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EAG BULLETIN

CHAIRMAN'S COLUMN

The September issue of the EAG Bulletin is dedicated to the role of the EAG observers in international cooperation. The observers' institute in FATF allows additional potential to be gained in strategic target defining, national system effectiveness evaluation, and donor assistance. Currently there are 32 observers in the EAG, including states and international organizations. Important role is taken by the FATF and the European FSRB -MONEYVAL.

Experience exchange and consultations on joint work coordination allow new forms and tools of cooperation in Eurasian region to be established. I would like to highlight that the joint EAG/MONEYVAL Typologies seminar dedicated to electronic payments and Internet crime money flows is going to take place in November in Moscow.

In this Bulletin issue we continue to talk about the EAG member states. Uzbekistan is the focus, where the mutual evaluation has been finished recently. There is a lot of work ahead enhancing national AML/CFT on system effectiveness, and the first follow-up report will be presented by the Uzbekistani delegation during the upcoming EAG Plenary meeting in December.

Member states and observers are ready to provide the Republic of Uzbekistan with technical assistance for AML/CFT personnel training, experience exchange and risk management improvement to enhance financial system transparency and integration into the global process of economic security.

> **Oleg Markov** EAG Chairman

Uzbekistan: International Cooperation and Partnership with the EAG

The integration of the Republic of Uzbekistan into the global economy is directly linked to efforts to improve the national system for combating money laundering and terrorist financing (AML/CFT) in compliance with international standards.

Chronicle of events

- In 2006, Uzbekistan's framework law on AML/CFT came into force.
- In April 2006, the national financial intelligence unit (FIU) – the Department on Combating Fiscal Crimes under the Uzbekistani Gen-Prosecutor's Office eral was transformed into the Department on Combating **Fiscal and Foreign Currency** Crimes and Money Laun-
- dering. In April 2009, the law of Uzbekistan on "Counteracting Legalization of Proceeds from Crime and Financing of Terrorism" was amended in order to bring the national legislative framework in further compliance with the Recommendations. FATF Experts from the FATF, EAG, IMF, the World Bank and UN ODC provided assistance in drafting the new legislation.
- In 2009, the EAG mutual evaluation of the Republic of Uzbekistan took place.
- In February 2010, Uzbeki-٠ stan was removed from the FATF enhanced monitoring due to the country's prog-



ress in developing national AML /CFT regime.

- In June 2010, the mutual evaluation report of Uzbekistan was approved by the 12th EAG Plenary meeting.
- In December 2010, Uzbekistan will present its first followup report to the EAG Plenary.

Uzbekistan has ratified the UN conventions against drug trafficking, organized crime and financing of terrorism. A legislative framework has been created in the country that makes it possible not only to prevent illegal financial transactions, but also apply mechanisms to confiscate illegal proceeds.

The national government devotes much attention to strengthening international cooperation and fulfilling its commitments. The participation of Uzbekistan in the activities of the EAG is an important part of these processes.

Uzbekistan has been a member of the Eurasian group since its foundation: Uzbekistan had observer status until 2005 and then joined the EAG as a fullfledged member.

The FUI in Uzbekistan is of law-enforcement type and carries out activities to combat money laundering, terrorist financing, tax and currency crimes, as well as to provide for indemnification of financial damages caused due to these offenses.

In the framework of the EAG activities, Uzbekistan receives technical and consultations assistance in developing national AML/CFT system as well as in terms of training AML/CFT specialists.

In October, Tashkent will host a EAG training seminar on internal control in financial and credit institutions. It will be attended by members of supervisory bodies and financial institutions.

The seminar aims to disseminate the experience of the Eurasian region in building and developing effective AML/CFT systems. Training and consulting events like these, which provide a platform for constructive dialogue and exchange of best

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practices between government agencies and private sector institutions, is one of the EAG's activities in terms of technical assistance.

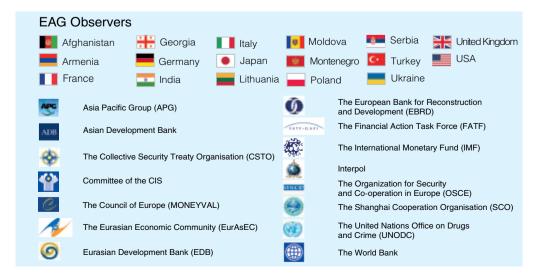
The observers of the Eurasian group organize similar activities as part of donor assistance. For example, an international conference of the UN Office on Drugs and Crime in Central Asia was held in Tashkent in August. It was devoted to the peculiarities of court cases related to ML and brought together experts from Kazakhstan, Kyrgyzstan, Russia, Turkmenistan, Uzbekistan, and a number of EAG observer states.

MAIN FEATURE

EAG Observers: Enhancing Collaboration

AML/CFT standards may become an observer in the EAG.

EAG observer states and international and regional organizations play a significant role in the development of the EAG's activities and improving international cooperation in AML/CFT.



The institution of observers in international organizations is a universal mechanism for exchanging experience. The UN General Assembly, OSCE, Shanghai Cooperation Organization (SCO), WTO, and FATF and FATF-style regional bodies (FSRBs) adhere to such practices.

According to the EAG's Terms of Reference, any state or organization that shares the goals and objectives of the EAG with regard to creating in the region comprehensive AML/CFT regimes and recognizes the FATF 40+9 Recommendations and other international

The decision on granting an observer status is approved by the EAG Plenary. Currently, 17 states and 15 international and regional organizations have observer status within the Eurasian group. The range of observers is being constantly expanded. In June 2010 the 12th EAG Plenary meeting admitted Serbia and Montenegro as observers, which helps to strengthen cooperation with MONEYVAL, the European FSRB. Observer status was granted to the Asia/Pacific Group on Money Laundering (APG) by the 11th Plenary meeting in December 2009, and the EAG was granted observer status within the APG this summer.

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MAIN FEATURE

EAG Observers: Enhancing Collaboration

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Thus, the activities of international organizations involved in global AML/CFT processes are being steadily integrated.

Observers are invited to participate in the EAG Working groups, Plenary meetings, consultations and other activities. They share information and implement donor and technical assistance programs. Experience as an observer allows individual states to later obtain full membership in the EAG. For example, Turkmenistan's status was changed from observer to member in the Eurasian group in June 2010. Uzbekistan had done so in 2005. These processes are testimony to the steady growth of the EAG. The EAG is open to new members who are interested in integrating into the international system for combating money laundering and terrorist financing and regional cooperation.

Nowadays, the observers are becoming increasingly involved in the activities of the EAG. They 1) implement projects and conduct research as part of Working groups, 2) organize training and analytical activities, and 3) conduct joint on-site visits, including high-level missions, to the countries of the region in order to devise recommendations on the development of national AML/CFT regimes.

For example, in April 2010 at the behest of the EAG Chairman Mr. Oleg Markov, representatives of the Eurasian group participated in a high-level FATF mission to Turkmenistan, which included experts from China, Russia, the U.S. and Switzerland. The EAG observers make a significant contribution into mutual evaluations processes in terms of discussing the evaluations' results at the Plenaries and elaborating recommendations on enhancing national AML/CFT regimes as well as organizing training for assessors.

Another important field of observers' activities is technical assistance provided to the EAG member states. The World Bank,

Klaudijo Stroligo, World Bank Senior Financial Sector Specialist and a World Bank/UNODC AML/CFT Mentor for Central Asia:

The relationship of the World Bank/UNODC and the EAG is based on our organizations' common goal to develop effective systems to counter money laundering and terrorist financing. This includes helping in all Central Asian countries and taking steps towards improved compliance with the relevant international standards. In practice this requires a close cooperation and permanent coordination with the

EAG Secretariat on all our AML/CFT technical assistance activities as well as on the mutual evaluations carried out in Central Asian region.

Our work has already helped some of the EAG member countries to successfully address their major AML/CFT deficiencies. This contributed to the recognition by the FATF of such progress.

It is also worth mentioning few examples of our excellent cooperation in other areas. In 2007 the World Bank team carried out a mutual evaluation of Tajikistan and a report was discussed and adopted by the EAG Plenary in December 2008. From 2008 to 2010 I have organized and carried out several AML/CFT related seminars/workshops in Kazakhstan and Uzbekistan, where the EAG actively participated by providing the resource persons or by co-organizing the events. Moreover, one good example of such cooperation was also a recent (April 2010) Pre-Assessment Workshop in Kazakhstan, which was organized jointly by the World Bank/UNODC, IMF and EAG, and which helped Kazakhstan to prepare for the upcoming EAG mutual evaluation.

As one of the most active FSRBs the EAG became in a very short period of time an important international organization and developed a reputation going beyond its regional role. This was recognized by FATF and other international organizations and I look forward to our continued and effective cooperation.

UN Office on Drugs and Crime and International Monetary Fund play a crucial role in these processes.

As observers within the EAG, they assist states in developing legislation in the sphere of AML/CFT, organize various forms of specialized training for employees of financial intelligence units, law enforcement agencies and supervisory bodies, as well as private sector institutions with the participation of leading international experts.

Observers do considerable work to prepare analytical materials and guidelines and typologies research in order to disseminate best practices on international standards' implementation. The EAG is constantly expanding collaboration with its partners in this area and covers these activities in two official languages: English and Russian. Translations of most of the FATF typologies reports are available today on the EAG website, and similar work is being done in collaboration with MONEYVAL.

The experience of observer states and organizations in AML/CFT, their continued participation in the Eurasian group and the donor assistance provided to the countries facilitate the integration of the EAG into the international financial architecture.

Terrorist Financing: Mitigating Risks

The September commemoration of the tragic events connected with the terrorist attacks in New York, Beslan and elsewhere forces us once again to think about improving the effectiveness of measures to counter the threat of international terrorism aimed at undermining its financial and economic foundations.

Many international organizations and government agencies join efforts in order to identify and block the channels through which terrorist groups receive financing. The FATF and FSRBs make a significant contribution to combating terrorist financing by elaborating international standards.

Since 2001, the FATF has been continuously analyzing the methods and typologies of terrorist financing. After the tragic events of 09/11, the FATF developed nine Special Recommendations which cover key risk zones in relation to cash transactions, electronic payments and alternative remittance systems, etc.

The recommendations require financial institutions to pay special attention to suspicious transactions that may result in the financing of terrorist activities, and then report this information to competent authorities. The FIUs should be empowered with the authority to suspend transactions which show signs of terrorist financing and freeze terrorist assets.

One of the key FATF requirements is to monitor the activities of non-profit organizations as the most vulnerable institutions in terms of keeping track of the origins of financing.

The EAG experts believe that the member states of the Eurasian group ensure compliance with the FATF Recommendations, particularly with regard to the criminalization of TF. Over the past five years, appropriate amendments to criminal laws have been adopted in most countries.

Timely detection of the signs of terrorist financing is an important part of preventing these crimes in which a significant role play the results of typologies research conducted by the FRSBs. For example, in 2006, the EAG experts conducted a typology research on the use of non-profit organizations to finance terrorism, and in 2007 prepared a comprehensive review of general TF schemes.

Dramatic boost of information and communication technologies entailed new risks of misuse of Internet payments for money laundering and terrorist financing. As banks and other financial institutions around the world impose more stringent procedures for internal control and monitoring of suspicious transactions and payments, criminals tend to use Internet-

Strengthening the EAG's Horizontal Links: Working Together to Counter the Threat of International Terrorism

The EAG is actively expanding collaboration with international and regional organizations involved in combating the terrorist threat.

The Shanghai Cooperation Organization (SCO), comprising China, Kazakhstan, Kyrgyzstan, Russia, Tajikistan and Uzbekistan, is an observer in the EAG and the two organizations work together to counter the threat of international terrorism and its financial basis in Eurasia.

Another area of cooperation is to coordinate efforts to create "security belts" around Afghanistan. The initiative is aimed at countering drug production, blocking transit channels through the region and eliminating bases and training centres of militants operating in the border areas of Pakistan and Afghanistan.

The work of the Collective Security Treaty Organization (CSTO), the UN Counter-Terrorism Committee (CTC), the UNODC Regional Office in Central Asia and the Central Asia Regional Coordination Center for Combating Illicit Trafficking of Narcotic Drugs, Psychotropic Substances and their Precursors (CARICC) is of great importance in this area. The CSTO and UNODC are observers in the EAG and take an active part in the EAG activities. The UN Counter-Terrorism Committee is also preparing to join the EAG as an observer organization.

The EAG plans to expand cooperation with these organizations. In January 2010 a Memorandum of Understanding and Cooperation was signed between the EAG and the Coordinating council of the heads of the competent authorities on combating drug trafficking (CCACD) of the member states of the Collective security treaty organization (CSTO). based systems, which are less tightly regulated.

Typologies research and studies of mechanisms for risk mitigation in the area of Internet payments is in the focus of the FATF and many FSRBs. The EAG is currently conducting typologies research on the risks of electronic money misuse for ML/TF and money laundering and terrorist financing through alternative remittance systems. These topics are also being elaborated by MONEYVAL.

In early November, Moscow will host a joint EAG and MONEYVAL typologies seminar, where experts will discuss the preliminary results of the research and devise recommendations for regulators and private sector institutions.

The EAG as an International Tool for Increasing the Transparency of the Region's Financial System

Recognized international AML/CFT standards are aimed at mitigating risks of financial crime and enhancing the transparency of business. Experts believe that standards for AML/CFT and financial monitoring mechanisms must also extend to countering corruption.

Read more about it in an interview with **Igor Voluevich**, Co-chair of the EAG Working group on typologies.

Corruption poses a serious threat to the national economies of various countries. What role in your opinion is given to international organizations in the fight against corruption?

Corruption today is not only seen as a significant social problem, but a real threat to the economy. Given the crossborder nature of corruption, the role of the international community in countering such crimes gains bigger importance.

The UN, the Group of States against Corruption (GRECO) and other international organizations devise tools to combat to identify the signs money laundering in corruption-related related.

Your work, both in the EAG Working group and in the Federal Financial Monitoring Service of Russia, is directly connected with typologies research of money laundering and terrorist financing. Are the results of such research being communicated to the business community?

The competent authorities, including financial intelligence units and supervisory bodies, study the most common criminal schemes and communicate the typologies that they develop



corruption at the cross-border level. The FATF and FSRBs have been analyzing how the current framework of AML/CFT measures may be leveraged in the fight against corruption.

How can implementation of the FATF standards improve the fight against corruption?

The FATF 40+9 Recommendations,

to the private sector. At the behest of the EAG Chairman Mr. Oleg Markov we have posted Russian translations of the FATF typologies on the EAG website, which had previously been only available in English and French. This makes it easier for financial institutions to put them into practice. This feedback makes it possible to configure internal control systems and identify suspicious transactions, the reports of which are passed on to the FIUs by the reporting entities. We've also posted on the website the results of our own research into the problem of the legalization of the proceeds from embezzlement of budgetary funds, which was conducted by the EAG experts during 2009. functionaries, including at the tender and auction stages.

All corruption is in one way or another connected with money laundering, whether it is in the public sector or in business. Capital obtained illegally often returns to the legitimate economy through the banking system and is used to purchase real estate or other assets. The typological signs that are identified from research and formulated in the form of recommendations to state bodies and the private sector help to monitor and prevent such transactions.

How effective is the practical work of the FSRBs in the area of combating economic crime and corruption?

Preventing and uncovering crimes like corruption is impossible without effective monitoring of financial flows, including crossborder ones, as well as close collaboration between financial institutions and the appropriate state bodies. Therefore, the FSRBs are a necessary and effective tool for the formation of a transparent financial system, civilized business relations between government and business, and improving the investment attractiveness of this or that region.

First of all, thanks to the efforts of FSRBs, more and more countries have begun to work with the FATF, and the introduction of international AML standards is becoming the norm for rule-of-law states.

Secondly, the tasks of the FSRBs include expanding collaboration between the state and the private sector in combating money laundering and other economic crimes. The fight against money laundering and corruption schemes must be implemented by the state on an ongoing basis. However, it must not prevent the development of legitimate business. Ill-considered prohibitive measures produce the opposite effect, forcing entrepreneurs to deal in the shadows.

The role of the EAG is to make available

The International Financial Community Is Devoting Special Attention to Combating Corruption

According to the final declaration of the G20 summit held this past summer in Toronto, it was resolved to set up a working group to devise recommendations on combating corruption. The recommendations will be considered at the November meeting in Seoul.

They must include a review of effective rules and mechanisms for combating bribery and corruption in the public and private sectors, preventing corrupt individuals from gaining access to the global financial system, collaborating in the denial of visas, extradition and asset recovery, and protecting those who blow the whistle on corruption and stand up against it.

Combating corruption was also discussed by leaders of the G20 summit in Pittsburgh in September 2009, after which the FATF was tasked with exploring the use of financial monitoring tools in order to counter corruption (including the strengthening of standards for customer identification, beneficial ownership and increased financial transparency). At the FATF Plenary meeting held in Amsterdam in late June, it was noted that the FATF would 1) study and publish information about how the mechanisms of AML/CFT can be used to combat corruption and 2) work to strengthen the standards in this area. The FSRBs are also expected to participate actively in this work.

which help to protect national economies from the circulation of criminal capital, are now being effectively implemented in most states. These standards include stringent requirements for financial institutions to comply with the principles of transparency of operations and due diligence in relation to their customers and owners.

The standards also require financial institutions to monitor the operations of executives and their families. These approaches can also be applied as part of anti-corruption mechanisms.

Thus, the tools of internal control services of credit institutions, insurance and leasing companies and other organizations that work with monetary funds make it possible

What are the main results of the research?

The research revealed a consistent correlation between embezzlement and to what extent the heads of the bodies that received these funds were corrupt, and also allowed us to analyze the main criminal technologies. In particular, the most popular schemes involved the use of transfer pricing among affiliated intermediary companies, which greatly increase the cost of property acquired using state funds. Experience shows that these abuses often involve corrupt and publicize all relevant information about the international AML/CFT system, which means raising awareness about international standards and disseminating the methodologies and best practices on how to use them in meetings and consultations with the private sector.

Finally, it must be understood that the Eurasian region has distinct national, economic and political peculiarities, and the development of responses to criminal capital flows and related negative phenomena requires the participation of experts with a good understanding of these peculiarities. For this reason, the role of regional organizations, including the Eurasian group, in the formation of effective measures to combat economic crime and corruption is very great indeed.

NEWS OF THE EURASIAN REGION

Recent events

New AML/CFT Law Comes into Force in Belarus

The law "On Amendments and Additions to Some Laws of the Republic of Belarus on Issues Related to Preventing the Laundering of Proceeds from Crime and Terrorist Financing" came into force in September.

The new version of the basic AML law was developed in Belarus during 2009 with the participation of representatives of the National Bank and other state bodies as well as the Association of Belarusian banks and national lending institutions.

The amendments to the law take into account the recommendations of international experts devised at the conclusion of the EAG mutual evaluation and are aimed at further harmonization of the national AML/CFT system in accordance with FATF standards.



EAG Members Exchange Experience in Assessing ML/TF Risks

In late July, Ukraine hosted an international workshop on "A National Assessment of the Risk of Money Laundering," organized by the State Committee for Financial Monitoring of Ukraine jointly with the World Bank.

The event was attended by representatives of state bodies and the financial sector of Ukraine, Kazakhstan, Turkmenistan, Azerbaijan and Moldova.

The aim of the seminar was to study current trends in ML and TF designated by the FATF and the World Bank, as well as to analyze ways to minimize risks in the financial sector.

Under consideration was the FATF's risk-based approach, which recommends identifying the most high-risk sectors and focusing the efforts of monitoring and law enforcement agencies in areas of high risk.

Jkraine has observer status in the EAG,

gages in a variety of training and advisory activities related to AML/CFT.

Kazakhstan to Undergo EAG Mutual **Evaluation**

The EAG mutual evaluation mission will make its first visit to the Republic of Kazakhstan in October. Experts of the Eurasian group will assess how well the national system of combating money laundering and terrorist financing in Kazakhstan complies with the FATF standards. Recommendations on how to improve the country's AML/CFT regime will be devised upon the completion of the evaluation.

Kazakhstan has been a member of the EAG since 2004 and takes an active part in its work. In an atmosphere of constructive cooperation, the legislative and institutional bases of the AML system were established: the necessary regulations were adopted, and the Financial Monitoring Committee of the Kazakhstan Finance Ministry-the national FIU—was formed.

The 12th EAG Plenary meeting and the Consultation forum with the private sector were held in Almaty in June 2010.

The law of the Republic of Kazakhstan "Law of the Republic of Kazakhstan on Counteracting Legalization (Laundering) of Ill-gotten Proceeds and Terrorist Financing" came into force in March 2009. It establish-



es a broad range of standards for identifying the customers of financial institutions, uncovering suspicious transactions, reporting the relevant information to the FIU, data storage, the operation of the financial intelligence unit, etc.

Ukraine Improving AML/CFT Legislation

The new Law of Ukraine "On Preventing and Counteracting the Legalization (Laundering) of Proceeds Obtained IIlegally or Terrorist Financing" came into criminal code and other regulations on AML/CTF in accordance with international standards.

In particular, it expands the list of reporting entities which must fulfill AML/CFT procedures including there non-financial professions, such as lawyers, notaries, retailers and realtors. Gosfinmonitoring of Ukraine, the financial intelligence unit, is now authorized to freeze transactions in which there is suspicion of ML or TF, as well as at the request of any foreign FIU.

Heads of State of Russia, Afghanistan, Pakistan and Tajikistan **Discuss Problems Related to CFT, Narcotics**

A meeting of the heads of state of Russia, Afghanistan, Pakistan and Tajikistan was held from 18-19 August in Sochi. The agenda included issues of transnational and regional cooperation such as fighting terrorism, drug enforcement, regional economic development, etc.

The participants expressed concern about rising crime in the region and the increasing flow of drugs, which are the main source of terrorist financing. According to statistics, up to 96% of Afghan opium is transported to the Central Asian republics and Russia. More than 100,000 people worldwide die every year from drugs produced locally.

The heads of state reaffirmed their readiness to support the activities of the government of Afghanistan in the fight against terrorism and to participate in rebuilding projects in the country.

UN Office on Drugs and Crime to Be Headed by a Representative from Russia for the First Time

UN Secretary General Ban Ki-moon appointed Yuri Fedotov, former Russian ambassador to the UK, as Executive Director of the UNODC. Mr. Fedotov is the first Russian to head the UN Office on Drugs and Crime.

The UNODC is an observer in the EAG. Both organizations are constantly expanding collaboration to combat ML and TF in the Eurasian region.

In his official address, Mr. Fedotov noted cooperates with the Eurasian group and en- force on August 21. The law amends the that the effectiveness of the UNODC in tions for the automation of FIUs.

combating drugs, crime and corruption has increased considerably in recent years.

CAREC Business Development Forum Held in China

The Business Development Forum of the Central Asia Regional Economic Council (CAREC) was attended by representatives from eight Asian countries: Afghanistan,



Azerbaijan, China, Kazakhstan, Kyrgyzstan, Mongolia, Tajikistan and Uzbekistan, as well as international financial organizations, including the Asian Development Bank.

The forum discussed topical issues in the Central Asian region, improving customs procedures and boosting trade.

The participants noted that the countries' participation in international organizations and the development of their national AML/CFT regimes contributes significantly to improving their investment climate and enhancing their economic attractiveness.

Centre for Financial Monitoring of the Central Bank of the Republic of Armenia to Share Experience in **Automating Information Analysis** and Visualizing Data from Financial Investigations

The financial intelligence unit of Armenia, which has observer status in the EAG, disseminates best practices in automating financial investigation of ML and TF through the use of advanced software products.

In particular, during the last Plenary meeting of the EAG, Armenian FIU presented a specialized information system that provides a set of tools for analysis and visualization of information, the management of electronic cases and workflow, arousing great interest from the other members of the EAG. The Financial Monitoring Centre is ready to share its experience in implementing advanced information technology solu

EAG Expert Community

The Eurasian group on combating money laundering and financing of terrorism unites the countries in Eurasia to join their efforts in the fight against economic crimes and the threat of international terrorism. The eight memobserver status.

ber states of the EAG include Belarus, Kazakhstan, China, Kyrgyzstan, Russia, Tajikistan, Turkmenistan and Uzbekistan. 17 countries and 15 international and regional organizations have

The EAG is creating an interactive expert community in order to discuss the current issues and share experience with the aim of bringing together specialists in the field of financial monitoring, financial security, law, banking technologies and others engaged in global AML/CFT processes.

The opportunities created by the EAG portal allow experts to hold interactive forums, carry out research and discuss the current AML/CFT initiatives. We welcome all experts that wish to join us in this work to fill in a form at www.eurasiangroup.org (follow the "Ex-

pert Community" link).

Editorial board

We welcome you to take part in the development of the EAG Bulletin. If you would like to place news, articles and other publications in the following issues of the Bulletin, please feel free to send an e-mail

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