UNODC
United Nations Office on Drugs and Crime

The World Bank

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

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CALENDAR

1 EAG Plenary Meeting [regional]

Date:	June 8-10, 2009
Organizer:	EAG
Location:	Saint Petersburg, Russian Federation
Contact information:	info@euroasiangroup.org

2 Transparency International Europe and Central Asia Annual Regional Conference

Date:	June 15, 2009
Organizer:	Macedonian Government/ Transparency International/ Macedonian National Chapter of TI in Information
Location:	Ohrid, Republic of Macedonia
Contact information:	cabel@transparency.org

3 UNODC Financial Investigation Training Course [national]

Date:	June 25-26, 2009
Organizer:	UNODC
Location:	Cholpon-Ata, Issyk-kul, Kyrgyzstan
Contact information:	Madina Sarieva, madina.sarieva@unodc.org

4 FATF plenary and working group meetings [international]

Date:	June 22-26, 2009
Organizer:	FATF
Location:	Paris, France
Contact information:	contact@fatf-gafi.org

5 International conference on fighting corruption in Kazakhstan [regional]

Date:	June 22-23, 2009
Organizer:	OSCE
Location:	Almaty, Kazakhstan
Contact information:	Terje.Helland, Terje.Helland@osce.org

6 Training course on prosecuting corruption and confiscation of crime proceeds [national]

Date:	June 24-26, 2009
Organizer:	OSCE, UNODC, Financial Police of KZ
Location:	Astana, Kazakhstan
Contact information:	Terje.Helland, Terje.Helland@osce.org

7 Moneyval evaluator training workshop [regional]

Date:	July 6-10, 2009
Organizer:	Moneyval
Location:	San Marino
Contact information:	dg1@moneyval.coe.int

8 Regional workshop on Asset Seizure and Asset Recovery for countries of the CIS [regional]

Date:	July 14-15, 2009
Organizers:	OSCE/World Bank/UNODC
Location:	Almaty, Kazakhstan
Contact information:	psu-oceea-at@osce.org

9 Regional workshop on Asset Seizure and Asset Recovery for countries of the CIS [regional]

Date:	July 14-15, 2009
Organizer:	OSCE/World Bank/UNODC
Location:	Almaty, Kazakhstan
Contact information:	psu-oceea-at@osce.org

10 National Workshop on implementation of the universal regime against terrorism [national]

Date:	September 14-18, 2009
Organizer:	UNODC
Location:	Astana, Kazakhstan (TBC)
Contact information:	Aydan Bashlinskaya aydan.bashlinskaya@unodc.org

11 OSCE workshop on the role of charities in combating terrorist financing

Date:	September 11, 2009
Organizer:	OSCE
Location:	Viena, Austria
Contact information:	psu-oceea-at@osce.org

12 Workshop on the implementation of the universal regime against terrorism [national]

Date:	November 4-5, 2009
Organizer:	UNODC
Location:	Bishkek, Kyrgyzstan
Contact information:	Aydan Bashlinskaya aydan.bashlinskaya@unodc.org

We welcome contributed articles of up to one page in length!
To submit information for inclusion to the newsletter or to be added to or removed from the distribution list, please, contact Ms. Aigerim Yesetova at aigerim.yesetova@unodc.org

AML/CFT Developments in Central Asia

AFGHANISTAN

Afghanistan enacted an AML/CFT law in 2004. The Financial Intelligence Unit was established in 2005. Afghanistan has commenced application process for Egmont Group Membership in 2007; sponsors are the USA and Malaysia. Afghanistan is scheduled to undergo an APG Mutual Evaluation in the 3rd quarter of 2009. Afghanistan is a member of the Asia Pacific Group (APG) and observer to the EAG.

BELARUS

Belarus became a full member of the Egmont Group in 2007. The Mutual Evaluation Report of Belarus was adopted by the EAG in December 2008. Belarus is a member of EAG, and co-chairs the EAG Typologies Working Group. It also holds position of the Deputy Chair of EAG.

CHINA

The AML/CFT law was adopted on 31 October 2006 and came into force on 1 January 2007. The Mutual Evaluation Report of China was adopted by FATF in June 2007 and by EAG in December 2007. China Progress report was adopted by FATF and EAG in July 2008. A follow up report was presented during the EAG Plenary Meeting in Moscow in December 2008. China is a member of EAG and FATF, and serves as co-chair of the EAG Evaluation/Legal Working Group.

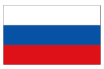
KAZAKHSTAN

The draft AML/CFT law was adopted by Majilis [the Lower Chamber of the Parliament] on April 1, 2009 and by Senate (the Upper Chamber) on June 4, 2009. Senate has proposed some amendments to the draft law and in June 2009 returned the draft law to Majilis for consideration. A decision to establish the Financial Monitoring Committee (FIU) within the Ministry of Finance was taken by the Government on 24 April 2008. The head of the Financial Monitoring Committee (Kazakh FIU) was appointed in September 2008. Kazakhstan is scheduled to undergo an EAG Mutual Evaluation in 1st quarter of 2010. Kazakhstan is a member of EAG, and co-chairs the EAG Technical Assistance Working Group.

KYRGYZSTAN

Kyrgyz Financial Intelligence Service - FIS (Kyrgyz FIU) became a member of the Egmont Group during its plenary meeting in Doha in May 2009. The EAG 1st round Mutual Evaluation Report of Kyrgyzstan was adopted in June 2007. Progress reports were presented during the 7th and 8th EAG Plenary meetings in 2007 and 2008. A follow up report was presented during the EAG Plenary Meeting in December 2008. Kyrgyzstan is a member of EAG.

RUSSIAN FEDERATION



Joint AML/CFT Mutual Evaluation of Russian Federation was conducted by FATF, Moneyval and EAG in 2007. Joint Evaluation Report was adopted by FATF/Moneyval/EAG in June and July 2008. Russian Federation is a member of FATF, Moneyval and EAG; chairs the EAG and co-chairs the EAG Technical Assistance, Typologies and Evaluation/ Legal Working Groups.

TAJIKISTAN

The AML/CFT law was drafted in the Office of the President in 2007 and is currently discussed in the AML/CFT working group The World Bank mutual evaluation report was adopted by the EAG during its Plenary Meeting in Moscow in December 2008. In December 2009 the EAG decided to place Tajikistan under the enhanced follow up procedure and on June 2, 2009 the EAG undertook a high-level mission to Tajikistan. In June 2009 during the EAG plenary meeting in St Petersburg Tajikistan presented its first progress report. The EAG decided to keep Tajikistan under the enhanced follow up procedure. Tajikistan is a member of EAG.

TURKMENISTAN

The AML/CFT law was adopted by the Parliament of Turkmenistan and signed by the President in May 2009. Turkmenistan is in the process of establishing the FIU. On 20 June 2008, 16 October 2008 and 25 February 2009 the FATF reaffirmed its statement of 28 February 2008 regarding the anti-money laundering and countering the financing of terrorism risks posed by Turkmenistan. In the last FATF statement FATF urges Turkmenistan to adopt without further delay a comprehensive AML/CFT regime, which meets international AML/CFT standards. FATF encourages Turkmenistan to continue to work closely with EAG and IMF to achieve this. On April 28-29, 2009 the EAG undertook a high-level mission to Turkmenistan. Turkmenistan became an observer member of EAG in December 2007.

UZBEKISTAN

The AML/CFT Law was adopted by both chambers of the Parliament and signed by the President in April 2009. On April 22, 2009 the AML/CFT Law came into force. Amendments to other 16 laws were drafted and are currently discussed between the relevant ministries. On 20 June, 16 October 2008 and 25 February 2009 the FATF reaffirmed its statement of 28 February 2008 regarding the AML/CFT risks posed by Uzbekistan. In its last statement FATF stated that despite the progress undertaken by Uzbekistan to adopt comprehensive measures, concrete measures to address the identified deficiencies have not yet been implemented. Uzbekistan is a member of EAG, and will undergo an AML/CFT Mutual Evaluation by EAG in the last quarter of 2009.

Euro-Asian Group (EAG) update

Schedule of EAG member-states' AML/CFT Mutual Evaluations:

Country	Evaluators	On-Site Evaluation	Plenary Discussion	Mutual Evaluation Reports [MER]
CHINA	FATF, EAG	Completed 2006	Adopted: FATF (June 2007) EAG (Dec 2007)	MER and Summary in English: http://www.fatf-gafi.org/dataoecd/24/45/39148209.pdf EAG First MER, Progress report in English: http://www.eurasiangroup.org/china.htm
BELARUS	EAG	July 27 – Aug 3, 2008	Adopted: EAG (December 2008)	MER and Summary in English and Russian: http://www.eurasiangroup.org/index-7.htm EAG Executive summary on first MER in English: http://www.eurasiangroup.org/belarus.htm EAG Executive summary on first MER in Russian: http://www.eurasiangroup.org/rus/belarus.htm
KAZAKHSTAN	EAG	1st quarter 2010	EAG (June 2010)	-
KYRGYZSTAN	EAG	Feb 2007	Adopted: EAG (June 2007)	MER with Summary and Progress report in English: http://www.eurasiangroup.org/kyrgyz.htm MER with Summary and Progress report in Russian:http://www.eurasiangroup.org/rus/kyrgyz.htm
RUSSIA	EAG, FATF, MONEYVAL	Sept 24 – Oct 2, Nov 12-23, 2007	Adopted: FATF (June 2008) Moneyval (July 2008) EAG (July 2008)	MER and Summary in English: http://www.fatf-gafi.org/dataoecd/51/27/40945440.pdf
TAJIKISTAN	EAG, World Bank	June 2007	Adopted: EAG (December 2008)	MER and Summary in English: http://www.eurasiangroup.org/tajikistan.pdf
UZBEKISTAN	EAG	4th quarter 2009	EAG (June 2010)	-

http://www.eurasiangroup.org

Technical Assistance Update & Regional news

- On April 6-8, 2009, the International Monetary Fund, with an expert from the Basel Institute on Governance, conducted a mission to Ashgabat, Turkmenistan. The main activity of the mission was **a 2-day workshop with representatives of Turkmen commercial banks, Central Bank of Turkmenistan, Ministry of Finance, and law enforcement agencies.** The workshop included presentations and discussions on the implementation of the international standard related to customer due diligence (CDD) requirements. The workshop was highly interactive and illustrated the willingness of Turkmen financial institutions to implement international AML/CFT standards. The mission also discussed the status on the draft AML/CFT law, on which the IMF commented extensively

- On May 5-6, 2009 the Office of the Co-coordinator of OSCE Economic and Environmental Activities (OCEEA), the OSCE Centre in Astana, the World Customs Organization (WCO), and the Customs Committee of the Republic of Kazakhstan organized a **"Seminar on enhancing anti-corruption efforts in the customs field"** in Astana, Kazakhstan.

  The objective of this training seminar was to raise awareness and promote integrity in customs, including the implementation of legislative and administrative measures for raising efficiency and reducing opportunities for corruption. The ultimate aim of the event was to build capacity of the national authorities to further improve and implement the existing national strategy.

  Participants of the seminar included the heads of relevant departments of the territorial divisions of the customs service, and several representatives of law enforcement agencies, the private sector and international organizations.

- On May 18-28, 2009 the International Monetary Fund conducted its **second mission of its AML/CFT project in Bishkek, Kyrgyz Republic**. The project, funded by the Swiss Government, was aimed at further strengthening the AML/CFT system in the Kyrgyz Republic. The mission involved working with the National Bank to draft onsite inspection procedures with regard to checking the adequacy of banks' STR systems and controls.

  A template was developed to serve as an information sharing mechanism between the National Bank and the FIS with regard to supervision and imposition of penalties for exchange offices and exchange bureau. The mission also worked with the Kyrgyz Securities Regulator to develop onsite inspection procedures on the following areas: Scoping and Planning; Conducting AML/CFT Risk Assessment; Assessing Securities firms' Compliance Program; and Developing conclusions and finalizing the examination. In addition, the mission included an FIU and IT evaluation to assess the analytical capacities of

the FIS and recommendations to enhance its capacities, including recommendations for the use of IT hardware and software.

As a part of the IMF mission a **two-days workshop was** held in Bishkek on May 27-28, 2009 for the Kyrgyz National Bank **on AML/CFT supervision with respect to exchange offices and exchange bureau.** The workshop was attended by 36 participants and included representations by experts and authorities on international/regional ML/FT typologies and examination issues, as well as on enhancing domestic cooperation between the National Bank and the FIS in preparing for on-site examinations of exchange offices and exchange bureau. A key feature of the workshop was interactive group exercises which required participants to analyze and present their assessments regarding the case studies.

UNODC update

On 15 May 2009 the Memorandum of Understanding and Cooperation was signed between UNODC Regional Office for Central Asia and the Supreme Court of the Republic of Uzbekistan.

The Memorandum is build on the existing good working relationships established by UNODC/ ROCA with the Supreme Court as a result of the technical assistance provided to Uzbek judges within the framework of the Global Legal Assistance Programme. The Memorandum is designed to deepen cooperation between UNODC/ROCA and the Supreme Court in strengthening the judicial system of Uzbekistan through, among other activities, development and delivery of the training courses aimed at enhancing judicial integrity and improving justice administration.

Fair and effective criminal justice system that ensures respect for human rights is a prerequisite for combating crime and for building societies based on the rule of law. Recently, Uzbekistan has undertaken several serious step to reform its criminal justice system. On 1 January 2008, habeas corpus and related amendments to criminal law came into effect. Under the new law all decisions to arrest accused individuals or suspects must be reviewed by a judge, and defendants have the right to legal counsel from the time of arrest.

Enlargement of the librarian pool of the Research Centre under the Supreme Court is one of the commitments of ROCA under this Memorandum. Regional Office handed over to the Research Centre the UN Standards and Norms in Crime Prevention and Criminal Justice, as well as a set of the UN legal instruments and publications in the field of preventing and combating drugs, organized crime, corruption and terrorism.

Wolfsberg group update

On May 20, 2009 the Bankers Association for Finance and Trade, the Clearing House, the European Banking Federation, the International Banking Federation, the International Chamber of Commerce, the International Council of Securities Associations, the International Financial Services Association, SWIFT and the Wolfsberg Group issued a joint statement in order to raise awareness regarding the new SWIFT Message Format for Cover Payments, which will be implemented on November 21st, 2009. The joint communication was developed as the organizations involved have been active in the area of cover payments for some time now and are therefore seeking, collectively, to apprise others in the industry, and beyond, of the forthcoming changes to the payments system and its implications, which may be substantial.

For more info please go to: www.wolfsberg-principles.com

CARICC update

On May 24-27, 2009 a delegation from CARICC and UNODC visited Bucharest, Romania on invitation of the Southeast European Co-operative Initiative- SECI. The goal of the meeting was to establish cooperation between CARICC and SECI Centre to improve coordination efforts of the law-enforcement agencies on the regional and international levels in counteracting transnational crimes.

A draft of the Memorandum of Understanding between these organizations was finalized and paraphed. Official signing of the Memorandum is planned to be held in autumn 2009 after approval by the Councils (Management Board) of the organizations.

During the meeting it was agreed to introduce mutual interests at different meetings where CARICC or SECI centre would participate.

"EGMONT" Group update

17th Egmont Group Plenary Meeting took place in Doha, Qatar from 24 to 28 May 2009. It was attended by over 300 participants representing Egmont member FIUs and numerous regional and international bodies, including the World Bank/UNODC, working to combat money laundering and terrorism financing.

During the meeting the following topics were discussed and decisions were taken:

- The following nine FIUs became the new Egmont Group members: Fiji, Kyrgyzstan, Malawi, Macau, Mongolia, Saudi Arabia, Senegal, Sri Lanka and St. Lucia. Now the Egmont Group consist of 116 FIUs from across the world.
- A record number of more than 50 bilateral cooperation agreements were signed between Egmont members during the week.
- The Prime Minister of the State of Qatar, in an address delivered by the Governor of the Qatar Central Bank, H.E Sheikh Abdullah Bin Saoud Al Thani, called for, "a greater commitment to the Egmont Group principles and international cooperation, as well as the expansion of the organization of the information sharing process among the FIUs around the world." This was in recognition of the changes arising from the global financial crisis and the role the FIUs play in preserving the global financial system safety and stability.
- The current Chair of the Egmont Group. Mr. Jensen, Head of the Australian FIU (AUSTRAC), concluded his term as Chair and the Heads of FIUs unanimously endorsed Mr. Luis Urrutia, Head of FIU Mexico, as the new Chair of the Egmont Group.
- An inaugural meeting between the Egmont Regional Representatives and the FSRBs emphasized the need to coordinate efforts at a local and regional level to support the development of new FIUs and to build the capacity of existing FIUs. A strategy to provide outreach assistance to FIUs in the sub-Saharan Africa region was endorsed, as well as a commitment to focus on the development needs of FIUs in the Pacific.
- Training sessions focused on topics of immediate operational concern to FIUs such as statistical analysis, as well as methods used to launder money through: Casinos, Real Estate, and Cash Couriers. The meeting also looked at money laundering methodologies and countermeasures relating to aspects of E-money laundering and Trade-based Money Laundering, as well as good practices and impediments for FIU feedback to reporting entities and the protection of data as a challenge for this FIU feedback.
- In highlighting the Egmont Group's enhanced focus on ML/FT threats, several international partners jointly presented on their Threat Assessment projects and Risk Based Approach studies and other initiatives. Stock was also taken of projects on aspects of corruption and suspicious activity reporting, initiated in 2008. There was awareness that the global financial crisis has also raised risks for some who might wish to misuse the global financial system.

Further information about the Egmont Group and a list of Egmont member FIUs can be found at www.egmontgroup.org. The Egmont Group 2007-2008 Annual Report is also available on this website.

"Egmont" Group Case study: CONCEALMENT WITHIN BUSINESSSTRUCTURES

Carlos and Hector, two brothers who lived near the border in an American country, approached a local bank with a view to open a standard business account. The brothers said that they owned a currency exchange house in the neighboring country but wanted to develop their financial base in their home country. After the account was opened, the bank saw a significant amount of cash, originating from deposits at other branches of the bank in different cities, being credited into the company account. The money did not stay in the account for long, with the brothers almost immediately requesting bank cheques to be made payable to a bank in the neighboring country. On one occasion they requested cheques made payable to two individuals, but these individuals also deposited the cheques in an account at the foreign bank. The bank decided to report the transactions to the national FIU.

Coincidentally, the FIU had also received a number of other disclosures from other banks, which referred to the brothers undertaking similar activity and using the same cover story of an exchange company as the source of the funds. The disclosures showed that the brothers were activists in a complex financial-web fraud. They received a lot of money from different individuals, who were themselves acting as laundering intermediaries. Rick, for instance, received a huge sum of money into his domestic account via an international transfer. He ordered his bank to pay the money to Carlos and Hector by issuing a bank cheque. A second money route involved Eugene and Jan – Eugene received a lot of cash deposits into his account. Then he ordered the bank to make bank cheques payable to Jan. Jan in his turn deposited these cheques into the brothers' account.

The brothers also seemed to have a business interest in a restaurant. The restaurant apparently received US$4,000,000 in income and used this money to order bank cheques payable to two other individuals. These individuals deposited the cheques in the brothers' account. Because the reporting bank had its suspicions about the amount of money being generated from a simple food business, their security personnel visited the restaurant. It was located in a lower income area and in a terrible condition and it was impossible to justify the funds that were being deposited into the restaurant's account. But Carlos and Hector did not only receive funds. They channeled the money out of their account via cheques and a money order remittance to different individuals and companies in the neighboring country. In a single month they sent US $ 500,000.

One bank had filed a report because the brothers tried to open an account with false identity documentation. Another bank reported that Carlos and Hector were connected to Jaime, via Lucas. The relationship is identified through a company account at the bank. The FIU knew that Jaime was already suspected of money laundering activities derived from narcotics trafficking. All the information was communicated to the competent police authorities. At time of writing the police were trying to establish the link between the funds involved and the narcotics trafficking.

Indicators:
- Unrealistic business turnover;
- A typical or uneconomical fund transfer to or from foreign jurisdiction;
- Large and/or rapid transfer of funds

«Egmont» group 100 Sanitized cases are available at: http://www.egmontgroup.org/files/library_sanitized_cases/100casesgb.pdf

Publications and Websites of Interest

http://www.unodc.org	Official website of the UNODC. (In English, Russian, Spanish)
http://www.amlcft.org	World Bank's AML/CFT website. (In English)
http://www.worldbank.org/StAR	World Bank and UNODC's Stolen Assets Recovery Initiative (StAR) website
http://www.imolin.org	International Money Laundering Information Network administered by UNODC Global Program against Money Laundering (GPML) on behalf of a partnership of eleven international organizations and offering model laws, legal library, calendar of key events and other AML/CFT related information. (In English, with some Russian)
http://www.euroasiangroup.org	The EurAsian Group is the FATF-Style Regional Body serving Central Asia. (In English and Russian)
http://www.imolin.org/pdf/imolin/MLawRussian_IMoLIN.pdf	UNODC Model Law in Russian
http://www.fatf-gafi.org/dataoecd/43/46/38960576.pdf	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.
http://www.fatf-gafi.org/dataoecd/61/28/40248726.pdf	Guidance on Capacity Building for Mutual Evaluations and Implementation of the FATF Standards Within Low Capacity Countries - is primarily intended to support low capacity countries (LCCs) in implementing the FATF standards in a manner reflecting their national institutional systems, is consistent with the ML/FT risks they face, and takes account of their limited resources
http://www.fatf-gafi.org/dataoecd/28/43/40285899.pdf	The study identifies four strategies which could help in further strengthening counter-terrorist financing efforts: (a) Action to address jurisdictional issues, including safe havens and failed states; (b) Outreach to the private sector to ensure access to the information necessary to detect terrorist financing; (c) Building a better understanding of terrorist financing across the public and private sectors; and (d) Using financial investigation, enhanced by financial intelligence.
http://www.eurasiangroup.org/rus/index-5.htm	Russian version of 40 FATF Recommendations [AML]
	Russian version of 9 FATF Special Recommendations [CFT] with Interpretive Notes
http://www.fatf-gafi.org/dataoecd/45/31/40705101.pdf	FATF's first in-depth study, which examines its vulnerabilities to misuse for money laundering and terrorist financing in real estate sector.
http://www.unodc.org/documents/wdr/WDR_2008/WDR_2008_eng_web.pdf	*The World Drug Report 2008* provides in depth trend analysis of the four main drug markets in its first section. It also contains an in-depth look at the development of the international drug control system and a small statistical annex which provides a detailed look at production, prices and consumption.
http://www.assetrecovery.org	Asset Recovery Knowledge Center of the International Centre for Asset Recovery (ICAR)
www.egmontgroup.org	The Egmont Group of Financial Intelligence Groups

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http://www.gfip.org/storage/gfip/executive%20-%20final%20version%201-5-09.pdf	Illicit Financial Flows from Developing Countries: 2002-2006 The objective of this study is to estimate the volume and pattern of illicit financial flows exiting the developing world through application of existing economic models using the most recent macroeconomic data available. Illicit financial flows in the context of this report includes the proceeds from both illicit activities such as corruption (bribery and embezzlement of national wealth), criminal activity, and the proceeds of licit business that become illicit when transported across borders in contravention of applicable laws and regulatory frameworks (most commonly in order to evade payment of taxes). This paper does not link illicit financial flows with the underlying activities (whether legal or illegal) that generated the capital to transfer abroad.
http://www.coe.int/t/dghl/monitoring/moneyval/	MONEYVAL - Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism
http://www.caricc.org	CARICC - Central Asian Regional Information and Coordination Centre for combating the illicit trafficking of narcotic drugs, psychotropic substances and their precursors, established within the Memorandum of Understanding on sub-regional drug control cooperation dated May 4 1996 (Tashkent, Uzbekistan) between the Republic of Azerbaijan, the Republic of Kazakhstan, the Kyrgyz Republic, the Russian Federation, the Republic of Tajikistan, Turkmenistan, the Republic of Uzbekistan and UN Office on Drugs and Crime (UNODC).

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