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XLI MEETING OF THE GROUP OF EXPERTS FOR
THE CONTROL OF MONEY LAUNDERING
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**OPEN SOURCES OF INFORMATION AS A TOOL OF DEVELOPMENT FOR THE
RESEARCH OF MONEY LAUNDERING AND THE FINANCING OF TERRORISM**

1. BACKGROUND

In the XL Meeting of the Group of Experts to Control Money Laundering, held from May 19 to 20, 2015, in Washington, DC, USA, there was a discussion regarding the proposal of the delegation of Peru. They raised a point concerning the development of a project that would consolidate the web pages Member States use in their LA/FT investigations.

On this point, Mr. Daniel Linares Ruesta, Mayor for Operational Analysis of the Department of Operational Analysis, Financial Intelligence Unit (FIU) of Peru made a presentation which showed how the FIU-Peru, in their research, used public access websites to obtain relevant information. He also highlighted that other security research agencies in other Member States have developed a similar practice. In this regard, the project's objective would be to consolidate all of these sites, in all OAS Member States, as a tool that would be available to all researchers. This would allow for all agencies to obtain relevant and timely information for their investigations, particularly if they involve individuals who are non-residents of the country where the research is being conducted.

It should be noted that the project involves the use of web pages that provide public information, which is both freely accessible and/or subject to payment or subscription. Confidential or classified information is not included in this project, given that it must be obtained through the appropriate channels.

After the XL Meeting of the Group of Experts for Money Laundering Control, it was agreed that the Peruvian delegation would present the terms of reference of the proposed project, for it to be transferred to the delegations. It was also agreed for its adoption to be discussed at the next meeting of the Group of Experts for Money Laundering Control, to be held in Lima in October.

The FIU-Peru in coordination with the FIU-Bolivia, considering the importance of sharing information sources, also sees the need to share experiences, information and documents that may reinforce the operational work of CICAD-GELAVEX. In this sense, as a coordinated work between the FIUs of Peru y Bolivia the implementation of the tool called "Virtual Campus of collaborative work CICAD – GELAVEX".

2. OBJECTIVE

Develop a technological information tool of support for the investigative process through the use of a collaborative virtual environment based on knowledge exchange and webs of public access in the

framework of security parameters to assure the confidentiality of CICAD/GELAVEX members . The tool would provide researchers from Member States timely access (online) to relevant public information, from different web pages available freely or by subscription, concerning citizens, non-residents or foreign[1] companies under LAFT investigations. It will also allow to share experiences, documents referred to public norms and the publication of news and events that can be disseminated or reproduced by other members in the framework of their attributions.

No part of this project concerns confidential information or that protected by the laws of Member States.

3. JUSTIFICATION

The implementation of a Virtual Campus allows CICAD/GELAVEX members to work in a collaborative environment, that means that they would be able to share experiences, activities that each of them are carrying out or that are taking place in their countries.

The campus will have different areas of work and can have a search tool as Google or Bing, that would look for information only inside the open sources websites that its members share.

The information obtained from public access web pages, documents and experiences is an important part of any LAFT investigation, and this information becomes more important if researchers have access to it in a timely manner or to solve doubts regarding eventual questions that may arise.

However, experience tells us that researchers do not manage all of the public websites in their country where they can get useful information for their research. This lack of access or availability becomes more severe in regards to foreign individuals or companies, or ones that are non-residents in the country of research.

In this regard, there is a need on behalf of researchers to have on hand a list of public web pages, which offer relevant and timely information (online) about people and companies, domestic or foreign, which are the subject of their research.

This project proposes to address this need for access to knowledge and information in a timely manner, providing a tool that allows researchers to check all available online web pages, make consultations and access the information of all open sources, whether in their country or abroad (other OAS Member States). These web pages can be publicly available and/or restricted[2], based on the information they contain from the identification of individuals and/or companies, to police records, and information of an economic, corporate, commercial, credit, professional or trade nature, among others.

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[1] Only considering Member States of the OAS.
[2] Web pages that require payment or a subscription to access the public information they offer. Not including confidential or other legally protected information.

4. ACTIVITIES NEEDED TO DEVELOP THE PROJECT

The aforementioned, consolidated list of web pages will be formed on the basis of lists provided by each Member State; therefore to develop this project, the commitment of Member State and their representatives to meet the following activities is essential:

1) Preparatory Phase

- Designation of coordinators: Each country will appoint a "Coordinator Country" (CPa) which is responsible for managing the relationship of their country websites. The profile of the coordinator should be similar to a cabinet specialized in research analyst, either the FIU, police or prosecutors. Also, the Gelavex should appoint a "Project Coordinator" (CPr) who will be responsible for the project.
- Defining the type and characteristics of the web addresses: The CPr will define the categories and characteristics of web pages that are useful for the work of analysts and researchers. With this information the CPa will then perform the work in their countries.
- Defining the type and characteristics of the documents that would be open sources for the members of the Virtual Campus;
- Defining the type of news that can be published on the virtual campus, that can be also used for investigations or to promote activities that are taking place in a country or a workshop or any other activity that takes place in a local level;
- Defining the type, format and politics of events and activities that would be published in the virtual campus as a virtual agenda that would accept the upload of documents.

2) Compilation of Information Phase

- Management to obtain web addresses: The CPa will identify, in their countries, all the web addresses that analysts or researchers use in developing their cases. It is recommended for meetings to be held with national agencies, such as prosecutors, police, customs, internal taxation, procurement, reporting, etc.

3) Consolidation Phase

- Transfer and consolidation of information. On completion of the previous stage, the CPa will forward web addresses identified to the CPr, who will then be responsible for the collection, consolidation and validation of all web addresses provided by Member States.
- Tool delivery: The final product will be available to the Presidency of Gelavex, with the recommendation that it be uploaded to the CICAD website so that it is available to all investigators, prosecutors and analysts of Member States.
- Deliver of the tool (virtual campus). The final product will be deliver to the President of GELAVEX.

4) Broadcasting and Maintenance Phase

- Holding Workshops: There will be personal/virtual workshops help that will allow for the socializing and training of OAS Member States in the use of the tool.
- Maintenance: It is important to indicate that the project will require the continued support of the CPa, as the lists should be reviewed from time to time to ensure the information is still valid and updated.

5. REPRESENTATION OF THE SUBJECT ENVIRONMENT PROJECT TOOL OF PERU-BOLIVIA

The tool would work very simply. After pre-authentication (username and password) the user will find a screen showing a panel in which all windows of the virtual campus can be accessed, similar to the following:

The tool would work in a very simple manner: after the identification of the user (user and password), the user will find a panel in which he could access all the environments of the virtual camp as follows:

Campus Environments

The virtual campus would have four main environments, a virtual agenda and a tool to search for information:

• environment for open access to information sources .
• collaborative environment for sharing experiences (collaborative forum).
• collaborative environment for sharing documents published , which will be classified by country
• environment of broadcast news
• calendar of events
• advanced information search in defined domains.

Atmosphere of open access to information sources

The open sources environment would permit the members of CICAD/GELAVEX to share access to public webpages, which can contribute to money laundering and terrorism financing investigations.

The user must select the flag that corresponds to the person or company on which he/she wants information about. After the selection, another screen will appear and will contain shortcuts to web pages of the country, classified by category, like the screen shown below in which Bolivia was selected. In this instance, the user will just select the link that he/she would like to enter to get information.

Collaborative forum for exchanging experiences

This area of the forum is aimed at sharing experiences, consultations and information related to the topic. It would allow CICAD/GELAVEX members to make consultations or answer questions in a confidential environment.

Collaborative environment for sharing public information, which will be classified by country

This is organized to allow access to public documentation that members of CICAD /GELAVEX would like to share, It is a way to exchange documents, such as legislation, presentations, and examples, and will be administered by each FIU independently.

The user can identify the documents according to the flag of each country as follows:

Once a country is selected, Bolivia for example, a screen will show the information under that classification, according to a definable parameter.

Collaborative environment of news

Advanced Search

Much like a search engine (Google, Bing, etc.), it will allow one to search or access information on particular domains (http://www.ruat.gob.bo/ - which is a Bolivian domain). In this case, the search domain will be the sources of information supplied by each country.

Virtual Calendar

This will be an electronic calendar which will be available through the virtual campus, the latter of which will be fed by the Cpa of each country or according to the policies of CICAD/GELAVEX. It will also serve to inform users of relevant events or activities, though this function can be filtered.
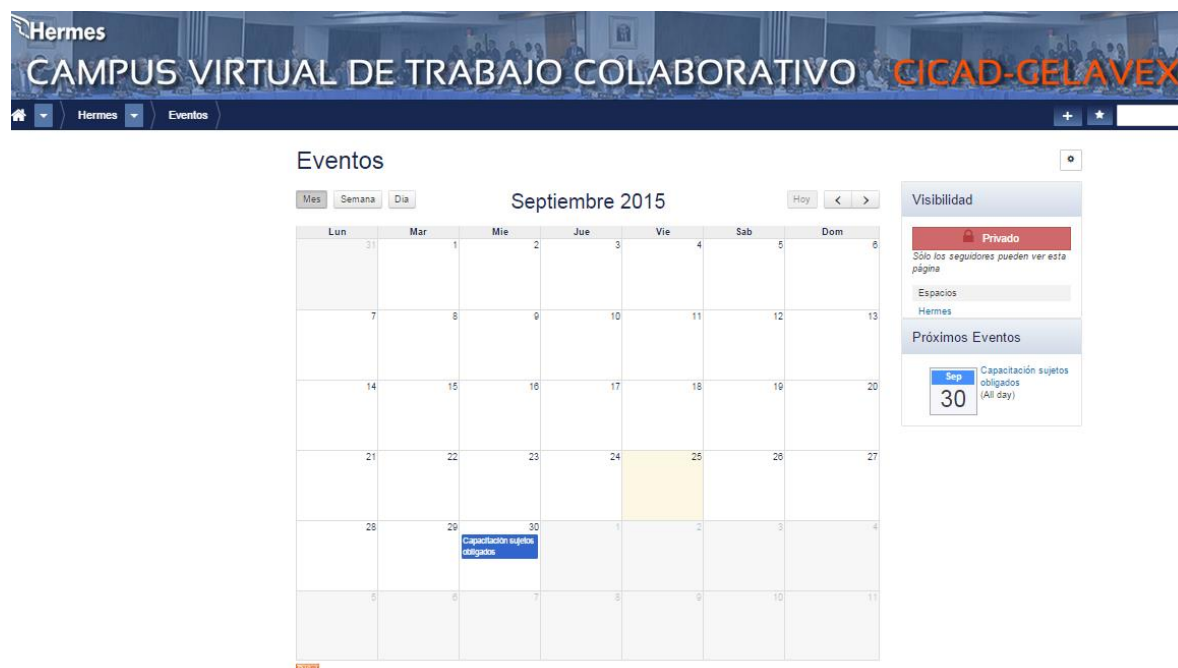
1.   **LOGISTICAL ASPECTS**

- Event spanning 2 days, full business day to gather the coordinators in the Project's Preparatory Phase.
- Event spanning 3 days, full business day to gather the coordinators in the Project's Consolidation Phase.
- Event spanning 3 days, full business day to gather the coordinators in the Project's Diffusion Phase.