

**GROUP 3**  
**PHASE 2**

**COUNTERMEASURES AGAINST MONEY LAUNDERING**

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<b>Chairperson</b>	Mr. Shankar Pratap Singh	(India)
<b>Co-Chairperson</b>	Mr. Masakazu Ameku	(Japan)
<b>Rapporteur</b>	Mr. Jan Samuel Maringka	(Indonesia)
<b>Co-Rapporteur</b>	Mr. Oscar Antonio Goyanes	(Argentina)
<b>Members</b>	Mr. Sazali bin Salbi	(Malaysia)
	Mr. Tsunekazu Kobashi	(Japan)
	Ms. Azumi Misawa	(Japan)
	Mr. Rafael Romero	(Venezuela)
	Mr. Taizo Yokoyama	(Japan)
<b>Advisers</b>	Deputy Director Keiichi Aizawa	(UNAFEI)
	Prof. Yuichiro Tachi	(UNAFEI)
	Prof. Kenji Teramura	(UNAFEI)

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**I. INTRODUCTION**

In view of the fact that money laundering is at the center of predominantly all other criminal acts, it becomes an integral part of any transnational organized crime. Hence, any genuine effort to combat transnational organized crime has to necessarily address the serious issue of adopting countermeasures to fight the menace of money laundering.

Since the goal of a large number of criminal acts is to generate a profit for the criminal that carries out the act, the processing of the criminal proceeds through money laundering assumes critical importance, as it enables the criminal to disguise their illegal origin and helps him in enjoying the proceeds of his crime without any threat. Thus, money launderers are continuously looking for new methods and routes for laundering their ill-gotten proceeds from crime. The criminals do this by effectively

exploiting the differences between the national anti-money laundering systems and tend to move their networks to countries and financial systems with weak or ineffective countermeasures. Therefore, the possible social and political consequences of money laundering, if left unchecked or dealt with ineffectively, can be very grave and serious for any country.

Most fundamentally, since money laundering is inextricably linked to the underlying criminal activity that generated it, targeting the money laundering aspect of criminal activity and depriving the criminal of his ill-gotten proceeds of crime would automatically mean hitting him where it hurts the most, i.e. where he becomes financially most vulnerable. Without a usable profit, the criminal activity cannot continue.

This, inevitably brings to the fore the need for having an effective and organized system to deal with money

laundering by adopting suitable countermeasures in the legislative systems and law enforcement mechanism of various countries. In a broader sense, some of the countermeasures would include making the act of money laundering a crime; giving the investigative agencies the authority to trace, seize and ultimately confiscate the proceeds derived from criminal activity and building the necessary framework for permitting the agencies involved to exchange information amongst themselves and their counterparts in other countries. It is, therefore, critically important that all countries should develop a national anti-money laundering programme. This should, *inter alia*, include involving the law enforcement agencies in establishing a financial transaction reporting systems, customer identification system, record keeping system and also a method for verifying compliance.

However, it needs to be emphasized that national strategies by themselves would prove inherently inadequate in responding to the challenges posed by transnational organized criminal groups in their activity relating to money laundering since they cross multiple borders, involve multiple jurisdictions and multiplicity of laws. Hence, the countermeasures to combat money laundering calls for a truly global response making it absolutely imperative for increased global cooperation between the law enforcement agencies of different countries in effectively dealing with the menace of money laundering by the transnational organized criminal groups.

## II. THE GLOBAL RESPONSE

Realizing the gravity of the problem, the international comity of nations has tried to come up with a global response.

The United Nations adopted the Vienna Convention, 1988 against the Illicit Traffic in Narcotic Drugs and Psychotropic Substances, which, *inter alia*, incorporated the incrimination of money laundering activity as a criminal act in an international treaty for the first time.

In response to the mounting concern over money laundering, the Financial Action Task Force On Money Laundering (FATF) was established by the G-7 Summit held in Paris in 1989. The FATF was given the responsibility of examining the money laundering techniques and trends, reviewing the actions which had already been taken at the national and international level and the further measures which were required to be taken to combat money laundering. In April 1990, FATF issued a report containing a set of the Forty Recommendations which provided a detailed plan of action needed to combat money laundering. The Forty Recommendations were further revised and made more comprehensive by the FATF in 1996.

Thus, drafted in 1990 and revised in 1996, the Forty Recommendations of the FATF provide a very detailed and comprehensive blue print for action in the fight against money laundering. The Forty Recommendations cover the criminal justice system and law enforcement, the financial system and its regulation and more importantly the intrinsic need for international cooperation to combat money laundering. The Forty Recommendations of the FATF have come to be recognized as the international standard with regard to anti-money laundering programmes. The Forty Recommendations of the FATF set out the basic framework for anti-money laundering efforts and are designed to be

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of universal application. However, it was recognized at the outset, that different countries have diverse legal and financial systems and therefore could not take identical measures. The Recommendations, therefore, only lay down the basic principles for different countries to implement, within their constitutional frameworks and thus allow the countries a degree of flexibility. The measures suggested by the FATF are found to be absolutely essential for the creation of an anti-money laundering framework.

**III. THE FORTY  
RECOMMENDATIONS**

The Forty Recommendations of the FATF, apart from the general framework, can be broadly classified under three major heads *viz*:

- A. The existence or creation, within the legal framework of each country, a law criminalizing the act of money laundering, as defined by the Vienna Convention of 1988 on NDPS.
- B. The existence or creation or strengthening of the legal and financial systems in different countries, which would provide the law enforcement and investigating agencies effective tools to combat money laundering.
- C. Strengthening of the International Cooperation between different countries at all levels, so as to enable an organized and concerted effort of the various law enforcement agencies of the different countries, in successfully combating money laundering.

The gist of some of the very important recommendations, under the above referred three major heads, are enumerated as follows:

- A.(i) Each country should take such measures as may be necessary, including legislative ones, to enable it to criminalize money laundering, as set forth in the Vienna Convention. Further, the offence of money laundering should not be merely confined to drug offences but should be extended to all serious offences which could be designated as money laundering predicate offences (R. 4).
- (ii) The concept of knowledge relating to money laundering may be inferred from objective factual circumstances (R. 5) and that corporations themselves, and not only their employees, should be subject to criminal liability (R. 6).
- B. The further perusal reveals that a predominant majority of the Forty Recommendations of the FATF falls within the ambit of major head (B). The gist of some of the very important recommendations are briefly summarized as follows:
  - (i) Countries should adopt measures, including legislative ones, to enable their competent enforcement authorities, to confiscate laundered property or the proceeds from the commission of any money laundering offence. This may also include confiscation of property of corresponding value of the offending party (R. 7). The above recommendation further stipulates, that the measures should include the authority to (1) identify, trace and evaluate property which is subject to confiscation, (2) provide for measures such as freezing and seizing to prevent any dealing, transfer or disposal of such property and (3) take any

further appropriate investigative measures toward this end.

The FATF has made very specific recommendations with regard to the strengthening of the financial systems of different countries. The gist of some of the very useful and important recommendations can be summed up as follows:

- (ii) Financial institutions of different countries should not permit opening of and operations in anonymous accounts or accounts in fictitious names. They should be necessarily required by law or regulation to establish the correct customer identity while opening an account, renting safe deposit lockers or while entering into large monetary transactions (R. 10).
- (iii) Financial institutions in each country should maintain, at least for a period of five years, all necessary records relating to financial transactions, both domestic and international, so as to enable them to comply swiftly with information requests from the competent authorities. Such records should be sufficient to be used as evidence for prosecution, if required (R. 12)
- (iv) Countries should pay special attention to money laundering threats inherent in new or developing technologies that might favour anonymity and take suitable measures, if required, to prevent their use in money laundering schemes (R. 13).
- (v) Financial institutions in different countries should pay special attention to all complex and unusually large patterns of transactions which have no

apparent lawful purpose. Such unusual transactions should be very closely examined and the findings should be made available to the law enforcement agencies (R. 14). If financial institutions suspect that funds emanate from a criminal activity, they should be required to report promptly their suspicions to the competent authorities (R 15).

- (vi) The various functionaries of the financial institutions should be protected from criminal or civil liability for reporting suspicious transactions in good faith (R. 16). The financial institutions and their functionaries should not be allowed to warn their customers for having reported any suspicious transaction to the competent authorities (R. 17). Financial institutions should comply with instructions from the competent authorities (R. 18).
- (vii) The financial institutions in different countries should develop programmes against money laundering including:
  - a. the development of internal policies, procedures and controls,
  - b. an ongoing employee training programme,
  - c. an audit system to test the functioning of the actual implementation of the scheme (R 19).

In addition to the above, the FATF has also made certain further recommendations to avoid money laundering and to cope with countries having no or insufficient money laundering laws/measures. Some of the important recommendations in this regard are as follows:

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- (viii) Financial institutions should give special attention to business transactions with countries having no or insufficient anti-money laundering laws/measures. There should be a very thorough scrutiny and monitoring of such transactions (R. 20 & 21).
- (ix) Countries should try to implement suitable measures to detect and monitor physical transborder transaction of cash and bearer negotiable instruments (R. 22). They should try to implement a system of reporting all domestic or international currency transactions above a specified or fixed amount to a national central agency having a computerized data base. Such information should be made available to the competent law enforcement agencies of each country as and when required (R. 23). Countries should try to develop safe money management techniques including use of checks, payment cards, etc. to replace cash transactions or transfer of money (R. 24). They should ensure that the money launderers are not able to abuse 'shell corporations' and strengthen their systems to prevent any such unlawful misuse (R. 25).
- (x) The competent authorities in different countries should ensure that adequate laws and regulations are in existence to provide safeguards against money laundering. They should also ensure that the enforcement authorities in each country have a very high level of co-operation and co-ordination amongst themselves in combating money laundering activity (R 26). They should ensure sufficient safeguards to protect taking over of control or acquisition of any financial institutions by criminals or their associates (R. 29).
- C. The FATF has very heavily emphasized the strengthening of international cooperation between the different countries with a view to effectively deal with the criminals indulging in money laundering activities. Some of the very important recommendations in this regard are enumerated as under:
- (xi) The first part of the 'Recommendation' pertains to greater and increased level of exchange of information, both general and those relating to suspicious transactions. It states that countries should have a system of recording international cash flows, both inflows and outflows, in all currencies so that an estimate could be made with regard to movement of money which should be made available to the International Monetary Fund (IMF) and the Bank for International Settlements to facilitate international studies (R. 30). Further, the 'INTERPOL' and the 'World Customs Organization' should be given the responsibility for gathering and disseminating such information to the competent authorities indicating the latest developments in money laundering and money laundering techniques. The above exercise should also be done by the Central Banks and competent authorities in

different countries domestically (R. 31). Countries should further ensure that there is a system of a spontaneous or “upon request” exchange of information relating to suspicious transactions, persons and corporations involved between the different countries. This international exchange of information should be in conformity with the national and international provisions on privacy and data protection (R. 32).

The second part of ‘Recommendations’ emphasizes on other forms of co-operation at international level including those relating to confiscation, mutual assistance and extradition.

The FATF has suggested that differences in the laws and the understanding of the money laundering definition and activity in various countries should not prove to be a hindrance or obstacle in providing each other with mutual legal assistance (R. 33). International co-operation should be further strengthened by bilateral and multi-lateral agreements and arrangements with the intent to facilitate maximum mutual assistance between different countries (R. 34). Further, countries should try to ratify and implement relevant international conventions on money laundering including the 1990 Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime (R. 35).

(xii) The concluding part of the Forty Recommendations pertaining to

enhancing international co-operation between different countries suggest some of the following important measures:

There should be increased co-operation, while conducting investigations between different countries including usage of the effective technique of controlled delivery related to assets known or suspected to be the proceeds of crime (R. 36). There should be procedures for providing mutual assistance in criminal matters, including production of records by financial institutions, the search and seizure of persons and premises for obtaining evidence in money laundering investigations and prosecutions (R. 37). An authority to take immediate action on requests from foreign countries to identify, freeze, seize and confiscate proceeds of crime or the underlying crime behind the money laundering activity (R. 38).

The FATF further suggested that conflicts relating to jurisdiction should be avoided and the accused should be prosecuted in the best venue, in the interest of justice, if more than one country is involved. Further, there should also be arrangements for coordinating seizure and confiscation proceedings, including sharing of confiscated assets (R. 39). It lastly suggested that different countries should have an arrangement for extradition, where possible, of individuals charged with a money laundering offence. All countries should recognize money laundering as an extraditable

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offence and should try to simplify their legal framework relating to extradition proceedings. (R. 40).

**IV. NON CO-OPERATIVE COUNTRIES AND TERRITORIES**

The FATF continued to further review the Forty Recommendations from time to time with regard to their effectiveness in dealing with the crime relating to money laundering and also the implementation by the various countries of the recommendations made more comprehensive in 1996. On 22 June 2001, the FATF published its Twelfth Annual Report which outlines its main achievements, including the significant progress made in relation to work on Non Co-operative Countries and Territories (NCCTs). The FATF has revised and updated its list of NCCTs which now includes the following countries/territories; Cook Islands, Dominica, Egypt, Guatemala, Hungary, Indonesia, Israel, Lebanon, Marshall Islands, Myanmar, Nauru, Nigeria, Niue, the Philippines,<sup>1</sup> Russia, St. Kitts and Nevis and St. Vincent and the Grenadines. The FATF has suggested that all countries should be especially vigilant in their financial dealings/transactions with the above mentioned 'NCCTs' and if necessary, take additional countermeasures.

**V. THE UNITED NATIONS CONVENTION AGAINST TRANSNATIONAL ORGANIZED CRIME**

The United Nations Convention against Transnational Organized Crime (TOC) 2000 has effectively combined many of the anti-money laundering

mechanisms explored at the international level into one comprehensive legal instrument. The convention on TOC addresses a number of issues, raised through several international initiatives, which in many instances were earlier not legally binding, into an international legal instrument having force. The convention has recognized that a considerable amount of valuable work related to the fight against money laundering has been undertaken by a number of organizations and has suggested that countries should seek guidance from such initiatives.

The UN Convention on TOC borrows from the 1998 General Assembly Political Declaration and extends the definition of money laundering to include money derived from all serious crimes which are defined as those offences which are punishable by a maximum sentence of at least four years or more.

In its focus on issues more directly related to financial institutions, the convention requires member countries to establish comprehensive regulatory and supervisory regimes for banks and also non-banking financial institutions. It requires that such regimes should specifically address the issue of customer identification, record keeping and suspicious transaction reporting. It stresses the importance of the exchange of information at the national and international levels and in that context highlights the role of Financial Intelligence Units (FIU) for the purpose of collecting, analyzing and disseminating information. It also highlights the need for co-operation amongst the law enforcement, judicial and financial regulatory authorities of different countries.

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<sup>1</sup> It needs to be emphasized that the Philippines has since enacted the Anti-Money Laundering Act on 29 September 2001.

For a fuller and more comprehensive understanding of the issue relating to money laundering, as adopted by the UN Convention on TOC, 2000, the complete reading of Article 6 and Article 7 and also articles 12, 13, and 14 is deemed imperative.

## **VI. SOME COUNTERMEASURES AGAINST MONEY LAUNDERING**

The workshop, after having deliberated at length and in detail, highlight three subjects which are regarded to be very important in strengthening the implementation of the Forty Recommendations.

### **A. Knowing Your Customers**

Money laundering is conducted by depositing proceeds of crime in financial institutions, hiding such proceeds of crime, and disguising them as if they originated from legitimate economic activity.

In order to detect money laundering in the most effective way, it is important to obtain illegal proceeds at an early stage. Therefore, the Forty Recommendations prescribe countermeasures, including identification of the person at the time of the opening of his or her bank account.

It was discussed, however, that the scope of the identity of the customer by the bank and other financial institutions should not be expanded. It is prescribed under law in most of the participant's countries that financial institutions identify the person by such means as his or her ID card at the time of the opening of his or her bank account. It was pointed out while it is effective to extend the scope of obligation for identification to the areas such as occupation, original capital and deposits, it may impose excessive burdens on the financial institutions.

Most of the participants, however, opined that the financial institutions obligations should be extended in order to control money laundering crime. It was discussed whether or not sanctions be imposed upon such financial institutions if and when they fail to meet the obligations on their part in order to ensure the practical effect of such obligations. On this point, some argued that it is not reasonable to impose sanctions upon the financial institutions. Most of the participants argued that some countries already have such sanctions and that it is useful to have provisions on sanction in order to achieve the most effective control over money laundering.

Another topic to keep in mind is that the crime of laundering assets is born as consequence of the seizure of earnings. The profits or instruments and the economic benefit must be confiscated. And this is the key to criminal politics on money laundering. We have to attack their economic interests, their results, and their earnings. The important thing for criminal organizations is not the crime itself but the earnings that they generate. Here, again we meet with another inconvenience from the legislative point of view.

In relation to the effective normative frame, and referring that is to say to the matter that concerns us, the financial system, diverse legislation is necessary for the identification of clients.

Also another regulation exists and it refers to the obligation of taking "accounting books" where the total operations are registered and banks may preserve the bank documentation for 10 years from the date of its registration.

Additionally other regulations are necessary to highlight, such us:

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- Register payments of checks and make it an obligation to maintain registration on determined operations;
- Enforce financial entities to inform about certain transactions where specifically it is required for the “Prevention of money laundering coming from illicit activities”;
- Regulations that include the Agencies and Offices of Change;
- To designate, in each entity, a responsible official for the specific topic of money laundering.

In relation to future perspectives, we should point out that the crime of money laundering should be considered as an international crime. It is necessary to have different tools that should accord with those that have already been implemented in other countries.

However, such laws must include an obligation on certain people to denounce operations and/or suspicious activities.

### **B. Asset Forfeiture System**

An asset forfeiture system is a veritable tool for law enforcement and judicial criminal process to deprive criminals of illegally acquired proceeds, and plough back such proceeds to the community for the greater good of society.

The legal provisions regarding an asset forfeiture system differ from country to country. Generally they have this system in a criminal proceeding act. But especially in countries like Venezuela and Argentina, they have a forfeiture system in their Money Laundering Act, the same as in Malaysia relating to the Dangerous Drugs (Forfeiture of Property) Act which was enacted in 1988.

In Indonesia, the Anti Corruption Act, 1971 (amended in 1999) deals with the

proceeds of crime. Such goods (from the proceeds of crime) can also be confiscated in the interests of the investigation.

The Japanese assets forfeiture system for organized crime is embedded in the Organized Crime Punishment Law, 1999. In this law, the system of confiscation and collection of equivalent value is provided, which is helpful for the asset forfeiture system. There is also provision for assets illicitly received in relation to property obtained by the parties during engagement in drug-related offences, if the value is deemed unreasonably large then such property or equivalent thereof is liable to be confiscated.

However, it is very difficult to confiscate effectively even for the countries which have a special forfeiture system against money laundering. In other words, one of the most serious problems that countries deal with, in the confiscation procedure, is where the 3rd party is disguised as bona fide to avoid seizure by the criminals.

It is hard to prove that a 3rd party has received illicit proceeds, knowing it was the product from crime. As a result, criminals keep their illicit proceeds. We should make a 3rd party prove he/she is bona fide.

Indonesia introduced this issue under the Anti-Corruption Law, 1999 about burden of proof. This article makes the defendant prove his innocence and to show that he is not conducting any corruption. This article contradicts the burden of proof regulation in the Criminal Procedure Code, which states that the burden of proof is in the prosecutor's hand. It is the prosecutor's duty to prove whether the defendant is guilty or not. The Anti-Corruption Law reversed this burden of proof in limited

circumstances, because the prosecutor still has to prove his indictment.

Thus, the transfer of the burden of proof can be an effective weapon for the law enforcement agent, but at the same time can also impose excessive burdens on a 3rd party. In case the money launderer has transferred the proceeds of crime to the 3rd party, the 3rd party receiver must prove that he/she has not known of the source of the money. In this sense, to prevent the burden of proof from being excessive, the scope and extent of such a burden should be adequately considered.

### C. Gatekeepers

The process of laundering illegal money normally goes through three different stages, that's 'investment', 'layering' and 'integration'. Naturally these three stages are used by the launderers as a means to circumvent money laundering countermeasures through more complex schemes. This increase in complexity means that those individuals desiring to launder criminal proceeds must turn to the expertise of legal professionals, accountants, financial consultants, and other professionals to aid them in the movement of such proceeds. The types of assistance that these professionals provide are the gateway through which the launderers must pass to achieve the above stages. Thus the legal and accounting professionals serve as sort of 'gatekeepers' since they have the ability to furnish access (knowingly or unwittingly) to the various tools that might help the criminal move or conceal the funds.

The functions that are most useful to the potential launderers include:

- Creation of corporate vehicles or other complex legal arrangement (trusts, for example). Such constructions may serve to confuse the links between the proceeds of a crime and the perpetrator;
- Buying or selling of property. Property transfer served as either the funds (layering stages) or else they represent the final investment of these proceeds after having passed through the laundering process (integration stage);
- Performing financial transactions. Sometimes these professionals may carry out various financial operations on behalf of the launderers (for example, cash deposits or withdrawals on accounts, retail foreign exchange operations, issuing and cashing cheques, purchase and sale of stocks, sending and receiving international fund transfers, etc.);
- Financial and tax advice. A criminal with a large amount of money to invest may pose as an individual hoping to minimize his/her tax liabilities or desiring to place assets out of reach in order to avoid future liabilities.

In some of these functions, the potential launderer is obviously not only relying on the expertise of these professionals but is also using them and their professional status to minimize suspicion surrounding their criminal activities. In view of the vast services these professionals provide, these so called 'gatekeepers' would have access to important and useful information that could be used to implicate the launderer of an offence of money laundering. However to obtain such incriminating information from the gatekeepers is not an easy task due to the privilege of confidentiality between the 'gatekeeper' and their clients, in particular the legal

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profession. This traditional professional confidentiality is now extended to other non-advocacy 'gatekeeper' functions.

One solution to overcome the above problem is to include these professional gatekeepers under the same anti-money laundering obligations as financial intermediaries when they perform their professional functions. In other words, these professional gatekeepers are required to identify the client with which they are dealing and to channel any suspicious transaction reports (STR) to the relevant authority/financial intelligence unit (FIU) or to face the penalties which come with failing to do so.

## VII. CONCLUSION

It may, thus, be seen that the problem of money laundering is being seriously viewed by the international community with the concern it rightly deserves. Subsequent to the September 11 2001 terrorist attacks on the World Trade Center and the Pentagon in the USA, the issue of money laundering has suddenly assumed altogether a new dimension in terms of the funding of terrorist organizations all over the world and the predominant use of money laundering by terrorist criminal organizations in funding their activities. However, the global response to the challenge posed has been overwhelming, as is evident by the media coverage (CNN: October 23, 2001) where it has been reported that more than 140 countries from all parts of the world are co-operating in tracking down funds of criminal organizations and more especially terrorist funds which are suspected to be involved in money laundering activity at different stages in various countries. It is, indeed, very heartening to note, that out of the above 140 countries, seventy countries have

actually gone ahead and frozen certain accounts in banks and financial institutions, which were believed to be involved in suspicious financial transactions. The intent behind the above exercise is to chase the 'money trail' used by the criminals/terrorists and after identifying such suspicious accounts, freeze, seize and finally confiscate the funds/assets involved so that organized criminal gangs/terrorist organizations are finally starved of funds.

It needs to be emphasized, however, that moving forward in the twenty first century is going to pose new threats and challenges to the law enforcement authorities in different countries with regard to combating organized crime, including money laundering. A case in point would be the financial frauds which can now easily be committed over the Internet. Certain instances of such financial frauds have already come to notice and preventive action needs to be taken as a priority.

The workshop, after having deliberated at length and in detail, is of the considered view that new challenges posed by the money launderers calls for new initiatives, techniques and tools to combat the menace of money laundering. To this end, the new techniques and tools would necessarily have to include 'controlled delivery', 'electronic surveillance' including 'wire tapping', whenever necessary, and also 'undercover operations'. It is the considered view of the workshop, that the domestic laws of different countries should provide for the usage of the above modern investigation techniques and tools, with the intent of effective enforcement of money laundering laws. However, the above specialized techniques are not meant to totally replace but only to strengthen and

supplement the existing investigation techniques and tools.

The workshop is also of the considered view that there should also be a provision in the domestic laws of each country for prosecution of the so called "gatekeepers" i.e. the legal professionals, accountants, financial consultants and other professionals who provide the requisite expertise, without which it would not be possible for the organized criminal groups to invest large sums of money without getting detected. Such professionals indulge in money laundering activity by way of providing professional accounting and legal advice to the criminal so as to enable him to conceal the origin of the illegal proceeds of crime. In the view of the workshop, such professionals also need to be simultaneously prosecuted with the criminal, in the same manner, for abetment of the offence of money laundering.

The workshop is also unanimously of the view that all the investigating and intelligence agencies within each country need to co-operate and interact more closely in the fight against money laundering. It is also felt desirable that for successfully combating the menace of money laundering, all investigating and intelligence agencies in different countries need to necessarily adopt a very pro-active attitude towards the collection of intelligence relating to money laundering, i.e. instead of just reacting, they need to actively act on gathering intelligence on the subject.

Lastly, with regard to international co-operation, there is total unanimity that it would be in the best interests of all countries to strengthen and enhance international cooperation at all levels, i.e. at the regional, inter-regional and international levels by way of bilateral,

multi-lateral and international treaties providing for mutual legal assistance and extradition, where necessary.

In view of the workshop, there are still a lot of genuine impediments and difficulties being experienced by many countries in the implementation of the Forty Recommendations of the FATF and the TOC UN Convention, 2000. However, it is the genuine belief of the workshop that all such obstacles and hindrances could be, over a period of time, removed backed by the all important political will of the leadership of such countries.