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EUROPEAN COMMITTEE ON CRIME PROBLEMS
(CDPC)

**SELECT COMMITTEE OF EXPERTS ON THE EVALUATION
OF ANTI-MONEY LAUNDERING MEASURES**

MONEYVAL

***SECOND ROUND EVALUATION REPORT ON
ESTONIA***

SUMMARY

¹ Adopted at the 14th Plenary meeting of Committee MONEYVAL (PC-R-EV) (Strasbourg, 10 – 14 May 2004.).

1. A MONEYVAL team of examiners, accompanied by a colleague from the Financial Action Task Force (FATF), visited Estonia between 5 November 2002 and 8 November 2002, in the context of the second round of MONEYVAL evaluations.
2. At the time of the second on-site visit, the major sources of criminal proceeds were reported as tax fraud (including tax evasion), smuggling, theft and corruption. Money laundering is still considered to be largely an external threat, though domestic money laundering does occur.
3. The financial sector is developing quickly. The banks continue to be regarded as highly vulnerable to money laundering, though considerable progress in regulation, supervision and enforcement in this sector has taken place since the first report was adopted. The Estonian authorities are conscious of the potential vulnerability to money laundering within the banking sector arising from the proportion of non-resident accounts, which is rising (approximately 12% of deposits at the time of the second on-site visit).
4. Exchange offices, money remitters and real estate are all increasingly profitable businesses in Estonia, though at the time of the on-site visit, they remained without any supervisory oversight for anti-money laundering purposes.² The exchange houses have no licensing procedure in place to verify the 'fitness and properness' of the owners and managers of these institutions and that should be remedied.
5. The securities and insurance markets are growth areas and present money laundering vulnerabilities.
6. At the time of the on-site visit, there were no completed prosecutions for money laundering, though 2 investigations had resulted in the institution of criminal proceedings.³
7. Article 394 of the new Penal Code replaces the money laundering criminalisation in Article 148¹⁵ of the previous Penal Code. It is an all-crimes offence. In general terms, the structure of the criminal offence has remained the same. The major changes involve a readjusting of the criminal penalties and the very welcome introduction of corporate criminal liability. Article 394 refers back to the definition of money laundering (in the MLPA), which remained as it was at the time of the first report.
8. At the time of the on-site visit, one of the main concerns of the first evaluation team in respect of the definition of money laundering still needed to be addressed, namely an amendment to the definition which ensured that money

² By amendments to the Money Laundering and Terrorism Financing Prevention Act (hereafter the MLPA), which came into force on 1 January 2004, exchange offices, money remitters and real estate businesses are subject to supervision by the FIU.

³ In April 2004, 4 cases were before the courts for money laundering.

laundering charges could be brought in respect of acts in relation to property constituting indirect proceeds, as well as direct proceeds.⁴

9. The first evaluation team also had concerns about how wide the physical elements would prove to be in practice, and this evaluation team considered that an amendment, which clearly encompasses all the language of the existing international conventions on the physical aspects of the offence would be highly beneficial.⁵
10. There has been a shift in legal thinking since the first evaluation in that, then, it was considered that the prosecution of an author of the predicate offence for 'own proceeds', laundering was not possible, but now the Estonian authorities consider this is possible. However it has not been tested in practice. Given that, the examiners strongly advise that the issue is put beyond doubt in legislation.
11. On the mental element of the offence, earlier plans to criminalise negligent money laundering have been abandoned, which is regretted by the examiners. In a further review of the mental element, the examiners would encourage a reconsideration of this issue, together with consideration of a lesser mental element of subjective suspicion.
12. The proof, in money laundering prosecutions, of underlying predicate offences appears now to be problematic. While it appears to be accepted that an investigation for money laundering can be initiated in the absence of a conviction for the predicate crime, a conviction for the predicate crime apparently has to precede the end of the proceedings. The examiners advise that the Estonian authorities should consider bringing money laundering prosecutions where a conviction for the predicate offence is not available, on the basis of circumstantial or other evidence sufficient to establish the predicate offence to the criminal standard. Written guidance for prosecutors and investigators on minimum levels of evidence generally for money laundering prosecutions, as suggested by the first evaluation team, would be useful – to encourage a more proactive approach to money laundering investigation and prosecution.⁶
13. Tipping off has been de-criminalised (though administrative penalties are available) since the first evaluation and the current examiners believe that tipping off in all its forms would be more effectively sanctioned by criminal penalties.
14. The range of offences to which confiscation can be applied appears largely unchanged, and could be widened. Confiscation of laundered property or

⁴ The new definition of money laundering in the 2004 amendments has removed the word 'direct' and refers to various acts done with property acquired as a result of a criminal offence.

⁵ The definition of money laundering since 1 January 2004 covers the acquisition, possession, use conversion or transfer of or the performance of transactions or operations with property acquired (as a result of a criminal offence) or in return for participation in such an offence, the purpose or consequence of which is the concealment of the actual owner or the illicit origin of the property.

⁶ The Estonian authorities have advised that it is now their practice to bring money laundering prosecutions in the absence of a conviction, but this has not been tested by the courts. Consideration should be given to putting this beyond doubt in legislation.

property of corresponding value (and income from laundered property) should be made mandatory in money laundering cases, and consideration should be given to making confiscation generally more mandatory in specific serious profit-generating offences. The examiners advise incorporating into Estonian law elements of practice which have proved of value elsewhere, including the reversal of the onus of proof regarding the lawful origin of alleged proceeds in particular serious profit-generating offences. The examiners had the impression that provisional measures were taken more frequently to secure civil actions rather than to ensure that proceeds were available (which could be subject to criminal confiscation). The Estonian authorities should review their provisional measures regime to ensure that it fully enables the freezing and seizing of all criminal proceeds swiftly. Comprehensive statistical data should also be kept in order to evaluate the effectiveness of the provisional measures regime.

15. On the preventive side, some significant progress has been made. The Financial Supervision Authority (FSA) became operational on 1 January 2002 as the single prudential supervisor. Licensing of credit and financial institutions where the FSA is involved appears generally sound. The FSA issues guidelines of a quasi-binding nature that provide guidance to subjects of financial supervision, but they cannot impose any sanctions for non-compliance with their guidelines. They do issue sanctions for non-compliance with relevant legislation. Equally, the examiners advise that clearer job descriptions for contact persons should be prepared, supplementing what is now in the law and emphasising their functional independence.
16. The level of implementation of anti-money laundering measures at the time of the on-site visit was higher in the banking sector than in the insurance and securities sector. Supervision of casinos needs intensifying and further awareness-raising of anti-money laundering issues is required in the real estate market.
17. General procedures for customer identification, including the required documents, are set out in the Money Laundering Prevention Act (which has been amended on several occasions since the first on-site visit) and in the Financial Supervisory Authority Guidelines. In special cases, financial institutions can create a customer relationship without direct contact. The procedures for acting in these special cases are governed only by internal procedural rules of financial institutions and clear rules should be elaborated as to the exceptional cases where it might be possible to make identification at a distance, and which provide the necessary procedures to be carried out speedily to confirm or verify the identification of the real owners and the ultimate beneficiaries. Particular attention should be paid in supervision to the extent to which ultimate beneficiaries are identified in the establishment of business relations in accordance with FSA Guidelines, and the extent to which 'Know Your Customer' Principles generally are being put into operation, particularly with regard to non-residents.
18. Professional participants in the securities market may hold nominee accounts. While the Estonian Central Register of Securities Act obliges owners of nominee accounts to disclose information in relation to the accounts to the supervisory authority or the Registrar of the Estonian Central Register of

Securities at their request, the evaluation team considers that, with such accounts in place, the transparency of the securities market is reduced and a re-examination of the rationale for such accounts is advised.

19. It is positive that the Strasbourg and Vienna Conventions have been ratified since the first round. There has, however, been little practice in respect of international co-operation at the judicial level. Assistance on provisional measures appears overly restrictive – particularly as it appears that, unless the property is required as evidence, applications for provisional measures depend on the existence of an extradition request. This contradicts the wide obligations under the Strasbourg Convention in this respect, and should be reviewed. The FIU, as a member of the Egmont Group, appears to be co-operating satisfactorily in information exchange with other FIUs.
20. The FIU (which, at the time of the on-site visit, had 6 personnel in place, including its head (on an establishment of 7) receives an increasing number of reports:
2000: 394
2001: 1829
2002 (up to 15 September 2002): 842.
21. The bulk of these reports are from banks – indeed 60% of these reports came from one bank. The lack of reporting from the insurance and security market at the time of the on-site visit needed urgent addressing.
22. It appeared to the examiners (and to other authorities with which the team met) that the resourcing of the FIU needed re-visiting. A large number of cases remained open in the FIU at the time of the on-site visit. More sophisticated performance indicators needed developing, from which resource bids for the FIU could be made. This is particularly important as, at the time of the on-site visit, there were discussions as to whether the FIU should take on some supervisory functions in respect of vulnerable obliged institutions, which have no formal supervisory authority.⁷
23. A priority for the FIU should be to send more reports to law enforcement more quickly. It appears that, in 2001, 42 cases were passed to law enforcement for further enquiries. The Economic Crime Department of the Central Criminal Police (ECD) investigates most money laundering cases. The results on the enforcement side achieved by the ECD (and other police investigative bodies), despite adequate police powers and apparently good internal co-operation, were very modest. Only 2 money laundering cases had reached the judicial phase and 10 were still under investigation. With only 3 dedicated anti-money laundering officers in ECD, their resources were spread too thinly if they are to be the principal anti-money laundering investigators. The Estonian authorities should ensure that there is adequate provision for investigators, properly trained in financial investigations and anti-money laundering issues, both within ECD and generally within specialist squads, so that real improvements can be achieved in money laundering detection, prosecution

⁷ Under amendments to the Money Laundering and Terrorism Financing Prevention Act (hereafter the MLPA), which came into force on 1 January 2004, exchange offices, money remitters and real estate businesses are subject to supervision by the FIU. Since the on-site visit, the FIU now has 11 personnel in place.

(and related confiscations). Money laundering investigation should be generated both by the STR regime and the police themselves in major proceeds-generating offences (such as drugs, crimes perpetrated by organised crime and corruption). More prosecutions and confiscations should be pursued in major profit-generating crime beyond the tax predicate.

24. At the strategic level, the work of the Inter-Departmental Co-ordinating Committee is very important and it should create some key performance indicators for the system as a whole and, in the first instance, address the issue of why there have been so few prosecutions with a view to developing a more proactive repressive strategy.
25. In this way, Estonia can move towards the development of an effective anti-money laundering system.

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⁸ “Recorded” offences in this context is understood to mean those offences which have been reported to the police and/or judicial authorities as criminal offences whether or not they were cleared up by way of investigation or prosecution.

⁹ “Detections” in this context means offences for which a person was charged with the relevant criminal offence before the courts whether or not they were convicted.

¹⁰ 870 000 in March 2004

¹¹ The examiners were advised after the on-site visit, that the Basel document on Risk Management Principles has been applied since July 2001.

¹² According to the Money Laundering and Terrorism Financing Prevention Act (effective as of 1 January 2004), the exchange offices, money remitters and businesses related to real estate are subject of the supervision performed by the Financial Intelligence Unit.

¹³ In April 2004 there are 4 cases under court proceedings for money laundering.

¹⁴ It has been amended once again between the on-site visit and the adoption of this report. The revised Money Laundering and Terrorist Financing Prevention Act came into force on 1.01.04. The amendments that were enforced pertain mostly to the harmonisation of the Estonian legislation with the EU Directive 2001/97.

¹⁵ Tax Board and Customs Board have been merged and there is Tax and Customs Board operating under the Ministry of Finance now.

¹⁶ The FSA had issued 7 guidelines by 1 April 2004.

¹⁷ The AML issues were covered in the course of most on-site examinations in 2003 as follows: credit institutions 9, insurance 7, insurance brokers 5, fund managers 3, investment service providers 4, other market participants 2.

Imposed sanctions by the FSA in 2003: credit institutions (4 prescriptions), investment service providers (7 prescriptions), fund managers (2 prescriptions, 3 fines), insurance/insurance brokers (1 prescription), remitters (3 prescriptions, 4 fines).

¹⁸ From 1 January 2004 FIU is operating under the Central Criminal Police.

¹⁹ In April 2004 the personnel of FIU consists of 11 employees, there are 3 vacancies.

²⁰ There are 9 employees involved in the investigation of criminal cases of money laundering, 7 are investigators and 2 analysts.

²¹ Tax Board and Customs Board have been merged to Tax and Customs Board since 1 January 2004, co-operation agreements within the competences of former Customs Board will be amended accordingly.

²² With regard to the representatives in the Inter-Institutional Co-ordination Committee; Tax Board and Customs Board have been merged; from 2004 Border Guard is represented in the Committee, as well as Ministry of Foreign Affairs, Ministry of Justice, Security Police Board and Central Criminal Police.

²³ Estonian Banking Association has drafted sample questionnaires for resident and non-resident natural persons in order to obtain information for drawing the activity profile and payments' profile of the clients.

²⁴ The Estonian authorities have recently advised that they now consider that a conviction is not required in proceedings for money laundering with respect to domestic predicate offences and that some cases are brought on that basis.

²⁵ The Estonian authorities have advised that offences under Articles 395 and 396 will be subject to corporate criminal liability.

²⁶ 83(4) is not relevant for these purposes.

²⁷ According to Article 5(8) of Code of Criminal Procedure, the death of the offender prevents any conduct of proceedings unless "it is necessary for the rehabilitation of the deceased person, or upon detection of new facts, for the resumption of criminal proceedings with regard to another person."

²⁸ Since the evaluation visit, the examiners have been assured that in 7 outstanding money laundering investigations, the Central Criminal Police has seized money or property to the total value of 342 million EEK. Currently, 8 criminal cases involving money laundering are being proceeded with (value of seized proceeds: 80 million Kroons). [4 were initiated on the basis of FIU materials and 4 by the Central Criminal Police.]

²⁹ The Estonian authorities have advised that the deadline used to be 2 working days. Since 1 January 2004, the situation has changed. MLTFPA Article 15¹ (1) provides that, in the event of justified suspicion of money laundering or terrorist financing, the Financial Intelligence Unit may issue a precept to suspend a transaction or to impose restrictions on the use of an account for two working days. In such a case, the transaction may be carried out or the restriction on using the account may be removed earlier only with the written permission of the Financial Intelligence Unit. Article 15² provides that the FIU may, on the basis of a precept, seize property to ensure its preservation. The FIU may seize property for a period of up to ten working days. Property may be seized for longer periods only if criminal proceedings have been commenced in the matter. In such cases, property shall be seized pursuant to the procedure provided by the Acts regulating criminal procedure.

³⁰ The examiners have been advised subsequently that the amendments to the MLTFPA that were enforced on 1 January 2004, which introduced the following provisions:

Article 26⁴. Unlawful notification of information submitted to Financial Intelligence Unit.

Unlawful notification of a person concerning whom notification has been submitted to the Financial Intelligence Unit or of third parties by the head or a contact person of a credit or financial institution or by another person acting on behalf of such an institution or by a person specified in Article 5 (1) of this Act or an employee thereof regarding information submitted to the Financial Intelligence Unit is punishable by a fine of up to 300 fine units.

Article 26⁵. Failure to comply with identification requirement

(1) Failure on the part of an employee of a credit or financial institution or on the part of another person or agency or an employee thereof to comply with the identification obligation provided for in the Money Laundering and Terrorist Financing Prevention Act is punishable by a fine of up to 300 fine units.

(2) The same act, if committed by a legal person, is punishable by a fine of up to 50 000 Kroons.

Article 26⁶. Failure to report suspicion of money laundering or terrorist financing and submission of incorrect information.

Failure on the part of the head or contact person of a credit or financial institution or another person to report a suspicion of money laundering or terrorist financing or submission of incorrect information thereby to the Financial Intelligence Unit is punishable by a fine of up to 300 fine units.

(2) The same act, if committed by a legal person, is punishable by a fine of up to 50 000 Kroons.

Article 26⁷. Violation of registration obligation by provider of currency exchange services
Violation of the registration obligation or the obligation to submit an application for the amendment of registration information or the obligation to give notification of the termination of activities established for providers of currency exchange services is punishable by a fine of up to 50 000 Kroons.

³¹ The Estonian authorities have indicated that there are about 40 operating exchange offices currently whose main activities are to provide money exchange services. Since 1994, the registration system reflected contractual arrangements with credit institutions, but from 15 April 2004, the contract with a credit institution is no longer relevant and all entities providing money exchange services will simply be entered into the Economic Activities' Register now kept by the Ministry of Economic and Communications Affairs.

³² As noted earlier, since the on-site visit the MLPA has been further amended and this version has also been annexed at G. The examiners have not reviewed it in detail.

³³ According to the amendments to the MPLA, the credit or financial institution, it is also required to identify any person who carried out a transaction where the value of the transaction is lower than a threshold specified in 6.

³⁴ MLTFPA Article 13 (6) provides for the requirements for code of conduct of credit and financial institutions. The Ministry of Finance establishes the rules to monitor compliance with the code of conduct and for the application of those documents.

³⁵ The amendments to the MLTFPA that were enforced on 1 January 2004 provide that FIU will be responsible for the supervision of non.-financial institutions and persons with regard to AML and anti-TF issues.

³⁶ MLTFPA Article 15 provides that the Financial Intelligence Unit shall issue advisory guidelines regarding the characteristics of suspicious transactions. The guidelines shall be published on the website of the Police Board.

³⁷ There are drafter amendments to the Commercial Code stating that share registers are not kept PLC-s any more. Share Registry is kept by the Central Registry of Securities.

³⁸ The Criminal Procedure Article 413(9) provides “The provisions of this Code apply to confiscated property unless the states have agreed otherwise.

³⁹ From 1 January 2004, one FIU operates as an independent structural unit under the Central Criminal Police.

⁴⁰ The current MLTFPA Article 19 states that the functions of the Financial Intelligence Unit are: to collect, register, process and analyse information received pursuant to Article 15 of this Act. In the course of these activities, the significance of the information submitted to the Financial Intelligence Unit for the prevention, identification or investigation of money laundering, criminal offences related thereto and terrorist financing shall be assessed;

2) to inform the persons who submit information the Financial Intelligence Unit of the use of the information submitted for the purposes specified in clause 1) of this section in order to improve the performance of the notification obligation;

3) to conduct investigations into money laundering and terrorist financing, to improve the prevention and identification of money laundering and terrorist financing and to inform the public thereof;

4) to co-operate with credit and financial institutions, persons specified in sub-section 5(1) of this Act, investigative bodies and police authorities in the prevention of money laundering and terrorist financing;

5) to organise foreign relations and the exchange of information pursuant to Article 24 of this Act;

6) to supervise the activities of persons specified in sub-section 5(1) of this Act in complying with this Act, unless otherwise provided by Law;

7) to conduct proceedings in matters of misdemeanours provided for in this Act.

⁴¹ In April 2004, the FIU has 11 personnel in place.

⁴² Online access is being established to relevant data.

⁴³ The reforms have taken place since the on-site visit. The Tax Board and Customs Board were merged, thus a new agreement is under elaboration.

⁴⁴ By the end of March 2004, there have made 5000 notices in all on STRs to the FIU.

⁴⁵ See comments on paragraph 65 and 66.

⁴⁶ See comment on paragraph 89.

⁴⁷ By April 2004, 4 money laundering cases have been generated by the police.

⁴⁸ As a result of centralisation reform, there are 4 regional prefectures.

⁴⁹ At the time of the final meeting on-site two completed prosecutions were mentioned but this could not be confirmed. By April 2004, there were 4 cases in court for money laundering.

⁵⁰ The examiners were subsequently advised that in the Ministry of Justice there is being established a database of criminal proceedings where all the relevant information will be reflected.

⁵¹ See footnote 5.

⁵² The new definition of money laundering since 1 January 2004 covers the acquisition, possession, use, conversion or transfer of, or the performance of transactions or operations with property acquired as a result of a criminal offence or in return for participation in such an offence, the purpose or consequence of which is the concealment of the actual owner or the illicit origin of the property. The new definition of money laundering in the 2004 amendments has thus removed the word 'direct', and refers to various acts done with property acquired as a result of a criminal offence.

⁵³ The Estonian authorities have advised that they have now abandoned plans to criminalise negligent money laundering, which is regretted by the examiners. Reconsideration of the recommendation of the previous examination team in this regard is encouraged.

⁵⁴ The Estonian authorities have subsequently indicated that they consider administrative penalties are more effective and do not intend to re-criminalise tipping off.

⁵⁵ A form of civil forfeiture is said to be contained in MLTFPA: the Prosecutor's Office or an investigative body may apply to an administrative court for permission to transfer property to state ownership if, within a period of one year as of the property being seized, it has not proved possible to establish the owner of the property and if the possessor of the property declares that the property does not belong to the possessor and relinquishes possession thereof. In the event where possession of movable property or immovable property is relinquished, the property shall be sold pursuant to the procedure provided in the Acts regulating enforcement procedure and the state shall receive the amount received from the sale. The owner of the property has the right to reclaim an amount equivalent to the value of the property within a period of three years as of the date on which the property is transferred to state ownership.

⁵⁶ According to MLTFA Article 15² The Financial Intelligence Unit may seize property for a period of up to twelve working days. Property may be seized for longer periods only if criminal proceedings have been commenced in the matter. In this case, property shall be seized pursuant to the procedure provided by the Acts regulating criminal procedure Article 146¹. Seizure of property in case of suspicion of money laundering

Property which is the object of suspicion of money laundering is seized by the preliminary investigator conducting the proceedings in the criminal offence of money laundering in order to secure a request for international legal assistance, seizure or civil matter if other measures are exhausted.

Property shall be seized pursuant to the procedure provided for in this Code on the basis of an order of a preliminary investigator or prosecutor and only with the consent of a judge.

⁵⁷ The Estonian authorities have advised that the FSA makes such checks.

⁵⁸ The mentioned entities have been brought under the supervision of FIU by the amendments of MPLA from January 2004

⁵⁹ Exchange offices and money transmitters, also credit unions have been brought within the MLPA by the January 2004 amendments.

⁶⁰ Anti-money laundering issues are being addressed in the course of the on-site examinations in insurance sectors and the securities market.

⁶¹ The 2004 amendments to the MLPA provide Article 13 that persons specified in S.5(1) of the Act may appoint a contact person or if no such person is appointed the duties of a contact person shall be performed by that person or by the head of the undertaking.

⁶² The 2004 amendments to the MLPA extend obligations to these persons under Article 5.

⁶³ The 2004 amendments have extended the application of the MLPA to providers of currency exchange services and providers of cash transfer services and the FIU is now responsible for their supervision.

⁶⁴ From 1 January 2004 on, realtors are subjects to MLTFPA.

⁶⁵ This recommendation has been followed with the enactment of the 2004 amendments to the MLPA. Real estate agents have anti-money laundering obligations and the FIU are charged with supervision over all persons set out in Article 5(1) where there is no other supervisor provided by law.

⁶⁶ The 2004 MLPA amendments provide *inter alia* that contact persons should be granted the authority to perform the duties specified in Article 5 14(1), but do not provide for contact persons at management level. The amendments however, clearly provide for audit rules to monitor compliance with statutorily required codes of internal conduct to prevent money laundering and terrorist financing.

⁶⁷ The evaluators have been advised by the Estonian authorities that dual criminal only applies to coercive measures.

⁶⁸ The Estonian authorities have advised that, under the Criminal Procedure Code currently in force and as further elaborated in the new version that will be enforced on 1 July 2004 there are no restrictions on mutual international assistance.

⁶⁹ The Estonian authorities have advised that, under the new Code of Criminal Procedure, in force from 1 July 2004, asset-sharing in joint investigations is provided for.

⁷⁰ In 2003, they received 78 requests.

⁷¹ At the beginning of April 2004, the FIU had 11 employees in place.

⁷² On the basis of the MLTFPA enforced from 1 January 2004 on FIU issues the indicators of suspicious transactions, MLTFPA Article 15(6) provides that FIU shall issue advisory guidelines regarding the characteristics of suspicious transactions. The guidelines shall be published on the web site of the Police Board.

⁷³ The Estonian authorities have indicated that this is now being pursued.

⁷⁴ The Estonian authorities have advised that the new Tax and Customs Board has such a competence.

⁷⁵ This has now been addressed in the 2004 amendments.

⁷⁶ The Estonian authorities have indicated that since 1 January 2004, under the amendment to MLTFPA, bureaux de change are brought under supervision of the FIU. Equally, money remitters have been brought under the supervision of the FIU.

⁷⁷ At the time of the on-site visit, there were no licensing procedures in place for exchange offices and money remittance companies. Under the amendments to MLTFPA, there is a registration procedure which includes consideration of 'fit and proper' criteria for owners and managers.

⁷⁸ The examiners have been advised that there is now an explicit provision in legislation (see P. 73)².

⁷⁹ Since the on-site visit, the FIU has increased its staff by 2 persons, though the establishment has increased by 4 (ie. 2 vacancies). As a result of structural reform, local units of the economic crime unit are also investigating money laundering cases.