

## INTERNATIONAL BODIES WITH DUTIES IN FIGHTING AGAINST MONEY LAUNDERING

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### ABSTRACT

*THIS ARTICLE AIMS TO ANALYZE THE ROLE OF THE MAIN BODIES HAVING DUTIES IN FIGHTING MONEY LAUNDERING INTERNATIONAL WIDE. THE SCANDALS INCURRED DURING THE LAST FEW YEARS, REGARDING MONEY LAUNDERING BY MEANS OF FISCAL PARADISES, INCREASED THE PUBLIC PRESSURE ON THE BANKING SYSTEM. JOURNALISTIC INVESTIGATIONS RAN FOR THE DISCOVERY OF THE FRONT COMPANIES USED TO DISSIMULATE SIGNIFICANT FUNDS, PROVED TO BE EXTREMELY EFFICIENT, ESPECIALLY DUE TO THE SPEED OF COMMUNICATION AND THE LACK OF BUREAUCRATIC BARRIERS. THE BANKING SECRET, ARGUED MOST OF THE TIMES WHEN SOLICITING OFFICIAL INFORMATION FROM OTHER JURISDICTIONS, GRADUALLY BECAME A CONTESTED CONCEPT. THE LEAK OF CONFIDENTIAL DATA WITHIN THE AREA OF INFORMATION SERVICES FACILITATED THE DIGGING OUT OF MONEY AMOUNTS GREEDILY HIDDEN BY BUSINESSMEN, FAMOUS SPORTSMEN, POLITICIANS OR MULTINATIONAL COMPANIES THAT BENEFITED FROM THE SUPPORT OF LAWYERS, FISCAL CONSULTANTS AND FINANCIAL INSTITUTIONS. ROMANIA IS TAKING PART IN THE INTERNATIONAL EFFORTS MADE TO FIGHT SUCH PHENOMENON, YET, THEY MUST ALLOCATE ADDITIONAL RESOURCES IN ORDER TO INCREASE THE INVESTIGATIVE CAPABILITY AND CONFISCATION OF THE CRIMINAL PRODUCT.*

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**KEY WORDS:** MONEY LAUNDERING, INTERNATIONAL COOPERATION, INVESTIGATIONS

### INTRODUCTION

The Roman emperor Vespasian (69-96), responded by a famous line to his son Titus, when being criticized for taxing the ammonia collected from the sewerage system in Rome (Cloaca Maxima). The historian Suetonius describes how Titus reamed out on his father on the lack of qualms in the taxation policy, in order to reduce the budgetary deficit, but the response of Vespasian, "Pecunia non olet" ("money don't smell")<sup>2</sup> made history and describes perfectly one of the main characteristics of money. The coin is basically, an abstract and anonymous means of payment, destined to simplify economic transactions and facilitate trade exchange.<sup>3</sup>

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<sup>2</sup> <https://www.istorie-pe-scurt.ro/originea-expresiei-banii-nu-au-miros/>, accessed on 03.03.2018

<sup>3</sup> Eric, Vernier, *Techniques de blanchiment et moyens de lutte*, (Paris:Ed. Dunod, 2005), 7

Information on money was always of interest, and in this respect, banks and information services played a very important role, as the funds were more important. The history of secret services knew numerous agents who “defected”. Nonetheless, for the past years, it is noticeable the surprising increase of the occurrences wherein the agents defect, supply to the press agents sensitive information on the funds incurred by corruption acts, fiscal evasion or organized crime, wherewith are involved public individuals, multinational companies or financial institutions. This is how cases such as the “Panama Papers<sup>4</sup>”, “Luxembourg Leaks<sup>5</sup>”, “Swiss Leaks<sup>6</sup>” or “Football Leaks<sup>7</sup>” were born. Secret services had to reconsider their data security policies, where after, in the international press, appeared information leaks such as those of the former secret American agent Edward Snowden<sup>8</sup> or disclosure attributes to several opaque entities, such as those of the so called journalist Julian Assange<sup>9</sup> by means of “WikiLeaks” portal. There were, of course, Romanian businessmen who ordered the famous Law Firm Mossack Fonseca from Panama, the start-up of some offshore companies such as Belize, British Virgin Islands, Gibraltar, Samoa or Isle of Man<sup>10</sup>. Although there have been a few years since the Panama Papers scandal burst, the response of the Romanian authorities to the questions the press or the society through its elected representatives addressed, are just as opaque as the banks within the offshore territories.<sup>11</sup> ANAF announced that they formed a work group that is still working, yet the status of the investigations seems to be either the same as when they started, or extremely confidential.<sup>12</sup> Unfortunately, the concrete research activity of such cases proved that the mass-media is by at least one step ahead of the fiscal control bodies or criminal investigation bodies. It is not less true that for documenting certain international money laundering schemes and confiscation of dirty money, is required the cooperation of authorities within several states, informational wise, as well as within the fiscal or judicial field.

### MAIN TEXT

Globalization imposed on the political decision makers, the institution of international levers of financial-banking or economic nature that were built and developed diplomatically so as the principle “follow the money”<sup>13</sup>, established by Americans, to be able to be applied international wide.

The Convention of the United Nations against organized transnational criminality, from December 2000, ratified by Romania on October 16<sup>th</sup> 2002, by Law no.565/2002<sup>14</sup> or the

<sup>4</sup> Bastian Obermayer, Frederik Obermayer, *Panama Papers- How the rich and powerful hide their money*, (Bucharest:Publishing House Litera, 2016), 194

<sup>5</sup> <https://www.icij.org/investigations/luxembourg-leaks/>, accessed on 04.03.2018

<sup>6</sup> Gerard Davet, Fabrice Lhomme, *Swissleaks Operation*, Bucharest, RAO publishing house, 2016

<sup>7</sup> <https://footballleaks2015.wordpress.com/>, accessed on 04.03.2018

<sup>8</sup> Edward Snowden, former secret American agent of CIA and NSA now accused by the US authorities of treason, and who has provided to Glenn Greenwald, a journalist with the British magazine "The Guardian," information about mass interception of US citizens and not only under a program encoded "PRISM",

<sup>9</sup> [https://ro.wikipedia.org/wiki/Julian\\_Assange](https://ro.wikipedia.org/wiki/Julian_Assange), accessed on 04.03.2018

<sup>10</sup> <https://www.riseproject.ro/afaceristi-romani-implicati-in-scandalul-panamapapers/>, accessed on 04.03.2018

<sup>11</sup> <http://www.cdep.ro/interpel/2018/i1176B.pdf>, accessed on 04.03.2018

<sup>12</sup> <http://www.cdep.ro/interpel/2016/r2942B.pdf>, accessed on 04.03.2018

<sup>13</sup> William F. Wechsler, *Follow the Money*, New York, in Foreign Affairs, July/august 2001, article available online at [https://www.foreignaffairs.com/articles/2001-07-01/follow-money.](https://www.foreignaffairs.com/articles/2001-07-01/follow-money), accessed on 25.02.2017

<sup>14</sup> Valerică Dabu, Sorin Căținean, *The new law for the prevention and sanction of money laundering*, Bucharest, *Law magazine*, no.6/2003, 24-27

International Convention concerning the matter of repressing terrorism funding, adopted in New York, on December 9<sup>th</sup> 1999, which was ratified by Romania by Law no.623/2002<sup>15</sup>, constitute regulation acts that reflect the preoccupation of the international community in the area of fighting the organized crime or terrorism.

Under the aspect of importance of fighting money laundering internationally, a moment which proved to be extremely important, was the year 1989, during the G7 Summit of the most powerful industrialized countries, organized in Paris, together with the constitution of G.A.F.I.(F.A.T.F.) –International Financial Action Group or *Financial Action Task Force*. This group operates as an intergovernmental body, which meets annually, under the presidency of one of the member states, managing to imprint a clear direction to the international efforts within the area of money laundering and funding terrorism.<sup>16</sup> Experts of FATF-GAFI, based on the conclusions resulted from the monitoring activities of the member states, issue recommendations destined to fighting money laundering or confiscation of illicit funds that are discovered at the level of the financial system. Thus, among the consequences of the FATF activity, the most important are those concerning the harmonization of the regulations with respect to the banking secret, extension of incrimination of crimes coming from funds subject to laundry, or the adoption of actions destined to confiscate the criminal product on the territory of a different state.<sup>17</sup> Romania is an FATF member, together with 35 other states, who, alongside international bodies such as the European Commission and the Cooperation Council for the Arab States in the Gulf- G.C.C., contributed to the definition of international principles and standards within the field, the most important being the 49 recommendations of FATF<sup>18</sup>, recognized and assimilated by the majority of financial centres worldwide. A regional body created according to the FATF model for the Asian/Pacific region, is APGML or *Asian Pacific Group on Money Laundering*, founded in 1997 in Bangkok-Thailand.<sup>19</sup> The permanent secretarial office of this body is in Sydney- Australia, and outside the member states, among observers there is the World Bank, OECD, INTERPOL or Egmont group of the Financial Information Units.

*Egmont Group* was founded in June 9<sup>th</sup> 1995, occasioned by an informal meeting of CTIF-CFI (Financial Information Unit from Belgium) and FinCen (Financial Information Unit in the United States of America). The meeting took place in the Egmont- Arenberg Palace in Brussels<sup>20</sup>, wherefrom, the denomination of the group. This international body became the operational arm of the international efforts to fighting money laundering and terrorism funding, managing to incorporate today, within a secured computerized platform, 155 financial information units worldwide. Through the computerized network named Egmont-ESW, it is possible to obtain, in timely manner, information from other jurisdictions, on the individuals or firms that direct funds raising suspicions regarding the legality of the origin<sup>21</sup>. Starting May 2000, Romania is also a member of the Egmont Group, being represented by ONPCSB- National Office for the Prevention

<sup>15</sup> George, Mocuța, *Methodology of investigating the money laundering crime*, (Bucharest: Noul Orfeu Publishing House, 2004), 210

<sup>16</sup> Costică, Voicu, *Money and organized crime*, (Bucharest:Publishing House Artprint, 1995), 41

<sup>17</sup> Camelia, Bogdan, *Money laundering*, (Bucharest: Publishing House Universul Juridic, 2010), 423

<sup>18</sup> <http://www.fatf-gafi.org/about/whoweare/#d.en.11232>, accessed on 05.02.2018

<sup>19</sup> <http://www.apgml.org/>, accessed on 04.03.2018

<sup>20</sup> Eric, Vernier, *Techniques de blanchiment et moyens de lutte*, 134

<sup>21</sup> Annual Report 2014-2015, Egmont Group of Financial Intelligence Units, available online at: [https://egmontgroup.org/en/filedepot\\_download/1660/22](https://egmontgroup.org/en/filedepot_download/1660/22), accessed on 04.03.2018

and fighting Money laundering<sup>22</sup>. When gaining information on financial funds derived from crimes, ONPCSB is obliged to provide the prosecutors with the respective information, to execute the investigations and the criminal charging of the guilty individuals<sup>23</sup>.

*The Basel Committee* was founded in 1974 by the governors of central banks within the Group of 10 or G-10, the most industrialized states<sup>24</sup>, which, at that time, identified the need to constitute an associative entity to regulate a series of financial-banking standards recognized internationally. Starting 1984 to this group adhered Switzerland also, and the headquarters, as the denomination shows is in Basel, in the BIS building (Bank for International Settlements<sup>25</sup>). Now, this international committee is made up of the governors of the central banks in 27 states and the European Union. International cooperation allowed the recognition of the best banking regulation practices, managing the elaboration of recognized standards within the field, especially supervision standards, exercised by the central banks<sup>26</sup>. The minimum requirements concerning the stock, prudential policies and of organization, based on the components of the banking risks (credit risk, operational risk and market risk) or the degree of exposure or the liquidity value, constitute prudential banking standards elaborated by successive agreements in Basel, which contribute today to the increase in the stability of the banking system<sup>27</sup>. Nonetheless, by the unification of the legislation, the adoption of banking ethical standards and clients recognition policies, the Basel Committee contributed in a significant manner international wide to the consolidation of the fight against money laundering and terrorism funding<sup>28</sup>. The Supervision Department within the National Bank of Romania, can offer, in togetherness, especially for the identification of the real beneficiary of the suspicious investigated transactions.

*The MONEYVAL Group* (Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Funding of Terrorism) is a European body subordinated to the Ministries Committee of the European Council, made up of experts who evaluate the actions took by the Member States in consideration of fighting against money laundering and funding terrorism. The standards the experts relate to are those provided by the recommendations of FATF-GAFI, Vienna Conventions, Strasbourg and Palermo.<sup>29</sup> For some time this body operated as an observer alongside FATF, and in June 2006, gained the statute of associated member. The MONEYVAL Group contains 28 Member States, that are represented also within FATF, as well as Israel, Vatican and other jurisdictions or offshore territories dependent on the Great Britain (Guernsey, Jersey, Insula Man, Gibraltar). The representatives of the states are experts in the supervision and regulation of financial institutions, experts within the fiscal field, in the field of justice or law application forces<sup>30</sup>. The evaluation activities include the verification of actions took by the

<sup>22</sup> <http://www.onpcsb.ro/html/cooperare.php?section=3>, accessed on 02.06.2017

<sup>23</sup> *The guide to fighting money laundering destined to judges and prosecutors*, available at [http://www.inm-lex.ro/fisiere/d\\_1443/Ghid%20combatere%20spalare%20bani\\_judecatori%20si%20procurori.pdf](http://www.inm-lex.ro/fisiere/d_1443/Ghid%20combatere%20spalare%20bani_judecatori%20si%20procurori.pdf), accessed on 04.03.2018, 10

<sup>24</sup> USA, Canada, France, Germany, Italy, Belgium, Japan, Sweden, The Netherlands and Great Britain

<sup>25</sup> <https://www.bis.org/bcbs/charter.htm>, accessed on 04.03.2018

<sup>26</sup> [https://en.wikipedia.org/wiki/Basel\\_Committee\\_on\\_Banking\\_Supervision](https://en.wikipedia.org/wiki/Basel_Committee_on_Banking_Supervision), accessed on 05.06.2017

<sup>27</sup> [https://en.wikipedia.org/wiki/Financial\\_crisis\\_of\\_2007%E2%80%932008](https://en.wikipedia.org/wiki/Financial_crisis_of_2007%E2%80%932008), accessed on 05.06.2017

<sup>28</sup> Slagjana, Taseva, *Money Laundering*, (Skopje- Macedonia:Ed. Akademski Pecat, 2007), 48

<sup>29</sup> Alina, Ana, Dumitrache, *Money laundering legal-criminal aspects*, (Bucharest: Publishing House Universul Juridic, 2013), 157

<sup>30</sup> <https://www.coe.int/en/web/moneyval/moneyval-brief/members>, accessed on 04.03.2018

member states in fighting money laundering and funding terrorism and especially the degree of implementation of the recommendations of FATF-GAFI. By the reports being elaborated and published (including the internet page of MONEYVAL), are made recommendations destined mainly to the improvement of the regulation frame or the method of implementing the legal dispositions existing in the field of fighting against money laundering and funding terrorism. Unfortunately, certain aspects mentioned into the evaluation report for Romania<sup>31</sup> can be considered worrisome. Experts recommended among others to the authorities in Romania, the increase in the number of financial investigators and a rigorous evaluation of the ongoing investigations, including from the perspective of geographic distribution, prosecution or delays registered in the resolution of cases registered in Court. Another issue, raised by the experts in Romania, is represented by the insufficient exploitation of information supplied by the Financial Information Units within the EGMONT Group network, especially under the aspect of investigating the dubious origin of certain revenues and application of safe actions destined to subsequent disposition of the special or extended confiscation actions.

*The WOLFSBERG*<sup>32</sup> Group was founded officially in 2000, on the occasion of a meeting organized by the shareholders of private banks at the premises of Wolfsberg Castle nearby Ermatingen-Switzerland. Just as FATF-GAFI elaborated recommendations, destined to governments and banking standards for central banks of the Member States, the Wolfsberg Group addressed to the main private banking groups<sup>33</sup>, considered the most influential in the field, international wide (such as Goldman Sachs, Barclays, Credit Suisse, Deutsche Bank, Société Générale and others). In order to support and protect its interests, in the context of international pressures against money laundering, the group adjusted the standards imposed by the International Community through FATF, to the requirements of the private banking sector. Thus, there have been elaborated conduct standards in the provisions of financial services<sup>34</sup> and have been promoted policies destined to the recognition of clients, reporting suspicious transactions and prevention of funding acts of the entities catalogued by the International Community as being supportive of terrorism. Among the relevant documents elaborated by the Wolfsberg group, important from the perspective of bank management, risks administration or the relationship with the politically exposed individuals we can mention the following: “*The guide concerning the risk based approach for the management of the risk of money laundering*”, “*The guide to fighting money laundering for mutual funds and other investment companies*” or “*The guide to fighting money laundering within the activities of issuing the credit/debit cards and items contracting*.”<sup>35</sup>

Being an atypical group, made up of the representatives of competing banking groups, whose primary purpose is to reduce the expenses and maximize the profit, was not by-passed by

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<sup>31</sup> *Report on Fourth Assessment Visit of MONEYVAL Comitee of Experts* (2014), available online at [http://www.coe.int/t/dghl/monitoring/moneyval/Evaluations/round4/ROM4\\_MERMONEYVAL\(2014\)4\\_en.pdf](http://www.coe.int/t/dghl/monitoring/moneyval/Evaluations/round4/ROM4_MERMONEYVAL(2014)4_en.pdf), accessed on 03.06.2017, 55

<sup>32</sup>[http://www.wolfsberg-principles.com/pdf/standards/Wolfsberg\\_Statement\\_on\\_the\\_Suppression\\_of\\_the\\_Financing\\_of\\_Terrorism\\_\(2002\).pdf](http://www.wolfsberg-principles.com/pdf/standards/Wolfsberg_Statement_on_the_Suppression_of_the_Financing_of_Terrorism_(2002).pdf), accessed on 06 .06.2017

<sup>33</sup> [https://en.wikipedia.org/wiki/Wolfsberg\\_Group](https://en.wikipedia.org/wiki/Wolfsberg_Group), accessed on 05.03.2018

<sup>34</sup> Alina, Ana, Dumitrache, *Money laundering legal-criminal aspects*, 158

<sup>35</sup> *Manual regarding the risk based approach and suspect transactions indicators* , edited by ONPCSB and FIU Poland within a project funded by the European Union available online at: [http://www.onpcsb.ro/pdf/manual\\_privind\\_abordarea\\_pe\\_baza\\_de\\_risc.pdf](http://www.onpcsb.ro/pdf/manual_privind_abordarea_pe_baza_de_risc.pdf), accessed on 05.03.2018



criticism<sup>36</sup>. The decisions adopted by the group sometimes lacked transparency, and the decisional factors of the banking groups are mostly unknown and therefore the association of the private interests of such banks did not enjoy complete trust.

*Eurojust*<sup>37</sup> is the European Judicial Cooperation Unit started in February 28<sup>th</sup> 2002, with the purpose of coordinating the investigations destined to fight the organized crime at the level of the European Union. The idea of starting such a body was first discussed within a formal setting at the meeting of the heads of states and governments which took place at Tampere-Finland, in October 15<sup>th</sup> and 16<sup>th</sup> 1999. Nowadays, Eurojust is headquartered in Hague, the body being funded from the general budget of the European Union and is made up of magistrates, prosecutors and police officers detached by the Member States, who are paying their salaries. In the field of money laundering, Eurojust plays a very important role in the coordination of investigations performed by joint teams made up of prosecutors and police officers within the member states on whose territories take place money laundering crimes or predicate crimes.

*Europol*<sup>38</sup> is the intergovernmental European Body whose role is to facilitate the information exchange and cooperation between member states, on fighting organized crime and terrorism. The frame decision 2002/465/JAI of the Council from June 13<sup>th</sup> 2002, regulates the participation of the Europol officers within joint investigation teams, and the Decision 2009/371/JAI/ from April 6<sup>th</sup> 2009<sup>39</sup> establishes the competence of Europol, as the supporting force for the authorities of the Member State wherein they act. Europol grants support and informative help by means of liaison officers within the joint investigation team, usually acting in close cooperation with Eurojust<sup>40</sup>. A very important role within the international investigations destined to dismantle the specialized criminal groups in money laundering, is assumed by informative packages supplied by the information analysis units within Europol, that have a sophisticated computerized platform, secured (denominated FIU.net) and the highest level experts. The National Office in the Prevention and Fighting Money laundering is the Institution in Romania who has access to this network, being able to disseminate information on the suspicious transactions to the other member states and of course, thus to receive information through Europol from other states<sup>41</sup>.

## CONCLUSION

Journalistic investigations that unveiled during the past few years numerous cases of funds concealment of dubious origin by means of banking institutions and front companies started on offshore territories, are explanatory for the need to stress the need for international cooperation within the field of fighting money laundering and funding terrorism. The banking secret, argued most of the time when soliciting official information from another jurisdiction, gradually became a contested concept, on the fund of international public pressure, generated mainly by the results

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<sup>36</sup> Robert Mazur, former federal agent within DEA and US Customs, author of the autobiography that was the base for the movie "The Infiltrator" (2016), catalogued the Wolfsberg group as being "cat among pigeons" [https://en.wikipedia.org/wiki/The\\_Infiltrator\\_\(2016\\_film\)](https://en.wikipedia.org/wiki/The_Infiltrator_(2016_film)), accessed on 05.03.2018

<sup>37</sup> <http://www.eurojust.europa.eu/about/background/Pages/mission-tasks.aspx>, accessed on 05.03.2018

<sup>38</sup> <https://www.europol.europa.eu/>, accessed on 05.03.2018

<sup>39</sup> Decizia 2009/371/JAI/6.04.2009- concerning the start of the European Police Office (EUROPOL)

<sup>40</sup> Viorel, Vasile, *Police and international judicial assistance - support for fighting the cross-border crime and terrorism*, (Bucharest: Publishing House Ministry Of Internal affairs, 2016), 253

<sup>41</sup> <http://www.onpcsb.ro/pdf/Reteaua%20FIU.net.pdf>, accessed on 25.06.2017

of the journalistic investigations. Informal collaboration between the passionate journalists throughout the world and the data leaks within the area of information services, constituted favourable factors for starting the aforementioned international scandals. Unlike the collaboration through official channels, by means of international institutions and bodies with duties in fighting money laundering, that are technical and bureaucratic, the collaboration of journalists was more than efficient and proved that dirty money can be discovered. One might say that in spite of the affirmation of the emperor Vespasian, that travelled through history for thousands of years, an efficient international cooperation of certain investigators, can prove that dirty money “do smell”, and that they can be traced.

International bodies dedicated to money laundering, developed rapidly during the last few years, but not as fast as the slickness of the organized crime groups, eager to reinvest the criminal product into the legal economy. The need to confiscate the amounts resulting from fiscal evasion, corruption acts or organized crime, is getting more acute into an economy such as that of Romania. But in order to have the ability to identify and confiscate such amounts, the international support is not enough. It is required the adoption of decisions at the level of political decision-making bodies, whereby to improve the legislative, the investigative potential and to allocate the resources that the importance of fighting such a criminal phenomenon holds.

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