



## ANTI-MONEY LAUNDERING AND COUNTERING THE FINANCING OF TERRORISM (AML/CFT) NEWSLETTER FOR CENTRAL ASIA

Issue 24, December 2007 - January 2008  
Available online at <http://www.imolin.org>

### CALENDAR

- 1 Round table to discuss drafting comments how to address the main legal recommendations of the EAG [national]**

Date: December 3, 2007  
Organizer: IMF  
Location: Bishkek, Kyrgyzstan  
Contact information: Daniel Thelesklaf,  
[thelesklaf@financial-integrity-network.com](mailto:thelesklaf@financial-integrity-network.com)

- 5 Legal Workshop for Member States of the Commonwealth of Independent States on the criminal law aspects of countering nuclear, chemical and biological terrorism in the light of relevant universal instruments [regional]**

Date: January 16-18, 2008  
Organizer: TPB/UNODC jointly with Executive Committee of CIS  
Location: Minsk, Belarus  
Contact information: *Albina Yakubova*,  
[albina.yakubova@unodc.org](mailto:albina.yakubova@unodc.org)

- 2 Discussion of the Anti-Money Laundering/Combating Financing of Terrorism (AML/CFT) Draft Law [national]**

Date: December 13, 2007  
Organizer: OSCE  
Location: Almaty, Kazakhstan  
Contact information: Jan Olsson, [jan.olsson@osce.org](mailto:jan.olsson@osce.org)

- 6 Full-Day AML/CFT Technical Training, final session of 6-session series, Astana, Kazakhstan [national]**

Date: February 2008  
Organizer: WB/UNODC  
Location: Astana, Kazakhstan, office of GPO  
Contact information: Cari Votava, [cvotava@worldbank.org](mailto:cvotava@worldbank.org)

- 3 7th EAG Plenary Meeting/3rd Donor Conference/Working Group Meetings [regional]**

Date: 10-14 December, 2007  
Organizer: EAG  
Location: Hainan, China  
Contact information: Victor Kochenov,  
[info@euroasiangroup.org](mailto:info@euroasiangroup.org)

- 7 Full-Day AML/CFT Technical Training, final session of 6-session series, Tashkent, Uzbekistan [national]**

Date: February 2008  
Organizer: WB/UNODC  
Location: World Bank office, Tashkent, Uzbekistan  
Contact information: Cari Votava, [cvotava@worldbank.org](mailto:cvotava@worldbank.org)

- 4 Regional Anti-Money Laundering Seminar for ETC/CIS Countries [regional]**

Date: January 16-17, 2008  
Organizer: EBRD  
Location: Tbilisi, Georgia  
Contact Information: Daniel Thelesklaf,  
[thelesklaf@financial-integrity-network.com](mailto:thelesklaf@financial-integrity-network.com)

- 8 Workshop on Role & Function of Financial Intelligence Unit [national]**

Date: March 4-5, 2008  
Organizer: World Bank/UNODC  
Location: Ashgabad, Turkmenistan  
Contact information: Cari Votava, [cvotava@worldbank.org](mailto:cvotava@worldbank.org),  
*Aigerim Yesetova*,  
[aigerim.yesetova@unodc.org](mailto:aigerim.yesetova@unodc.org)

### AML/CFT Developments in Central Asia

AFGHANISTAN



*Afghanistan enacted an AML/CFT law in 2004. The Financial Intelligence Unit, established in*

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2005, is operational, and Afghanistan has commenced the application process for Egmont membership; its sponsors are the USA and Malaysia.

Afghanistan is scheduled to undergo an APG Mutual Evaluation in the 4th quarter of 2008.

Afghanistan is an observer member of the EurAsian Group (EAG), and a member of the Asia Pacific Group (APG).



#### **BELARUS**

In May 2007, Belarus became a full member of the Egmont Group. Belarus is scheduled to undergo a Mutual Evaluation by EAG in 2<sup>nd</sup> quarter of 2008.

Belarus is a member of EAG, and co-chairs the EAG Typologies Working Group.



#### **CHINA**

The AML/CFT law was adopted on 31 October 2006 and came into force 1 January 2007. China is now working on improvement of AML/CFT implementation in securities, futures and insurance sectors. The Mutual Evaluation of China report was adopted by FATF in June 2007 and by EAG in December 2007.

China is a member of EAG and FATF, and serves as co-chair of the Evaluation/Legal Working Group.

#### **KAZAKHSTAN**



The draft AML/CFT law is in the Parliament and will be discussed for adoption in March 2008. The FIU will be established following the enactment of the AML/CFT law. Kazakhstan is scheduled to undergo an EAG Mutual Evaluation in 2<sup>nd</sup> quarter of 2009.

Kazakhstan is a member of EAG, and co-chairs the technical assistance working group.

#### **KYRGYZSTAN**



The Kyrgyz FIU has commenced its application process for membership in Egmont, sponsored by the Russian Federation and Ukraine. EAG's 1<sup>st</sup> round Evaluation Report of Kyrgyzstan was adopted at the EAG Plenary in June 2007 and can be found on EAG website.

Kyrgyzstan is a member of EAG, and Deputy Chair of EAG.

#### **RUSSIA**



The onsite visit of the Russian Evaluation conducted by FATF, Moneyval and EAG was completed in November 2007, and will be discussed in plenary sessions in 2009. Oleg Markov replaces Victor Zubkov as Head of the Russian FIU (RosFinMonitoring) and Chairman of

EAG. The Russian FIU now reports directly to Prime Minister.

Russia is a member of FATF, Moneyval and EAG, Chairs EAG, holds deputy chair of Moneyval, and co-chairs EAG Technical Assistance, Typologies and Evaluation/Legal Working Groups..

#### **TAJIKISTAN**



The Agency for State Financial Control and Combating Corruption was established in Tajikistan in early 2007. An AML/CFT law is being drafted in the Office of the President. The Mutual Evaluation Report of Tajikistan will be discussed at the June 2008 EAG Plenary.

Tajikistan is a member of EAG.

#### **TURKMENISTAN**



Turkmenistan is drafting an AML/CFT law and became an observer member of EAG in December 2007.

#### **UZBEKISTAN**



Pursuant to Presidential Decrees issued in January, February and April 2007, implementation of the most substantive provisions of the AML/CFT law was suspended until the year 2013. Uzbekistan is scheduled to undergo an EAG Mutual Evaluation in the 4<sup>th</sup> quarter of 2008.

Uzbekistan is a member of EAG.

## **EurAsian Group (EAG)**

EAG held its Annual Donor Meeting, Working Group Meetings and 7<sup>th</sup> Plenary meeting took place in Hainan, China on December 11-14, 2007. Mr. James Sasson, President of FATF participated at the meeting.

Oleg Markov, Head of RosFinMonitoring, was named as EAG Chairman. EAG accepted Turkmenistan, Poland and India as new Observer Members. The following reports were discussed and adopted:

- Mutual Evaluation Report of China
- Progress Report of Kyrgyzstan
- Technical Assistance Needs Assessment (TANA) Report of Uzbekistan

FATF President James Sassoon gave a presentation on FATF priorities for the coming year, which included:

- supporting the role of FSRBs
- greater attention to AML/CFT challenges faced by low capacity countries
- continued improvement in dialogue with private sector, in particularly developing risk-based guidance for designated non-financial businesses and professions (DNFBPs)
- developing guidance on strategic surveillance and national risk assessments, including typologies work
- producing a bi-annual global threat assessment report

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Mr. Sassoon explained that FATF is developing a paper on Guidance for Low Capacity Countries in preparation for Mutual Evaluations. He pointed out that input by EAG would be particularly useful in this area. This paper is expected to be finalized and submitted to FATF for discussion in February 2008.

Typologies reports on Drug Trafficking and Money Laundering, and Cash-Based Schemes of Money Laundering were adopted. Typologies topics for 2008 will include:

- Drug trafficking & money laundering (expanded to include topic of precursor chemicals)
- Transnational movement of cash by individuals

The Russian AML/CFT Methodological & Training Center reported its plans for 2008, which include:

1. Development of Training, analytical standards and creation of methodological foundations of AML/CFT subject areas
2. Preparation of Trainers, which would include professors and teachers in universities
3. Research in AML/CFT field
4. Implementation of IT & Analytical Systems for FIUs

EAG schedule for 2008:

- 8<sup>th</sup> Plenary: Third week of July, 2008 (Tajikistan Mutual Evaluation Report to be discussed)
- Evaluator Training: Autumn 2008 in Moscow
- Typologies Workshop: 23-24 September 2008
- 9<sup>th</sup> EAG Plenary: 16-19 Dec. 2008

<b>Schedule of EAG member-states' mutual Evaluations:</b>				
<b>Country</b>	<b>Evaluators</b>	<b>On-Site Evaluation</b>	<b>Plenary</b>	<b>Evaluation reports</b>
CHINA	FATF, EAG	Completed 2006	Adopted: FATF (June 2007) EAG (Dec 2007)	<a href="http://www.fatf-gafi.org/dataoecd/24/45/39148209.pdf">http://www.fatf-gafi.org/dataoecd/24/45/39148209.pdf</a>
BELARUS	EAG	2nd Quarter 2008	December 2008	2005 Evaluation Report IMF: <a href="http://www.eurasiangroup.org/index-7.htm">http://www.eurasiangroup.org/index-7.htm</a>
KAZAKHSTAN	EAG	2 <sup>nd</sup> Quarter 2009	December 2009	-
KYRGYZSTAN	EAG	Completed 2007	Adopted June 2007	<a href="http://www.eurasiangroup.org/kyrgyz.htm">http://www.eurasiangroup.org/kyrgyz.htm</a>
RUSSIA	EAG, FATF, MONEYVAL	Completed Nov 2007	Adopted: FATF (June 2008) EAG (Dec 2008)	-
TAJIKISTAN	World Bank	Completed June 2007	July 2008	-
UZBEKISTAN	EAG	Fourth Quarter 2008	May 2009	-

[www.eurasiangroup.org](http://www.eurasiangroup.org)

## REGIONAL NEWS

### ISTANBUL ACTION PLAN

The Anti-Corruption Network (ACN) was established in 1998. Its Secretariat is located at Organization for Economic Cooperation and Development (OECD) Anti-Corruption Division. The main objective of the ACN is to support its member countries in their fight against corruption by providing a regional forum for the promotion of anti-corruption activities, exchange of information, elaboration of best practices and donor coordination.

The ACN includes countries from Eastern Europe, Caucasus and Central Asia. The OECD member states are also taking part in the ACN activities. The main counterparts of the ACN are the national governments and anti-corruption authorities of the participating countries. Civil society, business associations, international organizations and international financial institutions (IFIs) are also taking an active part in the ACN.

The Istanbul Action Plan has been the main sub-regional initiative of the CAN over the past 4 years. It was endorsed at the CAN General Meeting in September 2003, in Istanbul: it brings together Armenia, Azerbaijan, Georgia, Kazakhstan, The Kyrgyz Republic, Russia, Tajikistan and Ukraine. The implementation of Istanbul Action Plan includes several phases:

- (a) review of legal and institutional framework for fighting corruption;
- (b) implementation of recommendations endorsed during reviews;

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(c) monitoring process in implementing the recommendations.

The reviews are based on self-assessment reports prepared by the governments of the participating countries. These reports are examined by experts from ACN and OECD countries, who develop a draft of assessment and recommendations. The assessment and recommendations are then presented for the discussion and endorsement of the plenary meetings of the Istanbul Action Plan. The recommendations cover three broad areas: anti-corruption policies and institutions, criminalization of corruption and preventive measures in civil service. The reviews of Armenia, Azerbaijan, Georgia, Kazakhstan, the Kyrgyz Republic, Tajikistan and Ukraine were completed in 2004-2005. The review of Russia has not been completed.

Monitoring of implementation of recommendations consists of two parts:

- regular *progress updates* presented by the countries during plenary sessions, and
- *country examinations* including country visits by groups of experts and endorsement of monitoring reports.

Reviews of Armenia, Azerbaijan, Georgia, Kazakhstan, Kyrgyz Republic, Tajikistan and Ukraine are available here: [http://www.oecd.org/document/55/0,3343,en\\_2649\\_34857\\_35718519\\_1\\_1\\_1\\_1.00.html](http://www.oecd.org/document/55/0,3343,en_2649_34857_35718519_1_1_1_1.00.html)

Outcomes of reviews of legal and institutional frameworks for fighting corruption in selected Transition Economies which were carried out in the framework of the Anti-Corruption Network for Transition Economies are available here: [www.oecd.org/corruption/acn](http://www.oecd.org/corruption/acn)

## CARRIC UPDATE

*UNODC project AD/RER/H22 – “Establishment of a Central Asian Regional Information and Coordination Centre (CARICC)”*

### Background

In an effort to enhance regional efforts to fight drug-trafficking, the UNODC and several donor countries are supporting the efforts of Kyrgyzstan, Kazakhstan, Turkmenistan, Tajikistan, Uzbekistan, Russia and Azerbaijan to establish a Central Asia Regional Information and Coordination Center in Almaty, Kazakhstan (CARICC). This purpose of CARICC is to facilitate cross-border information exchange on a regional basis, enhance analysis of data and to assist in the coordination of operational activities of the various law enforcement agencies in the region - police, drug control agencies, customs, border guards and other services of the countries involved.

Activities of the Centre will be supported by core staff (to be selected on international competitive basis from the law enforcement agencies of the participating countries) and by liaison officers from each of the participating states attached to it. Provision is also to be made for other interested donor countries and international organizations such as Interpol, Europol, World Customs Organization to post liaison officers to CARICC to facilitate cooperation and information flow.

### Current status of the project:

Signature of the formal CARICC Agreement - The Presidents of Azerbaijan, Kazakhstan, Kyrgyzstan, Tajikistan, Turkmenistan and Uzbekistan have signed the CARICC agreement.

–Kazakhstan has donated office facilities for CARICC in Almaty. Kazakhstan currently holds the rotating post of Director of CARICC and the position of Deputy Director will be held by Kyrgyzstan. Candidates for positions of Intelligence Analysts have also identified, and the Center has commenced its operations.

### Support from Interpol, Europol and other organizations

There is strong support for the project from Europol, Interpol, World Customs Organization (WCO) and the SECI Centre<sup>1</sup>. It has been agreed that Interpol will have an office within the Centre and that the Interpol I-24/7 encrypted communications system will be provided to CARICC. Both Interpol and Europol have offered support with regard to the training of CARICC staff.

## Building FIU Information Systems in Afghanistan Part I—Developing an Electronic Reporting System

*Kevin Whelan currently serves as the US Treasury Advisor to the Eurasian Group. His previous assignment was in Afghanistan where he helped to build the Afghan AML/CFT system.*

Financial Intelligence Units receive, process, and disseminate information. In order to perform these functions, large quantities of information must be processed. The volume of information makes manual processing highly impractical for all but the very

<sup>1</sup> Southeast European Co-operative Initiative [SECI] – Regional Center for Combating Trans-border Crime. Participating countries: Albania, Bosnia and Herzegovina, Bulgaria, Croatia, Greece, Hungary, F.Y.R. of Macedonia, Moldova, Romania, Serbia, Slovenia, Turkey. For more info, please go for: <http://www.secicenter.org/>

smallest FIUs. Instead, most FIUs develop an automated information system in order to assist in the performance of basic FIU functions.

The typical sequence for developing *any* information system is:

- 1) understand requirements
- 2) Identify system segments and components
- 3) define and 'legalize' interfaces among components
- 4) develop software
- 5) procure hardware

In general, the sequence proceeds from high-risk low-cost items (most development failures result from a failure to understand requirements) to low-risk high-cost items (e.g. procuring hardware). Even though this sequence appears straightforward and even obvious, it is surprising how many organizations develop systems out of sequence, often completely backwards! Failure to follow the proper sequence risks delays, confusion, reduced compliance, reduced political support, and increased development and operations costs. Part of the problem is that we often look to technology to solve what are essentially business problems. Premature consideration of technology and hardware procurement detracts from gaining a full understanding of the business problem and usually leads to failed or sub-optimal systems.

The recent development of a reporting system (as a component of a larger AML system) by the Financial Transactions and Reports Analysis of Afghanistan (FINTRACA) illustrates the proper approach. From the very beginning the system was approached as a business problem. Business goals were expressed as requirements of the system. Secure reporting was high-priority requirement. Low development and operational costs was another requirement. Perhaps the most significant requirement was that of zero-marginal costs for the reporting entities and the FIU to generate, transmit, and accept each report. The idea behind this requirement was that high marginal costs (i.e. the cost of generating and processing each additional report) discouraged reporting entities from creating such reports and resulted in lower quality reports. On the FIU side, high marginal costs meant that analysts would spend their time manually processing reports (e.g. by entering and correcting data) rather than on performing meaningful analysis.

In order to perform the first three steps of the development sequence, a working group was formed with FINTRACA, Da Afghanistan Bank (the central bank of Afghanistan and regulator over most financial institutions), and representatives of the Afghan Bankers Association. Once everyone understood the basic requirements and separate responsibilities imposed by the AML law, the working group began to define the content of reports to be submitted. It is important to note that a paper reporting 'form' in the typical sense was neither discussed nor developed. The Afghan reporting system is perhaps unique in this respect.

Once the content was defined, a specification was developed to describe the organization and limitations of that content. That specification served as the basis for development of an XML schema in order to represent the specification in a precise form usable as a medium of communication among disparate computer systems. Next, the group defined various business processes and parameters. Following a public review and comment period, Da Afghanistan Bank issued an updated AML regulation incorporating the results of the working group. Total budgetary costs up to this point were zero and the riskiest items in the development sequence had been addressed.

Prior to formal issuance of the updated regulation, FINTRACA began to develop software for its side of the reporting interface which had now been formally defined. Reporting entities were left to develop software for their side of the interface in whichever manner suited their particular business needs. The major FINTRACA software components were: 1) a program to transfer encrypted e-mail to an internal server, to decrypt the e-mail, and to control the received file; 2) a program to validate report contents; 3) a program to generate and issue receipts for validated reports; 4) a program to load the reporting data into a database; 5) development of an electronic form for reporting entities that did not wish to interface directly with their databases.

Development of each of these components was greatly simplified by the choice of XML because, as a universal standard, XML enjoys wide support from commercial software vendors. FINTRACA chose Microsoft enterprise software (operating system, database, forms) for its development and operating platform due to low cost, completeness, and the local availability of skills to work with this software. The entire software development effort took approximately six weeks and cost less than \$10,000.

In the first several months of operation, the software was hosted on a previously discarded notebook computer configured as a server. This configuration had no difficulty in handling the approximately 5,000 reports received each month during the first months of operation, while also allowing some degree of analysis to be performed on the reports. Eventually enterprise server hardware was procured bringing the total cost to approximately \$50,000. Currently the system processes approximately 17,000 threshold transaction reports each month and would not be limited in processing several magnitudes beyond this at no additional cost, even while simultaneously supporting analytic and other process functions. You can see many features of the reporting system from the reporting entity point of view by visiting the FINTRACA web site at <http://www.fintraca.gov.af>.

The result of strictly following the proper development sequence was a well-designed system component that uses state-of-the-art technologies to achieve well-defined business goals. Low cost was not an accident; rather it was a design goal as well as an achieved result. The keys to success were 1) an excellent AML law with clear requirements; 2) the lack of an existing operational system; 3) high level political support and inclusion of all affected parties in the definition process; 4) a clear plan

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that included a logically sequence development process; 5) the appropriate use of technology as applied to defined business problems.

Afghanistan is not an easy environment in which to operate and many daunting challenges remain in the development of a complete AML system. Nevertheless, the same formula described in this article can be used in other jurisdictions that are beginning to develop their AML systems. It is important to make every attempt to get the development right the first time, since several of the success factors mentioned above may not be present after a first attempt.

### Case study: Alternative/Emerging Remittance Services

An African national residing in a European country (Country Z) declared that he performed Hawala banking activities. His account was exclusively credited by cash deposits and numerous transfers for small amounts.

Over the course of several months the funds were transferred to company A in Africa. Shortly thereafter the funds were transferred to company B in Country Z.

Companies A and B performed international money remittance services. According to the subject, he performed Hawala activities for fellow countrymen wishing to send money to Africa. However, he did not hold any position within companies in country Z where he executed the transactions and he was not registered as a representative of an authorized exchange office.

Police enquiries revealed that he was known to be a member of a terrorist organization and it is thought that this alternative remittance system may have been used for terrorism financing.

Indicators:

- Underground banking / alternative remittance services
- Wire transfers
- Use of foreign bank accounts

*This case has been adopted from the "FIU's in Action", a compilation of 100 sanitized cases from Egmont Group. The full version is available at: [www.egmontgroup.org](http://www.egmontgroup.org)*

## TECHNICAL ASSISTANCE UPDATE

- Legal Advisory Programme of the Regional Office for Central Asia of the UNODC conducted jointly with the US OPDAT a **workshop on international asset forfeiture/recovery in Bishkek on 2- 4 October** for 25 national practitioners of Kyrgyzstan, representing national agencies involved in MLA/freezing/confiscation casework, i.e. Drug Control Agency, State Tax Committee, State Customs Committee, Supreme Court, City Court of Bishkek, General-Prosecutor Office, Prosecutor's Office of Bishkek city, ministries of interior and justice, National Bureau of Interpol, the Kyrgyz FIU, Financial Police and National Bank. Other participants were the Trial Attorney of the Asset Forfeiture and Money Laundering Section of the Criminal Division of the US Department of Justice, Senior Advisor of the Office of the Technical Assistance of the US Department of Treasury, Senior Lawyer of the Asset Forfeiture Division of the Revenue and Customs Prosecutions Office of the UK, Resident Legal Advisor of the U.S. Department of Justice-OPDAT as well as the Chief of Human Security Branch of the UNODC, Vienna. The workshop contributed to strengthening of capacities of Kyrgyz officers in international asset forfeiture/recovery casework through review of international standards, legislation and practice of other countries, discussions and exchange of experience. The seminar also facilitated the establishment of informal links among the officers of Kyrgyzstan, the US and the UK.
- Legal Advisory Programme of the Regional Office for Central Asia of the UNODC organized and conducted in collaboration with the UNODC Regional Centre for East Asia and the Pacific, and in coordination with the Office of the Honorable Attorney-General of Malaysia, an **inter-regional workshop entitled "Strengthening international legal cooperation among Central and East Asian countries to combat transnational organized crime" in Kuala-Lumpur (Malaysia) on 14-16 November 2007**. About 60 senior officers representing the Central Authorities in the areas of MLA/extradition, as well as law enforcement and prosecution bodies of Central and East Asia countries (China, Indonesia, Japan, Kazakhstan, Kyrgyzstan, Malaysia, Philippines, Russian Federation, South Korea, Singapore, Thailand, Tajikistan, Turkmenistan and Uzbekistan) as well as experts from the UK, US, Australia and France attended the workshop.

The workshop's main objective was to promote coordinated approach at the inter-regional level and effective cooperation between prosecution and law-enforcement bodies of the both regions in responding to transnational criminal activities, in particular, to trafficking in human beings and drug trafficking through exchange of experiences and establishment of personal links among the senior prosecutorial/law enforcement personnel and central authorities of participating countries. The workshop also promoted the effective implementation of the international cooperation provisions of the United Nations Convention against Transnational Organized Crime in accordance with the relevant decision 3/2 of the Conference of the Parties to this Convention, adopted at its third session held in Vienna on 9-18 October 2006. The workshop enabled the

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participants to discuss and identify the problems affecting the legal cooperation between participating countries and develop concrete recommendations aimed at overcoming these problems through implementation of certain best practices and updating laws in the areas of MLA and extradition. In addition, the workshop gave an opportunity for the senior representatives of Office of the Honorable Attorney-General of Malaysia and the General Prosecution Office of Uzbekistan to negotiate practical arrangements related to signing of MOU on Legal Cooperation between these two countries.

- OSCE Centre Astana in co-operation with the Majilis (lower chamber of Parliament), the World Bank and the NGO Forum of Entrepreneurs of Kazakhstan organized a **round table for discussion of AML/CFT draft law in Almaty, Kazakhstan on December 13, 2007**. It brought together representatives of the government, business community, non-governmental and international organizations. The conclusion of the meeting was that the draft AML/CFT law will be re-considered taking into account the recommendations of all: the private sector, government and international organizations.
- The World Bank/UNODC Mentor Program conducted **session #5 of the 6-session series of full-day AML/CFT Technical Training on November 27, 2007 in Astana, Kazakhstan, and on November 29, 2007 in Tashkent, Uzbekistan**. These sessions of training covered AML/CFT case studies presented by David Teitelbaum of the US FIU FinCEN. Special thanks to the US Embassy in Astana for their contributions to this training session. The final session #6 in this series will be held in Tashkent and Astana are scheduled for February 2008.

## Publications and Websites of interest

<a href="http://www.unodc.org">http://www.unodc.org</a>	Official website of the UNODC. (In English, Russian, Spanish)
<a href="http://www.amlcft.org">http://www.amlcft.org</a>	World Bank's AML/CFT website. (In English)
<a href="http://www.imolin.org">http://www.imolin.org</a>	International Money Laundering Information Network administered by UNODC Global Program against Money Laundering (GPML) on behalf of a partnership of nine international organizations and offering model laws, legal library, calendar of key events and other AML/CFT related information. (In English, with some Russian)
<a href="http://www.euroasiangroup.org">http://www.euroasiangroup.org</a>	The EurAsian Group is the FATF-Style Regional Body serving Central Asia. (In English and Russian)
<a href="http://www.imolin.org/pdf/imolin/MLawRussian_IMoLIN.pdf">http://www.imolin.org/pdf/imolin/MLawRussian_IMoLIN.pdf</a>	UNODC Model Law in Russian
<a href="http://www.fatf-gafi.org/dataoecd/43/46/38960576.pdf">http://www.fatf-gafi.org/dataoecd/43/46/38960576.pdf</a>	The Guidance on the Risk-Based Approach to combating Money Laundering and Terrorist Financing adopted by the FATF. It outlines the high-level principles involved in applying the risk-based approach, and indicates good public and private sector practice in the design and implementation of an effective risk-based approach.
<a href="http://www.eurasiangroup.org/rus/index-5.htm">http://www.eurasiangroup.org/rus/index-5.htm</a>	Russian version of 40 FATF Recommendations [AML] Russian version of 9 FATF Special Recommendations [CFT] with Interpretive Notes

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