

România, Sibiu 550400, P-ţa Crişan nr. 1 Nr. ORC J32/493/31.05.2013 CUI 31725262 Tel. 0369.404.124 Mob.0771.261036

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#		Source	The most important events of the period 01/12/2023 - 15/12/2023
1	1	^	Emerging trends and risks
2	1	UK NCA	[08/December/2023] National Crime Agency calls on parents to help young people recognise the signs of money muling The NCA's call follows three weeks of coordinated law enforcement action against money mules. Around 6 in 10 money mules are under the age of 30, with most of these recruited between the ages of 17 and 24 while attending sixth form, college or university. https://www.nationalcrimeagency.gov.uk/news/national-crime-agency-calls-on-parents-to-help-young-people-recognise-the-signs-of-money-muling
3	1	UK FIU	[04/December/2023] How to recognise a Money Mule Account A key mechanism in cashing-out the proceeds of crime (POC) is money mule activity. Money mule activity refers to a money laundering process in which POC are moved and transferred through personal and/or business bank accounts. The warning provides a list covers many of the common 19 indicators that may suggest money mule activity in accounts, transactions and other mancial activity. https://www.bsa.org.uk/media-centre/bsa-blog/december-2023/guest-blog-how-to-recognise-a-money-mule-account
4	2	^	Warnings and reports, thematic analyzes of national and international authorities



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5	2	UK OFSI	[14/December/2023] OFSI - Annual Review for the financial year 2022 to 2023 Each year UK - Office of Financial Sanctions Implementation (OFSI) conducts a comprehensive exercise known as the Annual Frozen Asset Review, published within OFSI's broader Annual Review. This exercise aims to gain insights into assets that have been frozen due to UK financial sanctions regulations within the specified timeframe. This figure includes the value of funds frozen in the UK, such as funds in UK bank accounts, as well as overseas where those funds or economic resources are subject to UK financial sanctions legislation. The Annual Frozen Asset Review for 2022 reported £21.6 billion of funds frozen as at 30 September 2022 across all of UK regimes. https://assets.publishing.service.gov.uk/media/657acdef095987001295e088/OFSI Annual Review 2022 to 2023 St rengthening our Sanctions.pdf
6	2	US DOJ	[11/December/2023] Know Your Cargo: Reinforcing Best Practices to Ensure the Safe and Compliant Transport of Goods in Maritime and Other Forms of Transportation The Department of Justice (DOJ), Department of Commerce's Bureau of Industry and Security (BIS), Department of Homeland Security's Homeland Security Investigations (HSI), Department of State's Directorate of Defense Trade Controls (DDTC), and Department of the Transports of Foreign Assets Control (OFAC) issued a joint compliance note highlighting common tactics deployed by malign actors in the maritime and other transportation industries, as well as recent criminal and civil enforcement actions taken in response to alleged violations of U.S. sanctions and export controls. The note also describes steps that the maritime and other transportation industries can take to ensure compliance with U.S. sanctions and export controls. https://ofac.treasury.gov/media/932_31/download?inline



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7	2	IMF	[05/December/2023] 2023 Review of The Fund's Anti-Money Laundering and Combating The Financing of Terrorism Strategy This paper reviews the Fund's efforts to safeguard financial integrity and proposes the way forward for the Fund's Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) Strategy. For over 20 years, the IMF has recognized that effective AML/CFT frameworks, and financial integrity more broadly, are key to the soundness and stability of the financial sector and to prevent the negative macroeconomic implications of financial crimes on the broader economy of members, progressively integrating this work across all its core functions and in a broad set of Fund policies. The paper takes stock of the implementation of the IMF's AML/CFT strategy since 2018. It also proposes deepening the integration of financial integrity issues and an enhanced focus on the macroeconomic impact of AML/CFT issues for the way forward. https://www.imf.org/-/media/Files/Publications/PP/2023/English (PPEA-023052.ashx)
8	2	EUROPO L	[04/December/2023] European Money Mules actions 2023 Law enforcement agencies from 26 countries, in collaboration with Europol, Eurojust, INTERPOL and several private industry partners, have joined forces to combat a key facilitator of money laundering: money mules and their recruiters. 2 822 banks and financial institutions join forces with law enforcement agencies in global effort against money laundering. In June, October and November 2023, several operational phases identified 10 759 money mules and 474 recruiters, leading to the arrest of 1 013 individuals worldwide. Participating countries: Australia, Austria, Bulgaria, Cyprus, Colombia, Czechia, Delmark, Estonia, Greece, Hong Kong (China), Hungary, Ireland, Italy, Latvia, Moldova, Netherlands, Poland, Portugal, Romania, Singapore Slovenia, Sweden, Spain, Ukraine, United Kingdom, United States. https://www.europol.europa.eu/media-press/newsroom/news/paper-trail-ends-in-jail-time-for-1-013-money-mules



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			[01/December/2023] The Puppet Masters - How the Corrupt Use Legal Structures to Hide Stolen Assets and What to Do About It
9	2	StAR	The Stolen Asset Recovery Initiative (StAR - a partnership between the World Bank Group and the United Nations Office on Drugs and Crime (UNODC)) report examines how bribes, embezzled state assets and other criminal proceeds are being hidden via legal structures – shell companies, foundations, trusts and others. The study also provides policy makers with practical recommendations on how to step up ongoing international efforts to uncover flows of criminal funds and prevent criminals from misusing shell companies and other legal entities. Billions in corrupt assets, complex money trails, shell companies and other spurious legal structures. These form the complex web of subterfuge in corruption cases, behind which hides the Puppet Master and beneficiary of it all. Linking the beneficial owner to the proceeds of corruption is difficult. With sizable wealth and resources, the corrupt stay ahead of the game by exploiting transnational constructions that are hard to penetrate. https://star.worldbank.org/sites/default/files/puppetmasters/1.pdf
10	3	^	Terrorism and International Sanctions updates
11	3	US	OFAC-Specially Designated Nationals and Blocked Persons (SDN) List https://www.treasury.gov/ofac/downloads/sdulist.pdf OFAC-Sectoral Sanctions Identifications (SSI) List https://www.treasury.gov/ofac/downloads/ssi/gsilist.pdf OFAC-List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanctions (CAPTA List) https://www.treasury.gov/ofac/downloads/capta/captalist.pdf
12	3	EU	European Union Consolidated Financial Sanctions Lis https://webgate.ec.europa.eu/fsd/fsf/public/files/pdfFullSanctionsList/content?token=n002g3ky https://data.europa.eu/data/datasets/consolidated-list-of-persons-groups-and-entities-subject-to-eu-financial-sanctions?locale=en
13	3	UN	United Nations Security Council Consolidated List https://secanctions.un.org/consolidated/



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			[14/December/2023] Transnational Criminal Organizations Designations; Counter Terrorism Designation; Iran-related Designation
14	3	US	The SDN* list has beed upadted (added) with 3 individuals and 1 entity related to Iran's Islamic Revolutionary Guard Corps – Qods Force, Hamas, and Palestinian Islamic Jihad.
			https://ofac.treasury.gov/recent-actions/20231214
			[13/December/2023] Counter Terrorism Designations
15	3	US	The SDN* list has beed upadted (added) with 8 individuals,key officials who perpetuate Hamas's violent agenda by representing the group's interests abroad and managing its finances.
			https://ofac.treasury.gov/recent-actions/20231213
			[12/December/2023] Russia-related Designations and Designations Updates; Issuance of Russia-related General Licenses
16	3	US	The SDN* list has beed upadted (added) with 23 individuals, 250 entities and 3 vessels engaged in sanctions evasion in numerous third countries, complicit in furthering Russia's ability to wage its war against Ukraine, and responsible for bolstering Russia's future energy production and export capacity.
			https://ofac.treasury.gov/recent-actions/20231212
			[12/December/2023] COUNCIL IN PLEMENTING REGULATION (EU) 2023/2798 implementing Article 12(2) of Regulation (EU) 2017/1770 concerning restrictive measures in view of the situation in Mali
17	3	EU	1 person have been removed from that list and the reasons in the entries for two other persons have been amended.
			https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023R2798



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18	3	US	[11/December/2023] Global Magnitsky Designations The SDN* list has beed upadted (added) with 2 individuals, former Afghan government officials colectively known as "the Rahmanis" — for their extensive roles in transnational corruption, as well as 44 associated entities registered in Afghanistan, Austria, Bulgaria, Cyprus, Germany, Netherlands, United Arab Emirates. https://ofac.treasury.gov/recent-actions/20231211
19	3	EU	[11/December/2023] COUNCIL DECISION (CFSP) 2023/2768 amending Decision 2010/788/CFSP concerning restrictive measures in view of the situation in the Democratic Republic of the Congo COUNCIL IMPLEMENTING REGULATION (EU) 2023/2771 implementing Article 9 of Regulation (EC) No 1183/2005 concerning restrictive measures in view of the situation in the Democratic Republic of the Congo The restrictive measures have bee renewed until 12 December 2024. The Annex II (24 individuals) is replaced by the text appearing in the Annex to this Decision. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023D2768 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023R2771
20	3	EU	[11/December/2023] COUNCIL IMPLEMENTING REGULATION (EU) 2023/2789 implementing Regulation (EU) No 401/2013 concerning restrictive measures in view of the situation in Myanmar/Burma 4 persons and 2 entities have been added to the list of natural and legal persons, entities and bodies subject to restrictive measures https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023R2789



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21	3	EU	[11/December/2023] COUNCIL IMPLEMENTING REGULATION (EU) 2023/2793 implementing Regulation (EU) 2023/1529 concerning restrictive measures in view of Iran's military support of Russia's war of aggression against Ukraine 6 persons and 5 entities have been included in the list of natural and legal persons, entities and bodies subject to restrictive measures. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023R2793
22	3	US	[08/December/2023] Human Rights-Related Designations; Issuance of Global Magnitsky Frequently Asked Question The SDN* list has beed upadted (added) with 22 individuals related to human rights abuse in nine countries. https://ofac.treasury.gov/recent-actions/20231208
23	3	UN	[08/December/2023] Security Council 2653 Sanctions Committee Adds 4 Entries to Its Sanctions Lis Security Council Committee established pursuant to resolution 2653 (2022) approved the addition of 4 individuals from HAITI to its Sanctions List of individuals and entities subject to the measures imposed by the Security Council and adopted under Chapter VII of the Charter of the United Nations. https://press.un.org/en/2023/sc13520.oc.htm
24	3	US	[07/December/2023] Counter Terrorism Designations; Cyber-related Designations The SDN* list has beed upadted (added) with 6 individuals and 9 entities related to Islamic Revolutionary Guard Corps-Qods Force (IRGC-QF) and Houthis. https://ofac.treasury.gov/recent-actions/20231207



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25	3	EU	[07/December/2023] COUNCIL IMPLEMENTING REGULATION (EU) 2023/2765 implementing Article 2(3) of Regulation (EC) No 2580/2001 on specific restrictive measures directed against certain persons and entities with a view to combating terrorism 2 persons listed in the Annex to this Regulation have been added to the list provided for in Article 2(3) of Regulation (EC) No 2580/2001. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023R2765
26	3	US	[06/December/2023] Counter Narcotics Designations The SDN* list has beed upadted (added) with 15 individuals and 2 entities related to the Beltrán Leyva Organization from Mexic. https://ofac.treasury.gov/recent-actions/20231206
27	3	EU	[05/December/2023] COUNCIL DECISION (CFSP) 2023/2721 amending Decision (CFSP) 2020/1999 concerning restrictive measures against serious human rights violations and abuses The restrictions were extended until 8 December 2026. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023D2721
28	3	EU	[05/December/2023] COUNCIL IMPLEMENTING REGULATION (EU) 2023/2722 implementing Regulation (EU) 2020/1998 concerning restrictive measures against serious human rights violations and abuses The entries concerning nine natural persons and three entities from Annex I to Regulation (EU) 2020/1998 have been updated. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023R2722



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			[04/December/2023] Sudan Designations; Cyber-related Designation Update; Ukraine-related Designation Update; Foreign Interference in U.S. Election Designation Update
29	3	US	The SDN* list has beed upadted (added) with 3 individuals related to undermining the peace, security, and stability of Sudan.
			https://ofac.treasury.gov/recent-actions/20231204
30	3	EU	[04/December/2023] EU Global Human Rights Sanctions Regime: restrictive measures prolonged The Council prolonged the EU Global Human Rights Sanctions Regime – targeting individuals and entities responsible for serious human rights violations and abuses worldwide – for three years, until 8 December 2026. Existing restrictive measures (sanctions) will continue to be reviewed annually. https://www.consilium.europa.eu/en/press/press-releases/2023/17/04/eu-global-human-rights-sanctions-regime-restrictive-measures-prolonged/
31	3	UN	[01/December/2023] Security Council Lifts Arms Embargo on Federal Government of Somalia, adopting Resolution 2714 (2023) The Security Council adopted resolution 2714 (2023) (to be issued as document S/RES/2714(2023)) decided to lift the arms embargo established in resolution 733 (1992), as amended. https://press.un.org/en/2023/sc15531.doc.btm
32	3	us	[01/December/2023] Russia-related Designations; Issuance of Russia-related General License The SDN* list has beed upadted (added) with 3 entities and 3 vessels related to Price Cap Coalition. https://ofac.treasury.gov/recent-actions/20231201



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33	3	UN	[01/December/2023] Security Council Renews Sanctions Regime, Arms Embargo against Al-Shabaab, adopting Resolution 2713 (2023) Council adopted resolution 2713 (2023) (S/RES/2713(2023)) decided that all States shall take the necessary measures to prevent all deliveries of weapons, ammunition and military equipment to Somalia, including prohibiting the financing of all acquisitions and deliveries of weapons, ammunition and military equipment. Also decided that these measures shall not apply to deliveries or supplies to the Federal Government of Somalia, the Somali National Army, the National Intelligence and Security Agency, the Somali National Police Force or the Somali Custodial Corps. By the terms of the text, the 15-member organ also renewed the provisions set out in paragraphs 15 and 17 of resolution 2182 (2014), and expanded by paragraph 5 of resolution 2607 (2021), to cover improvised explosive device components until 15 December 2024 and, in so doing, reauthorized Member States' maritime interdiction of illicit charcoal exports from, and weapons or military equipment imports to, the country as well as improvised explosive device components. https://press.un.org/en/2023/sc15510.doc.htm
34	3	US	[01/December/2023] Global Magnitsky Designation The SDN* list has beed upadted (added) with 1 individual related to corruption in Guatemala https://ofac.treasury.gov/recent-actions/20231201-33
35	4	^	EU ML/TF SupraNational Risk Assessment
36	4	ЕВА	EBA Opinion on money laundering and terrorist financing risks across the EU was published on [13/July/2023] https://www.eba/europa.eu/sites/default/documents/files/document_library/Publications/Opinions/2023/1058335/EBA/200p%202023%200pinion%20on%20MLTF%20risks%20EBA%20REP%202023%2021.pdf
37	4	EU	The EU report of the risk of money laundering and terrorist financing affecting the internal market and relating to cross-border activities (EU SNRA) was issued on [27/October/2022] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52022DC0344



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38	5	^	Information and assessments by national authorities on risks at national level
39	5	ROMANI A	[22/November/2022] RO: http://www.onpcsb.ro/pdf/Rezumat%20NRA%20Public.pdf EN: http://www.onpcsb.ro/pdf/Summary%20of%20the%20National%20Risk%20/ssessment%20Report%20on%20Money %20Laundering%20and%20Terrorism%20Financing.pdf
40	5	UK	[01/December/2023] The 2023 money laundering and terrorist financing risks within the British Gambling Industry The Gambling Commission's Money Laundering (ML) and Terrorist Financing (TF) risk assessment 2023 presents the key risks associated with each of the sectors and encompasses licensed land-based and remote activity in Great Britain's gambling industry. The reporting period this assessment is based on is 1 June 2020 to 31 March 2023. The methodology used to assess the risks in Great Britain's gambling industry has been developed from the previous risk assessment in 2020. https://www.gamblingcommission.gov.uk/gilldance/tbe-2023-money-laundering-and-terrorist-financing-risks-within-the-british/2023-money-laundering-and-risks-a ecutive-summary
41	6	^	Specific guidelines, guides, instructions or warnings
42	6	FATF	[08/December/2023] Consolidated Processes and Procedures for Mutual Evaluations and Follow-Up Universal Procedures The assessments of countries effective implementation of the 2012 FATF Recommendations are conducted in accordance with the 2013 Assessment Methodology. In principle, FATF-Style Regional Bodies (FSRBs) and International Financial Institutions, should be using the same or similar procedures as the FATF. While there is some flexibility in the procedural arrangements, there is a set of core elements that should apply to all assessments. This obligation is noted in the High-Level Principles and Objectives for FATF and FATF-style regional bodies which govern the relationship between FATF and FSRB. https://www.fatf-gafi.org/content/dam/fatf-gafi/publications/FATF-Universal-Procedures.pdf.coredownload.pdf



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43	6	UK NCA	[06/December/2023] Red ALERT -Exporting High Risk Goods The National Crime Agency has issued a Red Alert to financial institutions warning that Russia is attempting to obtain prohibited export goods through third countries. The alert targets the list of banned dual-use goods and high technology items published by the EU in cooperation with the US, UK and Japan on 22 September. https://www.nationalcrimeagency.gov.uk/who-we-are/publications/687-neck-led-alert-exporting-high-risk-goods/file
44	7	^	Warnings, fines and convictions for violating the KYC/AML/CTF, FiSa/Compliance legislation in financial market
45	7	OFAC	[13/December/2023] Settlement Agreement between the OFAC and CoinList Markets for \$1,207,830 The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) announced a \$1,207,830 settlement with CoinList Markets LLC. CoinList agreed to settle its potential civil liability arising from processing 989 transactions on behalf of users ordinarily resident in Crimea between April 2020 and May 2022, in apparent violation of OFAC's Russia/Ukraine sanctions. The settlement amount reflects OFAC's determination that CoinList's conduct was non-egregious and not voluntarily self-disclosed. https://ofac.treasury.gov/media/932406/download?inline
46	7	OFAC	[08/December/2023] Settlement Agreement between the OFAC and Nasdaq for \$4,040,923 The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) announced a settlement with Nasdaq, Inc. Nasdaq agreed to remit \$4,040,923 to settle its potential civil liability for a former wholly owned foreign subsidiary's apparent violations of sanctions on Iran. This former subsidiary engaged in the exportation of services to Iran and the Government of Iran, thereby committing 151 apparent violations of OFAC sanctions on Iran. https://ofac.treas.iry.ov/media/932386/download?inline



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47	7	ADAFINTR	[07/December/2023] Administrative monetary penalty on Canadian Imperial Bank of Commerce Canadian Imperial Bank of Commerce (CIBC), also operating as Banque Canadienne Impériale de Commerce, a bank headquartered in Toronto, Ontario, was imposed an administrative monetary penalty of \$1,329,150 on October 23, 2023, for committing 2 violations. This penalty was imposed for administrative violations committed by CIBC under the Proceeds of Crime (Money Laundering) and Terrorist Financing Act and its associated Regulations, and not for criminal offences for money laundering or terrorist activity financing. The administrative monetary penalty has been paid in full by CIBC and proceedings have ended. https://fintrac-canafe.canada.ca/pen/amps/pen-2023-12-07-eng
48	7	CYSEC	Cyprus Securities and Exchange Commission fined the following companies for AML deficiencies: -Egard Management Ltd 4000EUR -Enter Winglobe Management Ltd 1500EUR -Apollo (Cyprus) Limited 1000EUR https://www.cysec.gov.cy/CMSPages/GetFile.aspx?guid=e75fccf5-f586-457d-8602-db2deb89c237 https://www.cysec.gov.cy/CMSPages/GetFile.aspx?guid=4d50cb2a-ae0e-45d2-bbfd-ac58fedc249b https://www.cysec.gov.cy/CMSPages/GetFile.aspx?guid=5639c62e-eb01-44b7-822b-be8c77943ec8



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49	7	USDOJ	[06/December/2023] Bitzlato Ltd. Processed More Than \$700M Worth of Illicit Funds and Was Primary Counterparty of Notorious Drug Bazaar Hydra Market; The founder and majority owner of Bitzlato Ltd. (Bitzlato), a cryptocurrency exchange that served as a primary conduit for dark market purchasers and sellers, as well as a safe haven for illicit transactions by ransomware criminals, pleaded guilty today to operating a money transmitting business that transmitted illicit funds. According to court documents, Bitzlato, a Hong Kong-registered cryptocurrency exchange that operated globally, marketed itself as requiring minimal identification from its users, specifying that "neither selfies not passports [are] required." On occasions when Bitzlato did direct users to submit identifying information, it repeatedly allowed them to openly provide information belonging to "straw man" registrants. As a result of these deficient know-your-customer (KYC) procedures, Bitzlato allegedly became a haven for criminal proceeds and funds intended for use in criminal activity. https://www.justice.gov/opa/pr/founder-and-majority-owner cryptocurrency-exchange-pleads-guilty-unlicensed-money
50	7	ADAFINTR	Royal Bank of Canada (RBC) was imposed an administrative monetary penalty of \$7,475,000 on November 3, 2023, for committing 3 violations. The violations were found during the course of a compliance examination in 2022. This penalty was imposed for administrative violations committed by RBC under the Proceeds of Crime (Money Laundering) and Terrorist Financing Act and its associated Regulations, and not for criminal offences for money laundering or terrorist activity financing. https://fintrac-canafe.canada.ca/pen/amps/pen-2023-12-05-eng



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51	7	USDOJ	[04/December/2023] Swiss Private Bank, Banque Pictet, Admits To Conspiring With U.S. Taxpayers To Hide Assets And Income In Offshore Accounts The United States Attorney filed criminal charges against Swiss Bank, BANQUE PICTET ET CIE SA for conspiring with U.S. taxpayers and others to hide more than \$5.6 billion in 1,637 secret bank accounts in Switzerland and elsewhere and to conceal the income generated in those accounts from the IRS. Bank Enters into a Deferred Prosecution Agreement for Criminal Misconduct and agrees to pay more than \$122.9 million. https://www.justice.gov/usao-sdny/pr/swiss-private-bank-banque-pictet admits-conspiring-us-taxpayers-hide-assets-and-income
52	8	^	Law enforcement actions for money laundering and international sanctions crimes
53	8	USDOJ	[14/December/2023] Former Special Agent In Charge Of The New York FBI Counterintelligence Division Sentenced To 50 Months In Prison For Conspiring To Violate U.S. Sanctions On Russi CHARLES MCGONIGAL, a former Special Agent in Charge of the FBI's Counterintelligence Division in New York, was sentenced to 50 months in prison for conspiring to violate the International Emergency Economic Powers Act and to commit money laundering in connection with his 2021 agreement to provide services to Oleg Deripaska, a sanctioned Russian oligarch. https://www.justice.gov/usao-sdrv/pr/former-special-agent-charge-new-york-fbi-counterintelligence-division-sentenced-50



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54	8	USDOS	[05/December/2023] Designation of North Macedonia Public Official Kocho Angjushev for Significant Corruption The United States is designating Kocho Angjushev, a former Deputy Prime Minister of North Macedonia, as generally ineligible for entry into the United States, due to his involvement in significant corruption. While serving as Deputy Prime Minister, Angjushev abused his official position to benefit his private business interests, undermining the confidence of North Macedonia's public in their government institutions and public processes. https://www.state.gov/designation-of-north-macedonia-public-official-kocho-angjushev-for-significant-corruption/
55	8	FBI	[04/December/2023] FBI, Partners Conduct Thanks living Day Operation in Romania Tied to California Organized Crime/ATM-Skimming Network On November 23, Romanian law enforcement, in coordination with the FBI's Los Angeles Field Office, conducted enforcement operations targeting 84 locations in Romania tied to an organized crime group engaged in ATM skimming and money laundering. During this operation, Romanian law enforcement arrested 48 subjects, seized approximately \$1 million worth of various currencies, and seized 11 vehicles. This is the culmination of a three-year investigation conducted by the FBI and Romanian authorities targeting organized crime figures conducting ATM skimming operations in the United States and the money laundering apparatus used to send the profits of their crimes through western Europe back to Romania. https://www.fbi.gov/contact-us/field-puces/losangeles/news/fbi-partners-conduct-thanksgiving-day-operation-in-romania-tied-to-california-organized-crime-atm-skimming-network



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56	8	US	[04/December/2023] Direct Monthly Payments to Joe Biden from Hunter Biden's Business Entity House Committee on Oversight and Accountability Chairman James Comer (R-Ky.) released subpoenaed bank records revealing Hunter Biden's business entity, Owasco PC, made direct monthly payments to Joe Biden. Hunter Biden is currently under an investigation by the Department of Justice for using the Ovasco PC corporate account for tax evasion and other serious crimes. Following subpoenas to obtain Biden family associates' bank records, Chairman Comer issued subpoenas for Hunter and James Biden's personal and business bank records. The House Oversight Committee has identified over 20 shell companies and uncovered how the Biden's and their associates raked in over \$24 million dollars between 2015 and 2019 by selling Joe Biden as "the brand." https://oversight.house.gov/release/comer-releases-direct-monthly-payments-to-joe-biden-from-hunter-bidens-business-entity/
57	8	UKNCA	[02/December/2023] Three more convictions after £100 million 'cash in suitcases' conspiracy Three members of a criminal network that snuggled more than £100m in illicit cash from the UK to the UAE have been found guilty of money laundering offences – bringing the total number convicted of involvement in the conspiracy to 14. The network collected cash from criminal groups around the UK, which was believed to be the profits of drug dealing, and took it to counting houses, usually rented apartments in Central London. The money was then vacuum packed and separated into suitcases which would typically each contain around £500,000, weighing around 40 kilos. They were sprayed with coffee or air fresheners in an effort to prevent them being found by Border Force detection dogs. The couriers, who were paid around £3,000 for each trip and would be booked on business class flights due to the extra luggage allowance, communicated on a number of WhatsApp group. https://www.nationalfrimeagency.gov.uk/news/three-more-convictions-after-100-million-cash-in-suitcases-conspiracy



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58	8	USDOJ	[01/December/2023] "Money Mule" sentenced to one year in prison for call center's theme that defrauded victims of more than \$700,000 A 33-year-old man was sentenced to one year and one day in prison and three years of surjectived release for a money laundering conviction related to his participation in a call center scheme to defraud elderly victims. Arifkhan Pathan was arrested on January 4, 2021. Between August 2020 and January 2021, Pathan played a key role in defrauding 28 victims of more than \$700,000. According to multiple victims in the case, they had received a telephone call from someone who claimed to be employed by the Social Security Administration. The caller claimed the victim's Social Security number had been compromised, and the only way to protect the victim's money was to withdraw thousands of dollars in cash from their bank accounts and send it via UPS or FedEx to an "agent" elsewhere in the U.S. for safe-keeping. The callers allegedly demanded the victims send packages containing as much as \$30,000 in cash. The scammers used UPS and FedEx so the co-conspirators could track the packages and pick up the packages of cash using the fake identity documents. The investigation revealed the callers were connected to an Indian call center. https://www.justice.gov/usao-wdwa/pr/money-mule-sentenced-one-year-prison-call-center-scheme-defrauded-victims-more-700000
59	9	^	Threats, alerts and typologies
60	9		Nothing relevant during this period
61	10	^	Corruption Perception Indices and Country Reports
			2022 Corruption Perceptions Index was issued on [31/January/2023]



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63	11	^	Mutual evaluation reports or lists of states or jurisdictions that have KYC/AML/CT/ deficiencies
64	11	FATF	[07/December/2023] FATF consolidated countries assessment ratings This table provides an up-to-date overview of the FATF ratings that assessed countries obtained for effectiveness and technical compliance with the 40 reccomandations. https://www.fatf-gafi.org/content/fatf-gafi/en/publications/Mutualevaluations/Assessment-ratings.html
65	11	FATF	[07/December/2023] Germany's progress in strengthening measures to tackle money laundering and terrorist financing Germany has made progress in addressing the technical compliance deficiencies identified in its Mutual Evaluation in relation to Recommendations 6 and 7. Because of this progress, Germany has been re-rated on these Recommendations: Recommendation 6 is re-rated from Partially Compliant to Largely Compliant Recommendation 7 is re-rated from Partially Compliant to Largely Compliant Germany has 20 Recommendations rated Compliant, 17 rated Largely Compliant and 3 Recommendations remain Partially Compliant. www.fatf-gafi.org/content/dam/fatf-gafi/fur/Germany-Follow-Up-Report-2023.pdf.coredownload.pdf
66	11	UK	[04/Decembrie/2023] HM Treasury Advisory Notice: High Risk Third Countries The UK high risk third countries list has been updated in accordance with FATF actions from Oct 2023. https://www.gov.uk/government/publications/money-laundering-advisory-notice-high-risk-third-countries2/hm-treasury-advisory-notice-high-risk-third-countries



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67	11	FATF	[01/December/2023] Mutual Evaluation of the Central African Republic Overall, CAR has shown a low level of understanding of the ML and TF risks. This is due to the fact that no assessment has been carried out in any sector, either in terms of ML or TF. CAR does not adequately and sufficiently identify ML cases arising from predicate offences or systematically use parallel investigations due to the absence of an AML/CFT criminal policy and the lack of expertise of the investigative and prosecuting authorities. https://www.fatf-gafi.org/content/dam/fatf-gafi/fsrb-mer/Central-African-Republic MER.pdf.coredownload.inline.pdf
68	11	FATF	[01/December/2023] Turks and Caicos Islands' progress in strengthening its framework to tackle money laundering and terrorist financing This report analyses the Turks and Caicos Islands' progress in addressing the technical compliance deficiencies identified in the mutual evaluation. To reflect this progress, the CFATF has re-rated the Turks and Caicos Islands on the following Recommendations: 13 – Correspondent Banking from partially compliant to largely compliant 28 – Regulation and Supervision of DNFBPs from partially compliant to compliant The report also looks at whether the Turks and Caicos Islands' measures meet the requirements of FATF Recommendations that have changed since its 2020 mutual evaluation, taking into account any new measures since the mutual evaluation. The Turks and Caicos Islands is now rated as Compliant or Largely Compliant with 37 out of the 40 FATF Recommendations. https://www.fatf-gafi.org/content/wam/fatf-gafi/fsrb-fur/Turks-Caicos-Islands-FUR-2023.pdf.coredownload.inline.pdf



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69	11	FATF	[01/December/2023] Suriname's progress in strengthening measures to tackle money laundering and terrorist financing Suriname has been in an enhanced follow-up process, following the adoption of the CFATP-mutual evaluation report, which assessed the effectiveness of Suriname's anti-money laundering and counter-terrorist financing (AML/CFT) measures and the country's compliance with the FATF Recommendations. In line with the CFATF Procedures for the Fourth Round of AML/CFT Mutual Evaluations, Suriname has reported back to the CFATF on the progress it has made to strengthen its AML/CFT framework. This report analyses Suriname's progress in addressing the technical compliance deficiencies identified in the mutual evaluation. To reflect this progress, the CFATF has re-rated Suriname on the following Recommendations: 12 - Politically Exposed Persons (PEPS) from partially compliant to largely compliant 13 - Correspondent Banking from partially compliant to compliant 21 - Tipping-off and Confidentiality from partially compliant to compliant 22 - Designated Non-Financial Businesses and Professions (DNFBPS): Customer Due Diligence from partially compliant to largely compliant Suriname is now rated as Compliant or Largely Compliant with 14 out of the 40 FATF Recommendations. Publication short description https://www.fatf-gafi.org/content/dam/fatf-gafi/fsix-fur/Suriname-FUR-2023.pdf.coredownload.pdf
70	11	FATF	FATF lists have been updated on [27/October/2023] FATF has reviewed and published: - the lists of jurisdictions subject to a call for Action(BLACK), list remained unchanged: North Korea; Iran; Myanmar; - list of jurisdictions under Increased Monitoring(GREY), the updates are: Albania, Cayman I, Jordan and Panama exit; enter in the list a Bulgaria. The grey list contains 23 countries: 1/Barbados 2/ Bulgaria 4/Burkina Faso 3/Cameroon 4/Congó D.R. S./Croatia 6/Gibraltar 7/Haiti 8/Jamaica 9/Mali 10/Mozambique 11/Nigeria 12/Panama 13/Phi[ippines] 14/Senegal 15/South Africa 16/South Sudan 17/Syria 18/Tanzania 19/Turcia 20/Uganda 21/Únited Arab Emirates 22/Vietnam 23/Yemen https://www.fatf-gafi.org/en/publications/High-risk-and-other-monitored-jurisdictions/Increased-monitoring-october-2023.html https://www.fatf-gafi.org/en/publications/High-risk-and-other-monitored-jurisdictions/Call-for-action-october-2023.html



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71	11	EU	The EU list of high-risk third countries with strategic deficiencies has been updated in [18/October/2023]. The Commission Delegated Regulation (EU) 2016/1675 regarding high-risk third countries with strategic deficiencies has been updated by C.D.Reg. 2023/2070 as follows: NO exit; New entries: Cameroon & Vietnam The list contains 29 countries: 1/Afghanistan(2016) 2/South Africa (2023) 3/Barbados(2020) 4/Burkina Faso(2022) 5/Cameroon(2023) 6/Cayman I.(2022) 7/D.R.Congo(2023) 8/Filipine(2022) 9, Sibraltar(2023) 10/Haiti(2022) 11/Jordan(2022) 12/Jamaica(2020) 13/Mali(2022) 14/Myanmar(2020) 15/Nozan.bique(2023) 16/Nigeria(2023) 17/Panama(2020) 18/Senegal(2022) 19/Syria(2016) 20/South Sudan(2022) 21/Trinidad and Tobago(2018) 22/Tanzania (2023) 23/Uganda(2016) 24/Vanuatu(2016) 25/Vietnam(2023) 26/Yemen(2016) 27/United Arab Emirates(2023) 28/Iran(2016) 29/D.P.R.Korea(2016) https://eur-lex.europa.eu/eli/reg_del/2023/2070/oj https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=Ch_EX:3.016R1675
72	11	EU	EU list of non-cooperative jurisdictions for tax purposes has been updated on [17/October/2023] The EU list of non-cooperative jurisdictions for tax purposes has been updated. Antigua and Barbuda, Belize and Seychelles were added, British Virgin Islands. Costa Rica and Marshall Islands were removed. The black list contains the following countries: 1/ American Samod 2/ Anguila 3/ Antigua & Barbuda 4/ Bahamas 5/ Belize 6/ Fiji 7/ Guam 8/ Palau 9/ Panama 10/ Rusia 11/ Samoa 12/ Seychelles 13/ Trinidad & Tobago 14/ Turk & Caicos I. 15/ US Virgin I. 16/ Vanuatu For the grey list see Annex II https://www.consilium.curopa.eu/media/67379/st13879-en23.pdf



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73	11	Moneyva I	Romania MONEYVAL Mutual Evaluation Report [18/July/2023] The report provides a comprehensive assessment of the country's level of compliance with standards set by the Financial Action Task Force (FATF). MONEYVAL notes that Romania has achieved moderate levels of effectiveness in all areas assessed except for international cooperation, where it has achieved a substantial level of effectiveness and has been commended by other countries for its constructive assistance. MONEYVAL's mutual evaluation of Romania highlights that the country demonstrates a fair understanding of ML risks and, to a lesser degree, of TF risks. Romania needs to immediately start implementing mitigating actions that target the highest risks to which the country is exposed. https://rm.coe.int/moneyval-2023-5-mer-romania/1680abfd1c
74	12	^	Relevant information from credible and reliable organizations
75	12	Wolfsber g	[14/December/2023] Wolfsberg Group-IIF joint response to the FATF's public consultation on its Risk-Based Guidance on Recommendation 25. Wolfsberg Group and the Institute of International Finance (IIF) submitted a joint response to the FATF's public consultation on its Risk-Based Guidance on Recommendation 25 (Beneficial Ownership and Transparency of Legal Arrangements). https://db.wolfsberg-group.org/assets/79/5441d-4a46-4c88-981e-f071861e15df/FATF%20R25%20Quidante%20note%20consultation%20submission.pdf



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76	12	ICIJ	[06/December/2023] Police swoop on Seychelles financial services firm hours after new Pandora Papers probe Seychelles authorities raided an offshore financial service provider just hours after a new Pandora Papers investigation by ICIJ's media partners revealed that the firm had exploited a U.K secrecy loophole and helped front companies used by Vladimir Putin's inner circle. Seychelles-based Alpha Consulting was one of 14 offshore services providers whose leaked files made up the Pandora Papers, a trove of 11.9 million documents that were obtained by the International Consortium of Investigative Journalists and shared with more than 600 reporters around the world. The November investigation by media outlets Finance Uncovered, the BBC and Seychelles Broadcasting Corporation traced company records and analyzed hundreds of Alpha Consulting documents contained in the Pandora Papers cache to uncover more than 900 U.Kregistered firms set up by nominee directors linked to the Seychelles provider. https://www.icij.org/investigations/pandora-papers/police-sycopon-seychelles-financial-services-firm-hours-after-new-pandora-papers-probe/
77	12	OCCRP	[06/December/2023] Abramovich's Kids, Lithuanian Citizens, Shield His Wealth from Sanctions Two children of Russian billionaire Roman Abramovich used Lithuanian passports to help take control of some of his wealth, which may have safeguarded it from sanctions imposed on their father just weeks later, leaked documents reveal. Abramovich transferred the partial or complete ownership of trusts holding at least US\$4 billion to his seven children in February 2022, shortly after the U.K. and the U.S. threatened to sanction Russian oligarchs if Russia invaded Ukraine. https://www.occrp.org/en/daily/18-76 abramovich-s-kids-lithuanian-citizens-shield-his-wealth-from-sanctions



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78	12	ICIJ	[04/December/2023] The Russian underworld since the Ukraine invasion The annexation of Crimea in 2014 and the subsequent undeclared conflict in the Donhas region had already begun to reshape the Russian underworld. The 2022 invasion of Ukraine, however, brought dramatic changes. At the same time, new opportunities to smuggle sanctioned luxury goods for the rich and critical components for the defence—industrial complex have enriched and elevated other gangs, especially those abie to exploit and control routes through Belarus, Armenia and Central Asia. All this is putting pressure on the underworld status quo – and the state's capacity to manage and maintain it – and even reshaping the relationship between Russian criminal networks and their partners and subsidiaries abroad. https://globalinitiative.net/wp-content/uploads/2023/12/Marts-Galeotti-Time-of-troubles-The-Russian-underworld-since-the-Ukraine-invasion-GI-TOC-December-2023.pdf
79	13	^	Information from statistical organizations and academia & others
80			Nothing of relevance during this time period
81	14	^	Relevant information on ML/FT risks from mass - media
82	14	Mass- media	[15/December/2023] Senator Upakit indicted for drug trafficking and money laundering Senator Upakit Pachariyangkun was on indicted for collusion in narcotics trafficking and money laundering among six serious charges against him. Public prosecutors also slapped charges of possessing the illicit drug ketamine for sale, involvement in money laundering while serving as a senator, association with a transnational criminal organisation in committing crimes, and involvement with those illegal activities while serving as a senator. https://www.nationtbeiland.com/thailand/general/40033815



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			[14/December/2023] More sanctions on Russia agreed by EU leaders
83	14	Mass- media	European Union countries agreed on a 12th package of sanctions against Russia, meaning that a phased ban on Russian diamond imports among other measures will come into effect from Jan. 1. The EU has been adding sectoral and individual sanctions since Russia's invasion of Ukraine in February 2022 in an attempt to cut off revenues and military equipment feeding Moscow's war machine. "The European Council welcomes the adoption of the 12th package of sanctions," its concluding statements said. While the text of the package had been agreed by all countries earlier this week, diplomatic sources said, Austria held back on giving its final approval until late on Thursday. Austria said on Wednesday while it was not opposed, the capital needed time to examine the legal texts. However, sources familiar with the matter said the country had been attempting to have Raiffeisen Bank International, the biggest Western bank in Russia, struck off a Ukrainian blacklist in return for signing off on fresh European Union sanctions on Russia. https://www.reuters.com/world/europe/more-sanctions-russia-agreed-by-eu-leaders-2023-12-14/
84	14	Mass- media	The Reserve Bank has issued a formal warning over anti-money laundering rule failures The Reserve Bank has issued a formal warning to the New Zealand branch of Citibank under anti-money laundering and counter terrorism financing laws. The warning relates to wire transfer identity requirements under the Anti-Money Laundering and Countering Financing of Terrorism (AML/CFT) Act 2009. The Reserve Bank said Citibank NZ failed to provide appropriate originator information, obtained in its role as an intermediary institution in international wire transfers. The transactions took place between January 2017 and July 2020, and between November 2021 and April 2022. The Reserve Bank noted Citibank's the failures were not a deliberate attempt to evade its legal obligations under the Act and related to complex legal obligations. https://www.rnz.co.nz/pews/business/504723/citibank-nz-issued-formal-warning-over-anti-money-laundering-rule-failures



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85	14	Mass- media	[09/December/2023] Crypto users launch lawsuit against Mercedes F1 team A group of FTX cryptocurrency users have filed lawsuits against the Mercedes Formula 1 squad as they allege the team helped commit fraud by promoting the now-bankrupt cryptocurrency company. Mercedes entered into a partnership with FTX in 2021 with the cryptocurrency's logo appearing on the car livery as well as the team overalls. The deal was announced at a time when multiple F1 teams were striking agreements with cryptocurrency companies. https://racingnews365.com/crypto-users-launch-lawsuit-against-mercedes 11-and-ronaldo-among-others
86	14	Mass- media	Britain will remain the global centre of "dirty money" unless ministers revive stalled plans for public registers of who owns companies based in offshore havens such as the British Virgin Islands (BVIs) and Jersey, campaigners and senior MPs have said. The veteran anti-corruption campaigner Dame Margaret Hodge MP said it was a matter of national security to do away with the secrecy offered by the 10 inhabited overseas territories and three crown dependencies. In 2020, the government gave the overseas territories, which include the BVIs, Cayman Islands and Bermuda, a deadline of December 2023 to introduce public registers of corporate ownership. Only Gibraltar has done so. https://www.theguardian.com/business/2023/dec/07/uk-to-remain-global-centre-of-dirty-money-unless-offshore-registers-introduced
87	14	Mass- media	[06/December/2023] Trader Trafigura Targeted by US and Swiss Over Corruption Trafigura Group and one of its longstanding top executives have been charged over allegations of bribing public officials in Angola, in a major blow to one of the world's largest commodity traders. Trafigura acknowledged the Swiss charges in a statement, and also revealed for the first time a US Department of Justice investigation into "improper payments" made in Brazil. The charges are the latest in a series of actions from global prosecutors targeting corruption in the commodity trading industry, and the most serious so far against Trafigura, a leading oil and metals trader. https://www.swissinfo.ch/eng/trader-trafigura-targeted-by-us-and-swiss-over-corruption/49035944



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88	14	Mass- media	[05/December/2023] Criminal use of cryptocurrency expected to grow, Canada's financial intel agency says Canada's financial intelligence agency says it anticipates that criminals will increase their use of cryptocurrency to raise, move and hide funds outside the traditional banking system. In its latest annual report, released Monday, the Financial Transactions and Reports Analysis Centre of Canada highlights its development of strategic intelligence on the role virtual assets play in money laundering and terrorist financing. The agency, known as Fintrac, says the most prevalent form of money laundering involving virtual currencies is the movement of proceeds of fraud and ransomware attacks. https://www.cp24.com/news/criminal-use-of-cryptocurrency-expected-to-grow-canada-s-financial-intel-agency-says-1.6673393
89	14	Mass- media	[04/December/2023] Moscow Exchange would halt USD trading if sanctions imposed Moscow Exchange (MOEX.MM), Russia's largest bourse, said it would halt trading in the U.S. dollar should sanctions be imposed, after Washington targeted another Russian exchange, SPB, with restrictive measures last month. The U.S. Treasury in early November targeted SPB, Russia's second-largest stock exchange as part of sweeping new measures that also aim to curb Russia's future energy capabilities and sanctions evasion. Some Russian market players believe Moscow Exchange could be targeted next. The sanctions forced SPB, which specialises in trading foreign shares, to halt trading of shares on its exchange and tweak its strategy to focus on settlements in roubles. More than two thirds of clients' foreign currency funds are now blocked. https://www.reuters.com/markets/urrencies/moscow-exchange-would-halt-usd-trading-if-sanctions-imposed-2023-12-05/



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90	14	Mass- media	[03/December/2023] How a secret Fleet of Ships helps Russia avoid Sanctions and sell its Oil A secret fleet, untraceable operators, and omissions have helped Russia's oil trade flow despite Western sanctions over the past 18 months. After 18 months in the war with Ukraine, the effect of Western sanctions on the Russian economy is fading, especially on the income of the federal budget from oil, writes Euronews. The country has found ways to circumvent Western sanctions that have imposed a \$60 price ceiling on a barrel of Russian offshore Ural oil in global trade. A shadow tanker fleet has also appeared on the global market, consisting of hundreds of small tanker operators who own only one or two tankers. These are usually old ships, which pose a lot of security risks, sailing under the flag of countries like Liberia or Cameroon. https://sarajevotimes.com/how-a-secret-fleet-of-ships-helps-russia-avoid-sanctions-and-sell-its-oil/
91	14	Mass- media	[02/December/2023] U.S., allies pressure Liberia, Marshall Islands, Panama over Russia oil sanctions The U.S., EU and UK are pressuring Liberia, the Marshall Islands and Panama to increase oversight of ships carrying their flags to ensure they do not transport Russian oil soid above the price cap. The move marks another escalation in the West's efforts to enforce the \$60 price cap on seaborne shipments of Russian oil it imposed to punish Moscow for its war in Ukraine. The cap, which aims to reduce Russia's export revenues while maintaining flows of oil around the world, was imposed in late 2022 but has only recently been enforced. The mechanism bans Western companies from providing maritime services such as transportation, insurance and finance that facilitate the trade of Russian oil sold above the cap. https://www.reuters.com/business/energy/us-allies-pressure-liberia-marshall-islands-panama-over-russia-oil-sanctions-2023-12-02/



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92	14	Mass- media	[01/December/2023] Jewellery trade moves to expose shell companies, curb illegal fund flows Diamond houses, jewellers, and gem stores will soon be blacklisted by banks if they fail to disclose the 'ultimate beneficial owners' (UBOs) of their trading partners. Identifying the UBOs, or the true owners, would test the genuineness of foreign buyers and sellers, curb sham exports and imports, and expose rogue firms using cross-border trades in gold jewellery and other precious stones as a subterfuge for irregular fund transfers and hawala deals. https://economictimes.indiatimes.com/industry/cons-products/fashion-/-cosmet/cs-/-jewellery/jewellery-trade-moves-to-expose-shell-companies-curb-illegal-fund-flows/articleshow/105636597.cms
93	15	^	Legislative initiatives and changes
94	15	EU	[13/December/2023] Council and Parliament agree to create new authority -ALMA The Council and the Parliament reached a provisional agreement on creating a new European authority for countering money laundering and financing of terrorism (AMLA) - the centrepiece of the anti-money laundering package, which aims to protect EU citizens and the EU's financial system against money laundering and terrorist financing. AMLA will have direct and indirect a pervisory powers over high-risk obliged entities in the financial sector. This agreement leaves out a decision on the location of the agency's seat, a matter that continues to be discussed on a separate track. Given the cross-border nature of financial crime, the new authority will boost the efficiency of the anti-money laundering and countering the financing of terrorism (AML/CFT) framework, by creating an integrated mechanism with national supervisors to ensure obliged entities comply with AML/CFT-related obligations in the financial sector. AMLA will also have a supporting role with respect to non-financial sectors, and coordinate financial intelligence units in member states. In addition to supervisory powers and in order to ensure compliance, in cases of serious, systematic or repeated breaches of directly applicable requirements, the Authority will impose pecuniary sanctions on the selected obliged entities. https://www.consilium.europa.eu/en/press/press-releases/2023/12/13/anti-money-laundering-council-and-parliament-agree-to-create-new-authority/



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95	15	EU	[12/December/2023] Council and Parliament reach political agreement to criminalise violation of EU sanctions The Council and the European Parliament concluded their negotiations for an EU law which introduces criminal offences and penalties for the violation of EU sanctions. This directive ensures that those who violate or circumvent EU sanctions will be prosed ted. This gains particular importance in the context of the Russian war of aggresion against Ukraine. The law lays down that member states will need to define certain actions is criminal offences. These include: -helping persons subject to EU restrictive measures to bypass a trave, ban -trading sanctioned goods and running transactions with states or antities which are hit by EU restrictive measures -providing financial services or performing financial activities which are prohibited or restricted -covering up the ownership of funds or economic resources by a person entity or body which is sanctioned by the EU Inciting, aiding and abetting these offences will also be punishable as a crime. Trade with war material would constitute a criminal offence not only when committed intentionally but also if committed with serious negligence. The Council and the European Parliament negotiators have agreed that legal persons (e.g. companies) can also be held liable for the offences defined in this directive. This yould be the case when such an offence has been committed - to their benefit - by a person with a leading position in the organisation. Legal persons who violate restrictive measures would have to face sanctions which include the disqualification of business activities and the withdrawal of permits and authorisations to pursue their economic activities. https://www.consilium.europa.eu/en/pross/pross-releases/2023/12/12/council-and-parliament-reach-political- agreement-to-criminalise-violation of eu-sanctions/
96			Author: Ion Radu https://www.linkedin.com/in/ion-radu-aml/
97	*) Note: all property and interests in property of the designated individuals and entities that are in the United States or in the possession or control of U.S. persons must be blocked and reported to OFAC. In addition, any entities that are owned, directly or indirectly, 50 percent or more by one or more blocked persons are also blocked. OFAC's regulations generally prohibit all dealings by U.S. persons or within the United States (including transactions transiting the United States) that involve any property or interests in property of designated or otherwise blocked persons.		