hereinafter: the VDFI Law) was adopted by the Parliament of Republic of Moldova and entered into force on 17 August 2018. Based on the Secretariat’s analysis and the information provided by the Republic of Moldova during the Plenary meeting, it was concluded that the VDFI Law does contain a number of safeguards compatible with the FATF Four Basic Principles. Therefore, the Plenary agreed that no further action is required for the time being, but urged Republic of Moldova to continue to observe the FATF Best Practices Paper and the recommendations made by MONEYVAL in the implementation of the VTC programme. The Republic of Moldova was invited to present a brief outline of the results of the VTC programme at the next Plenary meeting in July 2019. The Republic of Moldova should also keep MONEYVAL informed of any developments or new elements added in the programme.

#### **Agenda item 8: Joint FATF/MONEYVAL mutual evaluation of Israel: endorsement of the report adopted by the FATF Plenary in October 2018**

28. The Executive Secretary recalled the rules of procedure for joint FATF/MONEYVAL evaluations, which required an endorsement of a report previously adopted by the FATF



Plenary for countries which are both members of the FATF and MONEYVAL (such as Israel). Israel's mutual evaluation report had been adopted by the FATF Plenary in October 2018. He thanked Mr Richard Walker (UK Crown Dependency of Guernsey), who had represented MONEYVAL as an expert on the assessment team. Mr Walker introduced the mutual evaluation report, followed by the delegation of Israel which took the floor for further comments. The Plenary endorsed the mutual evaluation report which was subsequently published on 10 December 2018.

29. On behalf of MONEYVAL, the Chair and the Executive Secretary warmly congratulated Israel for the very positive results of the assessment and the consequent full FATF-membership of the country as of December 2018.

**Agenda item 9: “Basel Open Intelligence (BOI) and e-learning products”: presentation by Mr Peter Huppertz, Basel Institute on Governance**

30. The Plenary heard a presentation by Mr Peter Huppertz, the “IT and eLearning Team Leader” of the Basel Institute on Governance, an independent not-for-profit competence centre working around the world with the public and private sectors to counter corruption and other financial crimes and to improve the quality of governance. The presentation was divided into two separate parts. The first half provided an overview of the e-learning products provided by the institute. These online courses (i.e. on conducting operational analyses or financial analyses), are developed together with the Egmont Group of Financial Intelligence Units. They use the intelligence cycle to cover all steps of the analysis - introduction, planning, collection and evaluation, while focusing on international best practices. The institute also offers advanced operational analysis training, based on e-learning, lectures, workshops, trainings and practical exercises tailored to the specific needs of each country. The online courses are free of charge and last 6 to 9 hours. The second part concerned the Basel Open Intelligence (BOI), which is a risk screening due diligence tool. It serves as an open-source search of information on individuals and companies regarding financial and other crimes. The tool is designed not only for FIUs but for the private sector as well.

**Agenda item 10: Presentation by the State Financial Monitoring Service of Ukraine of the case which was awarded the Best Egmont Case Award 2018**

31. The Ukrainian FIU presented the case which had been awarded the Best Egmont Case Award 2018. The case was highly complex in nature and involved large-scale profits from corruption and ML, linked to former high-ranking Ukrainian officials. 12 foreign FIUs were involved in the discovery of suspects and assets. The ML scheme was uncovered as a result of separate, unlinked investigations by the Ukrainian FIU, on SARs involving both national and foreign companies. The analyses revealed that a number of foreign companies had been controlled by Ukrainian citizens who were closely related to former high-ranking officials. At the same time, the Prosecutor General's Office of Ukraine initiated criminal proceedings against the founders and heads of several legal entities, on both the abuse of office of state property in large amounts and legalisations of the proceeds from crime. The FIU established that assets obtained from committed crimes had been laundered in Ukraine and abroad. It conducted a financial investigation to track the assets, identify the individuals behind the cases, and establish the amount of legalised assets for recovery. During the financial investigations, the FIU analysed 600 bank statements and received information from 12 foreign FIUs. It found that more than 1.000 business entities were involved in the ML scheme. Around USD 1,4 billion had been invested in Ukraine through the purchase of debts, depositing of funds and the purchase of shares in Ukrainian companies. As a result of the international co-operation and the financial investigations, it was established that the funds invested in Ukraine were managed from one single 'management centre' through a high number of shell

companies. In the framework of criminal proceedings, the authorities seized funds in the amount equivalent to USD 1,45 billion, and eliminated a number of the shell companies.

32. On behalf of the Plenary, the Chair congratulated the Ukrainian delegation for winning the Award.

#### **Agenda item 11 - Amendments to the FATF Recommendations to address the regulation of virtual assets: presentation by the FATF Secretariat**

33. The Plenary heard a presentation by Mr George Pearmain, representative of the FATF Secretariat, on the recent amendments to the FATF Recommendation 15 in relation to the regulation of virtual assets. In October 2018, FATF Plenary adopted changes to Recommendation 15 and added two new Glossary definitions of “virtual assets” and “virtual assets service providers”, as a response to the virtual assets related ML/FT risks and the risks of regulatory arbitrage (taking into account uneven national practices related to the regulation of virtual assets-related activities). In particular, countries are required to ensure that virtual assets service providers are regulated for AML/CFT purposes, licenced/registered and subject to supervision (i.e. monitoring of compliance with relevant FATF Recommendations). Notwithstanding these new requirements, Mr. Pearmain stressed that the FATF Standards noted the right of States/jurisdictions to prohibit certain activities based on their risk assessment.
34. The new definitions added to the Standards cover activities of any natural or legal persons engaged in exchange between virtual assets and fiat currencies; exchange between virtual assets; transfer of virtual assets; as well as safekeeping and/or administration of virtual assets or instruments enabling control over virtual assets; participation in and provision of financial services related to an issuer’s offer and/or sale of a virtual asset. Therefore, not only exchanges between virtual and fiat will be covered, but also virtual to virtual exchanges, certain types of wallet providers, and providers of financial services for Initial Coin Offerings (ICOs).
35. With regard to the potential consequences this may have for MONEYVAL evaluations, Mr Pearmain highlighted the following FATF roadmap: from October 2018 to June 2019 a first draft of the Interpretive Note to Recommendation 15 and an updated Guidance on a risk-based approach on the regulation and supervision of virtual assets service providers (including investigating illicit activity involving virtual assets) will be issued. From October 2019, the FATF will focus its work in updating the methodology. The first Mutual Evaluation Reports, assessing the new requirements under Recommendation 15, would be considered at the Plenary meetings in June 2020 the earliest.
36. During the discussion which was held after the presentation, further information was provided by the European Commission (EC). The EC stressed that the EU’s approach to virtual assets-related activities is narrower than the FATF approach: the 5<sup>th</sup> AML Directive covers virtual currency exchange operators and custodian wallet providers, thus leaving aside other natural or legal persons engaged in exchange activities between virtual currencies, ICOs. The EC added that the risks related to virtual assets are being assessed in light of the EU’s supranational risk assessment.

#### **Agenda item 12: Information on AML/CFT initiatives in MONEYVAL states and territories (tour de table)**

37. The Plenary held its *tour de table* with regard to recent AML/CFT developments (for more information on the *tour de table*, see forthcoming document MONEYVAL-Plenary 57(2018)INF12). For the current Plenary, as previously announced, developments were mostly reported in writing, while a number of delegations volunteered to make short

presentation with regard to a recent ML or FT case.

38. The Plenary reflected on how to further streamline the *tour de table* procedure at future occasions, in order to make this agenda item more focused while taking less Plenary time. Upon proposal by the Chair, the Plenary agreed that at future meetings only a limited number of members (3-5 delegations) would be invited to make presentations, while the remaining members would continue to submit their written contributions. The Secretariat would be tasked with making a pre-selection of those countries invited to make a presentation at the *tour de table*.

#### **Agenda item 13 - Information on AML/CFT initiatives in other fora**

39. The Plenary heard information about recent initiatives from the European Commission, the Egmont Group, the Eurasian Group on Combating Money Laundering and Terrorist Financing (EAG), the Financial Action Task Force (FATF), the Group of International Financial Centre Supervisors (GIFCS), the United Nations Office against Drug and Crime (UNODC) and the World Bank.

**Day 2: Wednesday 5 December 2018**

#### **Agenda item 14 – Discussion on the draft 5th round Mutual Evaluation Report on Czech Republic**

40. The Chair opened the discussion of the draft Mutual Evaluation Report (MER) on the Czech Republic. The Secretariat introduced the evaluation team and provided an overview of the key findings and priority recommended actions. The Co-Chairs of the Working Group on Evaluations (WGE) summarised the discussions in the WGE and presented the recommendations made to the Plenary on each key issue. An overview of the key issues which no longer needed to be discussed in the Plenary (as agreement had been reached by all participants in the WGE) was provided for information.
41. *Key issue 1 (Immediate Outcome 8):* The Plenary discussed whether moderate or major improvements are needed in relation to Immediate Outcome 8. One delegation requested that IO.8 be re-rated from a “substantial” (SE) to a “moderate” since core issues 8.2 and 8.3 were achieved only to some extent. Namely, confiscation figures are far lower than those seized whilst the statistics provided with regard to core issue 8.3 appear low compared to the economy, geographic situation and risk profile of the country. In addition, the level of proof required by authorities to seize cash for purpose of further investigation appears high. The Czech Republic presented a number of features which illustrated the effective confiscation regime. The assessment team referred to the discussions in the FATF plenary meetings and the conclusion that “the amounts confiscated should be taken into account when discussing effectiveness”. In addition, the assessment team provided a brief horizontal analysis of other reports and their findings justifying the reasons for the SE rating. One delegation and one observer expressed their concerns on the limited information on confiscation which had been provided e.g. statistics on instrumentalities seized and confiscated and information on assets restrained as a result of illegal transportation of currency and BNI. One scientific expert asked for further clarifications on some elements referred to in the analysis. As a consequence, the assessment team (together with the scientific expert) made necessary changes and clarified the matter further. A large number of delegations supported the current rating. There was eventually no consensus to change the rating which thus remained as “substantial”.

42. *Key Issue 2 (Immediate Outcome 6)*: The Czech Republic presented arguments in support of a request for an upgrade of IO.6 from a “moderate” to a “substantial” rating. The assessment team outlined key features of the system including certain weaknesses which led to a conclusion that a moderate rating was justified. Nine delegations supported the Czech’s request for an upgrade, based on the numerous positive findings under IO.6 and additional information provided by the authorities. Three delegations and three observers supported the assessment team’s views, including the current rating. Their arguments mostly concerned the deficiencies in relation to the effective use of the financial intelligence generated by the FIU, lack of feedback by law enforcement on the use of the FIU’s financial intelligence, the quality of STRs and certain technical deficiencies which could impact the effectiveness of the system. There was eventually no consensus to change the rating which thus remained as “moderate”.
43. *Key issue 3 (Recommendation 10)*: The Plenary was invited to decide whether the deficiencies in the CDD regime in the Czech Republic are minor or moderate. In line with the Working Group on Evaluation’s decision, the assessment team, the FATF Secretariat and the scientific expert revised the analysis and ratings associated to different essential criteria (EC). Consequently, amendments were made in the text to further clarify issues raised with regard to EC 10.1; 10.3; 10.4; 10.5; 10.7; 10.8; 10.10; 10.16 and 10.17. As a result, the proposed ratings were as follows: EC 10.2, 10.10, 10.11, 10.12, 10.14, 10.15 were rated as ‘met’; EC 10.1, 10.3, 10.4, 10.6, 10.7, 10.8, 10.9, 10.19 were rated as ‘mostly met’; EC 10.5, 10.13, 10.16, 10.17, 10.18 were rated as ‘partly met’, whilst EC 10.20 was rated ‘not met. One delegation considered that EC 10.5; 10.8; 10.16 and 10.20 were particularly important and shortcomings acknowledged therein were significant. Consequently, the delegation proposed that the overall rating of R.10 to be downgraded from “largely compliant” (LC) to “partially compliant” (PC). The Czech Republic argued that the number of deficiencies referred to was covered by certain general provisions which were not taken as sufficient by the assessment team and thus did not warrant a better rating of these particular criteria. In addition, the delegation argued that even with the current rating materiality should be taken into account, and, in the case of Czech Republic, the identified deficiencies should be considered as minor. The assessment team also provided a horizontal analysis pointing out several reports, where similar deficiencies were noted and LC rating was given. One delegation supported the LC rating, whilst other delegations did not take a stand on the matter, i.e. did not support the request for downgrade. The Chair concluded, whilst noting one delegation’s concern on consistency matters, that there was no support for downgrade by the Plenary. Consequently, R.10 remained rated as LC.
44. *Key issue 4 (Immediate Outcome 10 and Immediate Outcome 11)*: The Czech Republic presented arguments in support of a request for an upgrade of IO.10 and IO.11 from a “low” to a “moderate” rating. Given that the country applies similar measures for implementation of the targeted financial sanctions (TFS), both IOs were discussed together. The Czech authorities emphasised the fact that they introduced a domestic mechanism (Methodological Instruction 5) which enables the reporting entities to submit a STR as soon as they come across listed persons’ and entities’ assets and thus implement TFS without delay. The assessment team stated that the methodological instruction is not legally binding. In addition, the instruction does not provide for immediate freezing of assets but only calls for submission of a STR. One delegation made a comprehensive analysis/comparison of the situation in the Czech Republic vis-à-vis the jurisdictions which received “low”-ratings. Consequently, a majority of delegations supported the request for an upgrade, arguing that there were only moderate and not fundamental deficiencies. Two observers supported the assessment team on the current rating. Finally, a consensus was reached to change the rating to “moderate” for both IOs. It was decided that the report should be amended to better reflect the change of ratings decided by the Plenary.

45. *Additional issues raised at the Plenary:* The Czech Republic requested an upgrade of R.20 to “Largely Compliant”, disagreeing with the evaluation team that the wording “without undue delay, no later than 5 days” does not ensure prompt reporting. The Czech delegation also noted that five days was the absolute maximum and does not entail that reporting entities should not submit a STR earlier than this, if the circumstances allow. Following the intervention by one scientific expert on this matter and a need to clarify the matter further before deciding on the rating, the Chair suggested a short side meeting between the assessment team, the Czech delegation and the scientific expert. As a result of the meeting and discussion, therein no changes in the rating were proposed and the Plenary decided to maintain the “partially compliant” rating for R.20.

*Decision taken*

46. The Plenary adopted the 5th round MER of the Czech Republic and its executive summary, including the amendments agreed upon during the discussion and subject to further editorial changes. According to Rules 21 and 23 of MONEYVAL’s 5th Round Rules of Procedure, Czech Republic was placed in enhanced follow-up and requested to report back in mid-2020. The report became final and was published on 11 February 2019, after the completion of quality and consistency review of the global AML/CFT network.

**Agenda item 15 - Fourth round follow-up: application by Liechtenstein to be removed from regular follow-up**

47. The Plenary adopted the fourth round MER of Liechtenstein at its 44<sup>th</sup> meeting (April 2014). As a result, Liechtenstein was rated PC on 11 recommendations and was placed under the regular follow-up procedures. It had previously reported back in 2016 and July 2018, respectively.

48. The Secretariat introduced its analysis on the third follow-up report by Liechtenstein, where it concluded that substantial developments had been achieved on the implementation of the effectiveness concerns related to R.1, the only outstanding core recommendation which had not yet been brought to a level of LC. In particular, cases of autonomous ML conviction were reported and progress had been made in relation to the creation of jurisprudence on the burden of proof to establish the predicate offense.

49. Overall, Liechtenstein had taken significant steps to remedy the deficiencies identified under the core and key recommendations (and to a certain level under the other recommendations rated PC in the 4<sup>th</sup> round MER). In the view of that progress, the Secretariat proposed the Plenary to remove Liechtenstein from the follow-up process of the 4<sup>th</sup> round of mutual evaluations.

*Decision taken*

50. Following the discussion of the report, the Plenary considered that Liechtenstein had brought in the meantime all core and key recommendations to the level of at least LC, as required by Rule 13, paragraph 4 of MONEYVAL’s Rules of Procedure for the 4<sup>th</sup> round of mutual evaluations. Therefore, the country had taken sufficient steps to be removed from the 4<sup>th</sup> round follow-up process. The Plenary invited Liechtenstein to regularly inform MONEYVAL through the *tour de table* procedure on further developments until the beginning of its 5<sup>th</sup> round mutual evaluation.

**Agenda item 16 - Fourth round follow-up: application by Azerbaijan to be removed from regular follow-up**

51. Following the adoption of the 4<sup>th</sup> round MER in December 2014, Azerbaijan was placed in regular follow-up. Since then, Azerbaijan has submitted three follow-up reports (December 2015, December 2016 and September 2017). At the 54<sup>th</sup> Plenary in September 2017, the Plenary had noted that not yet sufficient progress had been made in relation to a number of recommendations (notably R.1, R.2, R.3, R.17, R.23, R.24, R.27, R.32, R.33, R.35 and SR.I). Therefore, Azerbaijan had been invited to submit a further progress report and seek exit from the regular follow-up process at the 57<sup>th</sup> Plenary.
52. The Secretariat's analysis concluded that Azerbaijan had made a significant improvement to its AML/CFT system. The Plenary concluded that after the adoption of a number of Presidential Decrees and draft amendments to the relevant legislation, the large majority of the deficiencies identified in the 4<sup>th</sup> round MER had been addressed. However, regarding R.2, the analysis concluded that the practical examples that were provided by the authorities did not fully demonstrate how the principle that criminal intent can be inferred from objective factual circumstances is being applied in practice.
53. Overall, the Plenary found that Azerbaijan had taken sufficient steps to remedy the deficiencies identified under the Core and Key Recommendations rated "partially compliant" in the 4<sup>th</sup> round MER and was ready to exit the regular follow-up procedure.

*Decision taken*

54. Following the discussion of the report, the Plenary considered that Azerbaijan had brought in the meantime all core and key recommendations to the level of at least LC, as required by Rule 13, paragraph 4 of MONEYVAL's Rules of Procedure for the 4<sup>th</sup> round of mutual evaluations. Therefore, the country had taken sufficient steps to be removed from the 4<sup>th</sup> round follow-up process. The Plenary invited Azerbaijan to regularly inform MONEYVAL through the *tour de table* procedure on further developments until the beginning of its 5<sup>th</sup> round mutual evaluation.

**Agenda item 17 - Fourth round follow-up: application by North Macedonia to be removed from regular follow-up**

55. Following the adoption of the 4<sup>th</sup> Round MER in 2014, North Macedonia was rated PC for 22 Recommendations and placed under regular follow-up process (with the first expedited report to be presented in April 2015). The country had reported back four times until the present Plenary.
56. During the 57<sup>th</sup> Plenary meeting, the Secretariat introduced its analysis on the fifth follow-up report by North Macedonia. Some tangible progress had already been acknowledged during previous MONEYVAL Plenary meetings, especially with regard to SR.I, SR.II, SR.IV and SR.V and SR.III. The Secretariat noted that the concerns expressed in relation to R.5 and R.13 had meanwhile been resolved through the adoption of the new AML/CFT Law. In relation to R.23, the Secretariat's analysis concluded that, with the adoption of the amendments on the "Law on insurance supervision", significant progress had been achieved and thus R.23 can be considered as having a level equivalent to LC (which had been the last remaining core and key recommendation which had not yet been brought to a level of at least LC). Progress was also noted in respect of other recommendations rated PC.

*Decision taken*

57. Following the discussion of the report, the Plenary considered that North Macedonia had brought in the meantime all core and key recommendations to the level of at least LC, as

required by Rule 13, paragraph 4 of MONEYVAL's Rules of Procedure for the 4<sup>th</sup> round of mutual evaluations. Therefore, the country had taken sufficient steps to be removed from the 4<sup>th</sup> round follow-up process. The Plenary invited North Macedonia to regularly inform MONEYVAL through the *tour de table* procedure on further developments until the beginning of its 5<sup>th</sup> round mutual evaluation. In addition, the Plenary strongly encouraged the authorities to continue with the legislative process to address the remaining deficiencies highlighted in the Secretariat's analysis, and to have them sufficiently addressed at the latest by the time of the 5<sup>th</sup> round mutual evaluation.

#### **Agenda Item 18 – Discussion of a regional operational plan to counter terrorist financing**

58. The Secretariat recalled that at the 56<sup>th</sup> Plenary in July 2018, the Secretariat put forward a number of proposals to be included in MONEYVAL's regional operational plan to counter terrorist financing. The Plenary adopted all the proposals and deputed the Secretariat to develop a more detailed action plan, including an indication of the timelines and the resources necessary. The Secretariat presented the detailed action plan and gave an overview of the steps taken in the implementation of some of the action items under the operational plan. The Secretariat conducted an analysis of the information that was gathered from the responses in the *tour de table* procedure and some national risk assessments made available by the delegations on FT risk. Since in most cases the conclusions on the level of FT risk present in the country appeared to be based on hypothetical considerations, it was difficult to gauge the actual level of FT risk that each country faces and identify any regional or other patterns. The Secretariat noted that it was therefore necessary to collect further information from delegations and proposed conducting a short statistical survey. The data from the survey would provide a clear indication to the Secretariat of the direction which action item A of the Operational Plan should be taking and which areas could be explored further.

#### *Decision taken*

59. The Plenary adopted the action plan and the survey proposed by the Secretariat. It was agreed that the survey would be circulated to delegations after the Plenary (which the Secretariat subsequently did with a deadline of 8 February 2019).

#### **Agenda Item 19 – Terrorist Financing Disruption Strategies: presentation by the FATF Secretariat**

60. The Plenary heard a presentation by Mr George Pearmain, representative of the FATF Secretariat, on Terrorist Financing (FT) disruption strategies. FT disruption strategies are an area of focus for the FATF and one of the key US presidential priorities. Mr Pearmain presented a Report on FT disruption strategies, which was adopted in a confidential format by the FATF Plenary in October 2018. The report aims to raise awareness in relation to FT threats and vulnerabilities and provide a comprehensive toolkit with disruption tools which will allow jurisdictions around the world to implement more effective disruption.

61. In particular, Mr Pearmain presented three case studies where countries had noted the evolution in the terrorism and FT threats they face and where they had developed effective disruption strategies to respond to these evolving threats. The examples included two MONEYVAL member states. Regulation enhancements, typologies, information sharing platforms, targeting trainings and seminars are among the disruption strategies deployed to mitigate the increased FT risk. Mr Pearmain informed the Plenary that the report will be open for delegations' comments on how it could be best used by domestic authorities and be further disseminated, bearing in mind the sensitivity of the

information included therein.

**Day 3: Thursday 5 July 2018**

**Agenda item 20 – Discussion on the draft 5<sup>th</sup> Round Mutual Evaluation Report on Lithuania**

62. The Chair introduced the draft Mutual Evaluation Report (MER) on Lithuania. He thanked the delegations for submitting written comments on the MER which served as a basis for selecting the key issues that were discussed at the Working Group on Evaluations (WEG). The Secretariat introduced the evaluation team and provided an overview of the key findings and priority recommended actions. Lithuania's head of delegation outlined some of the developments and measures taken in the country since the last evaluation and introduced the Lithuanian delegation. The Chair informed the Plenary that the WGE had reached a consensus on all the key issues discussed during the meeting. The Co-Chairs of the WGE had therefore concluded that none of the key issues would be taken forward to the Plenary for further discussion. A revised key issues document (KID) was circulated for information purposes only. The Chair invited the Plenary to raise any other issues in the MER that they wished to discuss. There was no such request. The Plenary was therefore invited to adopt the draft MER. An overview of the outcome of the discussion of each key issue at the WGE meeting is provided below.
63. *Key issue 1 (Immediate Outcome 2):* Concerning a request by the country to receive an upgrade from the "substantial"-rating in the draft MER, Lithuania noted that the situation in the only two countries in the AML/CFT Global Network that had received a "high"-rating for IO.2 was broadly similar to that in Lithuania. The assessment team pointed out that, while Lithuania provided some evidence that it had proactively sought co-operation from foreign counterparts, in the absence of complete statistics, it was not in a position to conclude with certainty whether the Lithuanian authorities had done so with sufficient frequency in line with the cross-border risks that the country faces. Two scientific experts supported the position of the assessment team. One delegation noted that, while statistics are not the only manner in which effectiveness could be demonstrated, in order to support the highest rating envisaged under the Methodology, the country should provide sufficient evidence both in the form of quantitative and qualitative information.
64. A discussion was also held on the extent to which deficiencies identified under IO.5 should be cascaded into IO.2 (core issue 2.5, in particular), since under IO.2 the assessment team is expected to determine whether the authorities have taken all possible measures to share information in their possession. It was noted that the treatment of core issue 2.5 has not always been consistent in the global AML/CFT network. However, a considerable number of reports do consider the extent to which the authorities have access to basic and beneficial ownership information in the ambit of international cooperation, in line with the position taken by the assessment team with respect to Lithuania. The assessment team also confirmed that it had not based its decision to rate IO.2 "substantial" due to the deficiencies identified under IO.5.
65. *Key issue 2 (Immediate Outcome 3):* None of the delegations wished to oppose the "moderate"-rating. Clarification was requested by one delegation and one scientific expert on the human resources allocated to AML/CFT supervision and the adequacy of the level of sanctions imposed. Lithuania and the assessment team provided clarifications which were deemed satisfactory by the WGE. The WGE also agreed that the text suggested by the assessment team in response to a request by one delegation would replace the existing text in para. 348 of the MER.



66. *Key issue 3 (Immediate Outcome 5)*: The delegation which had originally raised the issue indicated that the explanations provided by the assessment team and Lithuania in the key issues document broadly addressed its concerns. No further discussion was held on the rating. A number of textual changes proposed by the assessment team were accepted.
67. *Key issue 4 (Immediate Outcome 8)*: While the delegation which had originally opposed the “moderate”-rating reiterated the issues in the key issues document, it also acknowledged that further to explanations provided by Lithuania and the assessment team, Lithuania did appear to have achieved most of the key issues to some extent and therefore the current rating was largely justified. The WGE agreed that major (and not fundamental improvements) are required in Lithuania. A brief discussion was also held on the weight to be given to the enforcement of confiscation orders when considering effectiveness under IO.8. The Secretariat recalled the discussion held during the adoption of the MER of Denmark on the weight which should be given to the volume of assets actually recovered. It had been stressed that this should not be a decisive factor in determining whether a country’s confiscation system is effective given that it may be impacted by a number of factors. It was also noted that none of the core issues under IO.8 refer to the enforcement of confiscation orders, although a brief reference is made in the examples of information that could support the conclusions on core issues. The assessment team noted that in Lithuania, despite the fact that statistics were not available, no significant issues were identified which would have an impact on the effectiveness of the enforcement process. This further supported the “moderate”-rating.
68. *Key issue 5 (Immediate Outcome 9)*: Concerning a request to upgrade the rating of IO.9 to “substantial”, one delegation was of the view that more weight should have been given to the FT risk level, which is understood as being low in Lithuania, when determining the rating. The assessment team explained that the risk level in Lithuania had been duly taken into consideration. However, the fact that Lithuania had not conducted parallel financial investigations alongside the seven terrorism cases that had been investigated was deemed to constitute a significant shortcoming. The delegation was satisfied with the explanation provided by the assessment team. No other delegation supported the upgrade.

*Decision taken*

69. The Plenary adopted the 5<sup>th</sup> round MER of Lithuania and its executive summary, including the amendments agreed upon during the WGE meeting and subject to further editorial changes. According to Rules 21 and 23 of MONEYVAL’s 5<sup>th</sup> Round Rules of Procedure, Lithuania was placed in enhanced follow-up and requested to report back at the first Plenary in 2020. The report became final and was published on 8 February 2019, after the completed quality and consistency review of the global AML/CFT network.

**Agenda item 21 – Fifth round follow-up: first enhanced follow-up report by Andorra**

70. Andorra submitted its first follow-up report under the enhanced follow-up process along with a request for re-ratings in relation Recommendations 2, 3, 10, 11, 12, 15, 16, 20, 21, 22, 23, 25, 26, 32 and 34. A summary report and an analytical tool which were prepared by the Secretariat included also the inputs from the Rapporteur Teams (France and Romania). The report provided an assessment on compliance with the standards for which the Methodology has changed since the adoption of the MER (Recommendations 7, 18 and 21).
71. The draft report submitted for comments proposed the following re-ratings: from “partially compliant” to “largely compliant” or “compliant” for R.2, R.3, R.12, R.15, R.16, R.22, R.23, R.32 and R.34; and from “largely compliant” to “compliant” for R.11, R.20 and R.21.

Ratings would remain unchanged as “partially compliant” for R.25 and R.26 and as “largely compliant” for R.10 and R.18. One Recommendation (R.7) where standards were changed was proposed to be downgraded from “compliant” to “largely compliant”. Based on comments received from one delegation and from Andorra, a list of four key issues for the Plenary discussion was prepared and presented.

72. *Key Issue 1* concerned R.16, in particular criterion 16.2. This Criterion has been assessed as “partly met” due to the fact that there is no direct requirement under the AML/CFT Act placed on payment service providers (PSP) of the payer related to batch transfers. Andorra reported that the AML/CFT Act transposes Regulation (EU) 2015/847. Article 6 of the Regulation does not require information on the payer to accompany each single wire transfer contained in a batch file, provided that the batch file encloses the information referred to in Article 4 of Regulation (EU) 2015/847. The Andorran delegation was of the opinion that their AML/CFT Act goes beyond what the FATF standard (criterion 16.2) requires, given that equivalent provisions of Article 4 of Regulation (EU) 2015/847 are transposed into Article 30 of AML/CFT Act. The analysis provided by the Secretariat and the rapporteur countries confirms that Article 30 of the AML/CFT Act meet the requirements established by criterion 16.1. As far as criterion 16.2 is concerned, there is no direct requirement under the Act placed on PSP of the payer (in cases where several individual cross-border wire transfers from a single payer are bundled in a batch file for transmission to several beneficiaries) to assure that the batch file contains required and accurate originator information and full beneficiary information that is traceable within the beneficiary’s country. One of the Rapporteur teams supported the findings of the analysis. It also stated that the absence of specific provisions in the AML/CFT Act that would require the PSP of the payer to apply certain requirements related to batch transfers supports ‘partly met’ rating for criterion 16.2. Therefore, Recommendation R.16 remained was re-rated as “largely compliant” (but not as “compliant”).
73. *Key Issue 2* discussed R.7, in particular the criteria 7.1 and 7.4. R.7 was rated as “compliant” in the MER. The analysis considered criterion 7.1 as “mostly met”, given that Resolution 1/2016 of the Permanent Committee of Andorra (which is in charge of implementation of the targeted financial sanctions) does not contain any reference to UNSCR 2231 (2015). The Andorran delegation provided the translation of the resolution to the Secretariat, which confirmed that it applies to all restrictive measures that can be imposed under UNSC Committees, thus ensuring the immediate implementation of UNSCR 2231 (2015). Consequently, criterion C.7.1 is considered as “met”. Criterion 7.4 has been considered as “mostly met” since the analysis concluded that the public availability of the procedure to unfreeze the funds or other assets of persons or entities (established by Articles 53-54 of the AML/CFT Act) was unclear. However, the Plenary agreed that the rating for C.7.4 should be considered as “met”, given that this specific aspect of R.7 was assessed as “met” in the MER whilst the wording of the legislation had not changed since the MER was adopted. The Plenary agreed, following the intervention by the Chair on procedural matters and a clarification that the findings of MER in such situations should not be challenged, that criterion 7.4 was “met”. Consequently, the overall rating for R.7 remained “compliant”.
74. *Key Issue 3* discussed R.32, criterion 32.8(a) and the fact that the Customs Department is vested with powers to restrain currency and BNIs in all required scenarios, whilst the law makes an exception for “the first EUR 1,000 in concept of a minimum survival amount”. It was questioned by one delegation, whether the exception concerning this “minimum survival amount” presents a deficiency under sub-criterion 32.8(a). The Andorran delegation clarified that this amount concerns only the administrative procedure, whilst in case of a ML/FT suspicion law enforcement may restrain all funds as (as part of the criminal investigation). Given that law enforcement and customs share the

same premises at the two border-points that Andorra has, the Plenary found that the standard foreseen by criterion 32.8(a) is met. Consequently, the Plenary approved the re-rating for R.32 from “partially compliant” to “compliant”.

75. *Key Issue 4* discussed R.20. This Recommendation was rated as “largely compliant” in the MER, whilst the analysis proposed a re-rating to “compliant”. However, one delegation questioned whether the insufficient criminalisation of bribery in the private sector could have a negative impact on the reporting requirements. Given the explanation provided by the Secretariat that the reporting requirement of the Andorran AML/CFT Act does not require identification of the predicate offence, the Plenary agreed that the “compliant”-rating for R.20 was merited.

*Decision taken*

76. The Plenary adopted the summary report, and asked the Secretariat to amend the report based on its conclusions with regard to R.7 and R.32. Delegations were reminded that the follow-up report of Andorra would be submitted to the “quality and consistency review” of the global AML/CFT network (Rule 21.15 of MONEYVAL’s 5<sup>th</sup> round rules of procedure), and that any re-ratings decided upon by the Plenary are consequently not final before the finalisation of this review. The report has meanwhile become public and will be published on 14 February.

**Agenda item 22: Presentation of a questionnaire for a joint MONEYVAL/GRECO project on gender-related issues in the area of corruption and money laundering**

77. The Plenary heard a presentation by and held a discussion with Professor Slotboom and Professor Huisman of the Free University of Amsterdam on the topic of gender and corruption/money-laundering. Both academic experts, who had already been invited to a Plenary discussion in 2017 on the topic, introduced a project for which MONEYVAL and GRECO will co-operate (and which is inspired by the overall Council of Europe strategy for gender equality). In the course of this project, MONEYVAL delegations will be asked to respond to a questionnaire.
78. Professor Slotboom introduced a literature research, through which she established a link between gender and crime. While both women and men are involved in crimes with high profits and there are not many psychological differences between men and women relating to crime, crime is gendered by context, motives and circumstances. It appears from scientific studies that women are more involved in “lower level” white-collar crimes (e.g. embezzlement, mail order fraud), but that they become increasingly involved in high level crimes. There is a gender gap for fraud, corruption and money laundering, but it appears to be decreasing. Results of the preliminary study support a gender-sensitive approach towards economic crime, establishing particular attention for the role of women in the perpetration of economic crime.
79. MONEYVAL, GRECO and the Free University of Amsterdam will conduct a study with the aim to analyse the differences in the prevalence and nature of economic crime. The research will focus on corruption, fraud and money laundering. Between January and March 2019, data will be collected through a questionnaire, which will be sent to the MONEYVAL and GRECO jurisdictions, followed by phone interviews with delegations. The final product, to be presented at the 58<sup>th</sup> Plenary meeting in July 2019, will be a report with a methodological analysis, conclusions and recommendations. The report will not cover terrorist financing issues. With regard to money laundering, cultural and societal differences vis-à-vis gender (i.e. the number of women in high-level functions) will be taken into account. The questionnaires will be distributed in the course of January via the Secretariat.

### **Agenda item 23 – Fifth round follow-up: second enhanced follow-up report by Hungary**

80. Following the decision in September 2016 by the Plenary, Hungary was subjected to the 5<sup>th</sup> round enhanced follow-up process. Hungary had previously submitted the first enhanced follow-up report in December 2017. A summary report and an analytical tool were prepared by the Secretariat with contributions from the Rapporteur Teams (Armenia and the United Kingdom Crown Dependency of Jersey). The documents also included an assessment of compliance with those Recommendations for which the Methodology has changed since the adoption of the first enhanced follow-up report: R.7, R.18 and R.21.
81. The Plenary found that Hungary had made progress in addressing some technical compliance deficiencies identified in MONEYVAL's mutual evaluation report and first enhanced follow-up report. This led the Plenary to take the decision to grant Hungary's requests for up-grades for Recommendations 5 and 28 to "largely compliant". With regard to R.5, the Plenary noted that amendments to the Criminal Code (which had already been analysed under the first enhanced follow-up report) had entered into force in January 2018. Although some minor deficiencies remain or have been newly-created by the legislative changes, this did not preclude the overall conclusion that the level of compliance with R.5 had meanwhile been brought to a level of "largely compliant".
82. In the course of evaluating Hungary against the recent amendments made to the FATF standards and methodology, the Plenary discussed whether the safeguards concerning the sharing of information in the Hungarian legislation comply with c21.2 and would justify a "compliant"-rating. The Plenary considered that the Hungarian legislation did not provide that the information shared should be used only for AML/CFT purposes (and not for any other purpose). Therefore, Hungary could not be considered to be fully compliant with c.21.2. Hence the rating for R.21 remained "largely compliant".

#### *Decision taken*

83. The Plenary adopted the summary report, decided that Hungary remains in enhanced follow-up and invited the country to report back to MONEYVAL in December 2019. Delegations were reminded that the follow-up report of Hungary would be submitted to the "quality and consistency review" of the global AML/CFT network (Rule 21.15 of MONEYVAL's 5<sup>th</sup> round rules of procedure), and that any re-rating decided upon by the Plenary are consequently not final before the finalisation of this review. The report has meanwhile become public and will be published on 14 February.

### **Agenda item 24 – Fifth round follow-up: second enhanced follow-up report by Serbia**

84. The fifth mutual evaluation report (MER) of Serbia was adopted in April 2016. In line with MONEYVAL's 5<sup>th</sup> round rules of procedure, Serbia was placed under the enhanced follow-up process. The first follow-up report submitted by Serbia was discussed at the 54<sup>th</sup> Plenary meeting in September 2017. Serbia did not seek any re-ratings at that time.
85. Serbia submitted its 2<sup>nd</sup> enhanced follow-up report for the 57<sup>th</sup> Plenary meeting in December 2018. A summary report and an analytical tool were prepared by the Secretariat with contributions from the Rapporteur Teams (Bulgaria and Latvia). The documents also included an assessment of compliance with those Recommendations for which the Methodology has changed since the adoption of the MER: R.5, R.7, R.8, R.18 and R.21.
86. The draft documents submitted for comments proposed the following: re-ratings from "partially compliant" to "largely compliant" for R.1, R.8, R.10, R.13, R.16, R.25, R.26, R.35; from "partially compliant" to "compliant" for R.12 and from "non-compliant" to

“partially compliant” for R.7. Ratings would remain unchanged (i.e. as “partially compliant”) for R.18, R.19, R.22, R.23 and R.40. Based on comments received from delegations, a list of main issues for discussion in the Plenary was prepared by the Secretariat.

87. The first issue for discussion related to R.7. Based on information provided, the Secretariat analysis suggested an upgrade for R.7 from “non-compliant” to “partially compliant”. Serbia requested an upgrade from “non-compliant” to “largely compliant” and provided at the Plenary additional information on their new technical tool to apply targeted financial sanctions (TFS) without delay which would have an impact on addressing deficiencies in relation to c.7.1 and c.7.4. A number of delegations and one of the Rapporteur Teams expressed their satisfaction with the provided additional explanations by Serbia and supported the upgrade request for R.7.
88. The second issue for discussion related to R.19. Serbia requested an upgrade from “partially compliant” to “largely compliant” and provided additional clarifications in relation to c.19.1 and c.19.2. Serbia explained that in addition to legal provisions described in the summary report, Articles 35 and 104 of AML/CFT Law were also relevant and addressed the deficiencies identified in relation to these criteria. Some delegations and one of the Rapporteur Team expressed their general agreement with the explanations given by Serbia (with the exception of having measures proportionate to the risk) and also supported an upgrade to “largely compliant” for R.19.

*Decision taken*

89. The Plenary adopted the summary report with amendments relating to the analysis and ratings for R.7 and R.19. Serbia will remain in enhanced follow-up, and will continue to report back to MONEYVAL on progress to strengthen its implementation of AML/CFT measures. Serbia is expected to report back to the Plenary within one year.
90. Delegations were reminded that the follow-up report of Serbia would be submitted to the “quality and consistency review” of the global AML/CFT network (Rule 21.15 of MONEYVAL’s 5<sup>th</sup> round rules of procedure), and that any re-ratings decided upon by the Plenary are consequently not final before the finalisation of this review. The report has meanwhile become public and will be published on 18 February 2019.

**Agenda item 25 – Fifth round follow-up: first enhanced follow-up report by Slovenia**

91. The fifth mutual evaluation report (MER) of Slovenia was adopted in June 2017. In line with MONEYVAL’s 5<sup>th</sup> round rules of procedure, Slovenia was placed under the enhanced follow-up process. Slovenia submitted its 1<sup>st</sup> enhanced follow-up report and requested a re-rating for R.16. A summary report and an analytical tool were prepared by the Secretariat with contributions from Rapporteur Teams (Croatia and Georgia). The documents also included an assessment of compliance with those Recommendations for which the Methodology has changed since the adoption of the MER: R.7, R.18 and R.21. The draft documents submitted for comments proposed the following: re-rating from “partially compliant” to “compliant” for R.16. For R.7, R.18 and R.21 the previous ratings are maintained.

*Decision taken*

92. The Plenary adopted the summary report, including the re-rating for R.16 from “partially compliant” to “compliant”. Slovenia will remain in enhanced follow-up, and will continue to report back to MONEYVAL on progress to strengthen its implementation of AML/CFT measures. Slovenia is expected to report back to the Plenary within one year.

Delegations were reminded that the follow-up report of Slovenia would be submitted to the “quality and consistency review” of the global AML/CFT network (Rule 21.15 of MONEYVAL’s 5<sup>th</sup> round rules of procedure), and that any re-ratings decided upon by the Plenary are consequently not final before the finalisation of this review. The report has meanwhile become public and will be published on 18 February 2019.

93. With regard to all follow-up reports discussed at the present Plenary as well as future Plenaries, the Chair recalled the expectation for countries to have addressed most if not all the technical compliance deficiencies by the end of the third year after the adoption of the mutual evaluation report (Rule 21.8 of MONEYVAL’s 5<sup>th</sup> round rules of procedure).

**Agenda item 26 – Amendments of MONEYVAL’s 5<sup>th</sup> round rules of procedure to introduce a “silent procedure” for decisions to be taken in-between MONEYVAL Plenaries**

94. The Plenary discussed and adopted a proposal for the adoption of decisions “out of session” in a silent procedure. The MONEYVAL delegations had occasionally been requested to take such a decision in between Plenary meetings. Since such occasions could arise again in the future, the Plenary considered that it would be favourable to have a firm basis for such a procedure in MONEYVAL’s 5<sup>th</sup> round rules of procedure. The new procedure, which shall not be applied for the adoption of a mutual evaluation report, is laid down in an additional paragraph 6 to Rule 6 (“Decision making procedures”) of MONEYVAL’s 5<sup>th</sup> round Rules of Procedure. It was understood that this rule would only be applied in exceptional occasions which should be kept to the absolute minimum. Every member can object to a proposal made “out of session” and request that the issue be tabled at the next Plenary.

**Day 4: Friday 7 December 2018**

**Agenda item 27 – Panel discussion on countering the laundering of proceeds from human trafficking**

95. The Plenary held a panel discussion on human trafficking and the proceeds thereof, with experts from the FATF, Egmont Group, Wolfsberg Group and GRETA, which was chaired by the Chair of MONEYVAL.
96. The Plenary heard a presentation prepared by the Chair in relation to the “Financial Sector Commission on Modern Slavery and Human Trafficking” launched at the United Nations during the 73<sup>rd</sup> Session of the UN General Assembly. The Commission, known as the Liechtenstein Initiative, was formed as a public-private partnership between the Government of Liechtenstein together with the Department of Foreign Affairs and Trade of the Australian Government and the Centre for Policy Research at United Nations University. The Commission is comprised of 23 leaders and experts in the field, survivors of human trafficking and child slavery, leaders from hedge funds, commercial and retail banks, institutional investors, international financing organisations, global regulators, the United Nations, and leaders in the fight against modern slavery and human trafficking .
97. The panel discussion was continued by the FATF Secretariat, represented by Mr George Pearmain, who gave a presentation in particular on the basis of the recent report by the FATF on “Financial Flows from Human Trafficking” which had been published in August 2018. Mr Pearmain stressed the need of genuine effort and energy in taking action by governments, financial institutions and NPOs. Several typologies and best practices were introduced to the Plenary. The FATF considers that the key challenges are the limited

international co-operation, a lack of awareness by LEAs, the difficulties in detecting funds and the risks not adequately understood and enunciated. Mr Pearmain urged the Plenary to understand the ML/FT risks from human trafficking in as much detail as possible, and as an important first step in detecting the financial flows. Partnerships between the public sector, the private sector and NPOs may help to leverage access to relevant information and expertise and help to unlock some of the knowledge gaps to effectively tackle human trafficking.

98. Thirdly, the Plenary heard a presentation by the Egmont Group of Financial Intelligence Units, represented by Mr Nedko Krumov who introduced the Information Exchange Working Group Human Trafficking Project Update and the Strategic Plan of the Egmont Group for 2018-2021. Its aim is to enhance the operational capacities of the FIUs, facilitate innovations and usage of new technologies within the AML/CFT community and enhance co-operation with the private sector. The main goals of the Human Trafficking Project are the sharing of operational best practices, enhancing bilateral information sharing, increasing reporting by financial institutions and identifying human trafficking networks. Mr Krumov noted that the human trafficking project has to the following purposes: to raise FIU operational awareness and capabilities to identify and address the financial flows of human trafficking to increase engagement; information collection and sharing of data within countries and globally to examine human trafficking facilitators and networks; sharing of best practices; provision of leads to law enforcement for potential bilateral and multilateral investigations; as well as identification of gaps in information and challenges to combat the illicit financial flows of human trafficking and support FATF or FSRB projects.
99. Fourthly, Mr Jonathan Groom of the Wolfsberg Group Secretariat discussed the work of financial institutions in tackling “human trafficking and modern slavery” (HTMS). Members of the Wolfsberg Group believe that collaboration and Public Private Partnerships are critical for a more effective financial crime compliance and anti-HTMS regime. There are a number of such collaborative projects already. For example, a toolkit for tackling human trafficking was created by the Thomson Reuters Foundation & European Bankers Alliance. That toolkit increased the understanding on HTMS by providing indicators of human trafficking. The initiators further spread awareness by giving workshops on HTMS and the toolkit. Moreover, the Wolfsberg Group believes that banks should play an important role in identifying victims of HTMS because the institutions have a social responsibility in society. To this aim, the Group developed an approach which allowed support (i.e. provide bank account facilities) to victims, so that the latter can re-build their lives.
100. Lastly, Ms Rita Theodorou Superman (a police officer from Cyprus and GRETA expert) introduced the role and the work of GRETA, the Council of Europe’s Group on Expert on Action against Trafficking in Human Beings. The Convention on Action against Trafficking in Human Beings adopts a human rights perspective and focuses on victim protection. It also promotes international co-operation in the efforts to combat trafficking and a multidisciplinary approach incorporating prevention, protection of victims’ rights and prosecution of traffickers. GRETA will soon start its third evaluation round, for which it concentrates on access to justice and effective remedies for victims of trafficking, including victim compensation. Noteworthy for MONEYVAL are GRETA’s measures to ensure effective investigations, for which it examines the implementation of special investigative techniques and the financial investigations conducted (including the application of seizure and confiscation) in the framework of human trafficking investigations. She also noted that, while almost all GRETA States Parties have legislation in place with regard to corporate liability, very few cases on the application of the corporate liability provision have been demonstrated in practice.

101. The Plenary posed numerous questions to the presenters. These related to typologies, indicators and participation of states/FIUs to the projects discussed. It was noted during the discussion that, while typologies are usually publicly available, case studies however often tend to originate from developed countries (because little feedback was received from under-developed countries in the above-mentioned projects). The nexus between organised crime and trafficking was also discussed: trafficking can take place domestically and transnationally, but often more people are involved as perpetrators, and victims may become perpetrators. New technologies may increase the efficiency in identifying of human trafficking. Finally, the UNODC, Russian Federation, the Slovak Republic, the Gender Equality Rapporteur and the MONEYVAL Secretariat informed the Plenary shortly on their efforts taken in the area of human trafficking. The Plenary decided to keep this issue on the agenda for future meetings.

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

102. The Plenary held an exchange of views with the President of the Conference of the Parties to the CETS No. 198 (the “Warsaw Convention”), Mr Branislav Bohaçik. Mr Bohaçik informed the Plenary about the outcome of the 10<sup>th</sup> Plenary of the Conference of the Parties (30-31 October 2018), recent signatures/ratifications of the Convention, the 2015-2017 activity report of the Conference of the Parties and priorities with regard to issue of virtual currencies. He also gave an overview of the recent work of the Conference of the Parties on horizontally reviewing all 34 States Parties on selected provisions of the Convention which add particular value to the global AML/CFT standards. The first two reviews of these kind concerned Article 11 (individual recidivism) and Article 25 (asset-sharing and victim restitution).

**Agenda item 29 – Horizontal review of the DNFBP sector (supervision and implementation of preventive measures) in the new round of evaluations: presentation by the Secretariat**

103. The MONEYVAL Secretariat held a presentation following a horizontal review conducted on the DNFBP sector in relation to supervision (IO.3) and implementation of preventive measures (IO.4) in the new round of evaluations. The review was based on countries’ experience and 52 MERs adopted until September 2018. The presentation, which aimed to feature results of this horizontal review, was divided into three different parts:

- Materiality: This part gave an outline of the notion of “materiality” which must be taken into account, respectively, in the context of IO.3 and IO.4. As these two IOs deal with both Fis and DNFBPs, it was therefore necessary to question the weight to be given to DNFBPs in this context. The Secretariat highlighted in this respect the two new footnotes under each IO which were recently added to the FATF Methodology in October 2018.

- Comparative data: the Secretariat presented the results of the horizontal review conducted in order to identify patterns in terms of geographical location (comparison of the number of DNFBP supervisors by country on the different continents), types of supervisory structure (relation between the number of DNFBP supervisors and the IO.3 and IO.4 ratings) and the types of DNFBPs present in the country.

- Examples of main deficiencies and best practices within IO.3 and IO.4 in the DNFBP context were identified in the existing mutual evaluation reports. The Secretariat also highlighted some concrete examples of the main points noted within countries.



104. The Plenary welcomed this very useful presentation and invited the Secretariat, given the time constraints of the present presentation, to revert to some of the details in the presentation at the next plenary.

**Agenda item 30 – The International Training and Methodology Centre for Financial Monitoring: presentation by the Russian delegation**

105. The Plenary heard a presentation by Ms. Elizaveta Churilina (Russia) on the International Training and Methodology Centre for Financial Monitoring (ITC). The ITC provides assistance in preparing for mutual evaluations and in mitigating deficiencies identified for the purposes of improving the effectiveness of national AML/CFT systems. Since its creation in 2005, the ITC has provided over 500 trainings and experience-sharing events with approximately 15,000 participants attending. The presentation focused on the ITC's basic and thematic trainings, human resources and cooperation with all AML/CFT stakeholders. At present there are over 30 trainings and best practices sharing programs that can be carried by ITC experts at the request of interested jurisdictions. The presentation also mentioned that in November 2017 the EAG and the ITC signed a Memorandum of Understanding on the coordination of training in the Eurasian region.

**Agenda item 31 – Appointment of the Rapporteur Teams for the follow-up report to be considered at the 58<sup>th</sup> Plenary (Rule 21, paragraph 6 of MONEYVAL's 5<sup>th</sup> round Rules of Procedure)**

106. The Plenary appointed the following states/jurisdictions as rapporteur teams for the 5<sup>th</sup> round follow-up reports which are scheduled for consideration at MONEYVAL's 58<sup>th</sup> Plenary in July 2019: Estonia and Italy (for the follow-up report of the UK Crown Dependency of the Isle of Man); Israel and the UK Crown Dependency of the Isle of Man (for the follow-up report of Ukraine). After the Plenary, the Secretariat will contact the Rapporteur teams to explain the further progress and the division of work. The Secretariat thanked all Rapporteur teams which had contributed to the present Plenary.

**Agenda item 32 – Miscellaneous**

107. The Plenary said farewell to Mr Vladimir Nechaev, who had attended MONEYVAL Plenaries since 2002 and who had been chairing the Committee from 2009 to 2013. Mr Nechaev had subsequently been the President of the FATF and attended MONEYVAL in recent years in his capacity as Executive Secretary of the EAG. On behalf of MONEYVAL, the Chair as well as Mr John Ringguth (in his role as scientific expert and previous Executive Secretary of MONEYVAL) gave farewell speeches. The Plenary gave Mr Nechaev a big applause for his achievements in MONEYVAL.

108. MONEYVAL will hold its 58<sup>th</sup> Plenary from 15-19 July 2019.

**ANNEX I – Agenda of the Plenary**

Morning 9.30 a.m. / matin 9h30

1. **Opening of the Plenary Meeting at 9.30 a.m. / Ouverture de la 26e union plénière à 9h30**
  - 1.1 **Statement by Mr Jan Kleijssen, Director, Directorate Information Society and Action against Crime / Allocution de M. Jan Kleijssen, Directeur de la Direction de la société de l'information et de la lutte contre la criminalité**
2. **Adoption of the Agenda / Adoption de l'ordre du jour**
3. **Information from the Chairman / Informations communiquées par le Président**
  - 3.1 **Chairman's correspondence / Correspondance du Président**
  - 3.2 **Online survey for Heads of Delegations to support the development of a strategy for MONEYVAL / Sondage en ligne à l'attention des chefs de délégation visant à contribuer au développement stratégique de MONEYVAL**
  - 3.3 **Other issues / Autres sujets**
  - 3.4 **Joint expert meeting with the FATF / Réunion d'expert conjointe avec le GAFI**
4. **Information from the Secretariat / Informations communiquées par le Secrétariat**
  - 4.1 **MONEYVAL calendar of activities 2018-2019 / Calendrier des activités de MONEYVAL en 2018-2019**
  - 4.2 **Report from the Secretariat on the October FATF meeting / Rapport du Secrétariat sur la réunion d'octobre du GAFI**
  - 4.3 **Reports on Secretariat attendance in other fora / Rapports du Secrétariat sur sa participation aux réunions d'autres institutions**
  - 4.4 **Financing and staffing / Financement et questions de personnel**
  - 4.5 **Other issues / Autres sujets**
5. **Report by the Chair on recent progress by the UK Crown Dependency of the Isle of Man and proposal by the Bureau on the follow-up in MONEYVAL / Rapport du Président sur les progrès accomplis récemment par la Dépendance de la Couronne du Royaume-Uni de l'Île de Man et proposition du Bureau pour le suivi par MONEYVAL**
6. **Compliance Enhancing Procedures / Procédures de conformité renforcée**
  - 6.1 **Report from Croatia under step I of the Compliance Enhancing Procedures / Rapport de la Croatie au titre de l'étape (i) des Procédures de conformité renforcée**
  - 6.2 **Report from Montenegro under step II of the Compliance Enhancing Procedures / Rapport du Monténégro au titre de l'étape (ii) des Procédures de conformité renforcée**
  - 6.3 **Report from Romania under step I of the Compliance Enhancing Procedures / Rapport de la Roumanie au titre de l'étape (i) des Procédures de conformité renforcée**

7. **Voluntary Tax Compliance Scheme of the Republic of Moldova / Système de régularisation fiscale volontaire de la République de Moldova**
8. **Joint FATF/MONEYVAL mutual evaluation of Israel : endorsement of the report adopted by the FATF Plenary in October 2018 / Evaluation mutuelle d'Israël menée conjointement par le GAFI et MONEYVAL : validation du rapport adopté lors de la plénière du GAFI en octobre 2018**

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

9. **“Basel Open Intelligence (BOI) and e-learning products” : presentation by Mr Peter Huppertz, Basel Institute on Governance / “Basel Open Intelligence (BOI) et les produits de formation en ligne” : présentation par M. Peter Huppertz, Institut de Bâle sur la Gouvernance**
10. **Presentation by the State Financial Monitoring Service of Ukraine of the case which was awarded the Best Egmont Case Award 2018 / Présentation par la CRF ukrainienne (SFMS) du cas ayant reçu le Prix Egmont 2018 de la meilleure affaire**
11. **Amendments to the FATF Recommendations to address the regulation of virtual assets : presentation by the FATF Secretariat / Modifications apportées aux recommandations du GAFI pour répondre à la réglementation sur les biens fictifs : présentation par le secrétariat du GAFI**
12. **Information on AML/CFT initiatives in MONEYVAL States and territories (tour de table) / Informations sur les initiatives LAB/FT des Etats et territoires de MONEYVAL (tour de table)**
13. **Information on AML/CFT initiatives in other fora / Informations sur les initiatives LAB/FT d'autres institutions**
  - 13.1 **European Commission / Commission européenne**
  - 13.2 **EBRD / BERD**
  - 13.3 **Egmont Group / Groupe Egmont**
  - 12.4 **Eurasian Group on Combating Money Laundering and Terrorist Financing (EAG) / Groupe Eurasie sur le blanchiment d'argent et le financement du terrorisme (EAG)**
  - 13.5 **FATF / GAFI**
  - 13.6 **GIFCS / GSCFI**
  - 13.7 **IMF / FMI**
  - 13.8 **UNODC / ONUDC**
  - 13.9 **World Bank / Banque Mondiale**

**Day 2: Wednesday 5 December 2018 / 2ème jour: mercredi 5 décembre 2018**

**Morning 9.30 a.m. / matin 9h30**

14. **Discussion on the draft 5<sup>th</sup> round Mutual Evaluation Report on the Czech Republic / Discussion du projet de rapport d'évaluation mutuelle du 5<sup>e</sup> cycle de la République tchèque**

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

15. **Fourth round follow-up : application by Liechtenstein to be removed from regular follow-up / Suivi au titre du quatrième cycle : demande du Liechtenstein de sortir de la procédure de suivi régulier**

- 16. Fourth round follow-up : application by Azerbaijan to be removed from regular follow-up /** *Suivi au titre du quatrième cycle : demande de l' Azerbaïdjan de sortir de la procédure de suivi régulier*
- 17. Fourth round follow-up : application by North Macedonia to be removed from regular follow-up /** *Suivi au titre du quatrième cycle : demande de l' «ex-République yougoslave de Macédoine» de sortir de la procédure de suivi régulier*
- 18. Discussion of a regional operational plan to counter terrorist financing /** *Discussion sur un plan opérationnel régional de lutte contre le financement du terrorisme*
- 19. Terrorist Financing Disruption Strategies : presentation by the FATF Secretariat /** *Stratégies de perturbation du financement du terrorisme : présentation par le secrétariat du GAFI*

**Day 3: Thursday 6 December 2018 / 3ème jour: jeudi 6 décembre 2018**

**Morning 9.30 a.m. / matin 9h30**

- 20. Discussion on the draft 5<sup>th</sup> round Mutual Evaluation Report on Lithuania /** *Discussion du projet de rapport d'évaluation mutuelle du 5<sup>e</sup> cycle de la Lituanie*

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

- 21. Fifth round follow-up : first enhanced follow-up report by Andorra /** *Suivi au titre du cinquième cycle : premier rapport de suivi renforcé de l'Andorre*
- 22. Presentation of a questionnaire for a joint MONEYVAL/GRECO project on gender-related issues in the area of corruption and money laundering /** *Présentation d'un questionnaire sur un projet commun GRECO / MONEYVAL sur les questions liées au genre en matière de corruption et de blanchiment d'argent*
- 23. Fifth round follow-up : second enhanced follow-up report by Hungary /** *Suivi au titre du cinquième cycle : deuxième rapport de suivi renforcé de la Hongrie*
- 24. Fifth round follow-up : second enhanced follow-up report by Serbia /** *Suivi au titre du cinquième cycle : deuxième rapport de suivi renforcé de la Serbie*
- 25. Fifth round follow-up : first enhanced follow-up report by Slovenia /** *Suivi au titre du cinquième cycle : premier rapport de suivi renforcé de la Slovénie*
- 26. Amendments of MONEYVAL's 5th round rules of procedure to introduce a "silent procedure" for decisions to be taken in-between MONEYVAL Plenaries /** *Modifications apportées aux règles de procédure de 5<sup>ème</sup> cycle de MONEYVAL pour introduire une "procédure de silence" pour les décisions prises entre deux sessions plénières*

**Day 4: Friday 7 December 2018 / 4ème jour: vendredi 7 décembre 2018**

**Morning 9.30 a.m. / matin 9h30**

- 27. Panel discussion on countering the laundering of proceeds from human trafficking /** *Débat sur la lutte contre le blanchiment des produits issus de la traite des êtres humains*
- 28. Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the**

**Proceeds from Crime and on the Financing of Terrorism (CETS No. 198)** / *Convention du Conseil de l'Europe relative au blanchiment, au dépiage, à la saisie et à la confiscation des produits du crime et au financement du terrorisme (STCE No. 198)*

**29. Horizontal review of the DNFBP sector (supervision and implementation of preventive measures) in the new round of evaluations : presentation by the Secretariat** / *Analyse horizontale du secteur EPFND (supervision et mise en oeuvre de mesures préventives) : présentation par le secrétariat*

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

**30. The International Training and Methodology Centre for Financial Monitoring : presentation by the Russian delegation** / *Centre international de formation et de méthodologie pour la surveillance financière : présentation par la délégation russe*

**31. Appointment of the Rapporteur Teams for the follow-up reports to be considered at the 58<sup>th</sup> Plenary (Rule 21, paragraph 6 of MONEYVAL's 5<sup>th</sup> round Rules of Procedure)** / *Nomination des équipes de rapporteurs pour les rapports de suivi qui seront examinés lors de la 58<sup>ème</sup> session plénière (Règle 21, paragraphe 6 des Règles de procédure du 5<sup>ème</sup> cycle de MONEYVAL)*

**32. Miscellaneous / Divers**

## ANNEX II – MONEYVAL calendar of activities 2019

2019		
14-15 February	<b>Country training San Marino</b>	
17-22 February	<b>FATF Plenary</b>	<i>Paris</i>
14-15 March	<b>Country training Holy See</b>	
24-27 March	<b>Joint (FATF/MONEYVAL) Expert Meeting and Terrorist Financing Prosecution Workshop</b>	<i>Tel Aviv, Israel</i>
1-12 April	<b>5<sup>th</sup> round onsite visit to the British Overseas Territory of Gibraltar</b>	

8-12 April	<b>Joint FATF/MONEYVAL Assessor Training</b>	<i>Ostia, Italy</i>
April/May (tbc)	<b>High-level mission to Croatia (Step 2 CEPs) (tbc)</b>	
13-24 May	<b>5<sup>th</sup> round onsite visit to Cyprus</b>	
16-22 June	<b>FATF Plenary</b>	<i>Orlando, United States of America</i>
15-19 July	<b>PLEN 58 + WGE</b>	<b>5<sup>th</sup> round MER:</b> <i>Republic of Moldova, Malta</i> <b>5<sup>th</sup> round follow-up:</b> <i>Ukraine, Isle of Man</i>
September (tbc)	<b>Country training Poland</b>	
September (tbc)	<b>Country training Croatia</b>	
7-18 October	<b>5<sup>th</sup> round onsite visit to the Slovak Republic</b>	

October (tbc)	<b>11<sup>th</sup> Plenary of the Conference of the Parties to the Warsaw Convention</b>	<i>Strasbourg</i>
13-18 October	<b>FATF Plenary</b>	<i>Paris</i>
4-15 November	<b>5<sup>th</sup> round onsite visit to Georgia</b>	
2-6 December	<b>PLEN 59 + WGE</b>	<b>5<sup>th</sup> round MER:</b> <i>Gibraltar, Cyprus</i> <b>5<sup>th</sup> round follow-up:</b> <i>Albania, Latvia, Andorra, Serbia, Slovenia, Hungary</i>

### ANNEX III – MONEYVAL List of Participants

#### Evaluated States and Jurisdictions / *Etats et juridictions évalués*

#### ALBANIA / ALBANIE

Mr Arlind GJOKUTA *financial*  
**HEAD OF DELEGATION**  
**Working Group on Evaluations**  
 General Director  
 General Directorate for the Prevention of Money Laundering  
 Albanian Financial Intelligence Unit, Ministry of Finance

Mr Artan SHIQERUKAJ *law enforcement & financial*  
**Working Group on Evaluations**  
 Head of Legal and Foreign Relations Directorate  
 General Directorate for the Prevention of Money Laundering

Mr Arben KRAJA *law enforcement & legal*  
 Prosecutor, General Prosecutor Office  
 TIRANA, Albania

Mr Lufti MINXHOZI *law enforcement*  
Director for Investigating Economic and Financial Crime  
Directorate of State Police, Albanian State Police

Mr Pirro VËNGU *legal*  
Head of Anticorruption Department  
Prime Minister's Office

#### **ANDORRA / ANDORRE**

Mr Carles FIÑANA PIFARRÉ *financial*  
**HEAD OF DELEGATION**  
Chef de la CRF (Centre du Renseignement Financier)  
Directeur de l'Unité d'Intelligence Financière, Ministère de la Présidence,

Mr Ricardo Marcelo CORNEJO *legal/financial*  
Member of the FIU, Supervision Department  
Financial Intelligence Unit Principality of Andorra – UFIAND

Mr Gerard PRAST  
**Working Group on Evaluations**  
Member of the FIU, Supervision Department  
Financial Intelligence Unit Principality of Andorra – UFIAND

Ms Alba PEREZ  
Legal Department  
Financial Intelligence Unit Principality of Andorra – UFIAND

Mr Borja AGUADO DELGADO *legal*  
Deputy Prosecutor  
Member of Prosecutor's Office, General Prosecutor's Office

Ms Luis VIÑUALES  
Lawyer, Legal Adviser, Ministry of Finances  
Ms Francesca BALLESTER  
Senior Analyst, Division of Supervision  
AFA – Autoritat Financera Andorrana (ancient INAF)

#### **ARMENIA / ARMENIE**

Mr Daniel AZATYAN *financial*  
**HEAD OF DELEGATION**  
**Working Group on Evaluations**  
Head of the Financial Monitoring Centre  
Central Bank of Armenia

Mr Rustam BADASYAN  
**Working Group on Evaluations**  
Deputy Head  
State Revenue Committee

Ms Zaruhi BADALYAN *legal*  
Methodologist, Legal Advisor  
Legal Compliance Division,  
Financial Monitoring Center, Central Bank of Armenia

Ms Ani GOYUNYAN *legal*  
**LAW ENFORCEMENT EVALUATOR FOR THE CZECH REPUBLIC**  
**Working Group on Evaluations**  
Head of International Relations Division



Financial Monitoring Center, Central Bank of Armenia

Ms Sona SUVARYAN

**FINANCIAL EVALUATOR FOR LITHUANIA**

***Working Group on Evaluations***

Financial Monitoring Center, Central Bank of Armenia

### **AZERBAIJAN / AZERBAÏDJAN**

Mr Vusal ISAYEV

**HEAD OF DELEGATION**

***Working Group on Evaluations***

Member of AML Task Force under Anti-Corruption Commission

Mrs Farah MAMMADOVA

***Working Group on Evaluations***

Member of AML Task Force under Anti-Corruption Commission

Mr Kamal JAFAROV

Head of Secretariat of AML Task Force under Anti-Corruption Commission

Mr Fuad ALIYEV

*financial*

Director of Cooperation Department, Financial Monitoring Service

Mr Azar ABBASOV

*legal*

***Working Group on Evaluations***

Director of Legal Department, Financial Monitoring Service

Mr Kamran ALIYEV

*law enforcement*

Deputy Prosecutor General

Director of Anti-Corruption General Directorate with the Prosecutor General

Mr Sabuhi ALIYEV

Senior Prosecutor, Anti-Corruption Directorate with the Prosecutor General

### **BOSNIA AND HERZEGOVINA / BOSNIE-HERZÉGOVINE**

Mr Borislav ČVORO

*financial*

**HEAD OF DELEGATION**

***Working Group on Evaluations***

Leading Investigator

Financial Intelligence Department – State Investigation & Protection Agency

Mr Željko BOGUT

Secretary General of the Ministry of Justice

Mr Edin JAHIĆ

*legal*

Head of the Department for Combatting Organised Crime and Corruption

In the Sector for fight against Terrorism, Organised Crime and Drugs abuse

Ministry of Security

Mr Boris LOVRINOVIĆ

Expert Associate for inter-entity cooperation

Ministry of Justice

### **BULGARIA / BULGARIE**

Mrs Cvetelina Annanieva STOYANOVA

*law enforcement*

**HEAD OF DELEGATION**

***Working Group on Evaluations***

Head of Exchange of Information

Financial Intelligence Unit, State Agency for National Security (FID-SANS)

Mr Yordan TRENDAFILOV  
Expert, Financial Intelligence Unit  
State Agency for National Security (FID-SANS)  
SOFIA, Bulgaria

Mrs Tea PENEVA  
Senior Expert, Ministry of Justice  
SOFIA, Bulgaria

Mr Alexander GEORGIEV  
Head of team unit, Bulgarian National Bank  
SOFIA, Bulgaria

Mrs Valentina STEFANOVA  
Senior Expert, Financial Supervision Commission

#### **CROATIA / CROATIE**

Mr Tomislav SERTIĆ *legal*  
**Working Group on Evaluations**  
Head of Service for International Cooperation  
Anti-Money Laundering Office, Ministry of Finance

Ms Andreja PAPA *law enforcement*  
Service for Economic Crime and Corruption  
Police National Office for Suppression of Corruption and Organized Crime, Ministry of the Interior

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

Mrs Marcela KIR *financial*  
**Working Group on Evaluations**  
Chief Advisor, Payment Operations Area, Croatian National Bank,

#### **CYPRUS / CHYPRE**

Mrs Eva ROSSIDOU-PAPAKYRIACOU *legal*  
**HEAD OF DELEGATION**  
**Working Group on Evaluations**  
Attorney, Law Office of the Republic

Mr Marios NEOPTOLEMOU *financial*  
**Working Group on Evaluations**  
Senior Officer, Central Bank of Cyprus

Ms Elena PANAYIOTOU *law enforcement*  
Police Officer  
European Union and International Police Cooperation Directorate  
Police Headquarters, Cyprus Police

#### **CZECH REPUBLIC / RÉPUBLIQUE TCHÈQUE**

Ms Jana RUŽAROVSKÁ *law enforcement*  
**HEAD OF DELEGATION**  
**Working Group on Evaluations**  
International and Legal department, Financial Analytical Office  
Ministry of Finance

Ms Lenka MLYNAŘIK HABRNÁLOVÁ *legal*  
**Working Group on Evaluations**  
Director, International and European Union Department  
Ministry of Justice

Mr René KURKA *financial*  
**Working Group on Evaluations**  
Director of Management of Sanctions Department  
Czech National Bank

Ms Markéta HLAVINOVÁ  
Financial Analytical Office, Ministry of Finance

Ms Tereza BÁBOVÁ  
Mr Petr KORBÁŠ  
**Working Group on Evaluations**  
Financial Analytical Office, Ministry of Finance

Ms Aneta DVORÁKOVÁ  
Mr Martin MATAS  
**Working Group on Evaluations**  
Ministry of Justice

Mr Jiří PAVLIK  
Ms Anna RICHTEROVÁ  
**Working Group on Evaluations**  
Supreme Public Prosecutor's Office

Ms Marian DVORŠČÍK  
Mr Michal ŠMÍD  
Mr Petr KORDÍK  
Mr Martin BARTOŠ  
**Working Group on Evaluations**  
Police

Mr Michal VOLNÝ  
Ms Kateřina PSCHEROVÁ  
Ms Jitka KOMÁRKOVÁ  
Ms Pavla JINDŘICHOVÁ  
Mr Jindřich KUBÁT  
**Working Group on Evaluations**  
Czech National Bank

## ESTONIA / ESTONIE

Ms Ülle EELMAA *financial*  
**HEAD OF DELEGATION**  
**Working Group on Evaluations**  
Lawyer, Entrepreneurship and Accounting Policy Department  
Ministry of Finance

Mr Madis REIMAND *law enforcement*  
Police Lieutenant Colonel, Head of Financial Intelligence Unit  
Estonian Police and Border Guard Board

Mr Markko KÜNNAPU *legal*  
Lawyer, Business Conduct Supervision Division  
Estonian Financial Supervision Authority

Ministry of Justice

## FRANCE

Mme Pauline ENNOUCHY

### **CHEF DE DELEGATION**

#### ***Working Group on Evaluations***

Adjointe au Chef de Bureau de la lutte contre la criminalité financière et des sanctions internationales,  
Direction générale du Trésor, Ministère de l'Economie et des Finances

M. Franck OEHLERT

*legal*

#### ***Working Group on Evaluations***

Juriste au Service du droit de la lutte anti-blanchiment et du contrôle interne  
Secrétariat Général de l'Autorité de contrôle prudentiel et de résolution

Mme Alice BODET LARMARCHE

Chargé de mission, Policy Officer , SCN TRACFIN

## GEORGIA / GÉORGIE

Mr Malkhaz NARINDOSHVILI

*financial*

### **HEAD OF DELEGATION**

#### ***Working Group on Evaluations***

Director of Legal, Methodology and International Relations Department  
Financial Monitoring Service of Georgia

Ms Tamar CHELIDZE

#### ***Working Group on Evaluations***

Deputy Head of the Legal Department  
Financial Monitoring Service of Georgia

Mr Aleksandre MUKASASHVILI

Head of the Division for Combating Money Laundering  
Chief Prosecutor's Office of Georgia

Mr Nikoloz CHINKORASHVILI

Chief Prosecutor's Office of Georgia

Head of the Division for European Integration and Relations with international organisations

Mr George NIKOLAISHVILI

### **FINANCIAL EVALUATOR FOR THE CZECH REPUBLIC**

#### ***Working Group on Evaluations***

## HOLY SEE / SAINT SIEGE

Mgr Paolo RUDELLI

### **HEAD OF DELEGATION**

Permanent Observer of the Holy See to the Council of Europe

Dr René BRÜLHART

President of Financial Intelligence Authority, Vatican City State

Pr Roberto ZANNOTTI

Assistant Promotor of Justice, Tribunal of the Vatican City State

Dr Tommaso DI RUZZA

Director of Financial Intelligence Authority, Vatican City State

Rev. Fabio SALERNO

Secretary, Permanent Observer of the Holy See to the Council of Europe

Rev. Carlos Fernando DIAZ PANIAGUA  
**Working Group on Evaluations**  
Official, Secretariat of State  
Section of the Holy See's Relations with States

Dr Fabio VAGNONI  
Deputy Commissioner, Interpol Office  
Vatican Gendarmerie

Dr Federico ANTELLINI RUSSO  
Official, Office of Supervision and Regulation, Financial Information Authority  
Vatican City State

#### **HUNGARY / HONGRIE**

Mrs Zsófia PAPP *legal*  
**HEAD OF DELEGATION**  
**Working Group on Evaluations**  
Senior Expert, Department for EU and International Finance  
Ministry of Finance

Mr Gábor SIMONKA *financial*  
Head of the Hungarian Financial Intelligence Unit  
National Tax and Customs Administration, Central Office

Mr Bertalan VAJDA  
Head of Unit, Anti-Money Laundering Supervision Unit  
Market Monitoring and Anti-Money Laundering Department, Central Bank of Hungary

Mr Balázs GARAMVÖLGYI *law enforcement*  
Public Prosecutor, Deputy Head of Department for Priority,  
Corruption and Organized Crime Cases, Office of the Prosecutor General of Hungary

Mr Péter TÁRNOKI-ZÁCH  
Head of Department, Department for EU and International Finance  
Ministry of Finance

#### **ISRAEL / ISRAËL**

Dr Shlomit WAGMAN  
**HEAD OF DELEGATION**  
Head of Israel Money Laundering and Terror Financing Prohibition Authority

Ms Maya LEDERMAN  
Acting General Counsel, Israel Money Laundering and Terror Financing Prohibition Authority

Mr Elad WIEDER  
**Working Group on Evaluations**  
Head of the International Department  
Israel Money Laundering and Terror Financing Prohibition Authority

#### **ITALY / ITALIE**

Ms Maria Rosaria PETTINARI  
**Working Group on Evaluations**  
Senior Officer  
Prevention of Use of the Financial System for Illegal Purposes, Office I  
Treasury Department, Directorate V, Ministry of Economy and Finance

Mr Fabio TERAMO  
**Working Group on Evaluations**  
Treasury Department, Directorate V, Ministry of Economy and Finance

Mrs Isabella FONTANA  
Treasury Department, Directorate V, Ministry of Economy and Finance

Mrs Federica LELLI  
Central Bank of Italy

Dott. Italo BORRELLO  
Manager, Deputy Head of the International Cooperation Division  
Financial Intelligence Unit for Italy

*law enforcement*

#### **LATVIA / LETTONIE**

Ms Ilze ZNOTINA  
**HEAD OF DELEGATION**  
**Working Group on Evaluations**  
Head of Office for Prevention of Laundering of Proceeds Derived from Criminal Activity

Ms Maija TREIJA  
Director of Compliance Control Department  
Financial and Capital Market Commission  
Ministry of Finance

Ms Dina SPŪLE  
Lawyer, Deputy Director of Criminal Law Department  
Ministry of Justice

Ms Daina ISPODKINA  
Counsellor, Permanent Delegation of LATVIA to the OECD

#### **LIECHTENSTEIN**

Mr Daniel THELESKLAF  
**CHAIRMAN OF MONEYVAL / PRESIDENT DE MONEYVAL**  
**HEAD OF DELEGATION**  
**Working Group on Evaluations**  
Director, Financial Intelligence Unit

Mr Amar SALIHODZIC  
**Working Group on Evaluations**  
International Affairs, Financial Intelligence Unit

*law enforcement*

Ms Graziella MAROK-WACHTER  
Director, Office of Justice

Mr Werner MEYER  
Head of the Other Financial Intermediaries Division  
FMA Financial Market Authority Liechtenstein

Ms Bettina KERN  
Legal Officer of the Other Financial Intermediaries Division  
FMA Financial Market Authority Liechtenstein

*legal*

Mr Frank HAUN  
Deputy General Prosecutor, Public Prosecutor's Office

*legal*

Dr Michael JEHLE  
Judge, Court of Justice

**LITHUANIA / LITUANIE**

Mr Vilius PECKAITIS *law enforcement*  
**HEAD OF DELEGATION**  
**Working Group on Evaluations**  
Head of Money Laundering Prevention Board  
Financial Crime Investigation Service under the Ministry of Interior (Lithuania FIU)

Ms Auksė TRAPNAUSKAITE  
**Working Group on Evaluations**  
Operational Risk Division, Prudential Supervision Department, Supervision Service  
Bank of Lithuania

Ms Andrada BAVĖJAN *legal*  
**Working Group on Evaluations**  
Head of Legal Cooperation Division, International Law Department, Ministry of Justice

Mr Vytautas KUKAITIS  
**Working Group on Evaluations**  
Prosecutor, Department for Criminal Prosecution,  
Prosecutor General's Office of the Republic of Lithuania

Ms Egle KONTAUTAITE  
**Working Group on Evaluations**  
Head of Operational Risk Division, Prudential Supervision Department  
Supervision Service, Bank of Lithuania

Mr Karolis MASILIŪNAS  
**Working Group on Evaluations**  
Chief Lawyer, Licencing Division  
Prudential Supervision Department, Supervision Service, Bank of Lithuania

Ms Rasa KUNIGELYTE  
**Working Group on Evaluations**  
Acting Head of the Department of the Register of Legal Entities  
State Enterprise Center of Registers

Mrs Dalia SIMUTIENE  
**Working Group on Evaluations**  
Advisor of the Division of Coordination of Information Resources of the Department of Legal  
Institutions, Ministry of Justice

Mr Audrius VALEIKA  
**Working Group on Evaluations**  
Deputy Head of the Lithuanian Criminal Police Bureau

Mrs Ingrida RUMŠYTE-ZAJANKOVSKIENE  
**Working Group on Evaluations**  
Head of Activity Planning and Organization Unit of Activity Coordination and Control Board  
Lithuanian Criminal Police Bureau

Mrs Ruta GIEDRIENE  
**Working Group on Evaluations**  
Gaming Control Authority  
Chief Specialist of Control Division under the Ministry of Finance of the Republic of Lithuania

Ms. Auksė BUIKIENE  
**Working Group on Evaluations**  
Chief Inspector, Customs Department under the Ministry of Finance of the Republic of Lithuania  
Violations Prevention Division

Mrs Eglė RAMANAUSKIENE  
**Working Group on Evaluations**  
Head of Control Department State Tax Inspectorate  
under the Ministry of Finance of the Republic of Lithuania  
Ms Asta ŠEREIKAITE  
**Working Group on Evaluations**  
Chief specialist of Control Methodology Division, Control Department  
State Tax Inspectorate Under the Ministry of Finance of the Republic of Lithuania

Mr Gintautas BAGOTYRIUS  
**Working Group on Evaluations**  
Director of Lithuanian Assay Office

Mr Vaidas CEREBIEJUS  
**Working Group on Evaluations**  
Deputy Director, Lithuanian Assay Office

Mr Audrius SKAISTYS  
**Working Group on Evaluations**  
Deputy Director, Department of Cultural Heritage of Lithuania

#### **MALTA / MALTE**

Dr Anton BARTOLO *law enforcement*  
**HEAD OF DELEGATION**  
**Working Group on Evaluations**  
Director Enforcement Unit, Malta Financial Services Authority

Dr Alexander MANGION *legal*  
**Working Group on Evaluations**  
Senior Manager, Legal & International Relations  
Financial Intelligence Analysis Unit

Mr Ian Joseph ABDILLA  
Assistant Commissioner of Police  
Police General Headquarters

Mr Raymond AQUILINA *law enforcement*  
Superintendent of Police, Police General Headquarters

Dr George CAMILLERI *legal*  
Lawyer, Office of the Attorney General  
Ministry for Justice, Cultural and Local Government

#### **MONACO**

M. Philippe BOISBOUVIER  
**Working Group on Evaluations**  
Conseiller Technique, Service d'Information et de Contrôle sur les Circuits Financiers (SICCFIN)  
Ministère d'Etat

M. Jean-Marc GUALANDI  
**Working Group on Evaluations**  
Conseiller technique



Service d'Information et de Contrôle sur les Circuits Financiers (SICCFIN)

M. Louis DANTY

**Working Group on Evaluations**

Chargé de Mission

Service d'Information et de Contrôle sur les Circuits Financiers (SICCFIN)

Mlle Karine IMBERT

**Working Group on Evaluations**

Chef de Section

Service d'Information et de Contrôle sur les Circuits Financiers (SICCFIN)

Mlle Alison GERARD

**Working Group on Evaluations**

Administrateur au Département des finances et de l'économie, Monaco

## MONTENEGRO

Mr Vesko LEKIĆ

*financial*

**HEAD OF DELEGATION**

**Working Group on Evaluations**

Director, Administration for the Prevention of Money Laundering and Terrorist Financing

Mr Drazen BURIĆ

*law enforcement*

State Prosecutor, Supreme State Prosecutor's Office

Ms Merima BAKOVIĆ

*legal*

Head of the Directorate for Criminal Legislation, Ministry of Justice

Ms Danijela MILICEVIC

Senior Advisor, Sector for National and International Cooperation

Administration for the Prevention of Money Laundering and Terrorist Financing

Ms Ana BOŠKOVIĆ

*legal*

**Working Group on Evaluations**

State Prosecutor within Basic State Prosecutor's Office

Mrs Hedija REDZEPAGIĆ

Head of Compliance Department, Central Bank of Montenegro

Mr Ivan SIMONOVIĆ

Inspector at the Compliance Department

Central Bank of Montenegro

Ms Ana RAŽNATOVIĆ

General Directorate for Multilateral Affairs

Director of the Directorate for OSCE and Council of Europe

## POLAND / POLOGNE

Mrs Elzbieta FRANKOW-JASKIEWICZ

*law enforcement*

**HEAD OF DELEGATION**

**Working Group on Evaluations**

Department of Financial information, Ministry of Finance

Ms Monika WILCZYŃSKA

*financial*

**Working Group on Evaluations**

Financial Supervision Authority

Mrs Anna PAJEWSKA  
**LEGAL EVALUATOR FOR LITHUANIA**  
**Working Group on Evaluations**  
Department of Financial Information, Ministry of Finance

*legal*

Ms Magdalena SOCHACKA  
**LEGAL EVALUATOR FOR THE CZECH REPUBLIC**  
**Working Group on Evaluations**  
Polish Police Headquarters ( Polish Police Liason Officer in Italy)

Mr Jacek LAZAROWICZ  
State Prosecutor's Office

*legal*

Mr Piotr BRUDNICKI  
**Working Group on Evaluations**  
Financial Supervision Authority

*financial*

#### **REPUBLIC OF MOLDOVA / REPUBLIQUE DE MOLDOVA**

Mr Andrian MUNTEANU  
**HEAD OF DELEGATION**  
**Working Group on Evaluations**  
Deputy Director, Office for Prevention and fight against money laundering

Ms Oxana GISCA  
Head of Supervision and Compliance Direction  
Office for Prevention and fight against money laundering

Mr Vladimir MUNTEANU  
**Working Group on Evaluations**  
First Deputy Governor, National Bank of Moldova

Mr Sarco VASILE  
Director of FIU Moldova

Mr Constantin SCHENDRA  
Director of Banking Supervision Department  
National Bank of Moldova

Mr Vladimir TURCANU  
Director of Authorisation and Regulation Department, National Bank of Moldova

Mrs Corina TURCAN  
Director of Legislation and International Law Department  
National Bank of Moldova

Mr Gheorge BADIA  
Head of Directorate for Combating money laundering and financing terrorism  
National Bank of Moldova

Mr Eduard VĂRZAR  
Deputy Head, Anticorruption Prosecutor's Office

#### **ROMANIA / ROUMANIE**

Mr Daniel-Marius STAICU  
**HEAD OF DELEGATION**  
**Working Group on Evaluations**  
President, National Office for Prevention and Control of Money Laundering – FIU

Mr Florian GRIGORE  
**Working Group on Evaluations**  
General Director of General Directorate for Operations, FIU

Ms Laura COJOCARU-GALER  
**Working Group on Evaluations**  
Head of International Sanctions and Terrorism Financing Compartment  
Romanian FIU

Ms Denisa Oana PATRASCU  
Expert in charge with compliance and implementation of AML/CFT standards  
Financial Supervisory Authority

Mr Sorin TĂNASE  
Deputy Director, Directorate for Crime Prevention, Ministry of Justice

Mrs Dana Cristina BURDUJA  
Prosecutor, General Prosecutor's Office  
attached by the High Court of Cassation and Justice

Mr Sorin Alexandru SORESCU  
General inspector, National Bank

*financial*

Mr Cătălin ȘERBAN  
Specialist Officer, Directorate for Countering the Organised Crime,  
General Inspectorate of Romanian Police

Mr Liviu VIDRAȘCU  
Head of Monitoring Money Laundering Department  
National Agency for fiscal Administration, Ministry of Finance

Mr Romeo-Florin NICOLAE  
Inspector within NAFA

#### **RUSSIAN FEDERATION / FÉDÉRATION DE RUSSIE**

Mr Vladimir GLOTOV  
**HEAD OF DELEGATION**  
Deputy Head, Rosfinmonitoring

*Mr Alexey PETRENKO*  
*Head of Department, Rosfinmonitoring*

*apologized*

Ms Natalia LUKIANOVA  
**Working Group on Evaluations**  
Head of Division, Rosfinmonitoring

Ms Elizaveta CHURILINA  
**Working Group on Evaluations**  
Senior Expert  
Rosfinmonitoring

Ms Alexandra KHLEBNOVA  
**Working Group on Evaluations**  
Consultant, Rosfinmonitoring

Ms Iuliia DENISOVA  
Consultant, Rosfinmonitoring

Ms Ilya LYABUKHOV  
First Secretary, Ministry of External Affairs

Ms Diana LEONOVA  
Head Division, Bank of Russia

Mr Anatoly GORELOV  
Deputy Head of Unit, Ministry of Internal Affairs

Mr Denis PALTSIN  
Head of Department, Roskomnadzor

Mr Kirill CHERKALIN  
**Working Group on Evaluations**  
Federal Security Service

Mr Valentin CHAPANOV, Interpreter

#### **SAN MARINO / SAINT-MARIN**

Mr Nicola MUCCIOLI  
**HEAD OF DELEGATION**  
**Co-Chair of the Working Group on Evaluations**  
Vice – Director of the Financial Intelligence Agency  
(Sector: Financial Intelligence Unit)

*financial*

Ms Aurora FILIPPI  
**Working Group on Evaluations**  
Uditore Tribunale Unico (Single Court)  
(Sector: Judicial Authority)

#### **SERBIA / SERBIE**

Mr Željko RADOVANOVIĆ  
**HEAD OF DELEGATION**  
**Working Group on Evaluations**  
Director of the Administration for the Prevention of Money Laundering  
Head of Serbian FIU, Ministry of Finance

Mr Radomir ILIĆ  
State Secretary, Ministry of Justice

Ms Ilija HODOBA  
**Working Group on Evaluations**  
Deputy Head of the Service for the Combat against Organized Crime  
Ministry of Interior

Ms Milica TODOROVIĆ  
Advisor, Ministry of Justice

Mr Dejan DEVIĆ  
Director General, Directorate for Legislative and Legal Matters

Mr Miljko RADISAVLJEVIĆ  
Deputy Republic Prosecutor

Mr Vladimir STEVANOVIĆ  
Deputy Prosecutor for Organized Crime

Mrs Nevenka VAŽIĆ  
Justice of the High Court of Cassation,

Mr Aleksandar JANJUŠEVIĆ  
Team Leader for Accounting and Auditing  
Sector for Financial System, Ministry of Finance

Mr Mirko ŠUKOVIĆ  
Advisor, Minister of Interior's Office

Mrs Danijela TANIĆ ZAFIROVIĆ  
Head of Section for Supervision, FIU,

Mrs Jelena PANTELIĆ  
NRA Coordinator

Mrs Marina NOJKIĆ LAZAREVIĆ  
Legal expert, FIU,

Mrs Natalija ADŽIĆ  
Member of the Executive Board of the Chamber of Notaries,

Mr Jugoslav TINTOR  
President of Belgrade Bar Chamber

Mr Vladimir ČEKLIĆ  
Assistant Director, Seized Assets Management Directorate

Mr Miroslav STAROVLAH  
Mrs Katarina PAVLIČIĆ  
FIU, interpreters

#### **SLOVAK REPUBLIC / REPUBLIQUE SLOVAQUE**

Mr Ronald KAKAŠ *law enforcement*  
**HEAD OF DELEGATION ad interim**  
**Working Group on Evaluations**  
Senior police officer of International Cooperation Department  
Financial Intelligence Unit of the Slovak Republic, National Anti-Corruption Unit  
National Criminal Agency

Mr Daniel LESKOVSKÝ *financial*  
National Bank of Slovak Republic

Mrs Soňa POPPER-TOTHOVA *financial*  
National Bank of Slovak Republic

Mr Ladislav MAJERNÍK *legal*  
**LEGAL EVALUATOR FOR LITHUANIA**  
**Working Group on Evaluations**  
General Prosecution of the Slovak Republic

Mrs Lucia CIRAKOVA *financial*  
Ministry of Finance of the Slovak Republic

Mrs Lucia KOPIAROVÁ *financial*  
Ministry of Finance of the Slovak Republic

#### **SLOVENIA / SLOVÉNIE**

Ms Maja CVETKOVSKI <b>HEAD OF DELEGATION</b> <b>Working Group on Evaluations</b> Head of International Cooperation Service, Office for Money Laundering Prevention Ministry of Finance of the Republic of Slovenia	<i>law enforcement</i>
Mr Darko MUŽENIČ Director Office for Money Laundering Prevention	<i>legal</i>
Mrs Branka GLOJNARIČ Head of Section for Prevention and Supervision, OMLP	<i>legal</i>
Mr Leo PONGRAČIČ Head of Section for Suspicious Transactions OMLP	<i>law enforcement</i>
Mrs Andreja LANG Secretary, Ministry of Justice	<i>legal</i>
Mrs Jelena MILOŠEVIĆ Senior Supervisor, Bank of Slovenia	<i>financial</i>
Mrs Breda GAČNIK Senior Inspector Organized Crime Section, Department for terrorism and extreme violence, Police	<i>law enforcement</i>
Mr Bojan GERŠAK Economic Crime Division, Police	<i>law enforcement</i>

**NORTH MACEDONIA /  
MACÉDOINE DU NORD**

Mr Blazho TRENDAFILOV  
**HEAD OF DELEGATION**  
**Working Group on Evaluations**  
Director, Financial Intelligence Office

Mr Toni JANKOSKI  
Advisor to the Director, Bureau for Public Security  
Ministry of the Interior

Ms Iskra IVANOVSKA STOJANOVSKA  
Central Bank

Ms Marija ANGELOVSKA STOJANOVSKA  
Head of Sector for Supervision  
Regulation and International Cooperation  
Ministry of Finance, Financial Intelligence Office

**UKRAINE**

Mr Igor GAIEVSKYI <b>HEAD OF DELEGATION</b> <b>Working Group on Evaluations</b> First Deputy Head, The State Financial Monitoring Service of Ukraine	<i>legal</i>
Mr Ihor BEREZA	<i>financial</i>

**FINANCIAL EVALUATOR FOR THE CZECH REPUBLIC**

***Working Group on Evaluations***

Head of Financial Monitoring Department, National Bank of Ukraine

Mr Vitalii BEREHIVSKYI

**LAW ENFORCEMENT EVALUATOR FOR LITHUANIA**

***Working Group on Evaluations***

Head of Division for Cooperation with Financial Intelligence Units

Department for Financial Investigations, The State Financial Monitoring Service of Ukraine

Mr Andrii BALASHOV

First Deputy Head of Main Department for Counter-Intelligence Protection of State's Interests in the Area of Economic Security, Security Service of Ukraine

Mr Oleksandr HLUSHCHENKO

Director of Department for Financial Monitoring System Coordination of the State Financial Monitoring Service of Ukraine

Mr Yevgueniy YENIN

Deputy General Prosecutor of Ukraine

Mr Andrii OPRYSOK

Head of International Cooperation Division

The State Financial Monitoring Service of Ukraine

**UNITED KINGDOM CROWN DEPENDENCIES / DEPENDANCES DE  
LA COURONNE BRITANNIQUE**

**UNITED KINGDOM CROWN DEPENDENCY OF GUERNSEY / GUERNESEY DEPENDANCE DE  
LA COURONNE BRITANNIQUE**

Mrs Kate RABEY

(Mrs Catherine SWAN)

*legal*

**HEAD OF DELEGATION**

***Working Group on Evaluations***

Crown Advocate, Legislative Counsel

Law Officers of the Crown, St. James Chambers,

Mr Richard WALKER

*financial*

**FINANCIAL EVALUATOR FOR LITHUANIA**

***Working Group on Evaluations***

Director of Financial Crime Policy and International Regulatory Advisor

Office of the Policy and Resources Committee of the States of Guernsey

Mr Adrian HALE

Head of the Financial Intelligence Service

Guernsey Border Agency

**UNITED KINGDOM CROWN DEPENDENCY OF JERSEY / JERSEY DEPENDANCE DE LA  
COURONNE BRITANNIQUE**

Mr Hamish ARMSTRONG

*financial*

***Working Group on Evaluations***

Head of Financial Crime Policy, Office of the Director General

Jersey Financial Services Commission

Mr Tom FOTHERGILL

Lead Policy Adviser, Financial Services and Digital Economy

Government of Jersey

Mr Michael FITZGERALD  
Detective Sergeant, Joint Financial Crime Unit  
States of Jersey Police

**UNITED KINGDOM CROWN DEPENDENCY OF ISLE OF MAN / ILE DE MAN DEPENDANCE DE LA COURONNE BRITANNIQUE**

Mr Paul HECKLES  
**HEAD OF DELEGATION**  
**Working Group on Evaluations**  
AML/CFT Advisor, AML/CFT Policy Office, Cabinet Office  
Government Office

Ms Lindsey BERMINGHAM  
Head of Financial Intelligence Unit

Ms Ashley WHYTE  
Financial Regulator

**UNITED KINGDOM OVERSEAS TERRITORY OF GIBRALTAR**

Mr David PARODY  
**Working Group on Evaluations**  
Finance Centre Director  
Gibraltar Finance, National Co-ordinator AML/CFT  
HM Government of Gibraltar

Mr Paul RICHARDSON  
Police Superintendent, Gibraltar

Mr Charles LINARES  
Head of GFIU, Gibraltar

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

**CANADA**

Mr Claude LEFRANCOIS  
**LEGAL EVALUATOR FOR THE CZECH REPUBLIC**  
**Working Group on Evaluations**  
Senior Counsel  
International Assistance Group, Litigation Branch, Criminal Law Division

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

Ms Anna MORRIS  
**Working Group on Evaluations**  
Director, Iran Finance Fusion Cell, US Department of the Treasury

Mr James C. PRUSSING  
**Working Group on Evaluations**  
Senior Policy Advisor, Russia and Europe  
Office of Terrorist Financing and Financial Crimes, U.S. Department of the Treasury,

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



**GERMANY/ALLEMAGNE**

Mr Thomas MESSING  
**HEAD OF DELEGATION**  
**Working Group on Evaluations**  
Federal Financial Supervisory Authority (BaFin),  
Department for the Prevention of Money Laundering, GW

Mr Kristian LENSKI  
**Working Group on Evaluations**  
Federal Financial Supervisory Authority (BaFin),  
Department for the Prevention of Money Laundering, GW

Dr Raoul JACOBS  
BAFIN

Mr Uwe WIXFORTH, LL.M.  
Head of Division VII B1, International and European Financial Markets Regulation  
Federal Ministry of Finance, BERLIN, Germany

**PORTUGAL**

Mr Nuno MATOS  
**Working Group on Evaluations**  
Expert in the Technical Permanent Secretariat, Coordination Commission, Banco de Portugal

**UNITED KINGDOM / ROYAUME-UNI**

Mrs Colette LANCASTER  
**Working Group on Evaluations**  
Policy Advisor, Sanctions and Illicit Finance,  
International Group, HM Treasury

Mr Dylan BAGE  
**Working Group on Evaluations**  
International Group, HM Treasury

**Council of Europe bodies and mechanisms /**

*Organes et mécanismes suivants du Conseil de l'Europe*

**COUNCIL OF EUROPE DEVELOPMENT BANK /  
BANQUE DE DEVELOPPEMENT DU CONSEIL DE L'EUROPE  
EUROPEAN COURT OF HUMAN RIGHTS  
COUR EUROPEENNE DES DROITS DE L'HOMME**

Mrs Katherine DELIKOURA  
Director, Chief Compliance Officer  
Council of Europe Development Bank

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

Mr Titus CORLĂȚEAN  
Member of the Committee on Legal Affairs and Human Rights  
Senator, Senatul României

Mr Răzvan TĂNASE  
**Working Group on Evaluations**  
Delegation Secretary  
External Multilateral Relations Directorate, Senate of Romania

apologized

**CONFERENCE OF THE PARTIES TO THE CONVENTION ON LAUNDERING,  
SEARCH, SEIZURE AND CONFISCATION OF THE PROCEEDS FROM CRIME  
AND ON THE FINANCING OF TERRORISM (CETS NO. 198) /  
CONFÉRENCE DES PARTIES À LA CONVENTION RELATIVE AU BLANCHIMENT,  
AU DÉPISTAGE, À LA SAÏSIE ET À LA CONFISCATION DES PRODUITS DU CRIME  
ET AU FINANCEMENT DU TERRORISME (STCE N° 198)**

Mr Branislav BOHACIK  
**CHAIRMAN OF THE CONFERENCE OF THE PARTIES C198-COP**  
Prosecutor, General Prosecutor's Office of the Slovak Republic  
International Department

**EUROPEAN COMMITTEE ON CRIME PROBLEMS (CDPC) /  
COMITE EUROPEEN POUR LES PROBLEMES CRIMINELS (CDPC)**

**GROUP OF STATES AGAINST CORRUPTION (GRECO) /  
GROUPE D'ETATS CONTRE LA CORRUPTION (GRECO)**

Prof. dr Wim HUISMAN  
Department of Criminology, Vrije Universiteit Amsterdam

Dr Anne-Marie SLOTBOOM  
Department of Criminology  
Vrije Universiteit Amsterdam

**ACTION AGAINST TRAFFICKING IN HUMAN BEINGS (GRETA) /  
LUTTE CONTRE LA TRAITE DES ETRES HUMAINS (GRETA)**

Ms Rita Theodorou SUPERMAN  
Expert, GRETA

**International organisations and bodies /**

*Organisations et organismes internationaux*

**EUROPEAN COMMISSION / COMMISSION EUROPEENNE**

Mr David SCHWANDER  
**Working Group on Evaluations**  
Policy officer, Anti-Money Laundering and Countering Terrorist Financing, European Commission  
Directorate-General for Justice and Consumers, Unit Financial Crime

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

Mr George PEARMAIN  
**Working Group on Evaluations**  
Policy Analyst, Anti-Money Laundering – Counter-Financing of Terrorism  
Financial Action Task Force – FATF

Ms Laura KRAVALE

**Working Group on Evaluations**

Policy Analyst, Anti-Money Laundering – Counter-Financing of Terrorism  
Financial Action Task Force – FATF

**INTERNATIONAL CRIMINAL POLICE ORGANISATION (ICPO) - INTERPOL  
ORGANISATION INTERNATIONALE DE POLICE CRIMINELLE (OIPC) - INTERPOL**

**INTERNATIONAL MONETARY FUND (IMF)  
FONDS MONÉTAIRE INTERNATIONAL (FMI)**

**UNITED NATIONS / NATIONS UNIES**

**UNODC**

Mr Yevheniy UMANETS

**Working Group on Evaluations**

Program Officer UNODC GPML- Global Program against Money Laundering,  
Proceeds of Crime and the Financing of Terrorism (GPML)  
Implementation Support Section, Organized Crime and Illicit Trafficking Branch  
Division for Treaty Affairs, United Nations Office on Drugs and Crime (UNODC)

**WORLD BANK / BANQUE MONDIALE**

Ms Tanjit SANDHU KAUR

**Working Group on Evaluations**

Financial Sector Specialist  
World Bank Group, Financial Market Integrity

**EUROPEAN BANK FOR RECONSTRUCTION AND DEVELOPMENT (EBRD)  
BANQUE EUROPEENNE POUR LA RECONSTRUCTION ET LE DEVELOPPEMENT (BERD)**

Mr Luke GRIBBON

**Working Group on Evaluations**

Principal, Integrity Unit,  
Office of the Chief Compliance Officer  
European Bank for Reconstruction and Development

**GIFCS – GROUP OF INTERNATIONAL FINANCE CENTRE SUPERVISORS GS  
CFI - GROUPE DE SUPERVISEURS DE CENTRES FINANCIERS INTERNATIONAUX**

Ms Fiona CROCKER

**Working Group on Evaluations**

Guernsey Financial Services Commission  
GIFCS

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

Mr Yaroslav YURTSABA

*apologized*

*Working Group on Evaluations*

*National Programme Manager, Economic, Environmental and Politico-Military Programme  
OSCE Project Co-ordinator in Ukraine*

**EGMONT GROUP of FINANCIAL INTELLIGENCE UNITS /  
GROUPE EGMONT DES CELLULES DE RENSEIGNEMENTS FINANCIERS**

Mr Nedko KRUMOV

**Working Group on Evaluations**

Senior Officer  
Egmont Group Secretariat

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

Mr Vladimir NECHAEV  
**HEAD OF THE DELEGATION**  
***Working Group on Evaluations***  
EAG Executive Secretary

Mr Dmitry KOSTIN  
***Working Group on Evaluations***  
Administrator, EAG Secretariat

**Others / Autres**

Mr Jonathan GROOM  
Wolfsberg Group

Mr Peter HUPPERTZ  
Basel Institute on Governance

**Scientific Experts / Experts Scientifiques**

Mr John RINGGUTH  
***Co-Chair of the Working Group on Evaluations***

Mr Lajos KORONA  
***Working Group on Evaluations***  
Public Prosecutor, Metropolitan Prosecutor's Office  
Budapest, Hungary

Mr Andrew LE BRUN  
***Working Group on Evaluations***  
Director, Office of the Director General  
Jersey Financial Services Commission,

Mr Andrew STRIJKER  
***Working Group on Evaluations***  
European Commission, Task Force for Greece, Cluster Coordinator Anti Money Laundering and Anti-Corruption, BRUSSELS

Mr Boudewijn VERHELST  
***Working Group on Evaluations***  
Deputy Director CTIF-CFI, Scientific Expert Law Enforcement, Attorney General,  
BRUSSELS

**Secretariat of the Council of Europe /**

***Secrétariat du Conseil de l'Europe***

Mr Jan KLEIJSEN  
Director, Information Society and Action against Crime

Directorate General of Human Rights and Rule of Law – DGI

Mr Ivan KOEDJIKOV

Head of Department and Anti-terrorism Co-ordinator, Action against Crime Department  
Information Society and Action against Crime,  
Directorate General of Human Rights and Rule of Law – DGI

Mr Matthias KLOTH

**EXECUTIVE SECRETARY TO MONEYVAL / *SECRÉTAIRE EXÉCUTIF DE MONEYVAL***

Administrator, Directorate General of Human Rights and Rule of Law - DGI,  
Council of Europe, F – 67075 STRASBOURG Cedex

Mr Michael STELLINI, Deputy Executive Secretary to MONEYVAL

Head of Unit 2 - AML/CFT Monitoring and Training Unit

Mr Lado LALICIC, Head of Unit 1 - AML/CFT Monitoring Unit, Typologies & Conference  
of the Parties to CETS n°198 - MONEYVAL

Ms Astghik KARAMANUKYAN, Administrator, MONEYVAL

Ms Ani MELKONYAN, Administrator, MONEYVAL

Ms Veronika METS, Administrator, MONEYVAL

Mr Jeremie OGE, Administrator, MONEYVAL

Ms Kotryna FILIPAVICIUTE, Administrator, MONEYVAL

Mr Alexey SAMARIN, Administrator, MONEYVAL

Ms Claudia ELION, Programme Assistant, MONEYVAL

Mr Panagiotis PSYLLOS, Programme Assistant, MONEYVAL

Mr Hasan DOYDUK, Administrative Assistant, MONEYVAL

Mrs Odile GEBHARTH, Administrative Assistant, MONEYVAL

Mrs Danielida WEBER, Administrative Assistant, MONEYVAL

Mr Stanislav LICHEV, Trainee

**Interpreters / *Interprètes***

Mr Grégoire DEVICTOR

Ms Julia TANNER

Ms Bettina LUDEWIG