

S.C. AS Financial Markets S.R.L. România, Sibiu, 550400, P-ţa Crişan, nr.1 Nr. O.R.C. J32/493/31.05.2013, CUI RO31725262

	#		Source	KYC/AML/CFT/Financial Sanctions The most important events of the period 16/02/2024 - 29/02/2024 Autor : Ion P
	1	1	<u>ل</u>	Emerging trends and risks
	2	1	NL DE CA	[23/February/2024] Joint financial intelligence advisory: illegal procurement of dual-use goods by Russian end-users The financial intelligence units of the Netherlands (FIU-NL), Germany (FIU DE), and Canada (FINTRAC) received reports from a variety of source attempted export, of dual-use goods to Russian end-users in violation of current sanctions or export control-related legislation. The purpose of t recognizing financial transactions and other related activity that is suspected of being related to the purchase of dual-use goods for illegal export generated by this activity and includes: A description of how threat actors and products might be identified. An overview of financial and contextual indicators relevant to the illicit dual-use trade. Case studies illustrating common dual-use good sanction evasion and/or export control evasion typologies. This Advisory reinforces ongoing multilateral engagements and initiatives between our respective jurisdictions designed to further constrain and needed technology and goods to supply and replenish its military and defense industrial base. https://www.fiu-nederland.nl/en/knowledge_base/joint-financial-intelligence-advisory-illegal-produrement of dual-use-goods-by-russian-end-use
F	3	2	۵	Warnings and reports, thematic analyzes of national and international authorities
	4	2		[23/February/2024] STUDY - Legal options for confiscation of Russian state assets to support the reconstruction of Ukraine This report analyses the options under international law for the confiscation of Russian state assets to support Ukraine's reconstruction. It focuse which are frozen in various jurisdictions. The report considers four avenues for overcoming Russia's immunity from enforcement: avoidance of in action; justification for the breach of international law on the grounds that it is a countermeasure; evolution of international law to lift immunity aggression by a United Nations principal organ; and an exception in international law for the enforcement of international judgments. The report countermeasures and collective self-defence. It assesses six options under current review: enforcement of European Court of Human Rights judg compensation commission; taxing windfall contributions; placing Russian state assets into an escrow account as collateral; identifying Russia as of an investment 'common fund'. In conclusion, the report presents a risk assessment of each option, noting that (i) confiscation based on third- and (ii) confiscation based on the enforcement of international judgments against Russia are most likely to comply with international law. https://www.europarl.europa.eu/RegData/etudes/STUD/2024/759602/EPRS_STU(2024)759602_EN.pdf
	5	2	European and	[23/February/2024] Risks and Considerations for Doing Business in the Russian Federation and Russia-Occupied Territories of Uk The United States assesses that doing business in the Russia Federation and in Russia-occupied territories of Ukraine poses serious legal, financ risk severe civil and criminal penalties in navigating the raft of economic sanctions, export controls, and import restrictions imposed on Russia b Although any decisions—including whether and how to continue operations, suspend commercial operations, or exit the Russian market, in acco requirements—are ultimately up to businesses, individuals, and organizations, the U.S. government wants to highlight risks associated with doir the areas it occupies in Ukraine.
	6	2	UK	[22/February/2024] Deter, Disrupt and Demonstrate – UK sanctions in a contested world : UK sanctions strategy This strategy explains how UK uses sanctions as a foreign and security policy tool and the continued investment, partnerships and structures that https://assets.publishing.service.gov.uk/media/65d720cd188d770011038890/Deter-disrupt-and-demonstrate-UK-sanctions-in-a-contested-wor



prevent the Russian Federation from accessing

sers/

es on Russian Central Bank assets, US\$300 billion of mmunity through purely executive or legislative from enforcement upon, for example, a finding of t addresses proposals based on third-party gments; an international treaty setting up a a state sponsor of terrorism; and the establishment party countermeasures with a conditional element

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ial, and reputational risks. Businesses increasingly by the United States and its allies and partners. rdance with applicable statutory and regulatory ng business in or linked to the Russian Federation or

at support the progarmmes of sanctions.

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			[17/February/2024] SARs REPORTER BOOKLET February 2024
7	2	UK	The report presents case studies related to money mule, multiple accounts held by the business, which frequently received high value payments, and cash deposits inconsistent with the nature of the business.
			https://www.nationalcrimeagency.gov.uk/who-we-are/publications/700-sars-reporter-booklet-february-2024/file
8	3	¢	Terrorism and International Sanctions updates
			OFAC-Specially Designated Nationals and Blocked Persons (SDN) List https://www.treasury.gov/ofac/downloads/sdnlist.pdf
9	3	US	OFAC-Sectoral Sanctions Identifications (SSI) List https://www.treasury.gov/ofac/downloads/ssi/ssilist.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
10	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
11	3	UN	United Nations Security Council Consolidated List
	3	UN	https://scsanctions.un.org/consolidated/
			[28/February/2024] OFAC - Counter Narcotics Designations, Designation Update, and Designations Removals
12	3	US	The SDN* list has been updated (added) with 3 individuals and 4 entities related to Deputy Commander of Iran's Islamic Revolutionary Guard Co Falahzadeh, as well as Houthi group members.
			https://ofac.treasury.gov/recent-actions/20240228
			[27/February/2024] OFAC - Counter Terrorism Designations; Iran-related Designations
13	3	US	The SDN* list has been updated (added) with 2 individuals, 3 entities and 2 vessels related to Deputy Commander of Iran's Islamic Revolutionary Reza Falahzadeh, as well as a Houthi group member.
			https://ofac.treasury.gov/recent-actions/20240227
			[27/February/2024] COUNCIL IMPLEMENTING REGULATION (EU) 2024/768 implementing Article 8a of Regulation (EC) No 765/20 the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine
14	3	EU	The entries relating to 21 natural and 2 legal persons included in the list of natural and legal persons, entities and bodies subject to restrictive me 765/2006 have been amended.
			https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024R0768
			[27/February/2024] COUNCIL IMPLEMENTING REGULATION (EU) 2024/757 implementing Regulation (EU) 2016/44 concerning re Libya
15	3	EU	1 private individual has been replaced in the Annex II to Regulation (EU) 2016/44
			https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024R0757

, frequent high value transfers of unknown origin
orps-Qods Force (IRGC-QF), Mohammad Reza
y Guard Corps-Qods Force (IRGC-QF), Mohammad
006 concerning restrictive measures in view of
easures set out in Annex I to Regulation (EC) No
estrictive measures in view of the situation in

16	3	US	[23/February/2024] OFAC - Russia-related Designations; Issuance of Russia-related General Licenses The SDN* list has been updated (added) with 57 individuals, 484 entities and 12 vessels https://ofac.treasury.gov/recent-actions/20240223_33
17	3	US	[23/February/2024] OFAC - Russia-related Designations; Issuance of Russia-related General Licenses and new and amended Free The SDN* list has been updated (added) with Joint Stock Company Sovcomflot, Russia's largest state-owned shipping company and fleet operate listed 14 crude oil tankers as property in which Sovcomflot has an interest. https://ofac.treasury.gov/recent-actions/20240223_33
18	3	EU	[23/February/2024] COUNCIL IMPLEMENTING REGULATION (EU) 2024/753 implementing Regulation (EU) No 269/2014 concern undermining or threatening the territorial integrity, sovereignty and independence of Ukraine 106 persons and 88 entities responsible for actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine persons, entities and bodies subject to restrictive measures set out in Annex I to Regulation (EU) No 269/2014. (part of 13th package) https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024R0753
19	3	EU	 [23/February/2024] COUNCIL REGULATION (EU) 2024/745 amending Regulation (EU) No 833/2014 concerning restrictive measusituation in Ukraine -27 new entities have been added to the list of legal persons, entities and bodies set out in Annex IV to Decision 2014/512/CFSP, namely the list Russia's military and industrial complex in its war of aggression against Ukraine, on which tighter export restrictions regarding dual-use goods ar which might contribute to the technological enhancement of Russia's defence and security sector; -expands the list of controlled items which contribute to Russia's military and technological enhancement or to the development of its defence and development and production of unmanned aerial vehicles; -further restrictions on exports of goods which contribute in particular to the enhancement of Russian industrial capabilities; -added UK in the list of partner countries which apply a set of restrictive measures on imports of iron and steel and a set of import control measure Regulation (EU) No 833/2014. (part of 13th package) https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OI:L_202400745
20	3	EU	[20/February/2024] Council Implementing Regulation (EU) 2024/739 of 22 February 2024 implementing Regulation (EU) 2023/8 actions destabilising the Republic of Moldova 6 persons and 1 entity have been added to the list of natural and legal persons, entities and bodies set out in Annex I to Regulation (EU) 2023/88 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024R0739
21	3	EU	[20/February/2024] COUNCIL DECISION (CFSP) 2024/633 amending Decision (CFSP) 2022/266 concerning restrictive measures occupation or annexation by the Russian Federation of certain non-government controlled areas of Ukraine The restrictive measures contained in Decision (CFSP) 2022/266 have been renewed for a further 12 months, until 24 February 2025. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024D0633

uently Asked Questions

or. In addition to designating Sovcomflot, OFAC

ing restrictive measures in respect of actions

have been added to the list of natural and legal

ares in view of Russia's actions destabilising the

of persons, entities and bodies directly supporting nd technology, as well as goods and technology

nd security sector by adding components for the

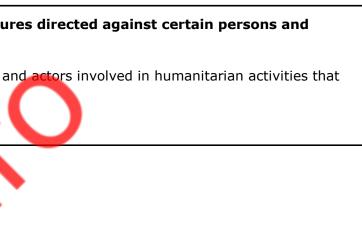
ares that are substantially equivalent to those in

388 concerning restrictive measures in view of

88.

in response to the illegal recognition,

			[20/February/2024] COUNCIL REGULATION (EU) 2024/669 amending Regulation (EC) No 2580/2001 on specific restrictive measu entities with a view to combating terrorism
22	3	EU	A humanitarian exemption under United Nations Security Council Resolution 2664 (2022), an additional exemption mechanism for organisations are not eligible for this humanitarian exemption, and a review clause on these exemptions are added.
			https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024R0669
			[20/February/2024] OFAC - Cyber-related Designations
23	3	US	The SDN* list has been updated (added) with 2 individuals affiliated of the Russia-based ransomware group LockBit.
			https://ofac.treasury.gov/recent-actions/20240220
			[20/February/2024] SC/15597 concerning the Democratic Republic of the Congo
24	3	UN	Security Council Committee established pursuant to resolution 1533 (2004) concerning the Democratic Republic of the Congo approved the addit individuals and entities subject to the measures imposed by the Security Council and adopted under Chapter VII of the Charter of the United Nati
			https://press.un.org/en/2024/sc15597.doc.htm
			[17/February/2024] Justice Department Transfers Approximately \$500,000 in Forfeited Russian Funds to Estonia for Benefit of Uk
25	3	US	The funds were forfeited (an Estonia-based company was involved) by the United States following the breakup of an illegal procurement network U.Sorigin machine tool with uses in the defense and nuclear proliferation sectors. This transfer is the first of its kind from the United States to a Ukraine.
			https://www.justice.gov/opa/pr/justice-department-transfers-approximately-500000-forfeited-russian-funds-estonia-benefit
			[16/February/2024] OFAC -Guidance for the Provision of Humanitarian-Related Assistance and Critical Commodities to the Yemer
26	3	US	The shipping of commercial goods into ports and airports in Houthi-controlled areas, including transactions normally incident to such shipments (shipments that were not prohibited prior to the designation of Ansarallah, such as shipments of food and other commodities to the Yemeni people relief is available for private sector shippers as well as nongovernmental and humanitarian actors.
			https://ofac.treasury.gov/media/932621/download?inline
			[16/February/2024] OFAC - Counter Terrorism Designation
27	3	US	The SDN* list has been updated (added) with 1 entity, the ANSARALLAH (a.k.a. ANSAR ALLAH; a.k.a. ANSARULLAH; a.k.a. "HOUTHI GROUP"; a. GOD"), Yemen.
			https://ofac.treasury.gov/recent-actions/20240216
28	4	Q	EU ML/TF SupraNational Risk Assessment
			EBA Opinion on money laundering and terrorist financing risks across the EU was published on [13/July/2023]
29	4	EBA	https://www.eba.europa.eu/sites/default/documents/files/document_library/Publications/Opinions/2023/1058335/EBA%20Op%202023%2008% P%202023%2021.pdf
			The EU report of the risk of money laundering and terrorist financing affecting the internal market and relating to cross-border activities (EU SNF
30	4	EU	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52022DC0554 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52022SC0344
31	5	¢	Information and assessments by national authorities on risks at national level



ion of 6 individuals to its Sanctions List of ons.

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A attempting to import into Russia a high-precision, a foreign ally for the express purpose of assisting

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e.g., port fees), is not prohibited. Commercial e, are not covered by these new sanctions. This

k.a. "PARTISANS OF GOD"; a.k.a. "SUPPORTERS OF

200pinion%20on%20MLTF%20risks%20EBA%20RE

RA) was issued on [27/October/2022]

		ROMANIA	The main findings and conclusions of the Romania ML/TF National Risk Assessment (NRA) was published on [22/November/2022]
32	5		RO: http://www.onpcsb.ro/pdf/Rezumat%20NRA%20Public.pdf EN: http://www.onpcsb.ro/pdf/Summary%20of%20the%20National%20Risk%20Assessment%20Report%20on%20Money%20Laundering%20ark
33	6	Q	Specific guidelines, guides, instructions or warnings
			[28/February/2024] OFSI refreshes its guidance for the maritime sector The refreshed guidance covers new tactics used by illicit actors to evade UK financial sanctions. By understanding these tactics, businesses can a
34	6	UK OFSI	potential risks. It also offers support for dealing with high-risk jurisdictions and provides links to relevant UK regulations. Additionally, the guidance offers recommendations for implementing additional due diligence practices, which are essential for building robust co
			https://ofsi.blog.gov.uk/2024/02/28/ofsi-refreshes-its-guidance-for-the-maritime-sector/
			[26/February/2024] Public Consultation on Recommendation 16 on Payment Transparency
			The Financial Action Task Force (FATF) is considering revisions to Recommendation 16 (R.16), its Interpretive Note (INR.16) and the related Glos in payment business models and messaging standards.
35	6	FATF	R.16/INR.16 needs to be updated to ensure that the FATF Standards remain technology-neutral and follow the principle of 'same activity, same r to help make cross-border payments faster, cheaper, more transparent and inclusive whilst remaining safe and secure; an objective that is part o
			https://www.fatf-gafi.org/content/fatf-gafi/en/publications/Fatfrecommendations/R16-public-consultation-Feb24.html
36	6	EU	[19/February/2023] European Commission updated FAQs related to the Russia sanctions regime. The updates cover: 22 February 2024 : "No re-export to Russia" clause - FAQs on sanctions against Russia and Belarus, with focus on the following provision: Article 19 February 2024 : Tanker sales - FAQs on sanctions against Russia and Belarus, with focus on the following provision: Article
			https://finance.ec.europa.eu/eu-and-world/sanctions-restrictive-measures/sanctions-adopted-following-russias-military-aggression-against-ukra russia_en https://finance.ec.europa.eu/document/download/66e8fd7d-8057-4b9b-96c2-5e54bf573cd1_en?filename=faqs-sanctions-russia-consolidated_en
37	7	\bigcirc	Warnings, fines and convictions for violating the KYC/AML/CTF/FiSa/Compliance legislation in financial market
38	7	US Department of Financial Services	[28/February/2024] Gemini Trust Company, LLC to Return at Least \$1.1 Billion to Earn Program Customers and also pay a \$37 mi
		Services	https://www.dfs.ny.gov/reports and publications/press releases/pr202402282
			[23/February/2024] S.S.I.F. BRK Financial Group S.A. fined 76.950 RON (Decision no.182) for the following breaches: The Compliance Officers of S.S.I.F. BRK Financial Group S.A. fined 18.300 RON (Decision no.185) and 1.900 RON (Decision no.19
			-failure to comply with the provisions of art. 28 para. (3) e) A.S.F. Regulation no. 13/2019 in relation to obtaining the source of funds for 2 client appropriate risk class
39	7	RO ASF	-non-compliance with the provisions of art. 17 para. (1) of Law no. 129/2019 in correlation with the provisions of art. 4 and art. 27 para. (1), of a 3 clients in high risk due to adverse media information
			https://asfromania.ro/uploads/articole/attachments/65d88fec36393972205552.pdf
			https://asfromania.ro/uploads/articole/attachments/65d8917d85711388926161.pdf

nd%20Terrorism%20Financing.pdf

djust their compliance measures to stay ahead of

mpliance programs and minimising risks.

ssary of specific terms, to adapt them to the changes

risk, same rules'. These proposed revisions also aim of the G20 Priority Action Plan.

e 12g of Council Regulation (EU) No 833/2014. gulation (EU) No 833/2014.

aine/frequently-asked-questions-sanctions-against-

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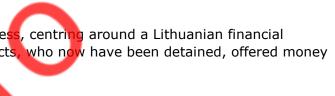
illion penalty for multiple compliance failures

1) for the following breaches:

its in order to correctly classify them in the

A.S.F. Regulation no. 13/2019 in relation to rating

40	8	<u></u>	Law enforcement actions for money laundering and international sanctions crimes
41	8	EUROJUST	[27/February/2024] Full-scale action against EUR 2 billion money laundering network via Lithuanian financial institution. Judicial and law enforcement authorities in Italy, Latvia and Lithuania have taken concerted action against a large-scale money laundering busine institution. Since 2017, an estimated EUR 2 billion has been laundered by two main suspects via a worldwide web of shell companies. The suspect laundering online as a service to criminals. https://www.eurojust.europa.eu/news/full-scale-action-against-eur-2-billion-money-laundering-network-lithuanian-financial
42	8	US DOJ	[23/February/2024] Oil and Gas Trader Convicted for Role in Foreign Bribery and Money Laundering Scheme An oil and gas trader was convicted for his role in a scheme to bribe Ecuadorean and Mexican government officials and to launder money to secur his then-employer, Vitol Inc. (Vitol), the U.S. affiliate of the largest independent energy trading firm in the world. According to court documents a of Houston, paid more than \$1 million in bribes to officials of Petroecuador, the Ecuadorean state-owned oil and gas company, and PEMEX Procur the Mexican state-owned oil and gas company, to obtain lucrative contracts for Vitol. https://www.justice.gov/opa/pr/former-oil-and-gas-trader-convicted-role-foreign-bribery-and-money-laundering-scheme
43		US DOJ	[22/February/2024] Sanctioned Russian Oligarch And Others Indicted For Sanctions Violations And Money Laundering The President and Chairman of a Russian state-owned bank, ANDREY KOSTIN, was charged in participating in two separate schemes that violated https://www.justice.gov/usao-sdny/pr/sanctioned-russian-oligarch-and-others-indicted-sanctions-violations-and-money_
44	8	US DOJ	[21/February/2024] Former San Antonio Lawyer Sentenced to 50 Years for Wire Fraud, Money Laundering Former San Antonio Attorney Christopher John Pettit, 56, was sentenced to 50 years in prison for fraud and money laundering. For more than tw misrepresentations that persuaded his clients to deposit money with his firm, Chris Pettit and Associates, PC, which funds the clients believed we irrevocable trusts, estate planning services, investments, and real-estate transactions, but which Pettit instead misused for his own enrichment a Pettit opened trustee accounts with client funds and simply moved the money to his own accounts, rather than using the funds for the benefit of promising to invest client money in high percentage bonds and instead wiring the funds to his personal account. He also falsely represented hims estate exchange, which he used to convince clients to wire millions of dollars from asset sales into accounts he controlled and then misused for h clients' funds to pay other client debts as well as to support an extravagant lifestyle. The schemes resulted in an estimated loss to the victims of guilty to three counts of wire fraud and three counts of money laundering. https://www.justice.gov/usao-wdtx/pr/former-san-antonic-lawyer sentenced-50-years-wire-fraud-money-laundering.
45	8	EUROPOL	[21/February/2024] Over 100 searches and 4 arrests in France, Germany, Italy, Latvia and Malta against financial institution invo National authorities in France, Germany, Italy, Latvia and Malta have carried out over 100 searches in a large-scale operation against a Russian- financial institution allegedly involved in money-laundering services. Four suspects were detained during an action day supported by Europol and also interviewed in Estonia, Germany, Latvia and Malta. The Maltese financial institution laundered at least EUR 4.5 million in proceedings from c laundered money could amount to tens of millions of euros. The financial institution and organised crime group (OCG) behind it offered money-la and individuals who were registered directors, without performing any real business activities. The OCG operated mainly from Riga and Berlin. https://www.europol.europa.eu/media press/newsroom/news/over-100-searches-and-4-arrests-in-france-germany-italy-latvia-and-malta-agains



re contracts worth hundreds of millions of dollars for and evidence presented at trial, Javier Aguilar, 49, rement International (PPI), a subsidiary of PEMEX,

d U.S. sanctions.

wo decades, Pettit made numerous buld be used for services such as living trusts, and as part of a Ponzi-type scheme. In one scheme, the trust. Other fraudulent schemes included falsely self as a Qualified Intermediary for a 1031 realhis own enrichment. Pettit would use his victimized between \$20 million and \$65 million. Pettit pleaded

lved in money laundering

Eurasian criminal network and a Maltese-based I Eurojust. Potential suspects and witnesses were criminal activities since end of 2015. The total sum of aundering services via a network of fake enterprises

st-financial-institution-involved-in-money

4	6	8	EUROPOL	[20/February/2024] Law enforcement disrupt world's biggest ransomware operation Law enforcement from 10 countries have disrupted the criminal operation of the LockBit ransomware group. 34 servers were takedown in the Net Australia, the United States and the United Kingdom. More than 200 cryptocurrency accounts linked to the criminal organisation have been frozer and Ukraine at the request of the French judicial authorities. Three international arrest warrants and five indictments have also been issued by th https://www.europol.europa.eu/media-press/newsroom/news/law-enforcement-disrupt-worlds-biggest-ransomware-operation
4	7	9	¢	Threats, alerts and typologies
4	8			Nothing relevant during this period
4	9 1	LO		Corruption Perception Indices and Country Reports
5	;0 1	LO	Transparency International	2023 Corruption Perceptions Index has been released on [30/January/2024] The 2023 Corruption Perceptions Index (CPI) was published by Transparency International. The global average remains unchanged for over a dec countries score below 50, while 23 countries have fallen to their lowest scores yet. Here is the score for some relevant countries from each risk cla Lithuania 61(=); Malta 51(=); Romania 46(4=); Moldova 42(+3); Pakistan 29(+2); Somalia 11(-1) ranked last. The average score of Western E Hungary 42(=). The biggest changes have been registered by Afghanistan 20 dropped the most (-4) and Egypt 35 increased the most (+5). <u>https://images.transparencycdn.org/images/CPI-2023-Report.pdf</u>
5	1 1	11	¢	Mutual evaluation reports or lists of states or jurisdictions that have KYC/AML/CTF deficiencies
5	52 1	11	FATF	[28/February/2024] 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 https://www.fatf-gafi.org/content/fatf-gafi/en/publications/Mutualevaluations/Assessment-ratings.html
5	3 1	11	FATF	[28/february/2024] Russian Federation's progress in strengthening measures to tackle money laundering and terrorist financing This report is an analysis of the results achieved by the Russian Federation* between October 2019 and July 2023 in addressing the technical con report. The country has been re-rated on the following Recommendations. Recommendation 6 has been re-rated from partially compliant to largely compliant. Recommendation 7 has been re-rated from partially compliant to largely compliant. Recommendation 25 has been re-rated from partially compliant to largely compliant. Recommendation 15 has been re-rated from compliant to partially compliant. Recommendation 15 has been re-rated from compliant to partially compliant.
5	;4 1	11	FATF	[27/February/2024] British Virgin Islands' measures to combat money laundering and terrorist financing The overall understanding of money laundering (ML) and terrorist financing (TF) risks in the VI is fair and narrow, particularly with respect to the and their misuse abroad. The relevant authorities and key reporting institutions broadly view the illicit activities of the foreign beneficial owners a do not consider that VI entities are directly involved in such activities. This understanding of the risks that VI entities play in the layering and inter cascading negative effects on the overall effectiveness of the AML/CFT system. https://www.fatf-gafi.org/content/dam/fatf-gafi/fsrb-mer/BVI-CFATF-MER-2024.pdf.coredownload.inline.pdf



cade at just 43 out of 100. More than two-thirds of class : Denmark 90(=) ranked first; Austria 71(=); Europe&EU is 65, with max Denmark 90(=) and min

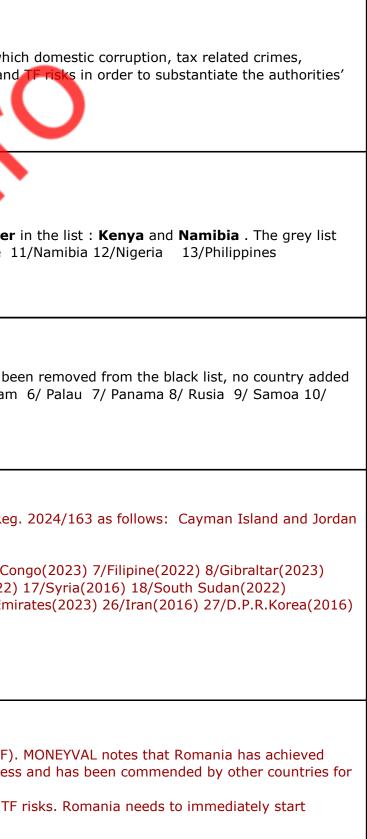
the 40 reccomandations.

mpliance deficiencies noted in the mutual evaluation

e design of VI legal persons and legal arrangements, as having an insufficient nexus with the territory and egrating phase of ML and TF activities abroad has

			https://www.fatf-gafi.org/content/dam/fatf-gafi/fsrb-mer/Azerbaijan-MER-2023.pdf.coredownload.inline.pdf [23/February/2023] FATF has updated the high risk countryies lists
56	11	FATF	 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: Barbados, Gibraltar, Uganda and United Arab Emirates exit; enter contains 21 countries : 1/Bulgaria 2/Burkina Faso 3/Cameroon 4/Congo D.R. 5/Croatia 6/Haiti 7/Jamaica 8/Kenya 9/Mali 10/Mozambique 14/Senegal 15/South Africa 16/South Sudan 17/Syria 18/Tanzania 19/Turcia 20/Vietnam 21/Yemen https://www.fatf-gafi.org/en/publications/High-risk-and-other-monitored-jurisdictions/Increased-monitoring-february-2024.html
			[20/February/2024] EU has updated the list of non-cooperative jurisdictions for tax purposes
57	11	EU	The EU list of non-cooperative jurisdictions for tax purposes has been updated. Bahamas, Belize, Seychelles and Turks and Caicos Islands have b to the black list - Annex I. The black list contains the following countries: 1/ American Samoa 2/ Anguila 3/ Antigua & Barbuda 4/ Fiji 5/ Gua Trinidad & Tobago 11/ US Virgin I. 12/ Vanuatu. For the grey list see Annex II
			https://www.consilium.europa.eu/media/70365/st06776-en24.pdf
			The EU list of high-risk third countries with strategic deficiencies has been updated on [18/January/2024] The Commission Delegated Regulation (EU) 2016/1675 regarding high-risk third countries with strategic deficiencies has been updated by C.D.Re exit ; NO entries:
58	11	EU	The list contains 27 countries : 1/Afghanistan(2016) 2/South Africa (2023) 3/Barbados(2020) 4/Burkina Faso(2022) 5/Cameroon(2023) 6/D.R.C 9/Haiti(2022) 10/Jamaica(2020) 11/Mali(2022) 12/Myanmar(2020) 13/Mozambique(2023) 14/Nigeria(2023) 15/Panama(2020) 16/Senegal(2022) 19/Trinidad and Tobago(2018) 20/Tanzania (2023) 21/Uganda(2016) 22/Vanuatu(2016) 23/Vietnam(2023) 24/Yemen(2016) 25/United Arab Er
			https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016R1675 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024R0163
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			Romania MONEYVAL Mutual Evaluation Report [18/July/2023]
59	11	Moneyval	The report provides a comprehensive assessment of the country's level of compliance with standards set by the Financial Action Task Force (FATF moderate levels of effectiveness in all areas assessed except for international cooperation, where it has achieved a substantial level of effectivenes its constructive assistance.
59	11	Moneyval	The report provides a comprehensive assessment of the country's level of compliance with standards set by the Financial Action Task Force (FATE moderate levels of effectiveness in all areas assessed except for international cooperation, where it has achieved a substantial level of effectivenes 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 T





61 12 OCCRP one of the ways this is accomplished — a scheme known as "lake transit" that base advantage of lighter or non-existent stanctions again across national borders with no customs checks. https://www.occrp.org/en/investigations/in-false-transit-loophole-nussiae-war-machine-is-supplied-through-kazakh-companies-and-bela 62 12 ICIJ ICIJ In 2022, the U.S. Internal Revenue Service neceived a histonic infusion of S80 billion, partly to bilk up the beleaguered agency's upartly bave sought to claw back the new funding. https://www.icil.org/article/inside-the-irs-unit-taking-on-americas-millionaires and billionaires/ 63 12 UK RUST [20/February/2024] The Threat from Russia's Unconventional Warfare Beyond Ukraine, 2022-24. This report details Russia's unconventional willion concepts. Wills achowledging the significant of the guidant of the RUS on the RUS and the RUM is a subgrafed by Normation warfare can ad action proments of Russia's unconventional Warfare Beyond Ukraine, 2022-24. This report details Russia's unconventional williary activities outside Ukraine, including efforts to prepare for detabilistion in European of critical resources, and outreach to target audiences in the Middle East. Influence operations subgrafed by Normation warfare and action proments of Russia's unconventional Warfare Beyond Ukraine, 2022-24. This report details Russia's unconventional warfare concepts. Wills achowledging the significant of the guidant time report of critical resources, and outreach to target audiences in the Middle East. Influence operations subgrafed by Normation warfare and acti moving subgrafed by Normation warfare and acti advalues activity. Significant of the guidant time report of the Russia's unconventional weap conceaps. Wills achowledging th				[21/February/2024] In "False Transit' Loophole, Russia's War Machine Is Supplied Through Kazakh Companies and Belarusian Wa
62 12 ICIJ ICIJ ICIJ In 2022, the U.S. Internal Revenue Service received a historic infusion of \$80 billion, partly to bulk up the beleaguered agency's upperly some early wins, including opening 1,600 new cases against millionaires and billionaires last year and recouping several hundred million have sought to claw back the new funding. 63 12 UK RUSI [20/February/2024] The Threat from Russia's Unconventional Warfare Beyond Ukraine, 2022-24 63 12 UK RUSI [20/February/2024] The Threat from Russia's Unconventional Warfare Beyond Ukraine, 2022-24 64 13 Components of Russia's unconventional military activities outside Ukraine, including efforts to prepare for denabilitation in European for dricial resources, and outcase, and outcase, within the Main Directorate of the General Staff of the Armed Fortes of the Buisan Federation (the GRU). https://static.rusi.org/SR-Russian-Unconventional-Weapons-final-web.pdf 64 13 Components of Russia's unconventional-Weapons-final-web.pdf 65 Nothing of relevance during this time period 66 14 Relevant Information on ML/FT risks from mass - media 67 14 Mass-media 68 14 Mass-media 68 14 Mass-media 69 14 Relevant Information on ML/FT risks from mass - media 67 14 Mass-media <td>6</td> <td>1 12</td> <td>OCCRP</td> <td>Countries around the world have imposed sanctions intended to cripple Russia's ability to wage war, but the flow of high-tech foreign goods into t one of the ways this is accomplished — a scheme known as "false transit" that takes advantage of lighter or non-existent sanctions against two of and Belarus. Both countries are members of the Eurasian Economic Union, a Russian-led trade bloc that integrates the economies of five former S across national borders with no customs checks.</td>	6	1 12	OCCRP	Countries around the world have imposed sanctions intended to cripple Russia's ability to wage war, but the flow of high-tech foreign goods into t one of the ways this is accomplished — a scheme known as "false transit" that takes advantage of lighter or non-existent sanctions against two of and Belarus. Both countries are members of the Eurasian Economic Union, a Russian-led trade bloc that integrates the economies of five former S across national borders with no customs checks.
62 12 ICIJ In 2022, the U.S. Internal Revenue Service received a historic infusion of \$80 billion, partly to bulk up the beleaguered agency's partly have sought to claw back the new funding. https://www.icij.org/article/inside-the-ins-unit-taking-on-americas-millionaires-and-billionaires/ 63 12 UK RUST Improvement of the second the instance of the second the sec				https://www.occrp.org/en/investigations/in-false-transit-loophole-russias-war-machine-is-supplied-through-kazakh-companies-and-belarusian-wa
62 12 ICJ some early wins, including opening 1,600 new cases against millionaires and billionaires tast year and recouping several huadred million have sought to daw back the new funding. https://www.icj.org/article/inside-the-irs-unit-taking-on-americas-millionaires-and-billionaires/ I2 IX RUST I2 (2/February/2024] The Threat from Russia's Unconventional Warfare Beyond Ukraine, 2022-24. This report details Russia's unconventional military activities outside Ukraine, including efforts to prepare for de tabilitation in European of critical resources, and outreach to target audiences in the Middle East. Influence operations supported by troimation warfare and acti components of Russia's unconventional warfare concepts. While acknowledging the significance of the Wule include incluties, while exclusing in the significance of the Wule include incluties. This report focal resources, and outreach to target audiences in the Middle East. Influence operations supported by troimation warfare and acti components of Russia's Unconventional warfare concepts. While acknowledging the significance of the Bulle activities, while exclude support details and activities outside Ukraine. The formation of the GRU, https://static.rusi.org/SR-Russian-Unconventional warfare concepts. While acknowledging the significance of the Bulle in the GRU. I4 I4 I4 I4 I4 I5 I5<td></td><td></td><td></td><td>[21/February/2024] Inside the IRS unit taking on America's millionaires and billionaires</td>				[21/February/2024] Inside the IRS unit taking on America's millionaires and billionaires
63 12 UK RUST [20/February/2024] The Threat from Russia's Unconventional Warfare Beyond Ukraine, 2022-24. 63 12 UK RUST [20/February/2024] The Threat from Russia's Unconventional Wille East. Influence operations supported by Normation warfare and action of critical resources, and outreach to target audiences in the Mildle East. Influence operations support db Normation warfare and action components of Russia's unconventional warfare concepts. While acknowledging the significant or thinke widen activities, this report focus particular spotlight on changes within the Main Directorate of the General Staff of the Armed Forks of the Russian Federation (the GRU). https://static.rusi.org/SR-Russian-Unconventional-Weapons-final-web.pdf 64 13 Information from statistical organizations and academia & others Nothing of relevance during this time period Relevant information on ML/FT risks from mass - media (28/February/2024] Man Who Laundered Billions in Bitcoins Says Bitcoin Fog Was a Help: Bloomberg Ilya Lichtenstein - known for the multi-billion Bithinex hack on theories worth 93.6 billion when he pleaded guilty to more laundering of the accused operator of the mixing service associated wirm earking on minality https://www.coindesk.com/policy/2024/02/27/man-who-nundere/-billions-in-bitcoins-says-bitcoin-fog-was-a-help-bloomberg/ 68 14 Mass- media Treasury Secretary Janet Yellen on Tuesday offere of the strongest public support yet for the idea of lightaking roughly \$300 billion in froz 68 14 Mass- media Treasury Secretary Janet Y	6	2 12	ICIJ	In 2022, the U.S. Internal Revenue Service received a historic infusion of \$80 billion, partly to bulk up the beleaguered agency's capacity to audit some early wins, including opening 1,600 new cases against millionaires and billionaires last year and recouping several hundred million dollars in have sought to claw back the new funding.
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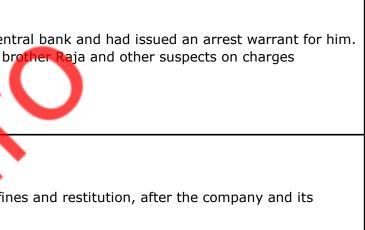
t America's ultra-rich. The IRS has since touted in unpaid taxes as a result. Meanwhile, Republicans

s, expeditionary operations in Africa to seize control ures exploited by agents of influence are core ussia's military unconventional activities, with a

e of the mixing services he said he'd used to conceal r – appeared this week in a Washington, D.C., trial

ian Central Bank assets and using them for g roughly \$300 billion in frozen Russian Central ic Prosperity and Opportunity for Ukrainians Act ed a law to set aside windfall profits generated from

69	14	Mass- media	[27/February/2024] German prosecutors confirm arrest warrant for former Lebanon cenbank chief German prosecutors confirmed for the first time that they were conducting money laundering investigations into the former head of Lebanon's central ban The Munich public prosecutor's office said it was investigating Riad Salameh, Lebanon's central bank chief from 1993 to 2023, together with his brother R including forgery, money laundering and embezzlement. https://uk.news.yahoo.com/german-prosecutors-confirm-probe-former-152939442.html
70	14	Mass- media	[23/February/2024]Judge Approves Binance's \$4.3 Billion Settlement For Anti-Money Laundering, Sanctions Violations A federal judge approved a plea deal by Binance on Friday, requiring the beleaguered cryptocurrency exchange to pay more than \$4.3 billion in fines and r founder Changpeng Zhao pleaded guilty late last year to breaking anti-money laundering laws and violating sanctions. https://www.forbes.com/sites/tylerroush/2024/02/23/judge-approves-binances-43-billion-settlement-for-anti-money-laundering-sanctions-violations/
71	14	Mass- media	[22/February/2024] US charges head of Russia's VTB Bank for sanctions violations The United States charged the CEO of Russian-state owned VTB Bank Andrey Kostin and two U.Sbased associates with sanctions violations as part of a fl Russia two years after it invaded Ukraine. Kostin, who was sanctioned by the United States in 2018, is accused of money laundering and sanctions violations worth more than \$135 million and a home in the resort town of Aspen, Colorado, according to an indictment in Manhattan federal court. Two associates, V arrested in the United States on charges of helping to take care of the \$12 million Colorado property while concealing that Kostin owned it, U.S. Justice De https://www.reuters.com/business/finance/us-charges-head-russias-vtb-bank-sanctions-violations-2024-02-22/
72	14	Mass- media	[23/February/2024]Former FTX exec Ryan Salame to be sentenced on May 1 Ryan Salame, the former co-CEO of FTX Digital Markets who pleaded guilty to two felony counts, will be sentenced in a New York courtroom on May 1. Acc the United States District Court for the Southern District of New York, Salame will appear before Judge Lewis Kaplan on May 1 to face sentencing related t cryptocurrency exchange FTX. In September 2023, the former FTX executive pleaded guilty to one count of making unlawful political contributions and one unlicensed money-transmitting business. Salame was charged in the same case as former FTX CEO Sam "SBF" Bankman-Fried, former Alameda Research Wang and former FTX engineering director Nishad Singh. https://cointelegraph.com/news/ftx-exec-ryan-salame-sentencing
73	14	Mass- media	[22/February/2024] Regulator probes money laundering controls at Austria's Raiffeisen Austria's financial regulator FMA has been investigating Raiffeisen Bank International over anti-money-laundering failures, the Austrian bank said on Thurs The investigation is focused on the so-called know-your-customer rules, the bank said, referring to a key safety guard to prevent money laundering. It comes as the group, the largest Western bank in Russia, is also under investigation by the United States' sanctions authority - the Treasury Department The Austrian inquiries concern payments involving Russia and data revealed by the International Consortium of Investigative Journalists in a project dubbe direct knowledge of the matter. https://www.reuters.com/business/finance/regulator-probes-money-laundering-controls-austrias-raiffeisen-2024-02-22/
74	14	Mass- media	[22/February/2024] Lloyds says it faces money laundering controls investigation Britain's Financial Conduct Authority (FCA) has opened an investigation into Lloyds Banking Group's, opens new tab anti-money laundering controls, the le said the investigation related to its compliance with money laundering rules in Britain and the FCA's rules and principles of business, with a focus on its co https://www.reuters.com/world/uk/lloyds-says-it-faces-money-laundering-controls-investigation-2024-02-22/



art of a flurry of enforcement actions aimed at ns violations through his maintenance of two yachts ociates, Vadim Wolfson and Gannon Bond were Justice Department officials said.

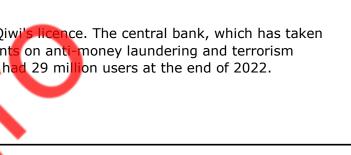
lay 1. According to a docket released on Feb. 23 in related to his role in fraud at defunct s and one count of conspiracy to operate an Research CEO Caroline Ellison, FTX co-founder Gary

on Thursday in its annual report. ng. partment's Office of Foreign Assets Control. ect dubbed Cyprus Confidential, said a person with

ols, the lender disclosed in its annual report. Lloyds on its controls framework.

75	14	Mass- media	[21/February/2024] Russian payment providers knocked offline after Qiwi Bank licence revoked Payment services used by Russians to transfer money overseas were knocked offline on Wednesday after the central bank revoked digital bank Q regulatory action against Qiwi five times in the last year, said Qiwi Bank had engaged in high-risk operations, systematically violating requirement financing legislation. Qiwi a Cyprus-based company listed on NASDAQ, is the Russia's largest payment services provider, an analogue to PayPar https://www.reuters.com/business/finance/russian-central-bank-revokes-qiwi-banks-license-2024-02-21/
76	14	Mass- media	[20/February/2024] Germany's BaFin warns Deutsche Bank of potential fines if it doesn't improve money laundering controls The Federal Financial Supervisory Authority of Germany, BaFin, has "threatened to impose penalty payments" on Deutsche Bank, the country's la "defects" concerning its money laundering controls. The regulator has extended the stay of its special representative at Deutsche Bank until 30 C the bank's implementation of safeguards against money laundering and terrorist financing. The representative was first instated by BaFin in 2018 https://www.fintechfutures.com/2024/02/germanys-bafin-warns-deutsche-bank-of-potential-fines-if-it-doesnt-improve-money-laundering-contro
77	14	Mass- media	[19/February/2024] Former Bank of China chairman indicted for bribery in nation's long-running anticorruption drive The former chairman of the Bank of China has been indicted on bribery charges adding to a long list of business and government officials who ha Jinping's yearslong anticorruption drive. Liu Liange is accused of taking advantage of his positions at the Bank of China and previously as preside charged with helping others with loans and personnel appointments in return for property and cash and with making loans in violation of regulation https://news.yahoo.com/former-bank-china-chairman-indicted-105832788.html
78	14	Mass- media	[19/February/2024] France Impounds Suspected Gazprom-linked Luxury Villa France has impounded a luxurious villa suspected of belonging to Russian energy giant Gazprom as part of a money-laundering investigation.Est Villa Maria Irina previously known as Villa del Mare is one of the most opulent mansions on the French Riviera. According to prosecutors, a F bought the villa in 2010, is believed to have acted in Gazprom's interests.
79	14	Mass- media	[19/February/2024] Sports gambling giants face 'wake-up call' as Australian money-laundering investigation nears end Australia's biggest sports gambling companies should be prepared for a 'wake-up call" as the financial crime watchdog finalises its investigation Any action by the Australian Transaction Reports and Analysis Centre (Austrac) – which began its investigation into Sportsbet, Ladbrokes and Be government's plans to regulate the industry amid calls for a total ban on gambling ads. https://www.theguardian.com/australia-news/2024/feb/19/austrac-inquiry-sportsbet-ladbrokes-bet365-money-laundering-investigation-gambling
80	14	Mass- media	[19/February/2024] Bank fined £1m by Isle of Man regulator Royal Bank of Scotland International has been fined £1m by the Isle of Man's financial regulator for breaching its anti-money laundering and cour fined by the island's Financial Services Authority (FSA) for failing to adequately carry out customer risk assessments. https://www.bbc.co.uk/news/articles/c88n2r57mk5o.amp





argest lender, if it doesn't fix what it refers to as October 2024 to report on and assess the progress of 8.

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into suspected breaches of money-laundering laws. t365 in late 2022 – could influence the federal

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ntering the financing of terrorism code. The firm was

			[17/February/2024] Judge orders Trump to pay \$355 million for lying about his wealth in staggering civil fraud ruling.
81	14	Mass- media	New York judge ordered the former president and his companies to pay \$355 million in penalties for what the judge described as a scheme to dee wealth on his annual financial statements.
			https://apnews.com/article/trump-civil-fraud-verdict-engoron-244024861f0df886543c157c9fc5b3e4
			[16/February/2024] Honduras watchdog bans institutions from trading crypto
82	14	Mass- media	Honduras' National Banking and Securities Commissionregulator has banned the Central American country's financial system from trading in cryc resolution, citing risks of fraud and money laundering. The resolution bans institutions under its supervision to "maintain, invest, intermediate or currencies, tokens, or any similar virtual assets not issued or authorized by the central bank." Honduran law does not currently regulate crypto a in the country.
			https://www.reuters.com/technology/honduras-watchdog-bans-institutions-trading-crypto-2024-02-16/
			[16/February/2024] NatWest Claws Back Bonuses From Ex-Staff Over Laundering Penalty
83	14	Mass- media	NatWest Group Plc is clawing back bonuses from ten former staff to address the "collective failure" that led to the firm's conviction for failing to p its annual report Friday the steps would include issuing reduction notices for ex-employees whose awards had been bought out by other UK bank in the same way as those who remained at the bank, and were affected when the 2021 bonus pool was cut in response to the penalty, according https://www.bloomberg.com/news/articles/2024-02-16/natwest-claws-back-bonuses-from-ex-staff-over-laundering-penalty
			[16/February/2024] Hong Kong authorities arrest seven in \$1.8 bln money laundering case
84	14	Mass- media	Hong Kong authorities said they had arrested seven people suspected of being involved in a \$1.8 billion money laundering case, the largest even million (\$21.10 million) worth of assets, including five properties and three commercial units, as part of the operation. The scheme allegedly involved online scams in India and the sale of electronics, rare gems including diamonds, among other goods and used she
			https://www.reuters.com/world/asia-pacific/hong-kong-authorities-arrest-seven-18-bln-money-laundering-case-2024-02-16/
			[16/February/2024] Federal regulators are probing whether Cash App leaves door open to money launderers, terrorists
85	14	Mass- media	Federal financial regulators are exploring allegations by two whistleblowers that Cash App, the popular mobile payment platform, and entities pro inadequate due diligence on customers, potentially opening the door to money laundering, terrorism financing and other illegal activities. Cash App had 55 million active transacting accounts as of last September.
			https://www.nbcnews.com/business/personal-finance/whistleblowers-cash-app-leaves-door-open-money-laundering-terror-rcna138958
86	15	<u></u>	Legislative initiatives and changes
			[22/February/2024] Frankfurt has been chosen by Parliament and Council as the seat of AMLA, the EU's new enforcer in the fight financing.
87	15	EU	In a joint vote MEPs and EU ambassadors chose Frankfurt to host the EU's central enforcer in the fight against dirty money, the Authority for Ant Terrorism (AMLA). The AMLA regulation is part of a wider package of laws to reform the EU's framework for combatting money-laundering and te been provisionally agreed between Parliament and Council, they need to be formally adopted by both before they can enter into law. Parliament plenary session of 22-25 April.
			https://www.europarl.europa.eu/news/en/press-room/20240219IPR17818/frankfurt-will-be-the-home-of-the-eu-anti-money-laundering-authorit

ceive banks and insurers by exaggerating Trump's

ptocurrency and similar virtual assets, it said in a trade in cyptocurrencies, crypto-assets, virtual ssets, though platforms trading in them do operate

prevent money laundering in 2021. The lender said in ks. The measures mean the former staff are treated to NatWest.

in the financial hub. Authorities seized HK\$165

ell companies and multiple bank accounts.

oviding transaction services to its users performed

against money laundering and terrorism

ti-Money Laundering and Countering the Financing of errorist financing. Now that the entire package has is expected to vote on its final approval in the



88	15	EU	[22/February/2024] Draft REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulations (EU) No 26 and Directives 98/26/EC and (EU) 2015/2366 as regards instant credit transfers in euro (first reading) https://data.consilium.europa.eu/doc/document/ST-6407-2024-REV-1/en/pdf
			[16/February/2024] The Council of the European Union published : - Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the prevention of the use of the financial system for the financing - Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing the Authority for Anti-Money Laundering amending Regulations (EU) No 1093/2010, (EU) 1094/2010, (EU) 1095/2010 - Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the mechanisms to be put in place by the Member States for the purposes of money laundering or terrorist financing and repealing Directive (EU) 2015/849
89	15	EU	The EU Parliament will deliberate on these proposal.
			https://www.consilium.europa.eu/media/70258/st06220-re01-en24.pdf
			https://data.consilium.europa.eu/doc/document/ST-6223-2024-INIT/en/pdf
			https://data.consilium.europa.eu/doc/document/ST-6217-2024-INIT/en/pdf
90	15	EU	[16/February/2024] COMMISSION DELEGATED REGULATION (EU) 2024/595 supplementing Regulation (EU) No 1093/2010 of the European Parliament and of the Council with regard to regulatory technical standards specif information collected, the practical implementation of the information collection and the analysis and dissemination of the information contained terrorist financing (AML/CFT) central database referred to in Article 9a(2) of that Regulation https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202400595
91			Author : Ion Radu in <u>https://www.linkedin.com/in/ion-radu-aml</u>
92	50 p in pr	ercent or more by c operty of designate	d interests in property of the designated individuals and entities that are in the U.S. or in the possession or control of U.S. persons must be blocked and reported to OFAC. 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 transied or otherwise blocked persons. ed or otherwise blocked persons. Istitutions and other persons that engage in certain transactions or activities with sanctioned entities and individuals may expose themselves to sanctions or be subject to

50/2012 and (EU) 2021/1230

e purposes of money laundering or terrorist

and Countering the Financing of Terrorism and

for the prevention of the use of the financial system

ying the materiality of weaknesses, the type of in the **Anti-money laundering and counter**

In addition, any entities that are owned, directly or indirectly, ing the United States) that involve any property or interests

an enforcement action.