

Strasbourg, 20 November 2019

C198-COP(2019)6

## **CONFERENCE OF THE PARTIES**

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

**11<sup>th</sup> meeting, Strasbourg, 22-23 October 2019**

## **MEETING REPORT**

Memorandum prepared by the Secretariat  
Directorate General Human Rights and Rule of Law (DGI)

## **SUMMARY ACCOUNT OF THE PROCEEDINGS**

1. The Conference of the Parties to the Council of Europe's Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS no. 198, hereafter: 'the Convention') held its eleventh meeting in Strasbourg, from 22 to 23 October 2019, under the Chairmanship of its President Mr Branislav Bohacik (Slovak Republic). The agenda of the meeting, the decisions taken and the list of participants are annexed to the present report.

### **Item 1. Opening of the Meeting**

2. The President opened the meeting and welcomed the participants. The Conference of the Parties (hereinafter: COP) adopted the meeting report for the 10th Plenary (C198-COP(2018)5). In order to avoid a long period between a COP Plenary and the adoption of the meeting report, the COP decided that future meeting reports should be circulated by the Secretariat within four weeks after the respective Plenary. Unless a delegation would object within two weeks' time, the meeting report would be considered as adopted and should be made available on the COP website.

### **Item 2. Adoption of the Agenda**

3. The COP adopted the agenda as it appears in Appendix I.

### **Item 3. Communication by the President**

4. The President welcomed all participants, in particular delegates who attended the Plenary for the first time, the delegation for Monaco which participated for the first time as a full State Party of the COP (see below), as well as representatives from observer organisations (notably the Financial Action Task Force (FATF) and the Eurasian Group on Combatting Money Laundering and Financing of Terrorism (EAG)).
5. The President informed the COP about the Bureau meeting held in June, which had been organised in order to prepare the agenda and the documents for the present Plenary.
6. On behalf of the COP, he welcomed the ratification of the Convention by Monaco in April 2019 and the signature by Liechtenstein in November 2018. In light of the fact that eight Council of Europe member states have signed the Convention a while ago, but have not yet ratified, the COP asked the Secretariat to send a letter to those Member States to invite them to do so. This should include offering advice by the COP in overcoming any legal or other perceived obstacles before acceding to the Convention, and by making available the interpretative notes on selected provisions of the Convention which had been adopted by the COP at previous Plenary meetings.
7. The President informed the COP about his representation of the COP at the Council of Europe's 70th anniversary celebrations which were held on 1 October 2019 in Strasbourg.

### **Item 4. Communication by the Executive Secretary**

8. The Executive Secretary informed the COP about a number of correspondence sent since the 10th Plenary in October 2018. Firstly, the President and the Executive Secretary had sent joint letters to the Permanent Representations which did not attend the previous 10th Plenary in October 2018, reminding them of the particular importance that all States Parties should be represented during the COP plenaries in order to provide further information and respond to

questions when their country's implementation of certain provisions are being discussed in the margin of the thematic monitoring reports. While some of these States Parties attended the 11th Plenary meeting, the COP deplored that other States Parties did still not attend. It was noted that such absence was unusual for Council of Europe monitoring and intergovernmental committees. The COP asked the Secretariat to further reach out to these States Parties to encourage them to attend the 12th Plenary in October 2020.

9. The Executive Secretary informed the COP about letters written to those States Parties whose declarations as required under Article 46, paragraph 13 of the Convention are still outstanding. The COP asked the Secretariat to continue to reach out to these States Parties in order to complete the declarations for all States Parties by the 12th Plenary in October 2020. The COP encouraged these States Parties to make such declarations and noted the binding nature under the Convention of making such declarations in an official manner.
10. The Executive Secretary also informed the COP about letters written to those States Parties which had not yet submitted the MLA template elaborated at a previous Plenary, and noted those States Parties that had already responded to this reminder. The COP reiterated its call for those States Parties which had not yet done so to submit the completed MLA template to the Secretariat ahead of the 12th Plenary in October 2020.
11. The Executive Secretary informed the COP about a study of the Committee of Experts on Cooperation in Criminal Matters (PC-OC) on the possible added value and feasibility of preparing a new binding instrument in the Council of Europe on international cooperation as regards the management, recovery and sharing of proceeds of crime. The study is made available for information to all delegates on the restricted COP website.
12. The Executive Secretary invited all States Parties that did not notify a Head of Delegation to nominate a Head of Delegation by mail to the COP Secretariat (DGI-COP198@coe.int). The COP agreed that, when discussing changes to the Rules of Procedure (see agenda item 10), Rule 1 should be amended as to reflect that the composition of delegations would include a Head of Delegation.
13. The COP took note of an update by the Executive Secretary on the possible accession to the Convention by third States. He also informed the COP that the Secretariat regularly liaises with other parts in the Council of Europe to include presentations on the Convention when meetings are held with third States which are interested in acceding to a whole group of Council of Europe treaties.

**Item 5. The state of signatures and/or ratifications of the Council of Europe Convention on laundering, search, seizure and confiscation of the proceeds from crime and on the financing of terrorism**

14. The Secretariat informed the Conference on several changes made in the document since the last plenary. The changes concern Article 46(13) and recent declarations made by Croatia and Monaco. The Secretariat also noted that Bosnia and Herzegovina, France and Denmark had not yet submitted their declarations under this Article and invited them to inform the plenary when the declarations will be made. Bosnia and Herzegovina stated that the new Government had not yet been constituted and as soon as the new Government takes up its duties the declaration will be sent. Monaco informed the plenary that they expected to send the declaration already in November and as soon as the new AML/CFT law is adopted. Delegations of France and Denmark

did not attend the 11<sup>th</sup> plenary meeting, therefore no information on their submission under A.46(13) was available.

15. The Secretariat also informed the plenary of the discussions held during the Bureau meeting with regard to Reservations and Declarations document (C198-COP(2019)4) and several suggestions made by the President on how to improve it. The document, under paragraph 7(c), states that three States Parties (Georgia, Ukraine, Turkey) apply Article 47 of the Convention '*subject to domestic legislation, though it remains unclear to what extent such co-operation could be afforded.*' The President suggested that these States Parties inform the Secretariat, in three months' time, on potential limitations in applying this article. This information would then be reflected in the document and would afford other States Parties an opportunity to know when and under which circumstances cooperation with these States Parties regarding Article 47 might not be materialised. The proposal was accepted by the plenary.
16. The President also proposed that each state party reviews the Declarations and Reservations document and consider whether the existing declarations and reservations are still needed. In other words, it would be useful that, in the interim period between the plenary meetings, i.e. in six months' time, States Parties review declarations and reservations and, in light of eventual changes in the national legal framework, reconsider whether they are still valid. The plenary approved this proposal and asked the Secretariat to communicate the States Parties inviting them to consider existing reservations and declarations and provide inputs.
17. Two more points were raised by the Secretariat in relation to the Declaration and Reservations Document: i) with regard to paragraph 13 - once Monaco sends declaration on Article 46(13) and in case no further declarations and reservations are made, the country will be mentioned in this paragraph among other States Parties which have largely accepted the principles of the Convention; ii) paragraph 14 will be aligned with the last paragraph of the document since some repetitions were noted – the second bullet point of the last paragraph will be moved to paragraph 14 whilst the rest of the last paragraph will be deleted.
18. One delegation made a comment with regard to paragraph 14(f) concerning the other state party's declaration on territorial application of the Convention. The Secretariat explained that the declaration was taken from the Treaty Office official web-page and that the document only copied what had officially been stated by the States Parties. Since COP is a technical and not a political body, the delegations agreed that no political statements should be included in its documents.

**Item 6. Presentation of the transversal thematic monitoring of the implementation of the Convention by the States Parties: Article 9(3)**

19. The COP discussed the transversal thematic monitoring report on Article 9(3), for which Ms Ani Goyunyan and Ms Oxana Gisca acted as rapporteurs. The COP heard an introduction by Ms Oxana Gisca on the study, the adopted approach and methodology of the study, and the general conclusions and recommendations. Afterwards, the scientific expert, Mr Paolo Costanzo, made some general remarks as regards the provision of Art. 9(3) of the Convention. In his opinion, *dolus eventualis* somewhat equals the element of suspicion, and negligence to a certain extent equals the element of 'ought to have known', even though these concepts may be interpreted differently among States Parties.
20. The States Parties were invited to make comments on the general part of the report. First of all, Greece made a comment regarding the non-compulsory character of Art. 9(3) in the general recommendation, and it proposed to refer to Art. 3(2) of the Directive (EU) 2018/1673 of 23

October 2018 on combating money laundering by criminal law. The Russian Federation and Belgium questioned whether cross-referencing to EU legislation would divide the COP States Parties or would pose future problems. Turkey raised a point on the difference between 'objective, factual circumstances' (Art. 9(2) Warsaw Convention and FATF Recommendation 3.8) and the provision of Art. 9(3), to which the Executive Secretary clarified that the requirement under art 9(2) and FATF Recommendation 3.8 required States Parties to ensure that a judge may establish the criminal intent of money laundering and hand down a money laundering conviction even on the basis of circumstantial and objective factual circumstances, i.e. even in the absence of a confession. This differed from the provisions of Art 9(3) that requires States Parties to criminalise money laundering where one suspects or ought to have assumed that property was proceeds. Bosnia and Herzegovina and Croatia pointed out that they should be mentioned in the summing up of Parties which have criminalised both alternatives under Art. 9(3). Finally, it was discussed and agreed that the cases (including cases where no conviction (yet) was reached) as provided by States Parties in their submissions demonstrating implementation of Art. 9(3) would be published on the restricted website.

21. The discussion on the individual country analysis started with interventions by Azerbaijan (on their draft law), Hungary (on provided case law), Italy (on the difference between *dolus eventualis* and *dolus specialis*), Romania (on a provision in their legislation regarding objective, factual circumstances) and Turkey (also on objective, factual circumstances). For Azerbaijan, Italy, Romania and Turkey, the relevant information will be considered during a follow-up procedure, and for Hungary an amendment to the text was made mentioning that cases were provided beyond the deadline.
22. Furthermore, Sweden intervened that it had submitted case law which was not sufficiently reflected in the report, thus the necessary text changes were suggested. San Marino thanked and congratulated the rapporteurs for the high quality of the report, and indicated that it had no objections to the analysis as it stood. Bosnia and Herzegovina pointed out that the text should reflect that both alternatives under Article 9(3) were criminalised, as was concluded during their 2015 COP Assessment. The COP accepted the argumentation. Portugal requested a change in the wording of the annex, as follow-up information was provided which contradicted the initial Portuguese submission, to ensure correct reading of the submitted information. Romania further informed the COP that a new AML Law came into force in July 2019, which meant that the annexed initial submission referred to the old provisions.
23. The United Kingdom explained the scope of the offence of money laundering and indicated that the analysis should be changed to omit the reference to the failure to report by a person which is required to make a disclosure, which the COP approved. Germany requested further clarification of column 2 of the table as annexed to the report. Croatia suggested that its analysis should be changed due to a translation issue; the text could be aligned to the analysis of Bosnia and Herzegovina. However, as the conclusion in the 2013 COP Assessment report differed from the conclusion of Bosnia and Herzegovina, and the laws in Croatia had not been changed since the report, the COP decided to invite Croatia to provide the relevant information during a follow-up procedure.
24. The rapporteur finally thanked all States Parties for their submissions and cooperation beforehand, as well as for their participation during the Plenary meeting. Moreover, the President suggested that a follow-up procedure could be useful, but this discussion would be postponed to agenda item 10 ('Future monitoring by the COP'). Consequently, the COP concluded that it was satisfied with the thematic monitoring report on Article 9(3) and decided to adopt the document.

25. Since not all Parties provided input to the report, the COP decided that it would still welcome the submission of the Russian Federation on their implementation of Art. 9(3) and Art. 14, but also emphasised that this should be an absolute exception. The relevant analysis of their submission would be published as an addendum to the report. The Russian Federation accepted this proposal, and further explained that it had undergone an intensive evaluation by the FATF which had resulted in the (exceptional) inability to submit answers to the initial questionnaire for the report.

**Item 7. Follow-up by the Conference of the Parties of progress made by States Parties concerning the monitoring of Arts. 11 and 25(§2-3)**

26. The COP discussed the follow-up report to the transversal thematic monitoring reports on Article 11 and 25(§2-3). The COP heard an introduction by the Secretariat on the study, the lack of results of progress due to the short period of time of review, and the general conclusions and recommendations. The Secretariat further pointed out that it had contacted the European Commission regarding the question which was raised by a State Party during the 10<sup>th</sup> Plenary meeting on the competence of individual EU Member States to conclude asset-sharing agreements with non-EU Member States. The President welcomed the steps undertaken and congratulated the States Parties which were able to demonstrate (certain) progress, as described in the follow-up report. The President then gave the floor to States Parties to raise comments or questions on the country-specific part of the report, as there were no comments regarding the general part.

27. First of all, Bosnia and Herzegovina pointed out that it had submitted statistics, which were part of the general recommendations and therefore could be regarded as progress, thus that it should be included in the list of States Parties which were able to demonstrate progress (as listed in paragraph 9 of the general part of the report). The COP made the necessary changes. The United Kingdom introduced that it had undertaken some non-legislative measures to implement the relevant recommendation on Article 11, which the COP would analyse for a possible follow-up. Bosnia and Herzegovina introduced some recent non-legislative measures to implement the recommendations, which the COP welcomed.

28. Bulgaria emphasised that it maintained its position regarding the implementation of Article 11, and suggested that there was a slight misunderstanding as to the scope of application of the domestic legislation (which does cover all COP States Parties and not only EU Member States as the current analysis suggests) which could be resolved during a possible 'selective' follow-up procedure. Sweden argued that the Swedish legislation did comply with the relevant provision of Art. 25(§2-3) but that this was not entirely reflected in the related thematic monitoring report nor in the follow-up report. The representative explained its system, which, according to him, reflected the text of the provision concerned, and mentioned established practice. He therefore requested for some changes in the text. The COP proposed to subject Sweden, as it had done to Bulgaria, to a possible 'selective' follow-up procedure. The Executive Secretary emphasised that any conclusions of the thematic monitoring reports or follow-up reports could be subject to changes and rectifications.

29. As regards Denmark, the Secretariat provided that the country had submitted a response beyond the deadline, so the respective analysis could not be included in the follow-up report. Their submission could be analysed during a possible follow-up procedure. The COP also discussed the missing submission by the Russian Federation and decided that the Russian Federation, by strong exception, could submit information which would be published as an addendum to the follow-up report.

30. Ultimately, the COP was satisfied with the follow-up report on Article 11 and 25(§2-3) and decided to adopt the document.

### **Item 8. Virtual Assets: Investigative Challenges, Best Practices and Techniques**

31. The FATF Secretariat, represented by Ms Laura Kravale and Mr Michael Moritz, introduced the FATF Report “Guidance on Financial Investigations Involving Virtual Assets” (June 2019), which complements the FATF Report “Dealing with operational issues for financial investigations” (2012). The FATF Secretariat stated that the development of this guidance was made in parallel with changes to the FATF standards in relation to virtual assets (VAs), and that it is meant to be used at the domestic level by operational authorities to improve detection, investigation and confiscation of VAs. The report provides ideas, good practices and concepts for practitioners in the field of financial investigations, and can assist a country on how to best implement the FATF recommendations relating to VAs.
32. The FATF Secretariat pointed out that VAs can be used to commit predicate offences or to launder the proceeds of crimes and to raise funds for terrorist financing purposes. Furthermore, the FATF Secretariat informed the COP that VAs’ characteristics can frustrate financial investigations and confiscation: as VAs entail unconventional sources of information, FIUs need to have special tools to investigate and the usual investigation techniques need to be implemented with the support of blockchain experts. With regards to the seizure process of VAs, the pre-seizure planning requires a strong logistical preparation, and all along the seizure process VAs experts are needed in order to seize the target’s private key, the recovery seeds and the VAs wallet files, to export the wallet and copy files and to transfer them to a controlled computer, and then put the wallet in cold storage offline while awaiting the confiscation order. In conclusion, the FATF Secretariat stressed the challenges and the hurdles of the VAs, such as the limited access to legal expertise, the need of technical expertise and of international cooperation, and recommended the countries to implement the FATF standards, to create specialized teams and to raise awareness about VAs.
33. The President, underlining the growing importance of virtual currencies, proposed to continue to monitor this phenomenon. Following the President’s proposal, the COP decided to continue to display presentations showing the best practices and to prepare a short questionnaire in order to know whether the countries’ national legislation or practice consider VCs as property, value or data and whether the national competent authorities are empowered to seize and confiscate VCs in a domestic case on the base of the request for mutual legal assistance or confiscation. The COP appointed the current President as Rapporteur for a questionnaire and/or report on this topic.

### **Item 9. Presentation of the transversal thematic monitoring of the implementation of the Convention by the States Parties: Article 14**

34. The COP discussed the transversal thematic monitoring report on Article 14, for which Ms Ani Goyunyan and Ms Oxana Gisca acted as rapporteurs. The COP heard an introduction by Ms Ani Goyunyan on the study, the adopted approach and methodology of the study, and the general conclusions and recommendations. The Secretariat introduced a proposal regarding the scope of Article 14, which covers not only money laundering, but also terrorist financing. The COP approved this proposal and the necessary changes were made. The scientific expert, Mr Paolo Costanzo, emphasised that terrorist financing is of such importance, that it should be dealt with in each future thematic monitoring report. This was welcomed by the COP. The President made a proposal to better align the wording of the recommendation with the text of the general part. The

President also questioned whether the COP should consider the length of postponement measures and the proportionality of such length in the future, which was accepted.

35. States Parties were then invited to make comments regarding the general part of the report. Greece proposed to include the duration of postponement orders in the general recommendation, which was accepted. Malta added that statistics could also include information on the results of postponement. Furthermore, Mr Costanzo questioned the added value of the paragraph explaining that 'when there is a suspicion' would not entail that a postponement order is issued if the responsible authority does not find it appropriate, but the COP decided to keep the wording as it was.
36. The discussion on the country analysis was started by representatives of San Marino, who confirmed that their respective analysis was correct. Turkey explained the procedural rules for postponement measures, thus the analysis was amended to better reflect the situation. Latvia requested an amendment to the text concerning provided case examples (which concerned the freezing of funds) and the period of postponement measures in case of TF suspicion. The United Kingdom made some proposals regarding the conclusion/recommendation part of its analysis, which concerned the maximum extension of postponement measures and the correct wording of procedural issues. Malta inquired whether competencies of FIUs relating to Art. 47(1) (postponement orders on the basis of a foreign request) should be included in the analysis for Art. 14; the COP considered the annex on Art. 47(1) sufficient. Mr Costanzo further pointed out that the statistics of Georgia demonstrated only some progress, thus the wording of the conclusion was amended. He also wondered whether the procedure in Spain was similar to Turkey, where the FIU supports the postponement order which is handed down by the Criminal Court of Justice, but no final conclusion was made on this matter due to the absence of a Spanish representative.
37. The COP continued to discuss the scope of the postponement measures, which should not only cover the ML offence but also the TF offence. Portugal, Sweden and Ukraine confirmed that its legislation on postponement measures extended to the TF offence. The COP decided to amend the text for these countries, as well as for the Republic of Moldova, Belgium and Armenia. Moreover, the COP requested the Secretariat to reach out to the Netherlands, Denmark and France on this question.
38. The COP was satisfied with the content of the thematic monitoring report on Article 14 and decided to adopt the document.

#### **Item 10. Further work programme of the Conference of the Parties**

39. Following a proposal by the Bureau, the COP decided to continue the transversal thematic monitoring under Rule 19bis of its Rules of Procedure for another five years, and to suspend the previous monitoring mechanism under Rule 19 for that period. This decision would be reflected in an update to the footnote to Rule 19, a text of which was agreed by the COP.
40. In order to continue the transversal thematic monitoring under Rule 19bis of its Rules of Procedure, the COP amended its Rules of Procedure to clarify a number of issues on the basis of a written proposal made by the Bureau and the Secretariat in document C198-COP(2019)2prov.
41. This included a degree of flexibility for the COP on the period for the follow-up process, depending on the nature of the recommendations made in the transversal thematic monitoring reports (e.g. whether these concern legislative or "soft measures", the latter naturally taking less time to enact).



Moreover, the COP added an additional measure which could be taken if a State Party repeatedly failed to implement the provisions of the Convention. Before issuing a public statement, the COP could conduct a full review of that country under Rule 19 of the Rules of Procedure on the basis of the questionnaire used for previous country assessments. It was the understanding of the COP that such measure would only be used as an ultima ratio and in case other measures (including a letter by the Secretary General of the Council of Europe to the competent minister(s) of that State Party) had been to no avail.

42. Another change in the Rules of Procedure related to the monitoring under this process of those States Parties which accede(d) to the Convention after the commencement of the transversal thematic monitoring. This concerned notably Monaco, for which the Convention entered into force on 1 August 2019. The COP decided that, in line with the changes made in the Rules of Procedure, Monaco would be assessed on the basis of a questionnaire with regard to the four provisions which had previously been subject to the transversal thematic monitoring. The COP would consider a Secretariat analysis at the 12th Plenary in October 2020.
43. The COP decided that the transversal thematic monitoring reports for the 12th Plenary meeting of the COP should deal with Article 3, paragraph 4 of the Convention, as well as with Article 7, paragraph 2c. read in conjunction with Article 19, paragraph 1 of the Convention. The Secretariat made a call for Rapporteurs for these reports which would be appointed by the COP after the Plenary by written mail.
44. The COP also amended Rule 1 of its Rules of Procedure to align the terminology of its delegations with general Council of Europe rules, and to ask all delegations to appoint a Head of Delegation. The Secretariat pointed out that these changes would not have any financial implications, with attendance of the number of delegates to be funded remaining unchanged.

#### **Item 11. Election of the President and Vice-President of the Conference of the Parties**

45. The COP elected Mr. Ioannis Androulakis (Greece) and Ms. Ana Boskovic (Montenegro) as President and Vice-President, respectively, for a term of two years.
46. As both candidates had already been Bureau members whose term lasts until the 12th COP Plenary in October 2020, the COP elected Ms. Ani Goyunyan (Armenia) and Mr. Alexander Mangion (Malta) as their replacement on the Bureau for the remainder of their term as Bureau members (i.e. until October 2020).

#### **Item 12. Cases of practical implementation of the Convention by State Parties**

47. Several States Parties provided cases of practical implementation of the Convention and presented them at the Plenary. These were Azerbaijan, Republic of Moldova, Romania, San Marino and Sweden.
48. The case presented by Azerbaijan concerned the application of Article 11 of the Convention. The Court of Appeal requested the Constitutional Court of the Republic of Azerbaijan to review the several articles of the Criminal Code in the light of the Constitution of the Republic of Azerbaijan with a purpose to determine the possibility of taking into account, when determining the penalty, the convictions awarded by foreign courts. The trigger for such a request was the decision of a competent court to convict an Azerbaijani citizen taking into account previous conviction on similar offence awarded by a foreign court. The Constitutional Court decided that the court's decision to consider criminal recidivism as an aggravate circumstance was a proper one. As a result, the

Constitutional Court has ruled in its decision that national courts should take into account, when determining the penalty, convictions rendered by the courts of the States Parties of the international treaties ratified by Azerbaijan.

49. Republic of Moldova presented the case of money laundering with drug trafficking as a predicate offence. The case concerns articles 3, 4 and 9.a) of the Convention. The newly established specialised prosecutors' office, carried out an investigation against the members of the organised criminal group which trafficked drugs from abroad and distributed it in the territory of the Republic of Moldova. The sale was organised via an internet store and the payments were made via electronic payment provider. The accumulated electronic money was converted via transfers to bank cards, the holders of which were the members of the organised criminal group. These funds were used to buy bitcoins which were then used to buy new drugs abroad. The investigation was initiated by a Suspicious Activity Report (SAR) submitted by a payment service provider, whilst the investigation included the application of special investigations techniques. In January 2019 the first instance court convicted one natural person to 5 years and 6 months of imprisonment and confiscated 330.000 Euro.
50. Case presented by Romania concerned the proper application of the criminal legislation with regard to money laundering offence. The Court of Appeal decided that the actions of the defendant BM and his acquaintances represented the money laundering offence and not of the offense of concealment as concluded by the first instance court. The crime consisted of the following: the defendant stole 50.000 euros in cash (in 500 euros banknotes). Part of the sum was used by the defendant to purchase a luxury car (registered on the name of his sister) and the sum of 25.000 euros was immediately transported to Italy, where his mother was employed. These 25.000 euros were transferred several times through connected persons' accounts - 25.000 euros was concealed in order to hide their true origin by converting them in smaller sums, personally or through acquaintances. In order to create the appearance that the money origins from the salary of the defendant's mother, the sums were transferred by postal orders or physically. When qualifying the crime the court made the following observations: the Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime incriminates the acts of acquiring, owning or using property knowing that such property, at the time of the receipt, is a proceed of crime – Article .9(1 c)) of the Convention. The court concluded that connected persons/acquaintances, who transferred the funds from and to the defendant BM committed money laundering offence. The court also stated that the knowledge, intent or purpose required were inferred from objective, factual circumstances.
51. San Marino delegation provided the case with reference to Article 23(3) of the Convention. The criminal proceeding was initiated by the FIU's report to the Judicial Authority. The person who was a subject to the FIU report was convicted for several crimes, including money laundering, in another jurisdiction. He opened an account in one bank located in San Marino, with proxy to operate in favour of his sister and his father. He used their accounts with the aim to conceal the true origin of money. The first-instance court found his sister and father guilty for committing money laundering offence. Amount of EUR 1,920,785.50 was seized. However, the Court of Appeals acquitted both defendants due to the lack of evidence that they knew that the proceeds were of a criminal origin. In particular, it was not ascertained beyond a reasonable doubt that the defendants had been aware of the criminal origin of the assets. Nevertheless, the court noted that the funds deposited in the bank accounts had had a criminal origin. The judge upheld the confiscation of the funds which had been seized. The Warsaw Convention has been used in order to request and execute the confiscation order in another state party. The foreign judicial authority granted the request. The funds are in the process to be repatriated.

52. Sweden presented two cases – one concerning Article 9(3) and the other one concerning Article 14. With regard to Article 9(3), the case included unlawful coercion – a person convicted for extortion induced other person to transfer EUR 37 000 to a third person. Third person was prosecuted for money laundering misdemeanor. The Court of Appeal found that the money was transferred over a period of three months. Although from the factual circumstances it could have not been proven that a third person knew that the proceeds derived from crime, the Court found that he had a reasonable cause to assume that the property derived from an offence. He was found guilty for money laundering misdemeanor. Other case concerns Article 14: the Swedish FIU received intelligence indicating that specific accounts in a Chinese bank would be used for money laundering and that a person of strategic interest controlled the accounts. A request was then made to the largest four banks in Sweden to identify outgoing transactions to these accounts. Almost at the same time, a bank notified the FIU of payments with a fraudulent source to these accounts. The FIU froze approximately EUR 31 000. Overall, the FIU noted that at least EUR 420 000 were or were supposed to be transferred to the mentioned accounts. Whilst some transactions were executed before the request was made to the banks, once the FIU sent the request several transfers were not approved and funds were seized. The case is still on-going.
53. Although it did not concern practical application of the Convention, the Polish delegation provided an update on the state of play of the draft law on criminal liability of legal entities. At the moment, the delegation could not inform the plenary of the exact date of adoption of this piece of legislation. The draft law was approved by the former Government back in January 2019, whilst the new Government will restart this process and review the draft law prior to sending it to the Parliament. The delegation will provide an update on this matter at the next plenary meeting.

### **Item 13. Technical assistance in the asset recovery field**

54. The plenary heard the presentation on modalities of technical assistance available in the asset recovery area. Economic Crime and Cooperation Division (ECCD) of the Council of Europe presented its prospective plans and activities covering this sector. Using the example of the Republic of Moldova as a case study, the ECCD described the structure of its technical assistance projects aimed at building up institutional structures of an Asset Recovery Office (ARO), developing legislative, operational and staff capacities in this field, and ensuring access to international cooperation channels. The practical impact of such assistance on the concrete results of an ARO in terms of volumes of seized assets was demonstrated. Prospective plans for asset recovery-related work of the ECCD include the production of a toolkit for practitioners, and several regional workshops on non-conviction based confiscation and asset management, to be carried out in 2020.
55. The FATF Secretariat provided an update on its on-going project on conviction based cross border confiscation. The aim of the project is to identify the most significant challenges currently faced by both - requesting and requested jurisdictions in the asset recovery process, and to identify where further work by the FATF could help tackle the challenges identified. The desktop review of the outcomes of the Mutual Evaluations, questionnaire responses and discussion at the FATF/MONEYVAL Joint Experts Meeting has been completed. As a result, key challenges for more thematic work of the project were identified. Next phase of the project will focus on best practices and effectiveness of the countries in the key areas of asset recovery process. This phase of the project has just commenced and is planned to be finished by October 2020.

#### **Item 14. Parliamentary Assembly of the Council of Europe: reports and other activities concerning AML and confiscation of proceeds of crime**

56. Mr Günter Schirmer, Head of the Secretariat of the Committee on Legal Affairs and Human Rights, provided an overview of the functioning and work of the Parliamentary Assembly. In his presentation, he particularly focused on AML-related issues. Recent work by the Parliamentary Assembly included a report on “Laundromats: responding to new challenges in the international fight against organised crime, corruption and money laundering” of 25 March 2019 (Doc. 14847), as well as the report of “Fighting organised crime by facilitating the confiscation of illegal assets” of 26 April 2018 (Doc. 14516). This latter report is also published on the restricted website of the COP. Both reports are accompanied by respective resolutions and recommendations by the Parliamentary Assembly.
57. Mr. Schirmer also gave an overview of ongoing work within the Parliamentary Assembly, such as a report on a general overview of the functioning of Financial Intelligence Unites (FIUs) within Council of Europe member states, which would also seek to make general horizontal recommendations to improve their work.
58. In the course of the exchange of views, related TF work by other committees of the Parliamentary Assembly was mentioned which is of interest of the COP, notably the Parliamentary Report (elaborated by the Political Affairs Committee) on “Funding of the terrorist group Daesh: lessons learned” of 12 March 2018 (Doc. 14510). All reports referred to above are available on the website of the Parliamentary Assembly (<http://assembly.coe.int/nw/Home-EN.asp>).

#### **Item 15. Miscellaneous**

59. The COP tentatively decided to hold its 12<sup>th</sup> Plenary meeting on 27-28 October 2020, with the final date to be confirmed.
60. On behalf of the COP, the Executive Secretary warmly thanked the outgoing President (Mr. Branislav Bohacik, Slovak Republic) and Vice-President (Mr. Jean-Sebastien Jamart, Belgium) for having chaired the COP in the past four years. The President warmly thanked his Bureau colleagues, COP experts and the Secretariat for their collaboration during his tenure. The COP gave both the President and Vice-President a standing ovation for their work.
61. All participants gathered for a group photo for the COP website.

#### **Item 16. Adoption of decisions**

62. The Conference of the Parties adopted the list of decisions of the meeting as it appears in Appendix II.

#### **Item 17. Close of the meeting**

63. The President thanked all participants and the interpreters and closed the meeting at 17:00h.

## Appendix I

<b>Agenda</b>	<b>Ordre du jour</b>
<b>Tuesday, 22 October 2019</b>	<b>Mardi, 22 octobre 2019</b>
<b>1. Opening of the Meeting</b> <b>9.30 am</b> <ul style="list-style-type: none"><li>- <i>Report of the 10th meeting and list of decisions - <a href="#">C198-COP(2018)5</a></i></li><li>- <i>Bureau of the COP: list of decisions and proposals</i></li></ul>	<b><i>Ouverture de la reunion</i></b> <ul style="list-style-type: none"><li>- <i>Rapport de la 10eme reunion et liste des décisions</i></li><li>- <i>Bureau de la CdP : liste des décisions et propositions</i></li></ul>
<b>2. Adoption of the agenda</b>	<b><i>Adoption de l'ordre du jour</i></b>
<b>3. Communication by the President</b>	<b><i>Communication de la Présidence</i></b>
<b>4. Communication by the Executive Secretary</b>	<b><i>Communication du Secrétaire Exécutif</i></b>
<b>5. The state of signatures and/or ratifications of the Council of Europe Convention on laundering, search, seizure and confiscation of the proceeds from crime and on the financing of terrorism - <a href="#">C198-COP(2019)4</a></b> <ul style="list-style-type: none"><li>- <i>Information by delegations</i></li></ul>	<b><i>Etat des signatures et/ou ratifications de la Convention du Conseil de l'Europe relative au blanchiment, au dépistage, à la saisie et à la confiscation des produits du crime et au financement du terrorisme</i></b> <ul style="list-style-type: none"><li>- <i>Information par les délégations</i></li></ul>
<b>6. Presentation of the transversal thematic monitoring of the implementation of the Convention by the States Parties: Article 9(§3) <a href="#">C198-COP(2019)1prov-HR-I</a></b> <ul style="list-style-type: none"><li>- <i>Presentation by the rapporteur</i></li><li>- <i>Discussion with States Parties</i></li></ul>	<b><i>Présentation du suivi thématique transversal de la mise en œuvre de la Convention par les Etats membres : Article 9(§3)</i></b> <ul style="list-style-type: none"><li>- <i>Présentation par le rapporteur</i></li><li>- <i>Discussion avec Etats membres</i></li></ul>
<b>7. Follow-up by the Conference of the Parties of progress made by States Parties concerning the monitoring of Arts. 11 and 25(§2-3)</b> <a href="#">C198-COP(2019)3prov</a> <ul style="list-style-type: none"><li>- <i>Follow up report / Tour de table / TBC</i></li></ul>	<b><i>Suivi par la Conférence des Parties du progrès accompli par les Etats membres concernant le suivi des articles 11 et 25(§2-3)</i></b> <ul style="list-style-type: none"><li>- <i>Rapport de progrès / tour de table/ à confirmer</i></li></ul>
<b>8. Virtual Assets: Investigative Challenges, Best Practices and Techniques</b> <ul style="list-style-type: none"><li>- <i>Presentation by the Ms Laura Kravale and Mr Michael Morantz (FATF Secretariat)</i></li><li>- <i>Proposal by the President on the topic</i></li></ul>	<b><i>Monnaies virtuelles : défis, meilleures pratiques et techniques d'investigation</i></b> <ul style="list-style-type: none"><li>- <i>Présentation par Mme Laura Kravale and M. Michael Morantz (Secrétariat du GAFI)</i></li><li>- <i>proposition du président sur le sujet</i></li></ul>

Wednesday, 23 October 2018	Mercredi, 23 octobre 2018
<p><b>9. Presentation of the transversal thematic monitoring of the implementation of the Convention by the States Parties: Article 14</b>  <a href="#">C198-COP(2019)1prov-HR-II</a></p> <ul style="list-style-type: none"> <li>- <i>Presentation by the rapporteur</i></li> <li>- <i>Discussion with States Parties</i></li> </ul>	<p><b>Présentation du suivi thématique transversal de la mise en œuvre de la Convention par les Etats membres : Article 14</b></p> <ul style="list-style-type: none"> <li>- <i>Présentation par le rapporteur</i></li> <li>- <i>Discussion avec les Etats membres</i></li> </ul>
<p><b>10. Further work programme of the Conference of the Parties</b></p> <ul style="list-style-type: none"> <li>- <i>Future monitoring by the Conference of the Parties</i></li> <li>- <i>Proposal for amendments to the Rule 19bis - <a href="#">C198-COP(2019)2prov</a></i></li> </ul>	<p><b>Programme de travail futur de la Conférence des Parties</b></p> <ul style="list-style-type: none"> <li>- <i>Suivi futur par la Conférence des Parties</i></li> <li>- <i>Proposition d'amendements à la règle 19bis</i></li> </ul>
<p><b>11. Election of President and Vice-President of the Conference of the Parties</b></p>	<p><b>Elections de Président(e) et de Vice-Président(e) de la Conférence des Parties</b></p>
<p><b>12. Cases of practical implementation of the Convention by State Parties</b></p> <ul style="list-style-type: none"> <li>- <i>Tour de table</i></li> </ul>	<p><b>Cas d'application pratique de la Convention par les États membres</b></p> <ul style="list-style-type: none"> <li>- <i>Tour de table</i></li> </ul>
<p><b>13. Technical assistance in the asset recovery field</b></p> <ul style="list-style-type: none"> <li>- <i>Presentation by the Economic Crime and Cooperation Division of the Council of Europe</i></li> </ul>	<p><b>Assistance technique dans le domaine du recouvrement des avoirs</b></p> <ul style="list-style-type: none"> <li>- <i>Présentation par la Division de la criminalité économique et de la coopération du Conseil de l'Europe</i></li> </ul>
<p><b>14. Parliamentary Assembly of the Council of Europe: reports and other activities concerning AML and confiscation of proceeds of crime –</b></p> <ul style="list-style-type: none"> <li>- <i>Presentation by Mr Günter SCHIRMER, Secretariat of the Parliamentary Assembly</i></li> </ul>	<p><b>Assemblée Parlementaire du Conseil de l'Europe: rapports et autres activités concernant la LBC et la confiscation du produit du crime</b></p> <ul style="list-style-type: none"> <li>- <i>Présentation de M. Günter SCHIRMER, Secrétariat de l'Assemblée parlementaire</i></li> </ul>
<p><b>15. Miscellaneous</b></p>	<p><b>Divers</b></p>
<p><b>16. Adoption of decisions</b></p>	<p><b>Adoption des décisions</b></p>
<p><b>17. Close of the meeting</b> <span style="float: right;"><b>17.00</b></span></p>	<p><b>Fin de la réunion</b> <span style="float: right;"><b>17h00</b></span></p>

## **Appendix II**

### **LIST OF DECISIONS**

At its 11<sup>th</sup> meeting, held in Strasbourg from 22 to 23 October 2019, the Conference of the Parties (COP) to the Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS n° 198, hereinafter: “the Convention”):

- Adopted the agenda (as provided in document C198-COP(2019)OJ1prov3) with no further changes.
- Adopted the meeting report of the 10<sup>th</sup> Plenary (30-31 October 2018, document C198-COP(2018)5).
- Welcomed the ratification of the Convention by Monaco and the signature by Liechtenstein; asked the Secretariat to send a letter to those Council of Europe Member States which are signatories to invite them to accede to the Convention; and asked the Secretariat to reach out to those States Parties which were not represented at the 11<sup>th</sup> Plenary meeting or whose declarations as required under Article 46, paragraph 13 of the Convention are still missing.
- Took note of an update by the Secretariat on the possible accession to the Convention by third States.
- Heard updates from several States Parties on developments on reservations made in relation to several provisions of the Convention, and encouraged States Parties to reconsider the necessity of the reservations made with a view to their withdrawal. For the purposes of this review in the future, the COP decided that States Parties’ input on developments should be sought in writing six months before the next Plenary meeting.<sup>1</sup>
- Discussed and adopted the transversal thematic monitoring report of Article 9, paragraph 3 of the Convention. The COP decided to consider an Interpretative Note for Article 9, paragraph 3 of the Convention at the next Plenary, and have a follow-up report to the respective transversal thematic monitoring report in two years’ time. It also decided that cases submitted for this report should be compiled in a sanitised form and made available on the restricted website of the COP.
- Discussed and adopted the transversal thematic monitoring report of Article 14 of the Convention. The COP decided that a tour de table on developments with regard to the general recommendations in that report should be held in two years’ time.
- Discussed and adopted the follow-up report for the thematic monitoring reports of Article 11 and Article 25 (paragraphs 2 and 3). The COP decided that the Secretariat would liaise with a selected number of countries on outstanding issues with regard to these reports, to be considered at the next Plenary. The COP would confirm at that occasion to have a second follow-up report to complete the monitoring on that provision which would be considered in two years’ time.
- Noting that one State Party which had not yet provided information for the above-mentioned monitoring reports for the present Plenary will make such information available to the Secretariat, asked the latter to then prepare a respective analysis for that State Party for consideration at the next Plenary.

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<sup>1</sup> States Parties mentioned in paragraph 7c. on p.4 of document C198-COP(2019)4 (“Review of Reservations and Declarations with respect to CETS No. 198”) would be contacted by the Secretariat three months after the 11<sup>th</sup> Plenary with a view to resolving the issues mentioned in that paragraph ahead of the 12<sup>th</sup> COP Plenary.

- Heard a presentation from and had an exchange of views with Ms. Laura Kravale and Mr. Michael Morantz from the Secretariat of the Financial Action Task Force (FATF) on “Virtual Assets: Investigative Challenges, Best Practices and Techniques”. Appointed Mr. Branislav Bohacik as Rapporteur for presenting at the next Plenary the results of a questionnaire on the regulation and seizure/confiscation of virtual assets (to be circulated to all States Parties after the present Plenary).
- Elected Mr. Ioannis Androulakis (Greece) as President and Ms. Ana Boskovic (Montenegro) as Vice-President of the COP for a term of two years. As both candidates have already been Bureau members whose term lasts until the 12<sup>th</sup> COP Plenary in October 2020, the COP elected Ms. Ani Goyunyan (Armenia) and Mr. Alexander Mangion (Malta) as their replacement on the Bureau for the remainder of their term as Bureau members (i.e. until October 2020).
- Decided to continue the transversal thematic monitoring under Rule 19*bis* of its Rules of Procedure for another five years, and to suspend the previous monitoring mechanism under Rule 19 for that period.
- Amended its Rules of Procedure to clarify a number of issues in relation to the transversal thematic monitoring, including its follow-up process and the monitoring under this process of those States Parties which accede(d) to the Convention after having commenced the transversal thematic monitoring. The COP also amended Rule 1 of its Rules of Procedure to align the terminology of its delegations with general Council of Europe rules, and asked those delegations which have not yet done so, to nominate a head of delegation within one month after the present Plenary.
- Decided that the transversal thematic monitoring reports for the 12<sup>th</sup> Plenary meeting of the COP should deal with Article 3, paragraph 4 of the Convention, as well as with Article 7, paragraph 2c. read in conjunction with Article 19, paragraph 1 of the Convention.
- Took note of different cases of practical implementation of the Convention, presented by Romania, Republic of Moldova, Sweden, Azerbaijan and San Marino, and encouraged all States Parties to continue informing the Plenary of their experiences in implementing the Convention in their jurisdictions.
- Heard a presentation from and had an exchange of views with Mr. Igor Nebyvaev (Economic Crime and Cooperation Division of the Council of Europe) on “Technical Assistance in the Asset-recovery Field”.
- Heard a presentation from and had an exchange of views with Mr. Günter Schirmer (Secretariat of the Parliamentary Assembly of the Council of Europe) on recent relevant reports and other activities by the Parliamentary Assembly in the field of anti-money laundering and counter-terrorist financing.
- Decided to hold its next meeting in Strasbourg from 27-28 October 2020 [*tbc*].

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## **Appendix III**

C198-COP(2019)LP1

**LIST OF PARTICIPANTS / LISTE DES PARTICIPANTS**  
**Strasbourg, 22 – 23/10/2019**  
**Agora, Room G3/ Salle G3**

***I. States Parties to CETS 198 / États parties à la Convention STCE 198***

**ALBANIA / ALBANIE**

Ms Enkeleda MILLONAI  
Head of Prosecutor's Office, District of Elbasan, Albania, General Prosecutor's Office of Albania

Ms Diana SILA  
Head of International Treaties and Judicial Cooperation Section, Ministry of Justice

**ARMENIA / ARMÉNIE**

Ms Ani GOYUNYAN  
**RAPPORTEUR**  
**HEAD OF DELEGATION**  
Head of International relations Unit, Financial Monitoring Center, Central Bank of Armenia

Ms Seda GRIGORYAN  
Ministry of Justice, Republic of Armenia

**AZERBAIJAN / AZERBAÏDJAN**

Mr Azar ABBASOV  
**RAPPORTEUR**  
Head, Legal Division of the Financial Monitoring Service, Financial Markets Supervision Authority of the Republic of Azerbaijan

Mr Elchin NASIBOV  
Deputy Head of the General Department of Legislation of the Ministry of Justice of the Republic of Azerbaijan

Mr Ramin VALIZADA  
Prosecutor of the Internal Security division of the Anticorruption Directorate with the Prosecutor General of the Republic of Azerbaijan

**BELGIUM / BELGIQUE**

M. Jean-Sébastien JAMART  
**VICE - PRESIDENT / VICE - PRÉSIDENT**  
Attaché juridique, Service public fédéral Justice , Direction générale de la Législation et des Libertés et Droits fondamentaux, Service des infractions particulières, Blanchiment d'argent et financement du terrorisme, Manipulation des compétitions sportives

**BOSNIA AND HERZEGOVINA / BOSNIE-HERZÉGOVINE**

Mr Željko BOGUT  
Ministry of Justice of BiH

Ms Sanela LATIC  
Ministry of Justice of BiH

Mr Nikola SLADOJE  
Ministry of Justice of BiH

Ms Arijana ĆUROVAC  
State investigation and protection agency of BiH (SIPA BiH)

Ms Biljana LELEK  
Ministry of Justice of BiH

#### **BULGARIA / BULGARIE**

Mrs Cvetelina STOYANOVA  
Head of Department, Financial Intelligence Unit, State Agency for National Security (FID-SANS)

Ms Tea PENEVA  
Senior expert of International Legal Cooperation and European Affairs Directorate, Ministry of Justice

#### **CROATIA / CROATIE**

Ms Željka KLJAKOVIĆ GAŠPIĆ  
Economic Crime and Corruption Service, National Police Office for Suppression of Corruption and Organized Crime, Ministry of the Interior;

Ms Danka HRŽINA,  
Department for Mutual Legal Assistance and International Cooperation, General State Attorney's Office of the Republic of Croatia

#### **CYPRUS / CHYPRE**

Ms Sylia PAPAPETROU  
Investigator, member of FIU-CYPRUS

#### **DENMARK / DANEMARK**

Ms Helene FESTER  
Deputy to the Permanent Representative of Denmark to the Council of Europe

#### **FRANCE**

Apologised / Excusé

#### **GEORGIA / GEORGIE**

Ms Tamta KLIBADZE  
Specialist of the Methodology, International Relations and Legal Department, Financial Monitoring Service of Georgia

Mr Aleksandre MUKASASHVILI  
Chief Prosecutor's Office of Georgia, Head of the Criminal Prosecution of Legalization of Illegal Income Division of the Investigation Unit

#### **GREECE / GRECE**

Mr Ioannis ANDROULAKIS  
MEMBER OF THE BUREAU / MEMBRE DU BUREAU  
Assistant Professor of Criminal Law & Criminal Procedure

Ms Argyro ELEFTHERIADOU  
Head of the Directorate of Legislative Work, International Legal Relations and International Judicial Cooperation, Ministry of Justice

**GERMANY / ALLEMAGNE**

Dr. Jürgen MÜLLER  
**HEAD OF DELEGATION**  
Federal Ministry of Justice and Consumer Protection

Mr Sabri AYDIN  
Administrative Assistant  
Federal Ministry of Justice and Consumer Protection

**HUNGARY / HONGRIE**

Dr captain Attila SISÁK  
**HEAD OF DELEGATION**  
Deputy Head of Department, National Tax and Customs Administration,  
Directorate General of Criminal Affairs, Department for the Coordination of Criminal Affairs

Mr Márk MÉSZÁRICS  
Financial investigator, National Tax and Customs Administration Directorate General of Criminal Affairs  
Department for the Coordination of Criminal Affairs

**ITALY / ITALIE**

Mr Nicola PIACENTE  
Chief Prosecutor  
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Mrs Indra GRATKOVSKA  
Head of the Criminal Law department of the Ministry of Justice

Mr Dainis VĒBERS  
Senior Risk Analyst of the Strategic Analysis Unit  
of the Financial Intelligence Unit

**MALTA / MALTE**

Dr. Cinzia AZZOPARDI ALAMANGO  
Office of the Prosecutor General

Dr. Alexander MANGION  
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Financial Intelligence Analysis Unit

**REPUBLIC OF MOLDOVA / RÉPUBLIQUE DE MOLDOVA**

Mrs Oxana GISCA  
**HEAD OF DELEGATION**  
**MEMBER OF THE BUREAU / MEMBRE DU BUREAU**  
**RAPPORTEUR**  
High Officer for exceptional cases, Office for prevention and fight against money laundering National anticorruption center

Mr Eduard VARZARI  
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M. Jean-Marc GUALANDI  
Conseiller Technique du Service d'Information et de Contrôle sur les Circuits Financiers

## **MONTENEGRO / MONTÉNÉGR0**

Ms Ana BOSKOVIC

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Mr Drazen BURIC

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## **NETHERLANDS / PAYS BAS**

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Ms Dragica PAVLOVIKJ NEDELKOVA

Public Prosecutor Office for organized crime and corruption

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Mrs Ewa SZWARSKA-ZABUSKA

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Mr Jan WIŚNIEWSKI

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## **PORTUGAL**

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**RUSSIAN FEDERATION / FEDERATION DE RUSSIE**

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Mrs Giorgia UGOLINI  
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Ms Petra RUPNIK  
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**SPAIN / ESPAGNE**

Apologised / Excusé

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Mr Murat KARAGOZ  
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## **UKRAINE**

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Ms Nataliia STRUK  
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## **UNITED KINGDOM / ROYAUME-UNI**

Mr Justin MILLAR  
Homeoffice, United Kingdom

## *II. Observer States and Organisations / États et organisations observateurs*

## **HOLY SEE / SAINT SIEGE**

M. l'Abbé Fabio SALERNO  
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Ms Giorgia BALDINO  
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Mr Michael MORANTZ  
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Mme Sally BAILEY-RAVET, Chef Interpreter  
Mme Rebecca BOWEN  
Mme Clarissa WORSDALE  
Mme Isabelle MARCHINI