

Inter-Governmental Action Group against Money Laundering in West Africa



QUARTERLY E-NEWSLETTER

July - September 2009

www.giaba.org

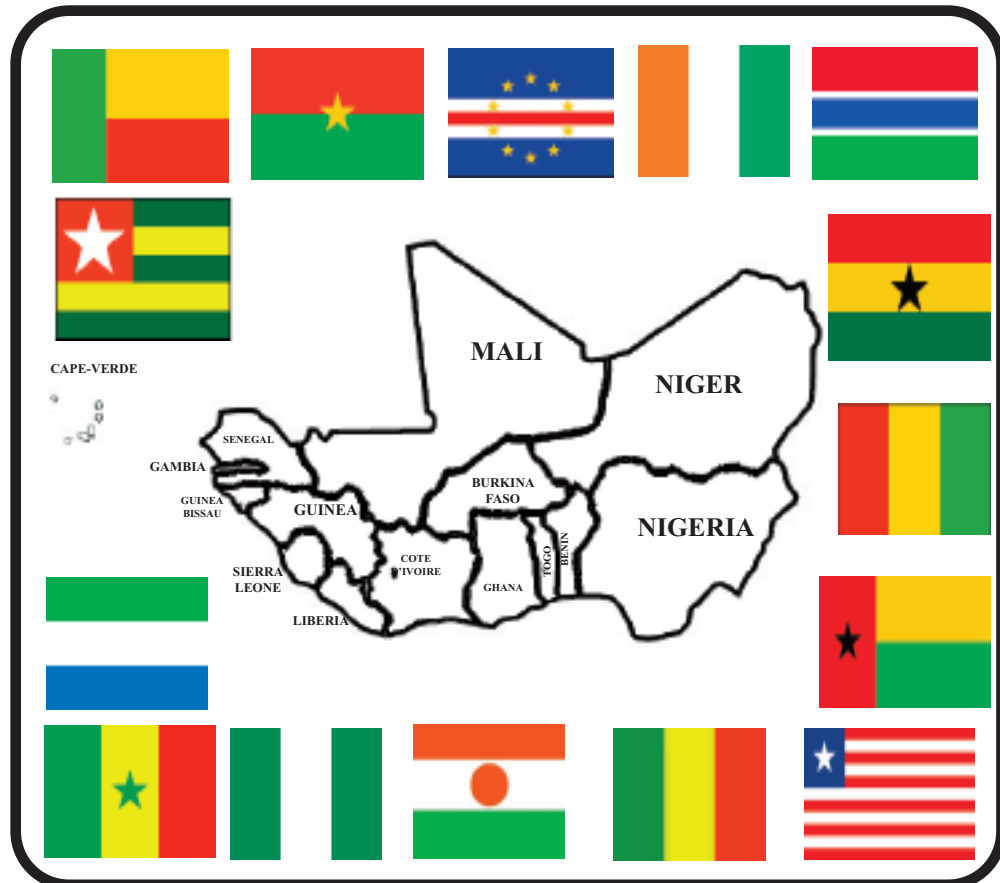
EDITORIAL

The quest of an e-newsletter

Given the mission and objectives of GIABA, communication and advocacy remain central to the fulfillment of this vision and the attainment of the objectives. Therefore, it is imperative that a communication and advocacy strategy is developed. To this end, there is the need to create a durable and sustainable mechanism for the dissemination of information on programs and activities of GIABA. That is why TV and radio programs are being organized for the Director General, press releases are published and sent to the media and posted on the website and journalists are mobilized to cover GIABA activities both in Senegal and in other member countries where programs are organized.

The quarterly GIABA e-newsletter aims to:

- Bridge communication gap within the Secretariat;
- Keep national correspondents and FIUs well informed on the activities of the Secretariat;
- Reach a wide range of audience



that the printed copy hardly reaches: senior officials of Member States, civil society organizations and private sector in West Africa and around the world, international organizations; etc.

- Reach out to audiences residing far from West African sub-region and among those just mentioned;
- Encourage adherence to GIABA mandates and missions;
- Provide opportunities to save resources and, at the same time, reaching out to more readers;
- Enable readers to easily access information for reference and research purposes.

Inter-Governmental Action Group against Money Laundering in West Africa (GIABA)

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LOW CAPACITY COUNTRIES FACE DIFFICULTIES IN IMPLEMENTING FATF STANDARDS - DG GIABA

Low capacity countries are committed to a full implementation of the Financial Action Task Force (FATF) 40+9 Recommendations, but they face daunting challenges.

Dr. Abdullahi Shehu, Director General of GIABA presented a keynote address entitled "*Promoting Financial Market Stability through Effective AML/CFT Regime*" at the opening of the Twenty-Seventh International Symposium on Economic Crime on Monday 31 August, 2009, at the Jesus College, University of Cambridge, UK.

According to him, the challenges faced by low capacity countries include competing priorities for scarce resources, acute shortage of resources and expertise, weaknesses in legal institutions, dominance of the informal sector, and poor documents/data retention systems.

The Director General asserted that one of the core

functions of GIABA is the monitoring of compliance of member states in West Africa through a mutual evaluation which includes a robust follow up process to ensure that member states are assisted to remedy deficiencies in their systems through a strategic implementation planning.

The Director General stated further that GIABA provides technical assistance to its members by seeking their cooperation and agreement, strengthening inter-agency cooperation and coordination; and the promotion of strategic partnerships with stakeholders, including the private sector.

GIABA also hosted a Workshop on "*Promoting the Integrity of the Financial Sector: Supervisory and regulatory challenges for Developing countries*" to further discuss the challenges they face in enforcing effective AML/CFT regimes in developing countries.

GIABA TASKS ASSESSORS ON ETHICS.

The Director-General of Inter-Governmental Action Group against Money Laundering in West Africa (GIABA), Dr Abdullahi Shehu has charged assessors to uphold professionalism and adhere strictly to the methodology adopted by the Financial Action Tasks Force (FATF) in assessing a country.

In a remark at a 5-day regional AML/CFT Assessors' training program organized by GIABA in Accra, Ghana. Dr Shehu urged for objectivity and transparency in their assessments aimed at determining the effectiveness with AML/CFT system of a country.

The training programme was held from July 27 - August 2, 2009.

To this end, he charged the trainees on the need to apply the relevant United Nations Conventions and Security Council Resolutions to the mutual evaluation process in addition to the FATF procedures in order to assess a country's level of compliance with AML/CFT standards.

Dr Shehu disclosed that the purpose of the programme is to build the capacity of member States to conduct

proper and thorough assessments based on the FATF methodology, hence the need for assessors to apply the skills and knowledge acquired during the training in diligently conducting a fair and transparent mutual evaluation exercise.

The Director-General of GIABA expressed appreciations to all development partners, particularly to the World Bank, FATF and the IMF for their contributions towards the successful hosting of the programme. He noted that the quality of GIABA's mutual evaluation reports have improved significantly in view of the support and assistance from FATF and the IFIs.

He further disclosed that GIABA as a specialized institution of the ECOWAS, as well as a Financial Action Task Force (FATF)- Style Regional Body has since 2006, concluded the mutual evaluation of 11 member States. Dr Shehu thanked GIABA member States for their continued support and cooperation towards achieving GIABA's objectives of combating the scourges of money laundering and terrorism financing in the region.



WEST AFRICAN COUNTRIES VULNERABLE TO DRUG TRAFFICKERS - *DG, GIABA*

The Director-General of Inter-Governmental Action Group against Money Laundering in West Africa (GIABA), Dr Abdullahi Shehu has decried the high prevalence of drug trafficking in West Africa, thereby endangering the socio – political and economic development of the region.

Making the disclosure in a paper entitled “ *Drug Trafficking and its impact on West Africa*” presented at a recent meeting of the Joint Committee on Political Affairs, Peace and Security / NEPAD and Africa Peer Review Mechanism of the ECOWAS Parliament, held in Katsina, Nigeria, Dr Shehu depicted his presentation with statistical analyses, the glooming and high prevalence of transshipment of hard drugs in the region as greater than in other region of the world.

The Director – General of GIABA who advocated for an holistic plan of action towards combating the menace of drug trafficking in view of its attendant consequences on the socio – political and economic development of the region, stressed the need for strong legislations in conformity to acceptable international standards and best practices aimed at regulating the criminal activities of drug and human traffickers to the bearest minimum.

Citing many international conventions relating to prevention and control of drugs, Dr Shehu lauded the efforts of the ECOWAS Authority of Heads of State and Government to have approved a regional framework and action plan in 2008 on combating drugs and organized crime in the region.

He urged the ECOWAS Commission to strengthen its drug control unit and commence the implementation of the action plan without further delay in order to reduce the incidence of drug trafficking.

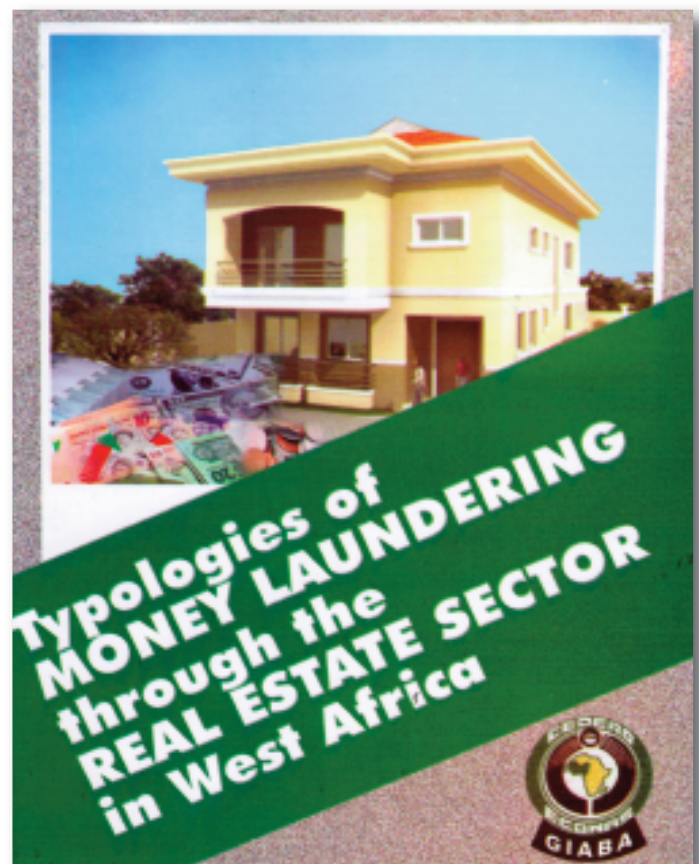
While advocating for a pro-active measure and joint co-ordinated response towards countering the drug threat, the Director – General of GIABA reiterated the need for adequate funding of the action plan and regu-

lar review of legislation against drug offences.

Other measures suggested includes strong public awareness to empower the citizens of the various countries to resist a threat that is detrimental to their corporate existence and continuous training of personnel to equip them with the necessary knowledge of gathering intelligence information and skills in the fight against drug abuse.

Dr Shehu further pointed out that the use of latest technologies would go along way to detect drugs and other illegal shipments within unopened containers.

He urged ECOWAS parliamentarians to enact quality legislation against drug trafficking and support the establishment of Financial Intelligence Unit (FIU) in their respective countries as a major recommendation of FATF for the prevention of money laundering and terrorism financing.





Inter-Governmental Action Group against Money Laundering in West Africa

GIABA HOLDS 12TH PLENARY SESSION

The 12th Technical Commission /Plenary meeting of the Inter-Government Action Group against Money Laundering in West Africa (GIABA) is scheduled to take place from the 1st – 6th November, 2009 in Freetown, Republic of Sierra Leone.

The event offers an opportunity for member States to come together to share their experiences with respect to the challenges they are facing in implementing effective AML/CFT measures. The Plenary meetings are thus an integral part of GIABA's efforts at fostering regional integration in ECOWAS region. GIABA as a specialized ECOWAS institution as well as FATF-Styled Regional Body (FSRB) holds twice a year technical commission/ plenary meetings for representatives of member States to discuss a number of pertinent issues that require concerted and harmonize approach in addressing them.

The plenary is an assembly of experts including representatives of member States, development partners and observers in the fight against money laundering and terrorist financing. A key element during the meetings is the consideration and approval of mutual evaluation reports of member States towards assessing their level of compliance to FATF 40+9 Recommendations in the fight against money laundering and terrorist financing. Also during the meetings, the activity report of GIABA is presented by the Director General of GIABA, Dr Abdullahi Shehu. In addition, the forum of heads of Financial Intelligence Units (FIUs) in member States will be inaugurated.

For more information visit www.giaba.org or call (+221) 33 859 18 18



GIABA TRAINED WEST AFRICAN ENGLISH SPEAKING JUDGES ON ECONOMIC AND FINANCIAL CRIME

From 13 to 17 July, 2009, the second seminar on economic crime for English speaking judges of the Economic Community of West African States (ECOWAS) took place in Accra, Republic of Ghana. Like the first one held in Abuja in March 2008, it was organized by the Intergovernmental Action Group against Money Laundering in West Africa (GIABA). The 53 participants discussed issues related to judicial integrity, asset forfeiture and confiscation; the legal framework on money laundering and terrorist financing; sentencing procedures and plea bargaining; admissibility of electronic documents; role of financial intelligence units; and principles of international cooperation.

Participants agreed to implement these principles in their various countries and to promote respect for rule of law while bearing in mind the public perception of their judicial decisions. It was noted that corporate governance in the judicial sector is important and that the judiciary should be able to develop three lines of defense, namely: "*policies, procedures and internal control*".

Additionally, they noted that appointment of judges should be done in a transparent manner and only judges who have been probably screened and whose background exhibits good conduct should be appointed. They also requested that judges should be consulted during the review of the legislation in order that the law will reflect some of the practical challenges experienced by judges in the trial of economic and financial crime. Apart from that, the participants recommended that there is need to reform the rules of evidence and codify measures on the admissibility of electronic evidence before calling for the immediate establishment of effective FIUs in all the Anglophone countries as well as the training of all relevant agencies on the relevance of FIUs in crime prevention nationally and globally.

It was also noted that the sanctions in some of the AML legislation in the region are weak and need to be strengthened. On sentencing, participants stressed that the judges should ensure that the power to sentence should be proportionate to the crime committed. For that reason, participants observed that there was need

to form the West African Judges Association to promote social justice and provide support to judges who are harassed or sacked. Then, GIABA and the ECOWAS Court of justice are urged to develop the mechanism for the operational establishment of the Association before the end of 2009.

With regard to international judicial cooperation, attendees urged that judges should treat requests for international cooperation with the urgency it demands. On plea bargaining, participants called for urgent clear rules to be established for the application of plea bargaining so that it is not misapplied through judicial discretion. About the last issue which the implementation of the law, the participants noticed that given the sociological implications of judicial decisions, social realities should be taken into account and judicial powers should serve the purpose of social justice.

THE MISSION OF GIABA IS TO:

- *Protect the national economies and the financial and banking systems of signatory states against the laundering of the proceeds of crime, and combat the financing of terrorism;

- *Strengthen co-operation amongst its members;

- *Ensure harmonized and concerted adoption of appropriate legal measures to combat money laundering and the financing of terrorism;

- *Evaluate progress and the efficacy of measures through self-evaluation and mutual-evaluation in accordance with the FATF procedures;

- *Ensure that Member States recognize, adopt and implement:

- The FATF norms including recommendations, especially the forty (40) recommendations on money laundering and the nine (9) special recommendations on the financing of terrorism, adopted by the FATF members;

- The FATF revised methodology and other relevant documents;

- The Action Plan against Money Laundering, adopted by the United Nations General Assembly in New York on 10 June 1998, the International Convention for the repression of the Financing of Terrorism of 19 December 1999 and any other relevant international instrument.

- *Encourage any other African States to join GIABA.



COMPLIANCE OFFICERS ON STUDY TOUR

From 15 - 19 June, 2009, Compliance Officers from the five English Speaking West African Countries embarked on a study tour to London organized jointly by Four Pillars Network, UK and GIABA.

The aim of the tour was to build on the knowledge acquired during the Bank Compliance Officers training program held in Banjul, the Gambia in November, 2008.

During the tour, participants met with Four Pillars Network, HSBC, Barclays, Standard Chartered, GTBank, Access Bank, Clifford Chance, Financial Services Authority, European Bank of Reconstruction and Development, Citigroup, Serious Fraud Office, SOCA and Transparency International UK, in order to acquire knowledge from the regulatory agencies related to compliance with AML/CFT measures.

At the end of the study tour, participants recommended for more training of regional banks' Compliance Officers in order to implement and maintain a robust AML/CFT compliance and internal control system in line with the FATF 40+9 Recommendations.

Money laundering and terrorist financing : two threats to the health of individuals and economies!

ECOWAS: ICT EXPERTS MEETS IN BOBO-DIOULASSO, BURKINA FASO

A meeting of Information and Communication Technologies (ICT) experts from ECOWAS members States and Regional Economic Commission took place at the headquarters of the West African Health Organization (WAHO) in Bobo-Dioulasso, Burkina Faso. It is aimed towards reviewing ICT policies in meeting with the challenges of 21st century technological advancement.

The meeting which was declared open by the Vice President of ECOWAS Commission, Mr. Jean de Dieu Somda. The meeting which was the 6th in the series of ECOWAS ICT Coordination Committee meeting was held from August 24 - 28, 2009

In a remark, the ECOWAS Vice President reiterated the Commission's resolve towards deploying ICT tools and processes for efficient administration and enhanced flow of information for economic growth and social integration of the region.

He added that the initiatives would further redefine and inject more dynamism to the Community ICT policy to render services to member States. He urged participants to contribute meaningfully and come up with recommendations that will improve technology driven capacity to facilitate inter-connectivity between members States and all institutions of ECOWAS.

Indeed, the advent of the information society has created unprecedented conditions for bridging divides within countries and between member countries of ECOWAS.

It is also an opportunity for all institutions of our Community who organize regular meetings to update and harmonize their policies on ICT to show a clear awareness of having advantages from the use of this tool. Lack of communication is said to be the enemy of any social group and every institution. This is particularly true for international cooperation and regional integration. We must therefore seize the opportunity that ICT provides to promote the economic and political integration of ECOWAS countries.

Moreover, at a time when the need to change the mode of economic, democratic and administrative governance is imperative, the discussions conducted by ECOWAS in Bobo-Dioulasso are more relevant than ever. Participants at the meeting resolved on the need for an actualized draft ICT policy in order to widen the scope of regional integration. The stakeholders have resolved to work towards harmonizing the ICT policies from member States and ECOWAS institutions as the region moves towards a common market. It is true that economic and social integration could only be achieved with a harmonized ICT policy.

GIABA as an ECOWAS specialized institution as well as Financial Action Task Force (FATF)-Styled Regional Body responsible for the development of standards and policies against money laundering and financing of terrorism in West Africa participated in the 4 days meeting. The benefit of ICT tools to GIABA is enormous for intelligence gathering and analysis towards curbing the menace of transnational organized crimes in the region as the rate at which criminals are adapting to new methods in response to the counter-measures developed at national and international level is alarming and consequential to economies of member States, particularly the advent of cyber crime.



ECOWAS SENSITIZES INSTITUTIONS ON VISION 2020

The Strategic Planning Unit of the ECOWAS Commission has embarked on sensitization of ECOWAS Institutions on the Commission vision 2020 towards achieving a regional integration to the people of the community.

During an interactive session with staff of GIABA, Friday, September 4th, 2009, the Strategic Planning Unit led by its Director, Essien Abel Essien explained that the mission is to communicate the strategic planning process towards achieving the ECOWAS vision 2020.

The Commission's vision 2020 is aimed to create a borderless, peaceful, prosperous and cohesive region, built on good governance and where people have the capacity to access and harness its enormous resources through the creation of opportunities for sustainable development and environmental preservation.

Mr. Essien stated that the framework for the implementation process is designed to identify all the internal and external elements necessary for transforming the vision to reality, stressing that each institution has a role to play towards the success and implementation process.

He disclosed that the Strategic Planning Unit established in June 2007 is a brain-child of the Authority of Head of States and Governments of the Economic Community of West Africa States (ECOWAS) yearning for change, hence the need to develop a proactive mechanism to guide them in a crisis situation towards achieving a region where every citizens would have a minimum standard for a living.

Mr. Essien emphasized the need for a specific goal and strategic plan in conformity with the regional plan in order to translate the vision and objectives of the Commission into concrete action that would benefit the community.

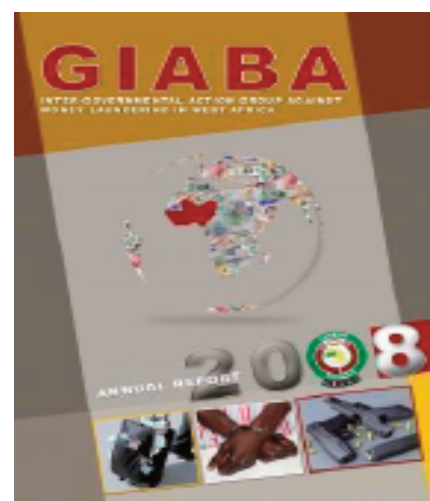
Earlier in an address of welcome, Deputy Director General of GIABA, Dr Elizabeth Diaw commended the visiting team accompanied by three consultants of the unit. She assured that GIABA as FATF-Styled Regional Body will incorporate the Commission's strategic planning process into its internal strategic action plan towards achieving the desired objectives.

In a message, ECOWAS President, Dr Mohammed Ibn Chambas implored staff to put in their best towards delivering the benefits of regional integration to the people of ECOWAS. He urged other directorates to sensitize staff of the Commission through any effective medium and ensure the Commission mandate is incorporated in their programmes.

TOGO CENTIF ORGANIZED AML/CFT SEMINAR

A seminar to strengthen the capacity of the Togolese Financial Intelligence Unit (FIU) on Anti-Money Laundering and Counter Financing of Terrorism (AML/CFT) system took place in Lome, the capital of Togo from September 7-9, 2009. The 3-day seminar geared towards capacity development for better understanding of how to implement an effective FIU operation and the techniques of investigation in AML/CFT system is organized by the Togo CENTIF.

During the seminar, participants were exposed on how to gather, disseminate and analyze financial intelligence reports in the line with the FATF 40+9 Recommendations on AML/CFT framework. GIABA as an FATF Style Regional Body (FSRB) provided technical and financial assistance towards the success of the seminar, a gesture in fulfillment of its mandate of providing technical assistance to member States.





PRE-EVALUATION SEMINAR TO TAKE OWNERSHIP OF TOOLS IN COTE D'IVOIRE

The Ivoirian national follow up committee for GIABA activities - CNSA-GIABA- tasked with coordinating this country's mutual evaluation exercise organized jointly with GIABA a pre-evaluation seminar from 3-5 September in Grand Bassam, Côte d'Ivoire.

The seminar convened all the actors of the national anti money laundering/combating terrorist financing mechanism focused on explaining the contents of the mutual evaluation questionnaire.

It was timely, as Côte d'Ivoire, under the aegis of the Intergovernmental Action Group against Money Laundering and Financing of Terrorism in West Africa, GIABA, will be subject of a mutual evaluation in November 2009

At the forum, an expert from GIABA delivered a presentation on "*Common Mutual Evaluation Practices: FATF and GIABA methodologies*" and also supervised the seminar's proceedings on Designated Non Financial Businesses and Professions (DNFBP).

The overall objective of the meeting was to enable the various actors to benefit from training within the fra-

mework of the fight against money laundering and financing of terrorism, in order to carefully examine and fill out the mutual evaluation questionnaire.

Specifically, the seminar aims at the following objectives:

- To initiate the participants in filling out the mutual evaluation questionnaire ;
- To review answers given by the GIABA/CNSA working group for possible amendments ;
- To propose measures and mechanisms for adoption in order to strengthen the operation of the AML/CFT mechanism.

Participants were drawn from the institutional, administrative and monetary institutions, concerned, as well as intermediaries and stakeholders in professional organizations of the private sector.

The seminar composed of three workshops under the supervision of international experts drew financial groups, legal practitioners and prosecution authorities' group, and the Designated Non Financial Businesses and Professions (DNFBP) group.

GIABA ORGANIZES RETREAT FOR PROFESSIONAL STAFF

The Intergovernmental Action Group against Money laundering in West Africa (GIABA) organised from 2 - 4 July, 2009, a 3- day retreat for its professional staff with a view to develop a synergy that injects more dynamism in the fight against money laundering, terrorism financing and other related vices across the West Africa sub-region. A total of fifteen professional staff attended the retreat led by GIABA Director General, Dr Abdullahi Shehu and the Deputy Director General, Dr Ndèye Elisabeth Diaw.

As participants barred their minds on the mandate of GIABA, Mrs Maty Ndiaye Sy, a consultant on human resources and management presented two papers on result-based management and on strategic management with a view to provide a theoretical insights on the operation of GIABA aimed towards achieving its

mandate in the fight against the scourges of money laundering and terrorism financing.

The retreat afforded staff the opportunity to brainstorm on major impediments to the day to day operations of GIABA and the ways forward.

Participants applauded the pragmatic leadership style of Director General of GIABA, Dr Abdullahi Shehu in his quest to combat the scourges of money laundering and terrorism financing in the West African sub-region.

While pledging their unalloyed support in achieving the dreams of ECOWAS members countries to rig the region of criminals, the GIABA Director General was commended by participants for affording them the opportunity to interact on issues of common interest to the growth an development of GIABA. The applauded his openness and exemplary leadership.



WABA 2nd WORKSHOP AGAINST AML/CFT IN COTONOU TO COUNTER THE SCOURGES

The Intergovernmental Action Group against Money Laundering and Terrorist Financing (GIABA) organized from 16-18 September 2009, the second workshop on the fight against ML/FT for the benefit of the West African Bars Association (WABA). The objective of this meeting was to keep lawyers informed about the evolution of the combat and the important role they play in the establishment of an institution to fight against money laundering and terrorist financing. It also aims to help the bars of West Africa familiarize themselves with laws and regulatory texts set up at international level against such crimes that hurt West African economies.

The opening ceremony was chaired by the Beninese Minister of Justice, Legislation and Human Rights, Victor Topanou. In his speech, Mr. Topanou stressed that these two scourges are the manifestation of crime and they threaten international peace and security. The Minister of Justice of Benin has also focused on the combined efforts of governments, private sector and civil society as well as the ethics of justice professionals. He drew the attention of lawyers who are often in charge of defending criminals. He also ensured the participants about the Beninese government support of GIABA to effectively fight against money laundering and terrorist financing.

Money laundering and terrorist financing are facilitated by weak legislation and laws and by the banking system of the ECOWAS countries. According to Mr. Roger Laloupo, Director of the Legal Division of the ECOWAS Commission, money laundering exists in the sub region and is given very little attention. Seen in this light, Mr Laloupo said that prosecution of criminals, perpetrators of money laundering, are few because of the slowness of procedures and difficulties in finding evidence. *"The reality is that it is not always easy to prove the origin of the money. The investigations require expertise and a legal and judicial cooperation that is not always easy to get,"* he said. To Mr. Arthur Ballè, representing the Bar of Benin, authorities have a duty to monitor and be vigilance, because *"the lawyer's role is to defend while the industry of crime seeks its prosperity in the weaknesses of the regulation and wants to expand the boundaries of tort franchises"*.

One goal of this workshop was to help the bars of West Africa impregnate the steps and measures in the fight against money laundering and terrorist financing. According to the Director General of GIABA, Dr. Abdullahi Shehu, criminals use the services of legal professionals to conceal and disguise the source and ownership of their illicit income. Although the services offered by lawyers vary from one jurisdiction to another, they should have a common understanding of the risks of money laundering as defined by standards and acceptable practices .

However, he said, international standards against money laundering and terrorist financing have recognized the critical role of legal professionals in the fight against these threats. Detailed provisions and guidelines have been developed to help not only assess these roles, but ensure they respect the fact if necessary. Finally, the Director General of GIABA reaffirmed the commitment of GIABA to support professional associations of lawyers such as the West African Bar Association (WABA) to develop a robust system of compliance with AML / CFT and provide continuing legal education for practitioners in AML / CFT. During the workshop, the Director - General of GIABA, Dr. Abdullahi Shehu, visited Benin CENTIF office to inspect the progress of work and challenges at the institution and see to what extent GIABA can intervent. He was received at the premises of the institution by the President of Benin CENTIF, Mrs Sévérine Dossou.

THE MANDATE OF GIABA

- Development of Strategies to protect the economies of Member States from abuse and the laundering of the proceeds of crime;
- Improvement of measures and intensifying efforts to combat the laundering of proceeds of crime in West Africa;
- Strengthening co-operation amongst its members.



Activities	Date	Venue
	July	
Training Seminar for FIU staff and correspondents	7 - 9	Ouagadougou, Burkina Faso
Training Seminar for Prosecutors and Magistrates on Countering Drug Trafficking and Financial Crime	13 - 16	Bissau , Guinea - Bissau
Assessor training for anglophones	27-31	Accra, Ghana
Training of GIABA's Evaluators	27-31	Monrovia, Liberia
Seminar on AML/CFT and the real estate agencies	20	Dakar, Senegal
	August	
Validation Workshop for the Official Response to Burkina's Draft Mutual Evaluation Report	18	Ouagadougou, Burkina Faso
	September	
Seminar in Preparation of the AML/CFT Mutual Evaluation of Côte d'Ivoire	3 - 5	Grand Bassam, Côte d'Ivoire
Domestic AML/CFT Awareness Raising Seminar for Designated Non Financial Businesses and Professions	8 - 10	Cotonou, Benin
West African Bars Association 2nd Workshop	16 - 18	Cotonou, Benin
	November	
INTERGOVERNMENTAL ACTION GROUP AGAINST MONEY LAUNDERING IN WEST AFRICA (GIABA) Plenary Meeting	02 - 05	Freetown Sierra Leone

NB : Other activities are scheduled but they are to be confirmed

USEFUL LINKS

Financial Action Task Force (FATF): www.fatf-gafi.org	http://www.apgml.org/	http://www.interpol.int/
United Nations Office on Drugs and Crime (UNODC): www.unodc.org	http://www1.worldbank.org/finance/html/mlcft/index.htm	http://www.scuml.net/web/dnfi/help
Commonwealth Secretariat: www.thecommonwealth.org	http://www.imf.org/external/np/fsap/fsap.asp	http://www.efccnigeria.org
US Treasury: www.ustreas.gov	http://www.imf.org/external/np/rosc/rosc.asp	http://www.fas.org/irp/world/nigeria/ndlea.htm
French Treasury: www.francetresor.gouv.fr	http://www.unodc.org/unodc/en/money_laundering.html	http://www.esaamlg.org/
Downton Hill UK: www.downtonhill.com	http://www.un.org/sc/etc/	http://sd.eurasiangroup.org/
World Bank: www.worldbank.org	http://www.un.org/Docs/sc/committees/1267Template.htm	http://www.apgml.org/
African Development Bank: www.afdb.org	http://www.fatf-gafi.org/	http://www1.worldbank.org/finance/html/mlcft/index.htm
International Monetary Fund: www.imf.org	http://www.met.police.uk/fraudalert	http://www.ogbs.net/home.htm
http://www.cfatf.org/	http://www.soca.gov.uk	http://www.imf.org/external/np/rosc/rosc.asp
http://www.esaamlg.org/	http://www.usdoj.gov/dea/	http://www.unodc.org/unodc/en/money_laundering.html
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http://www.gafisud.org/	http://www.nigeriapolice.org/functions.htm	http://www.un.org/Docs/sc/committees/1267Template.htm
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