

# Latvia

## Fifth Round Mutual Evaluation Report

### Executive Summary

1. This report provides a summary of the anti-money laundering (AML) and countering the financing of terrorism (CFT) measures in place in Latvia as at the date of the onsite visit (between 30 October and 10 November 2017). It analyses the level of compliance with the FATF 40 Recommendations and the level of effectiveness of Latvia's AML/CFT system and provides recommendations on how the system could be strengthened.

#### *Key Findings*

- Latvia produced the report on its most recent full-scope national assessment of money laundering (ML) and terrorist financing (FT) risks in April 2017, presenting it as a key document that comprehensively articulates the understanding of ML/FT threats, vulnerabilities and residual risks in the country. A high-level commitment and support for making the national assessment of ML and FT risks a systemic and consistent exercise was demonstrated through two rounds of elaborating a national risk assessment (NRA) in 2010 and 2014, respectively. Large financial flows passing through Latvia as a regional financial centre pose a significant threat. Certain authorities, such as the Control Service (FIU) and the Financial Capital Market Commission (FCMC), demonstrated a rather broad understanding of the risks within the AML/CFT system. However, there is uneven and overall inadequate appreciation of the potentially ML-related cross-border flows of funds passing through Latvia.
- Competent authorities have access to and use a broad range of financial intelligence. Unusual transaction reports (UTRs) and suspicious transaction reports (STRs) are not fully in line with Latvia's risk profile and their quality appears modest. Relevant factors for this include: confusion between UTRs and STRs; possible confusion with the parallel reporting system on tax suspicions; "defensive" reporting; insufficient supporting documentation attached to STRs; inaccurate or incomplete information related to the ultimate beneficial owner (UBO); and limited feedback provided to reporting entities (REs) by the FIU. The FIU's work feeds in a large number of law enforcement authorities' (LEA) investigations and is critical to the remarkable results in non-conviction-based confiscation. However, some LEAs also noted the limited quality of the FIU's analysis. Cooperation between the FIU and other authorities appears to be improving, although it remains to be more clearly established at the operational and policy level.
- Until recently, the judicial system of Latvia did not appear to consider ML as a priority and to approach ML in line with its risk profile as a regional financial centre. This appears to have changed lately to a certain extent, with some large-scale ML investigations underway, involving bank

employees having actively facilitated the laundering of proceeds. The country has achieved a certain number of ML convictions in the five years prior to the onsite visit. ML convictions for both domestic and foreign predicate offences have been achieved. Latvia also demonstrated one conviction for third-party laundering and one conviction for stand-alone ML, the latter being possible only because the accused made a full confession. Otherwise, prosecutors still rely on the existence of a predicate offence to meet the prerequisite of proving that the accused had knowledge of the illegal origin of the laundered property. Sanctions for natural persons appear neither dissuasive nor proportionate due to the frequent reduction of sentences in light of the length of proceedings or the application of the legal possibility to suspend a custodial sentence of up to five years' imprisonment. Latvia demonstrated the application of coercive measures provided by the Criminal Law (CL) against legal persons. The country also uses a number of alternative criminal measures where a ML conviction is not possible for justifiable reasons.

- The absence of a robust FT risk assessment, including in the non-profit organisations (NPO) sector, presents a major deficiency in Latvia's effective efforts to prevent and combat FT. The country has not yet achieved any prosecutions or convictions specifically for FT, while conducting a number of terrorism-related investigations. However, Latvia is largely able to demonstrate the application of alternative measures to disrupt potential FT activities.

- Latvia's legal basis for targeted financial sanctions (TFS) calls for urgent clarifications and improvements. Most reporting entities (REs) follow a list-based approach, which - associated with limited effectiveness in implementing customer due diligence (CDD) - appears highly insufficient in light of the sanctions-evasion risk of the country. In the case of proliferator-states such as Democratic People's Republic of Korea (DPRK), such evasion is perpetrated through highly sophisticated means. Cases of proliferation financing (PF)-related TFS evasion through Latvian banks detected in 2017 illustrated those vulnerabilities. It is unclear whether the authorities, including the FIU and the FCMC, have taken sufficient steps (and have the necessary means, including legal) to mitigate sanctions-evasion risks. Moreover, it remains uncertain whether other supervisors can and do include TFS compliance in their monitoring programme.

- Overall, the appreciation of ML/FT risk in the financial sector is not commensurate with the factual exposure of financial institutions (FIs) in general, and banks in particular, to the risk of being misused for ML and FT. The general understanding of risks among designated non-financial businesses and professions (DNFBPs) is limited to risks relevant for their particular businesses and professions; it does not amount to an appropriate perception and awareness of ML/FT risks. The NRA conducted by Latvia does not appear to facilitate better understanding of ML/FT risks and relevant AML/CFT obligations in the private sector. There are certain concerns about the insufficient independence of the compliance (as well as audit) function particularly regarding the decision-making on termination of business relationships and reporting of STRs.

- The supervisors demonstrate widely varying views and knowledge about ML/FT risks. The authorities are aware of this issue, as noted in the strategic plan of the Financial Sector Development Board (FSDB). The FCMC displays the highest level of risk-understanding. Despite the knowledgeable and persistent approach taken by the FCMC to the non-resident banking sector, change of risk-appetite in this sector remains slow. In practice, issues such as understanding the nature or significance of ML/FT risks, or a lack of knowledgeable resources, prevented the supervisory authorities from fully implementing programs focused on higher-risk market segments.

- The NRA acknowledges that a significant number of Latvian legal persons and foreign legal

entities are very likely involved in ML/FT schemes. Nevertheless, the NRA does not consider them to be vulnerabilities in the AML/CFT system of the country. The interviews with the private sector highlighted insufficient understanding of AML/CFT risks in the company service providers sector. This is a concern, given that company service providers are among the medium to high risk-ranked groups in the NRA. As a result of recent legislative amendments, the Enterprise Register (ER) will include UBO information obtained from all legal entities. However, this functionality was not up and running as of the time of the visit.

- International cooperation constitutes a critical component of the country's AML/CFT system. Latvia demonstrates many of the characteristics of an effective system in that area. Overall, the Latvian authorities proactively cooperate with foreign counterparts, effectively providing and seeking not only mutual legal assistance (MLA), but also exchanging financial intelligence, and engaging in joint investigations and cooperation meetings with positive results. However, with the exception of the FCMC, the supervisory authorities do not seem to take an active part in international cooperation. The main challenge appears to be connected with difficulties to obtain assistance from countries of the Commonwealth of Independent States (CIS), which should be critical partners given Latvia's risk profile.

### ***Risks and General Situation***

1. Given its geographic location, its European Union (EU) membership (including being part of both the Schengen and the euro area) and the ability of its FIs to provide services in Russian, Latvia is a major gateway between Western Europe and CIS countries. In particular, the country is a regional financial centre, with a majority of its commercial banks focusing on servicing foreign customers, mainly from the CIS countries, including the provision of investment services and management.

2. The vulnerability of CIS countries to economic crime, especially corruption, remains one of Latvia's key ML risks. Latvia's own level of corruption, vulnerability to international organised crime and significant shadow economy are also key factors of the overall ML risk faced by Latvia. The NRA assesses the overall ML risk of the country as "medium high". It notes that the main sources of criminal proceeds are corruption and bribery, tax offences, fraud and smuggling as confirmed by most judicial and LEAs met onsite. According to the NRA a significant part of laundered proceeds are generated abroad, while domestic ML mainly pertains to self-laundering. ML methods employed in Latvia are complex and wide-ranging and involve a number of sectors. FT is considered to pose a low risk in the NRA; however, the risk of FT does not appear to be appropriately identified and assessed by Latvia.

### ***Overall Level of Effectiveness and Technical Compliance***

3. Since the last evaluation, Latvia has taken steps to improve its AML/CFT framework. Notably, since 2012 the Law on the Prevention of Money Laundering and Terrorism Financing (AML/CFT Law) has been amended several times to widen the definition of politically exposed persons (PEPs), FIs, and FT; the regulation was updated regarding the identification of UBOs; and a set of other normative FCMC regulations were executed to achieve significant compliance with the FATF recommendations. The Latvian authorities also made amendments to the legal framework of Latvia in order to implement the 4<sup>th</sup> EU Directive. However, some deficiencies remain in Latvia's technical compliance framework, for example with respect to preventive measures, the TFS regime and international cooperation.

4. Certain Latvian authorities have demonstrated rather broad understanding of the risks within the AML/CFT system. However, there is uneven and overall inadequate appreciation of the threats emanating from large financial flows passing Latvia as a transit point in its capacity of a regional financial centre.

5. A substantial level of effectiveness has been achieved in international cooperation. A low level of effectiveness has been achieved in the areas of transparency of legal persons and arrangements and implementation of PF financial sanctions. Latvia has achieved moderate results in the other areas covered by the FATF standards.

#### *Assessment of Risks, coordination and policy setting (Chapter 2 - IO.1; R.1, R.2, R.33)*

6. Latvia adopted its NRA in 2017 presenting it as a key document that comprehensively articulates the understanding of ML/FT threats, vulnerabilities and residual risks in the country. Certain key authorities, such as the FIU and the FCMC, demonstrated rather broad understanding of the risks within the AML/CFT system. However, in the vast majority of cases participation of competent authorities in the NRA process was limited to providing information, with limited or no involvement in the analysis of collected data and drafting of relevant conclusions.

7. The key document defining nation-wide efforts aimed at effective implementation of AML/CFT measures is the 2017-2019 Action Plan. However, the action plan seems to fall short of specific targeted measures to address the major ML threat emanating from, *inter alia*, the high concentration of the foreign customer base of the credit institutions and the related large cross-border movements of funds.

8. The FSDB chaired by the Prime Minister and comprising representatives of all key public and private sector stakeholders is the coordinating authority with the objective to improve the cooperation between state authorities and the private sector in the prevention of ML/FT. The Advisory Board of the CS (ABCS) chaired by the General Prosecutor (GP) is tasked with, *inter alia*, facilitating the work of the FIU and coordinating its cooperation with pre-trial investigation agencies, the Prosecutor's Office, the judiciary and the subjects of the AML/CFT Law. Most of the government agencies (except for the Ministry of Economy and the Ministry of Foreign Affairs) that are members of the FSDB also sit at the ABCS.

9. The private sector showed little if any interest in using the results of the risk assessment for revisiting their relevant policies, procedures and controls. This may be partly due to the lack of previously unidentified threats, vulnerabilities and residual risks articulated in the 2017 NRA Report, and partly to the disagreement with its analysis and conclusions.

#### *Financial Intelligence, Money Laundering and Confiscation (Chapter 3 - IOs 6-8; R.3, R.4, R.29-32)*

10. All competent authorities report having access to and making use of necessary sources of financial intelligence to support their analytical and investigative activities. However, UBO information is of limited reliability. The general quality of UTRs/STRs is modest, given the confusion between UTRs and STRs; the possible confusion with the parallel reporting system on tax suspicions; "defensive" reporting; insufficient documentation attached to STRs; inadequate UBO-related information; and limited FIU feedback to REs. The reports do not fully reflect the country's risk profile. Although an important part of the FIU's disseminations leads to ML/FT investigations, the quality of FIU analysis is deemed unsatisfactory by some LEAs. However, FIU/State Police (SP) coordination efforts since 2015 have resulted in FIU disseminations progressively becoming the

main source of ML prosecutions. More generally, coordination and cooperation efforts between the FIU and LEAs have increased since 2015, especially at the operational level, but no clear mechanisms have been established.

11. Latvia has a sound legal system and institutional framework for the investigation and prosecution of ML. Until recently, the judicial system of the country did not appear to consider ML as a priority and to approach ML in line with Latvia's risk profile as a regional financial centre. This appears to have lately changed to a certain extent, with some large-scale ML investigations underway, involving bank employees having actively facilitated the laundering of proceeds. The country has achieved a certain number of ML convictions in the five years prior to the onsite visit, which however appears modest when compared with the high number of convictions for predicate offences during the same period. ML convictions for both domestic and foreign predicate offences have been achieved. Latvia also demonstrated one conviction for third-party laundering and one conviction for stand-alone ML, the latter however being possible only because the accused made a full confession. Otherwise, prosecutors still rely on the existence of a predicate offence to meet the prerequisite of proving that the accused had knowledge of the illegal origin of the laundered property. The large majority of custodial sentences are deferred. Sanctions for natural persons appear neither dissuasive nor proportionate due to the frequent reduction of sentences in light of the length of proceedings or the application of the legal possibility to suspend a custodial sentence of up to five years' imprisonment. Latvia demonstrated the application of coercive measures provided by the CL against legal persons. The country also uses a number of alternative criminal measures where a ML conviction is not possible for justifiable reasons.

12. Latvia has a sound and broad legal system for confiscation of criminal proceeds, which is based on two pillars, conviction-based and non-conviction based confiscation. While results from conviction-based confiscation are hampered by previous evidentiary requirements to demonstrate the criminal origin of the property, the absence of routinely-performed parallel financial investigations and the modest number of ML-convictions achieved through the judicial system, non-conviction based confiscation brought some encouraging results, enabling Latvian authorities to confiscate considerable amounts in both domestic and international cases. In individual cases, Latvia is able to demonstrate effective repatriation of large amounts of confiscated proceeds of crime to third states, as well as in a domestic context the restitution of victims of economic crime.

13. Latvia has not been able to demonstrate an effective system of confiscation of undeclared or falsely declared cross-border movement of currency and bearer negotiable instruments (BNIs). Given that smuggling is identified as one of the main ML risks in Latvia, the lack of effectiveness in that area raises concern. The authorities are actively freezing and seizing illegal property, especially bank account assets, which resulted in some cases with considerable amounts of confiscated illegal property. In order to reach the characteristics of an effective system to a large extent, the evaluators would however have expected Latvia to demonstrate even stronger confiscation results in line with the ML risks the country faces.

#### *Terrorist Financing and Financing Proliferation (Chapter 4 - IOs 9-11; R.5-8)*

14. The absence of a robust FT risk assessment presents a major deficiency in Latvia's effective implementation of IO.9. Without a thorough understanding of how its broader financial vulnerabilities expose Latvia to exploitation by terrorist actors, the country cannot provide a systematically effective response to the FT threat. The Security Police (SeP) appears to be both empowered and enabled to identify potential terrorism and FT risks emanating from within Latvia.

15. Latvia does not have a national counterterrorism or CFT strategy, instead incorporating CFT elements in other strategic policies. Latvian authorities are capable of cooperating to investigate cases of FT, but do not have a single platform for obtaining information on FT-related matters across all relevant agencies. Interagency awareness and cooperation has not been shown to suffer as a result but could be enhanced. Latvia has not yet achieved any prosecutions or convictions specifically for FT, while it has had only a handful of terrorism-related investigations. This absence appears consistent with Latvia's terrorist threat level, if not necessarily with the level of its terrorist financing risks, since no assessment accounting for its role as a financial hub has been conducted. The country is largely able to demonstrate the application of alternative measures to disrupt potential FT activities.

16. No relevant outreach has been conducted towards the NPO sector. However, the sector appears to be proactively monitored by a number of competent authorities, which seems to mitigate the potential risks of FT abuse.

17. There are major issues in the legal basis for the TFS in Latvia (both for FT and PF), which may have an impact on the effectiveness of its TFS regime, as they necessarily limit the authority to regulate, monitor and sanction breaches of TFS obligations. A list-based approach to compliance followed by most REs, large numbers of foreign shell companies, deficiencies in the effectiveness of CDD measures (IO.4) and limited penalties imposed to date, among other factors, create a permissive environment for sanctions evasion, as demonstrated by the exploitation of Latvian banks for the purposes of circumventing PF-related sanctions exposed in 2017. The detection of sanctions evasion schemes resulted in enforcement actions in mid-2017, an autonomous Latvian PF TFS designation, additional guidance to the financial sector and the implementation of improved internal control programmes by banks.

#### *Preventive Measures (Chapter 5 - IO4; R.9-23)*

18. The financial sector's appreciation of the ML/FT risk is not commensurate with the factual exposure of FIs in general, and banks in particular, to the risk of being misused specifically for ML as well as for FT. The general understanding of risk among DNFBPs which is virtually unrelated to the ML/FT implications relevant for individual businesses and professions does not amount to an appropriate perception and awareness of ML/FT risks.

19. Banks and other non-bank FIs demonstrated fair knowledge of the applicable requirements in the AML/CFT Law and relevant regulations regarding the pillars of the preventative regime, i.e. CDD (including identification of UBOs and on-going monitoring of transactions/business relationships) and record-keeping. Nonetheless, there are grounded concerns about the quality of the additional information/documents collected and maintained by banks in the CDD process for verifying the UBOs, obtaining proof of the source of funds and source of wealth, as well as for monitoring transactions in terms of legitimacy and economic rationale, where primary emphasis is made on self-identification and there is overreliance on internet data. Poor implementation of the preventive measures by many DNFBPs is the presumed direct result of their insufficient knowledge in the area of AML/CFT.

20. There are certain concerns about the insufficient independence of the compliance (as well as audit) function, particularly regarding the decision-making on termination of business relationships and reporting of STRs. Concentrated ownership structure of the banks is among the reasons for that.

*Supervision (Chapter 6 – 10.3; R.26-28, R. 34-35)*

21. The supervisors demonstrate widely varying views and knowledge about ML/FT risks. The FCMC displays the highest level of risk understanding demonstrated through multiple examples. Other supervisors often referred to mitigation as risks, and non-compliance with preventative measures as a risk.
22. All FI and DNFBP supervisors appear to understand the theory of paying more supervisory attention to their higher risk market segments. However, in practice, issues such as understanding the nature or significance of ML/FT risk, or a lack of knowledgeable resources, prevented them from fully implementing such programs.
23. Despite the knowledgeable and persistent approach taken by the FCMC to the non-resident banking sector, the rate of change of risk appetite in this sector is slow.
24. Effective, proportionate and dissuasive sanctions are relatively new in Latvia as the AML/CFT Law provisions on sanctions entered into force (in the banking sector) between July 2016 and the date of the onsite visit.
25. The impact of the actions of supervisors on the FI and DNFBP sectors ranges from negligible (with regard to some DNFBP sectors) to fairly good (with regard to the FCMC).

*Transparency of Legal Persons and Arrangements (Chapter 7 – 10.5; R. 24-25)*

26. The NRA acknowledges that a significant number of Latvian legal persons and foreign legal entities are very likely involved in ML/FT schemes.
27. The interviews with the DNFBP sector have highlighted the involvement of company service providers to incorporate companies in Latvia. However, there is insufficient understanding of AML/CFT risks and measures in the company service providers sector.
28. BO information gathered by REs must conform to the AML/CFT Law but self-identification through a statement signed by the customer was used as a primary method for determining the BO of a transaction or a business relationship.
29. Under the amended provisions of the AML/CFT Law that were enacted during the onsite visit all legal persons in Latvia are obliged to collect and submit information about BO to the ER. However, this functionality was not up and running as of the time of the onsite visit.
30. The FIU, LEAs and control authorities in the field of tax administration, public procurement or public-private partnership have direct electronic access to a wide range of information and databases and indirect access to other databases. After enactment of the latest legislative amendments BO information contained in the ER will be publicly accessible.

*International Cooperation (Chapter 8 – 10.2; R. 36-40)*

31. International cooperation constitutes a critical component of Latvia's AML/CFT system. The country demonstrates many of the characteristics of an effective system in the area of international cooperation. Overall, the Latvian authorities proactively cooperate with foreign counterparts, effectively providing and seeking not only MLA, but also exchanging financial intelligence, and engaging in joint investigations and cooperation meetings with positive results. However, with the exception of the FCMC, the supervisory authorities do not seem to take an active part in international cooperation. The main challenge appears to be connected to difficulties to obtain assistance from CIS countries, which should be critical partners given Latvia's risk profile.

***Priority Actions***

- With regard to the proper understanding of its ML/FT risks, Latvia should take measures to:
  - 1) ensure substantial participation of competent authorities in all stages of the NRA process; 2) improve the analysis and proper understanding of ML/FT threats and vulnerabilities.
- Latvia should take measures to ensure that obliged entities draw from the relevant outcomes of national ML/FT risk assessments to support or supplement their own risk assessments.
- Latvia should take measures to ensure that among the subjects of the AML/CFT Law: 1) the understanding of FT risk extends beyond the screening against “terrorist lists”; 2) the understanding of ML/FT risks is practicably facilitated by contributions to and feedback on national risk assessments.
- Latvia should take measures to enhance enforcement of the minimum requirements to the quality of additional information and documents collected and maintained by the subjects of the AML/CFT Law in the CDD process (e.g. verifying the UBOs).
- With regard to the internal controls and procedures, Latvia should take measures to: 1) consider introduction of additional (legislative) measures to ensure independence of the compliance (as well as audit) function; 2) ensure effective and substantial implementation of internal controls and procedures by all subjects of the AML/CFT Law, as ascertained through targeted supervisory action.
- Latvia should increase outreach to and eventually regulation of REs to develop and institute internal control systems capable of detecting potential PF activity, taking into account developments in efforts at detecting PF sanctions evasion and Latvia’s PF vulnerabilities.
- Latvia should revise the legal framework for TFS and assign adequate resources to PF and FT TFS compliance supervision.
- The FCMC should substantially increase the frequency of AML/CFT supervisory visits to the foreign deposits banking sector.
- Latvia should ensure that the authorities have access to the relevant BO information as defined in the AML/CFT Law at the time of incorporation and throughout the lifetime of all legal persons. Priority should be given to the Limited Liability Company (LLC) sector as this is the most prevalent and also at the highest risk of ML/FT according to the NRA. Latvia should establish a mechanism to compel FIs/DNFBPs to take reasonable measures to determine the BO of their customers who are legal persons and actively verify such information.
- Latvia should take measures to revise the concepts of unusual transaction and suspicious transition to eliminate the overlap in the relevant definitions.
- Latvia should pursue ML as a priority and seek to systematically prosecute a wider range of ML offences, including third party and stand-alone/autonomous ML, for criminal activity which is in line with its profile as a regional financial center.
- Latvia should develop law enforcement guidance, backed up by corresponding training for all judicial stakeholders involved in the prosecution of proceeds-generating offences, on the minimum levels of evidence which the courts may require to establish underlying predicate criminality in a ML prosecution under the recently-changed legislation.

## Effectiveness & Technical Compliance Ratings

### Effectiveness Ratings

<b>IO.1</b> – Risk, policy and coordination	<b>IO.2</b> – International cooperation	<b>IO.3</b> – Supervision	<b>IO.4</b> – Preventive measures	<b>IO.5</b> – Legal persons and arrangements	<b>IO.6</b> – Financial intelligence
Moderate	Substantial	Moderate	Moderate	Low	Moderate
<b>IO.7</b> – ML investigation & prosecution	<b>IO.8</b> – Confiscation	<b>IO.9</b> – TF investigation & prosecution	<b>IO.10</b> – TF preventive measures & financial sanctions	<b>IO.11</b> – PF financial sanctions	
Moderate	Moderate	Moderate	Moderate	Low	

Technical Compliance Ratings (*C* – compliant, *LC* – largely compliant, *PC* – partially compliant, *NC* – non-compliant, *N/A* – not applicable)

<b>R.1</b> - assessing risk & applying risk-based approach	<b>R.2</b> - national cooperation and coordination	<b>R.3</b> - money laundering offence	<b>R.4</b> - confiscation & provisional measures	<b>R.5</b> - terrorist financing offence	<b>R.6</b> - targeted financial sanctions – terrorism & terrorist financing
C	LC	LC	C	LC	PC
<b>R.7</b> - targeted financial sanctions - proliferation	<b>R.8</b> - non-profit organisations	<b>R.9</b> - financial institution secrecy laws	<b>R.10</b> - Customer due diligence	<b>R.11</b> - Record keeping	<b>R.12</b> - Politically exposed persons
PC	PC	C	PC	LC	LC
<b>R.13</b> - Correspondent banking	<b>R.14</b> - Money or value transfer services	<b>R.15</b> - New technologies	<b>R.16</b> - Wire transfers	<b>R.17</b> - Reliance on third parties	<b>R.18</b> - Internal controls and foreign branches and subsidiaries
LC	LC	LC	LC	LC	LC
<b>R.19</b> - Higher-risk countries	<b>R.20</b> - Reporting of suspicious transactions	<b>R.21</b> - Tipping-off and confidentiality	<b>R.22</b> - DNFBPs: Customer due diligence	<b>R.23</b> - DNFBPs: Other measures	<b>R.24</b> - Transparency & BO of legal persons
LC	LC	C	PC	LC	LC
<b>R.25</b> - Transparency & BO of legal arrangements	<b>R.26</b> - Regulation and supervision of financial institutions	<b>R.27</b> - Powers of supervision	<b>R.28</b> - Regulation and supervision of DNFBPs	<b>R.29</b> - Financial intelligence units	<b>R.30</b> - Responsibilities of law enforcement and investigative authorities
LC	PC	C	PC	LC	LC
<b>R.31</b> - Powers of law enforcement and investigative authorities	<b>R.32</b> - Cash couriers	<b>R.33</b> - Statistics	<b>R.34</b> - Guidance and feedback	<b>R.35</b> - Sanctions	<b>R.36</b> - International instruments
LC	PC	LC	C	LC	LC
<b>R.37</b> - Mutual legal assistance	<b>R.38</b> - Mutual legal assistance: freezing and confiscation	<b>R.39</b> - Extradition	<b>R.40</b> - Other forms of international cooperation		
LC	LC	PC	PC		

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