

**55TH MEETING OF THE GROUP OF EXPERTS
FOR THE CONTROL OF MONEY LAUNDERING
October 31 – November 1, 2023
Washington, D.C.**

**OEA/Ser.L/LV.55
DDOT/LAVEX/doc.13/23
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**FINAL REPORT
(PROVISIONAL)**

Draft

1. BACKGROUND

The Group of Experts on the Control of Money Laundering (GELAVEX) was created through the “**First Meeting of the Inter-American Group of Experts to Prepare Model Regulations on Money Laundering Offenses Related to Drug Trafficking**” (OEA/SGE/CAD-62/90), which was held at the headquarters of the General Secretariat of the Organization of American States (OAS) from **November 26 to 30, 1990**.

GELAVEX currently serves as one of the OAS advisory bodies and is provided with technical secretariat services by the OAS Secretariat for Multidimensional Security **Department against Transnational Organized Crime (DTOC)**, as established by Executive Order 16-01 Rev. 1 issued by the OAS Secretary General in July 2016 creating the DTOC.

GELAVEX currently comprises two working subgroups, namely, on International Cooperation and Forfeiture; and on coordination involving Financial Intelligence Units (FIUs) and Criminal Investigation Agencies (CIAs). Its activities are determined via triennial strategic plans that spell out lines of action, and via annually approved work plans that outline specific activities to be pursued in accordance with predetermined lines of action. The approved 2020-2023 Strategic Planning ([DDOT/LAVEX/doc.33/20](#)) serves as the guideline for the activities pursued by the Group during the current triennium.

Based on the approved 2022–2023 work plan, the Working Subgroup on International Cooperation and Forfeiture will work on: 1) A study on the Implementation status of laws on extinction of ownership in the region and other forms of pre-conviction forfeiture; and 2) developing a guide to procedures and best practices in asset seizure processes, including virtual assets and their proper administration and return. The Working Subgroup on Financial Intelligence Units and Criminal Investigation Agencies will be devoted to: 1) a study on illegal money collection typologies, including pyramid schemes, ponzi schemes, extortive loans, using activities carried out by virtual asset service providers as fronts, etc.; and 2) developing a Guide to member states’ strategic analysis techniques and methodologies for strengthening advanced analytical capabilities and the use of new technological systems and solutions.

The GELAVEX *Pro Tempore* Chair, held by Ecuador, instructed the technical secretariat (DTOC) to convene the 55th Meeting of GELAVEX to be held in **hybrid** format, in person in **Washington, D.C., United States of America**, from **October 31 to November 1, 2023**, with the possibility of virtual participation in the meeting sessions, for quorum and voting purposes, as provided for in Article 9 of the GELAVEX Rules of Procedure. The purpose of the plenary will be to follow up on the approved Work Plan and the recommendations agreed upon at the Fifty-third (53rd) meeting, held virtually from Washington, D.C., on November 16, 2022. It will also unveil the new Strategic Planning for the 2023-2026 period and the 2023-2024 Work Plan. Lastly, the delegations responsible for coordinating the two Working Subgroups for the new term will be elected.

2. Meeting documents

The documents prepared by the working subgroups during the 2022-2023 term and panelist presentations that have been cleared for distribution are available on the [Documents](#) website of the 55th Meeting of GELAVEX:

<https://www.oas.org/en/sms/ddot/gelavex/55/>.

The **Technical Secretariat** invites delegations to visit the GELAVEX website, which includes general information about the group and access to documents from previous meetings:

<https://www.oas.org/es/sms/ddot/prog-expertos-para-el-control-del-lavado-de-activos-gelavex.asp>

3. MINUTES

October 30, 2023

The Chair, Vice Chair, Technical Secretariat and Working Subgroup Coordinators held a coordination meeting to review the agenda items; check on the preparation of documents, and coordinate their distribution; and ensure that all logistical requirements for the meeting were met.

October 31, 2023

3.1 Inaugural Session

Roberto Andrade Malo, Director General of the Financial and Economic Analysis Unit (UA FE) of Ecuador and *pro tempore* Chair of the Group of Experts for the Control of Money Laundering (GELAVEX).

Aileen Guzmán Coste, Director General of the Financial Analysis Unit (UAF) of the Dominican Republic and *pro tempore* Vice Chair of GELAVEX.

Gastón Schulmeister, Director, Organization of American States (OAS) Department against Transnational Organized Crime (DTOC).



TECHNICAL AGENDA

3.2 First meeting

3.2.1 Adoption of the agenda and review of topics. The Group adopted the draft agenda as submitted. The agenda was adopted without any changes.

3.2.2 Progress report on implementation of the 2022–2023 Work Plan, delivered by the Chair (Financial and Economic Analysis Unit (UAFFE), Ecuador)

Decisions: The Chair submitted the report presented for the consideration of the Group and deemed it approved with the consent of the delegations.

3.2.3 Working Subgroup on Forfeiture and International Cooperation. Presentation: Report on implementation status of laws on extinction of ownership in the region and other forms of pre-conviction forfeiture. **Delegation of Costa Rica.**

The delegation of **Costa Rica**, in the person of **Marcela Carvajal** of the Costa Rican Institute on Drugs, presented the findings of the study that was conducted during the 2022-2023 biennium.

Decisions: The Chair submitted the study presented by the Working Subgroup coordinator for the consideration of the Group and deemed it approved with the consent of the delegations.

3.2.4 Working Subgroup on Financial Intelligence Units and Criminal Investigation Agencies. Presentation: Technical guide and methodology used by member countries in generating strategic analysis for strengthening advanced analytical capabilities and the use of new technological systems and solutions.

The delegation of **Guatemala**, through **Sonia Annabella Girard Luna**, Legal Advisor at the Special Verification Office [IVE] of the Superintendency of Banks, Guatemala, presented the findings from analyzing the information shared by countries and open-source information.

Decisions: The Chair submitted the guide presented by the working subgroup coordination for consideration of the Group and deemed it approved with the consent of the delegations.



3.2.5 Panel discussion: Topic: Experiences with financial investigations from a police perspective.

- **Michelle Ford-Stephney**, Assistant Deputy Director of the INTERPOL National Central Bureau in the United States of America.
- **Eliana Ramos**, Attaché with the Chilean Investigative Police (PDI) in the United States.

Moderator: **Caio Pellim**, OAS Police Specialist, DTOC.

3.2.6 Panel discussion: Topic: National and multilateral efforts to combat money-laundering

- **Patricia Maribel Reyes Navarro**, General Technical Coordinator of the Financial and Economic Analysis Unit (UA FE) of Ecuador.
- **Julio Pinedo Lara** and **Oswaldo Cuadro Franco**, Financial Intelligence Unit of Colombia (UIAF).
- **John Grajales**, DTOC Technical Specialist, OAS.

Moderator: **Karoline Moraes**, DTOC Specialist, OAS.

3.2.7 Panel discussion: Topic: Outlook for asset recovery and other tools to combat money laundering.

- **Francis Vargas**, Special Projects Manager at Special Assets Corporation (SAE) of Colombia.
- **Florence Hermite**, Justice Attaché at the Embassy of France in the United States of America.
- **Chady El Khoury**, Deputy Division Chief, Legal Department, Financial Integrity Group - International Monetary Fund.

Moderator: **Monica Espinoza**, DTOC Specialist, OAS.



November 1, 2023

3.3 Second Session

3.3.1 Working Subgroup on Financial Intelligence Units and Criminal Investigation Agencies. Presentation: Study on illegal money collection typologies. **Delegation of Chile.**

The delegation of **Chile**, in the person of **Tania Gajardo**, Legal Counsel to the Money Laundering Specialized Unit of the National Prosecutor's Office, presented the findings of the study.

Decisions: The Chair submitted the study presented by the Working Subgroup coordinator for the consideration of the Group and deemed it approved with the consent of the delegations.

3.3.2 Working Subgroup on Forfeiture and International Cooperation. Presentation: Guide to procedures and best practices in asset seizure processes, including virtual assets and their proper administration and return

The delegation of **Costa Rica**, in the person of **Marcela Carvajal** of the Costa Rican Institute on Drugs, gave a presentation on the preparation of the guide and the results of the exercise.

Decisions: The Chair submitted the guide presented by the working subgroup coordination for consideration of the Group, deeming it to have been approved with the consent of the delegations.

3.3.3 Panel discussion: **Topic: Crimes associated with money laundering**

- **Leni Ysaguirre McGann**, Director of the Belize Financial Intelligence Unit.
- **Janaína Pereira Lima Palazzo**, Delegate of the Federal Police of Brazil.
- **Julia Yansura** (Program Director) and **Claudia Helms** (Program Manager), Latin America and the Caribbean, Global Financial Integrity (GFI).

Moderator: **Michael Bejos**, DTOC Senior Officer, OAS.

3.3.4 Presentation: **Topic: Advanced technology tools for anti-money laundering analysis.**

- **Shaun Barry**, Director, Global Security Intelligence Practice, Software and Analytics Solutions (SAS).

3.3.5 Panel discussion: **Illegal use of cryptocurrencies.**

- **Sanjeev Bhasker**, U.S. Digital Currency Council with the Digital Currency Initiative (DCI) and the U.S. Department of Justice's National Cryptocurrency Enforcement Team (NCET).
- **Sol Cinosi**, Advisor in the OAS Secretariat for Legal Affairs.

Moderator: **John Grajales**, DTOC Technical Specialist, OAS.

3.3.6 Presentation: **Topic: Experiences of Financial Intelligence Units in anti-money laundering matters.**

- **Francisco Subero**, Director of Analysis at the Financial Analysis Unit (UAF) of the Dominican Republic.

3.3.7 Presentation of proposals to be submitted for consideration by the OAS General Assembly, through the Committee on Hemispheric Security ([DDOT/LAVEX/DOC.16/23](#)).

The **Chair** opened up the floor for delegations to put forward their proposals for submission by the technical secretariat to the Committee on Hemispheric Security for consideration by the OAS General Assembly. The delegations offered no comment at this session.

The **technical secretariat** announced that it could receive written proposals from the delegations, e-mailed to DDOT@oas.org, up to November 15, 2023.

3.3.8 Presentation of the proposed Strategic Plan 2023-2026

Serving as **Vice Chair**, the delegation of the Dominican Republic took the floor to present the proposed Strategic Plan for the GELAVEX Working Subgroups for the 2023-2026 term. The proposal includes the following issues:

Working Subgroup on Financial Intelligence Units (FIUs) and Criminal Investigation Agencies (CIAs).

1. Thoroughly analyze the progress, challenges, and issues with implementing Financial Action Task Force (FATF) Recommendations 24 and 25, regarding transparency and beneficial ownership for individuals and other legal arrangements.

2. Analyze the techniques and tools used by member states to carry out parallel financial investigations and their effectiveness in money laundering investigations.
3. Present the member states' experiences with developing and using technology tools to improve operational and strategic analysis through a report on best practices.
4. Perform region-wide analysis and research on predicate crimes involving virtual assets (VA) and virtual asset service providers (VASPs) to identify challenges in terms of regulation, prohibition, or non-declaration on this activity, with a view to national and international cooperation.
5. Do an analysis and subsequent study on the inherent risks associated with using new technologies in view of digital transformation.
6. Identify the various coordination mechanisms or action protocols among the authorities involved in the anti-money laundering system and pinpoint member states' best experiences for the subsequent replication in a best practices report.
7. Do a study of best practices to outline the different sources of information and means of access that are available to Financial Intelligence Units in the Americas (national, international, public sector, private, open, and closed).
8. Conduct a survey for the purpose of studying sentences or cases in judicial process that include the concept of “Professional Money Laundering” or “Professional Launderer” in order to examine to what extent they have been prosecuted or convicted.
9. Conduct a regional analysis and research on how politically exposed persons are dealt with in terms of their activities, identifying crimes that are linked to the levels of risk exposure intrinsic to their work.

Working Subgroup on International Cooperation and Forfeiture.

1. Undertake efforts to determine the relevance and benefits of moving forward with implementing electronic processing of requests for international legal cooperation in money laundering-related cases.
2. Pursue efforts to strengthen international cooperation, both formal and informal, in order to improve asset identification and recovery.
3. Conduct a comprehensive study on investigations involving virtual assets and virtual asset service providers and their approach to seizure and forfeiture.
4. Conduct a study to determine effective measures to promote collaboration with Financial Intelligence Units in relation to the declaration or non-declaration of cross-border movement of cash and other negotiable instruments, in order to encourage sharing of this type of information.
5. Develop or identify best practices in seized and forfeited assets custody and administration.

Expressing appreciation for the presentation, the **Chair** opened up the floor for comments from the delegates. The delegation of Costa Rica offered the following comments, which had been previously shared via DTOC e-mail:

Costa Rica: Working Subgroup on Financial Intelligence Units (FIUs) and Criminal Investigation Agencies (CIAs)

1. Proposes merging items 2 and 3 because one deals with parallel financial investigation techniques and tools while the other mentions experiences using technology tools for analysis.
2. A request was made for the explanation of item 5 to be elaborated on for it to be clear to the reader.

Costa Rica: Working Subgroup on International Cooperation and Forfeiture.

1. A clarification of item 1 was requested in order to understand what the end-product would be.
2. The FIU/ICO Subgroup item 4, on virtual assets, deals with an issue similar to that of item 3 of the Subgroup on Forfeiture, hence the suggestion (if applicable) is that they be viewed as complementary since they could be read as one and the same topic extending each other.
3. A request was made for clarification of item 4, dealing with commitment to and compliance with controls.

The **Vice Chair** thanked Costa Rica for its comments and announced that it would do the relevant updates along with the other comments that would be received by November 15, 2023.

Decisions: The Chair submitted the proposed 2023-2026 Strategic Plan presented by the Vice Chair for the consideration of the delegations, deeming it approved with the consent of the delegations as soon as the comments to be received are dealt with.

3.3.9 Other business

- **Elevation of the Dominican Republic as *Pro Tempore* Chair for the 2023-2024 term**

The Chair announced the direct elevation of the Dominican Republic as *pro tempore* Chair of GELAVEX for the 2023-2024 term.

The Chair opened up the floor for delegations to comment on the matter. The delegations applauded the elevation of the Dominican Republic as *pro tempore* Chair of GELAVEX for the 2023-2024 term.

- **Nomination of Panama for *pro tempore* Vice Chair for the 2023-2024 term**

The **Chair** announced that the delegation of Panama had submitted in writing, through the Technical Secretariat, its nomination for *pro tempore* Vice Chair of GELAVEX for the 2023-2024.

The Chair offered the floor for the delegations to comment on the matter. The delegations applauded Panama's elevation as *pro tempore* Vice Chair of GELAVEX for the 2023-2024 term.

- **Nomination for coordinators of the working subgroups for the 2023-2024 term**

The **Chair** offered the floor to those delegations wishing to be nominated as coordinators of the Working Subgroups on Financial Intelligence Units and Criminal Investigation Agencies (FIU/CIA) and on Forfeiture and International Cooperation, respectively, for the 2023-2024 term.

Chile stated its interest in continuing on as coordinator of the Working Subgroup on Financial Intelligence Units and Criminal Investigation Agencies (FIUs/CIAs).

Costa Rica also confirmed its desire to continue leading the Working Subgroup on Forfeiture and International Cooperation for the new term.

The Chair opened up the floor for comments from delegations. The delegations applauded the reelection of **Chile** and **Costa Rica** as coordinators of the two working subgroups.



Decisions: After submitting Panama's nomination for the consideration of the Group, the **Chair** announced that it would be included on the agenda for the fifty-fifth (55th) meeting of GELAVEX, to be held in the fourth quarter of this year, for the consideration of the delegations.

– **Conclusions and recommendations**

The GELAVEX plenary decided:

- i. To approve reports submitted by the Working Subgroup on Financial Intelligence Units and Criminal Investigation Agencies (FIUs/CIAs), regarding: a) the study on illegal money collection typologies; and b) the development of a Guide to member states' strategic analysis techniques and methodologies for strengthening advanced analytical capabilities and the use of new technology systems and solutions.
- ii. To approve reports submitted by the Working Subgroup on Forfeiture and International Cooperation, regarding: a) the Implementation status of laws on extinction of ownership in the region and other forms of pre-conviction forfeiture; and b) the guide to procedures and best practices in asset seizure processes, including virtual assets and their proper administration and return.
- iii. To express appreciation for the guest experts' contributions to each of the panel discussions and for the presentations included on our agenda yesterday and today.
- iv. With respect to proposals to be referred to the OAS General Assembly (GA) for consideration: Up to **November 15, 2023** GELAVEX will receive proposed **paragraphs for referral to the GA**. After that date, GELAVEX will furnish the OAS Committee on Hemispheric Security with the recommendations and conclusions of this report, in addition to any recommendations received and considered by the *pro tempore* Chair.
- v. To approve by acclamation the nominations of **Chile** and **Costa Rica** as coordinators of the Working Subgroups on Financial Intelligence Units and Criminal Investigation Agencies and on International Cooperation and Forfeiture, respectively, for the 2023–2024 term.
- vi. To approve by acclamation the candidacies of **Dominican Republic** and **Panama** for Chair and Vice Chair, respectively, for the 2023-2024 term.
- vii. To approve the proposed **Strategic Plan 2023-2026** of the incoming Chair and Vice Chair, as well as the **Work Plan 2023-2024** to be pursued by the Working Groups over the next



year, together with any comments received and considered by the *pro tempore* Chair up to **November 15, 2023**.

- viii. To agree that the next plenary meeting of GELAVEX will be scheduled by the Chair and the Executive Secretariat to take place in the second quarter of 2024. The Technical Secretariat will confirm in due course the dates, city, and format.

3.3.10 Closing remarks

Aileen Guzmán Coste, Director General of the Financial Analysis Unit (UAF) of the Dominican Republic and *pro tempore* Chair of GELAVEX.

Isabel Y. Vecchio-Arófulo, Technical Secretary to the National Anti-Money Laundering and Financing of Terrorism Commission of the Ministry of Economy and Finance of Panama and *pro tempore* Vice Chair of GELAVEX.

Gastón Schulmeister, Director, Department against Transnational Organized Crime (DTOC), Organization of American States (OAS).

Ivan Marques, Secretary for Multidimensional Security (SMS), Organization of American States (OAS).