



17th St. & Constitution Avenue N.W.
Washington, D.C. 20006
United States of America

Organization of American States

P. 202.458.3000
www.oas.org

**INTER-AMERICAN DRUG ABUSE
CONTROL COMMISSION
CICAD**

Secretariat for Multidimensional Security

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**AML/CTF STRATEGIC PRIORITIES
MARIANO FEDERICI, IMF**



**AML/CTF
Strategic Priorities**

**Financial Integrity Group
International Monetary Fund**

National Strategies

- IMF Supports the development of AML/CTF national strategies on the region
- - Peru 2011
- - Uruguay 2012
- - Paraguay 2013
- - Chile 2013
- - Currently is working on the national strategies for Bolivia and Costa Rica
- - Started process for developing the National Strategy of Panama

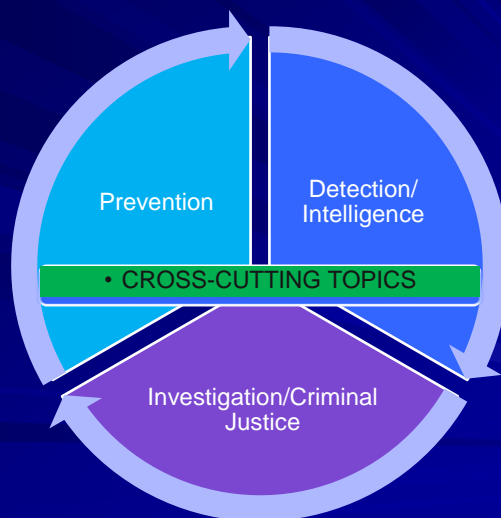
National Strategies

- Consolidate the high-level political commitment
- Complementary of the National ML/TF Risk Diagnostics (or promote them)
- Contribute to the organization of the state effort rationally and efficiently (allowing > effectiveness)
- Provide guarantee of rationality and proportionality in the use of state power and improve transparency
- Promote the enacting of pending reforms
- Contribute to the strengthening of inter-institutional coordination and compliance. FATF Rec. 2
- They are a tool for education and awareness of the AML/CFT national policy

Strategic Priorities

WHAT ARE THE MAIN STRATEGIC PRIORITIES FREQUENTLY IDENTIFIED ON THE NATIONAL STRATEGIES DEVELOPED ON THE REGION?

Strategic Priorities Components



Strategic Priorities Cross-cutting Topics

- Harmonization of the AML/CTF Legal Framework
- Understanding the risks of ML/TF nationwide
- Strengthening inter-institutional coordination
- Creating instances of ongoing coordination
- Analysis of the impact of corruption on the effectiveness of the AML/CTF system
- Analysis of the incidence of informality in the effectiveness of the AML/CTF system
- Capacity building for statistical collection and integrity on statistical management

Strategic Priorities Prevention

- Incorporación del enfoque basado en riesgos (EBR) a la prevención ALA/CFT
 - Fortalecimiento de la regulación ALA/CFT con un EBR
 - Fortalecimiento de la supervisión ALA/CFT con un EBR
 - Fortalecimiento del cumplimiento ALA/CFT por parte de los sujetos obligados con un EBR

Strategic Priorities

Prevention

- Strategic Strengthening of the AML/CTF regulation
 - Strengthening the AML/CTF regulation for DNFBPs
 - Strengthening the AML/CTF regulation for other risk sectors identified
 - Purchases of all assets subject of registry
 - Foreign trade activities
 - Non Profits, NGOs, civil associations
 - State Contractors
 - Free trade zones
 - Implementation of the sanction regime

Strategic Priorities

Prevention

- Training, awareness raising and communication/dissemination
 - Strengthening the AML/CFT training for regulators, supervisors and reporting entities
 - Strengthening awareness about the roles of key actors in the AML/CTF system and the public in general
 - Strengthening the communication/dissemination of risks, strategic actions, effectiveness and expectations

Strategic Priorities Detection and Intelligence

- Strengthening the operational and analytical capabilities of the FIU
 - Strategic Analysis Capacity building, and strengthening of the operational approach to areas with high risk
 - Increase direct access to databases/sources of information
 - Improve the technological capabilities
 - Improve the feedback to reporting entities

Strategic Priorities Detection and Intelligence

- To improve coordination and cooperation between FIUs and other public entities;
 - Strengthening cooperation with financial supervisors
 - Assignment and transfer of supervisory responsibilities to other entities
 - Improving the institutional and operational capacity of public registry
 - Strengthening cooperation with prosecutors and criminal investigators
 - Strengthening international cooperation in financial intelligence

Strategic Priorities

Detection and Intelligence

- Strengthening border control over cash and negotiable bearer instruments
 - Improvement of border risk understanding
 - Strengthening capacities of customs and intervention protocols
 - Strengthening inter-institutional coordination in the borders
 - Strengthening international cooperation between neighboring countries

Strategic Priorities

Detection and Intelligence

- To improve the transparency regime for legal persons and legal structures
 - Strengthening the requirements for the identification of final beneficiaries
 - To improve control of bearer shares (restrictions on use or emission)
 - Strengthening the control of foreign companies
 - Improvements in the control of trusts (registry obligations)

Strategic Priorities Investigation/Criminal Justice

- Adaptation of the Criminal Procedure for complex financial investigations
 - Adaptation of the terms for the preliminary investigation of financial/complex crimes
 - Mandatory parallel financial investigations
 - To improve access of prosecutors and investigators to information protected by secrecy
 - Incorporating a wide range of special investigative techniques

Strategic Priorities Investigation/Criminal Justice

- Strengthening inter-institutional coordination on financial/complex investigations
 - Formation of multidisciplinary teams for conducting financial/complex investigations
 - Participation of FIU in preliminary investigations
 - Development of protocols and procedures with a defined description of roles
 - Coordination of interpretation criteria between prosecutors and judges

Strategic Priorities

Investigation/Criminal Justice

- Specialization of investigators and judges in topics related with AML/CFT/ organized crime
 - Creating specialized investigation units in police forces
 - Creating special prosecutors units
 - Creating specialized courts

Strategic Priorities

Investigation/Criminal Justice

- Strengthening institutional capacities, training and resources
 - Creation/strengthening of units of experts in financial investigations
 - Creation / strengthening of a registry of criminal records and criminal statistics at the national level
 - Increase and stabilization of human, physical, and technological resources in police units, prosecution offices and specialized courts
 - Strengthening training of police units, prosecution offices and specialized courts

Strategic Priorities

Investigation/Criminal Justice

- Strengthening the capacity of the state to deprive criminals of their assets
 - Promoting the use of precautionary measures of seizure/freezing and seizures/forfeitures (including assets of equivalent value)
 - Creation/strengthening mechanisms of custody, management or disposition of seized property, seized/confiscated;
 - Development of standards and procedures for forfeiture

Strategic Priorities

Investigation/Criminal Justice

- Strengthening international judicial cooperation
 - Establishing strategic priorities for international cooperation
 - Strengthening links with priority countries through the signing of treaties and MOUs
 - Improvement and clarification of national requirements to be observed by foreign jurisdictions
 - Strengthening measures to repatriate and share seized / confiscated assets in joint operations



THANKS

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