

Preventing terrorist abuse of the non-profit sector: Summary observations

Working document prepared by the
Center on Global Counterterrorism Cooperation¹ for consideration at the

Final expert working group meeting on preventing terrorist financing abuse of the non-profit sector

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New York*

About this document

This document summarizes the key observations made by participants in a multiyear project aimed at developing a common understanding of sound regulatory approaches to counter the risk of terrorist financing through the non-profit sector. The initiative has been led by the United Nations Counter-Terrorism Committee Executive Directorate (CTED) on behalf of the United Nations Counter-Terrorism Implementation Task Force Working Group on Tackling the Financing of Terrorism, which brings together the members of the UN family that work on counter-terrorist financing issues, namely the 1267/1988 Monitoring Team on Al Qaeda, the International Monetary Fund, INTERPOL, the United Nations Office on Drugs and Crime, and the World Bank. CTED has implemented this initiative in close partnership with the Center on Global Counterterrorism Cooperation (CGCC) with support from the government of Canada, and also from the governments of Australia, New Zealand, Sweden, Switzerland, and the United Kingdom. The governments of Canada, the United Kingdom, New Zealand, and the United States also provided invaluable in-kind substantive support by making available practitioners experienced in this area throughout the project who provided expert guidance and direction. This initiative was launched with a global-level ministerial meeting in London (January 2011), followed by regional-level working group meetings in Bangkok (March 2011), Auckland (November 2011), Nairobi (March 2012), Buenos Aires (November 2012), and Doha (January 2013). The final meeting of the project will take place in New York from 5-7 March 2013. These meetings have brought together relevant officials from within governments (i.e. charities regulators, policymakers, law enforcement and financial intelligence unit [FIU] officials, and prosecutors) and from across states. Conceived as a dialogue, each meeting has also included representatives from the non-profit sector. In total, more than 50 states and 80 non-profit organizations (NPOs) participated, as well as representatives from the financial sector and relevant UN agencies. Officials from the Financial Action Task Force (FATF) as well as several FATF-style regional bodies (namely, the APG, ESAAMLG, GAFISUD, and MENAFATF) also participated. This mix of stakeholders brought to the table different perspectives on the issues. The process has aimed to foster appreciation of those views, while building consensus and contacts as states seek to improve their implementation of global counter-terrorist financing measures, while preserving the provision of public goods by the non-profit sector.²

As noted below, the project has tapped into a strong demand for dialogue among this group of stakeholders: in this sense, the process itself has been important. At each meeting, participants contributed wide ranging observations about the issues and reflected on a series of good practices among governments, within the sector, and pertaining to state-civil society relations. While several frameworks for understanding non-profit regulation have been advanced in the past,³ in this document we group relevant observations under three headings: risk and proportionality; communication and outreach; and oversight and investigation. We then consider future directions.

On the basis of the discussion at the New York meeting, the observations herein will be included in the final report from the project, to be released later in the spring.

1. Risk and proportionality

- 1.1. Terrorists have diverse methods for raising, moving, and deploying funds and material resources. Participants debated the specific vulnerabilities of the non-profit sector, as well as published cases where abuse has occurred. Abuse may arise where NPOs are “complicit” (that is, terrorist organizations pose as legitimate entities) or are “exploited” (otherwise legitimate organizations are abused by insiders or outsiders). There was a general consensus that, in interactions among stakeholders and in public statements on the issue, the threat should be articulated in a way that advances the objective of strengthening and securing the non-profit sector with minimum disruption to its many positive contributions. For some participants this should include contextualizing the risk of terrorist financing through the non-profit sector against the background of other terrorist financing threats. Participants also acknowledged that governments may face challenges in quantifying and sharing publicly information relating to the threat because relevant information may be held by intelligence agencies and few cases of terrorist abuse are actually prosecuted as terrorist financing offenses.
- 1.2. The vulnerability of NPOs to abuse by terrorists, participants noted, should also be viewed against the background of the economic and social impact of NPOs across the world. The sector is remarkably dynamic and diverse, and has grown significantly in recent years.⁴ NPOs are active in every sphere of civic life, including in the fields of culture, the arts and recreation, education and research, health care and social service provision, development assistance and disaster relief, the environment, and business and professional associations. NPOs operations represent *at least* \$2.2 trillion (USD) in expenditures annually and NPOs employ some 56 million full-time equivalent workers.
- 1.3. For these reasons, participants stressed the principle of proportionality, i.e. that actions to reduce the vulnerability of the sector should be pursued in a way that preserves its many positive contributions. Participants recalled that the ability to participate in charitable activity derives from fundamental human rights, including the rights to freedom of speech, association, and religion. These rights are enshrined in many national constitutions, and in regional and international human rights documents. Whereas a vibrant civil society ought to have the effect of reducing opportunities for extremists, the suppression of these rights through disproportionate or arbitrary intervention may be used by terrorists as part of the narrative of radicalization.
- 1.4. To implement the principle of proportionality, participants endorsed a risk-based approach in responding to the vulnerability of NPOs to abuse by terrorists (i.e. applying measures that are commensurate with the risk of terrorist financing identified and ensuring that legitimate charitable activities are not disrupted). They noted the emphasis given to risk in the revised recommendations of FATF, issued in February 2012 (as per Recommendation 1).⁵ In implementing a risk-based approach, knowledge of the sector is critical; risk is likely to vary across the diversity of the non-profit sector. In some cases, participants noted, such knowledge is underdeveloped or resides in a single government agency (whereas multiple agencies may be involved, directly or indirectly, in reducing the vulnerability of the sector to terrorist financing).

- 1.5. As set out in FATF Recommendation 8 (R8; formerly Special Recommendation VIII), undertaking a review of relevant laws and regulations pertaining to the non-profit sector is an important part of a risk-based approach. However, as the United Nations Counter-Terrorism Committee Executive Directorate pointed out in its 2011 Global Implementation Survey, compliance with R8 remains modest in most regions. Most countries have not undertaken a risk-based review of the sector and its activities in respect of terrorist financing, nor of the legal and institutional framework used to address it. Several participants suggested that this recommendation has not been accorded a high priority as yet. Where such reviews have been undertaken, participants noted the good practice of involving NPOs in the review.
- 1.6. Beyond reviewing the adequacy of laws and regulations as required by R8, a few states have undertaken a review or mapping exercise of the non-profit sector in their jurisdiction. Again, where this has occurred in collaboration with the sector, it has been an important step in building trust between the government and civil society actors. While participants noted the utility of conducting such a review of the sector they also commented that further guidance and expertise is needed to accomplish this task and few good practices have emerged in this regard.
- 1.7. Participants contributed other examples of good practice among states in implementing a risk-based approach, identifying several risk-assessment tools. These include matrices and frameworks for assessing risk (as have been published by several governments). These help to generate a systematic understanding of risk by identifying factors that increase or reduce vulnerability including, for example, the geographic location of NPO activity, methods for disbursing funds, the terms of any agreement between a grantee and beneficiary, or the use of on-site or field audits, etc. Many states also make use of available typologies reports as part of their risk assessments. Participants noted that such tools should be utilized on an ongoing basis; as risks evolve, risk assessments should be updated over time.
- 1.8. Participants also contributed examples of good practice among NPOs in implementing a risk-based approach. For example, some large charities utilize internal controls including “partnership appraisal forms,” searches of publicly available information (including lists of sanctions targets), and face-to-face interactions to ensure the integrity of partners and beneficiaries in the field. Formal contracts may be used to hold partners accountable and performance assessments may be undertaken to ensure effectiveness.
- 1.9. Participants also acknowledged that the risk-based approach can be particularly challenging in conflict or disaster-affected regions, where NPOs may come into contact with armed groups and terrorists. In several workshops, participants engaged in a frank discussion about the impact of counterterrorism measures on principled humanitarian action in these settings. NPO participants in particular argued that counter-terrorist financing laws should not criminalize the provision of humanitarian assistance. Applicable laws and policies should not be vague or overly broad and should aim to facilitate—not inhibit—humanitarian action in crisis situations. Participants underscored that governments and the sector share a common interest here: no one intends that charitable action should benefit terrorists; all acknowledge the importance of aiding the victims of violence, terrorism, or humanitarian crises.
- 1.10. In this regard, participants offered several ways forward, to permit aid to needy civilians in conflict or disaster settings while minimizing the risk of diversion to terrorists. In some

jurisdictions, government development agencies have established guidelines for locally-registered NPOs working in these environments, requiring that they seek accreditation and demonstrate due diligence. In other jurisdictions, such procedures may include a licensing regime, to allow NPOs to act in certain regions after a review of their proposed operations and procedures. Still others have recommended providing in-kind aid and, to the extent possible, controlling the flow of financial aid to final beneficiaries. In countries where natural disasters have occurred, authorities have introduced special procedures for registering and monitoring foreign NPOs, to facilitate the rapid delivery of aid while protecting against its diversion to terrorists.

2. Communication and outreach

- 2.1. Participants underscored the importance of communication for the purpose of raising awareness, consulting with partners and stakeholders, building consensus and understanding, and sharing knowledge and expertise. Communication is vital at four levels: within governments (inter-agency); across governments (international); between government and the non-profit sector (through consultation and outreach) and; within the sector itself (through professional networks and umbrella bodies).

Inter-agency communication

- 2.2. As noted above, government participants in the project meetings were drawn from a range of different domestic agencies. In some cases, participants reflected that these agencies had limited experience in interacting with each other directly and they undertook to build more effective networks and channels for communication. Given the division of labor across relevant agencies (those with expertise pertaining to the sector may have little experience with terrorist financing and vice versa), internal communication is critical to the implementation of proportional, risk-based measures.
- 2.3. Participants described both formal and informal methods to facilitate inter-agency communication. Often, governments have formed general counterterrorism committees—or more specific counter-terrorist financing committees—to facilitate coordination at the whole-of-government level. In some (but not all) cases relevant agencies, including charities regulators, are represented on these committees, which often establish points of contact and specific procedures through which communication can occur. Informal contacts among officials can also facilitate communication, especially where professional networks already exist.

Information exchange among states

- 2.4. Reflecting that the project brought together officials from different government agencies, participants detected some variation in practices of information exchange among states. For example, FIU officials noted that communication is often facilitated through the Egmont Group. Law enforcement officials have relatively well established networks and procedures for sharing information, including mutual legal assistance arrangements (which can be a long process) as well as less formal channels for assistance. Among regulators, however, such mechanisms are underdeveloped. For example, in many regions points of contact have not been developed among regulators and they often do not know their counterparts in neighboring jurisdictions or even which agency is the regulator. Several meetings revealed a strong demand to enhance such networks among regulators in particular. While it was

observed that some countries, particularly with shared borders, have developed agreements for sharing information in this regard, to date, in most regions the forum in which the vulnerability of NPOs to terrorist abuse has been most discussed is the FATF or the relevant FATF-style regional body (FSRB).

- 2.5. Participants also noted several general challenges in sharing information at the international level. Among these is the sensitivity of some information and intelligence, which may be protected for security reasons, and the privacy issues related to sharing information with/from tax authorities. Participants noted the importance of reciprocity among governments, although they again described a lot of variation in practice. Mechanisms including traditional forms of international cooperation such as memorandums of understand and mutual legal assistance treaties are in place among some states and aid communication.

Consultation and outreach between governments and the non-profit sector

- 2.6. Participants suggested that the volume and scope of consultation and outreach between governments and the sector should continue to increase. Some countries have established good practices in this regard, including regularized meetings that are open to the public, interactions with umbrella bodies, on-site visits, and the dissemination of information through websites and electronic media. Across the regional workshops, NPO participants in particular stressed the importance of clear, consistent, and actionable guidance from states to mitigate risk of terrorist financing
- 2.7. Participants observed that outreach activities should encompass issues beyond countering terrorist financing alone and that NPOs should have a role in setting the agenda for such interactions. Indeed, participants suggested that NPOs should be directly consulted about regulatory changes that affect them.
- 2.8. In some regions, relations between the government and civil society actors are tense or politicized. Participants elaborated that concern about the vulnerability of the sector to terrorist abuse should not exacerbate any such tension. Rather, participants often noted points of overlapping interest among states and NPOs and suggested that governments and the sector should “work together” as “partners” and through “dialogue,” to address a common problem. This sentiment provides a useful basis for undertaking the kinds of consultation and outreach activities described here.

Building knowledge within the non-profit sector

- 2.9. NPO participants indicated that levels of knowledge in the sector are quite low regarding the FATF recommendations and counter-terrorist financing measures generally. With that said, participants suggested that levels of understanding are perhaps better where there is some infrastructure for interaction among NPOs in a country or region, such as in the form of umbrella bodies. These bodies may also possess the capacity and expertise to disseminate information to the wider non-profit sector and to undertake a dialogue with government on these issues.
- 2.10. At the global level, participants noted that professional networks among NPOs are often highly advanced but that they tend to cluster around operational issues, reflecting the multiple fields across which civil society actors are engaged. The kinds of governance or

business-process related issues that are at the core of the discussion about the vulnerability of NPOs to terrorist abuse have not attracted sustained attention within the sector until relatively recently.

Other relevant actors

- 2.11. Beyond governments and NPOs alone, several participants commented on the importance of banks and financial institutions, whose decisions impact the non-profit sector significantly. The degree and quality of risk mitigation undertaken by financial institutions that handle international financial flows for NPOs influence the speed and ease of the transmission of those flows. Regarding the use of suspicious transaction reports (STRs) by banks and financial institutions, several participants noted that these bodies may lack expertise in making decisions about whether and how to file reports pertaining to NPOs. More specific guidance from governments—or relevant regional and international bodies—may facilitate more effective and consistent practices regarding STRs.

3. Oversight and investigation

- 3.1. Effective regulation is critical in preventing and disrupting NPO abuse. Participants concurred that there is no “one size fits all” approach to regulating the non-profit sector. Different jurisdictions have different legal systems and different implementing agencies, while definitions of an “NPO” vary across states.⁶ Nonetheless, the regional workshops also brought to light certain similarities in regulatory approaches, which can be grouped under the interlinked subheadings: registration and licensing; monitoring and supervision and; investigation, enforcement, and prosecution.

Registration and licensing

- 3.2. Participants agreed that criteria for establishing NPOs through registration or licensing should be transparent, consistent, and accessible. There are possible unintended consequences of overly-stringent registration requirements, including loss of trust between government and the sector. Such disproportionate regulation may also lead NPOs to incorporate as for-profit companies, contrary to their objectives. It may also have the effect of driving NPO activity underground, which both undermines the ability of NPOs to operate and mitigates against the broader objectives of preventing terrorist financing through the sector.
- 3.3. Registration provides an opportunity to gather information about NPOs, as appropriate, enabling governments to improve their knowledge of the sector. Relevant information can include the purpose and objectives of the organization, and the names of officers and trustees. Many countries utilize databases to collect and store this information. In some cases, these databases may be made public to improve transparency about NPOs and their operations.
- 3.4. Consistent with the principle of proportionality and the risk-based approach, there should be incentives for NPOs to comply with registration requirements, and to maintain transparency in their operations. A principal benefit of registration for NPOs in many countries is tax-exempt status. Participants commented that NPOs often benefit from having registration and operational information made public, as it demonstrates good standing and bona fides to potential donors and beneficiaries alike.

Monitoring and supervision

- 3.5. States utilize a range of regulatory tools to monitor NPO operations. These can include the submission of annual financial statements, related reporting and record-keeping requirements, and accounting controls to ensure that funds are spent in pursuit of the stated objectives of the organization. Again, some NPOs make this information public, to demonstrate transparency in their operations and improve public trust of the sector. Some states utilize on-site visits as part of their monitoring activities, providing opportunities for consultation and outreach alongside supervision. It was noted that monitoring and supervision needs to be calibrated to the risk and will be different depending on the size and composition of the sector in a particular jurisdiction.
- 3.6. Several participants commented on the use of auditors as part of monitoring and supervision activities. In general, participants noted that not all NPOs need to be audited but that this practice should be applied on the basis of risk. Similarly, while it seems that some jurisdictions define NPOs as “reporting entities” for the purposes of STR requirements, some participants also noted that this may well be unnecessary. In many jurisdictions, NPOs are required to operate through the formal financial sector and their transactions are therefore already subject to monitoring by financial institutions. It was also pointed out that NPOs are already regulated by other government agencies in most instances and that they may not be well equipped to respond to reporting requirements designed for financial institutions.
- 3.7. The competent authority responsible for monitoring and supervision can play an important role in the prevention of terrorist financing through NPOs by detecting and disrupting terrorist resourcing activities. This underlines the importance of good interagency cooperation and the involvement of all relevant actors.

Investigation, enforcement and prosecution

- 3.8. In the event that an alleged or possible case of NPO abuse emerges, participants noted the importance of conducting investigations and pursuing enforcement actions. The ability to investigate should be set out in law. The financing of terrorism should be criminalized and the legal authority to obtain evidence should be clearly established. Good practice suggests that a division of labor be established among the various competent authorities (direct and indirect regulators), underscoring the importance of inter-agency communication. Within a government, rules about sharing security-classified information among multiple agencies should be considered. Thus, although legislation is necessary, it is not sufficient to ensure effective investigations.
- 3.9. In pursuing enforcement actions, many states distinguish between criminal and civil or administrative penalties. In some cases of non-compliance, the latter may be preferred. These include deregistration, removal or suspension of tax exempt status, freezing accounts, removing trustees, and issuing fines. In some countries, support for terrorism is explicit grounds to refuse or revoke charitable status.
- 3.10. Participants described further applications of the principle of proportionality in the context of enforcement actions. In some cases, the charitable activities of an NPO may be preserved while investigating and prosecuting abuse. For example, some jurisdictions take targeted steps, on a case-by-case basis, to remove or replace rogue staff, rewrite governing

documents, and freeze assets or allocate them to other charitable activities consistent with the objective for which the funds were raised.

- 3.11. Participants noted the difficulties faced by prosecutors in advancing cases of terrorist abuse of NPOs. In many jurisdictions, prosecutors elect to pursue cases under laws other than counter-terrorist financing legislation, where experience may be more limited. Given the paucity of criminal cases that have been advanced to date, participants noted that building knowledge and expertise regarding NPOs through information sharing and interaction is a good practice. To put this point in context, participants added that prosecutions are not necessarily appropriate in each case of alleged abuse as more tactical intervention, such as disruption, can yield good results.
- 3.12. Participants noted the importance of FIUs as part of a “whole-of-government” approach to managing the risk of terrorist financing through NPOs. It was noted that, through the Egmont Group, FIU officials possess an established mechanism for sharing information.

Internal oversight: Governance within the non-profit sector

- 3.13. Participants in each workshop described the growth of self-regulation within the non-profit sector as a positive and relevant development in the context of reducing the vulnerability of the sector to terrorist abuse. Such measures are often advanced through umbrella organizations of NPOs at the national or regional level and aim to enhance governance practices within the sector. More than 370 self-regulatory initiatives are now in operation across the world. Beyond striving to improve governance standards within the sector, self-regulation has an important demonstration effect, signalling that the sector itself has an interest in establishing robust and transparent business practices.
- 3.14. Some states provide assistance or training to NPO officers to enhance their governance practices. For example, in one country NPO officers are required to attend training sessions on governance issues within six months of registration.

4. Future directions

- 4.1. Across each of the areas discussed to date—risk and proportionality, communication and outreach, and oversight and investigation—the project yielded a range of ideas for advancing the effectiveness of measures to reduce the vulnerability of the non-profit sector to terrorist abuse.
- 4.2. Having noted low levels of compliance with R8 across the world, participants suggested that further guidance and expertise is required by states in order to undertake the reviews called for in the recommendation. Implementation would also improve if specific practices reflecting the risk-based approach, and more precise risk-assessment tools in particular, were to be elaborated. In general, participants revealed a commitment to the risk-based approach and proportionality in principle but sought concrete guidance and assistance in translating them into laws and policies that comply with R8.
- 4.3. A related point concerning R8 pertains to the mutual evaluation process itself. Several participants perceived that there is variation in evaluation practices. Different evaluation teams, they suggested, have applied the evaluation methodology in different ways. While accepting that some variation in this regard is perhaps inevitable, participants emphasized

clarity and consistency in the administration of global standards, noting that this would aid implementation and enable the dissemination of good practices. One specific good practice here is to suggest that evaluators meet with representatives of the non-profit sector as part of the country visit.

- 4.4. Although the current round of workshops has been completed, participants confirmed the need for ongoing dialogue at several levels. Within states, this may entail the creation of new inter-agency working practices, procedures, and systems for identifying, monitoring, and investigating possible abuse. Across states, several participants identified the need for enhanced cooperation, especially among regulators, for whom there is no existing international mechanism with this purpose. An initial step might be to develop a list of points of contact for regulators, with a view toward annual meetings. Between governments and the sector, further opportunities for consultation and outreach should be embraced, premised on the idea of partnership in confronting a common problem. Within the sector, there is a need to raise awareness about counter-terrorism financing measures. Umbrella bodies should be utilized or developed in this regard, toward the broader goal of effective governance within the sector.
- 4.5. Regarding the tasks of oversight of the sector, and detection and investigation, a wide range of technical assistance and capacity-building needs were identified by participants. For many governments, technical assistance is required in order to improve implementation of R8. Similarly, participants described numerous capacity-building needs among NPOs, suggesting that advancing governance procedure through self-regulatory mechanisms holds promise as a response to concerns about terrorist financing, and to enhance the robustness and reputation of the sector more generally.
- 4.6. In conclusion, to underscore the timeliness of the project, it has occurred in parallel with other developments on these issues in related fora. In particular, participants noted with interest the recent priority given to this issue by the FATF president, including the importance of consultation with the non-profit sector.⁷ Similarly, the recent presidential statement issued by the United Nations Security Council reflects many of the themes discussed by participants:

The Security Council recognizes the need for Member States to prevent the abuse of non-governmental, non-profit and charitable organizations by and for terrorists. The Security Council also calls upon non-governmental, non-profit, and charitable organizations to prevent and oppose, as appropriate, attempts by terrorists to abuse their status. The Security Council recognizes that terrorists sometimes abuse the non-profit status of organizations, including facilitating terrorist financing. As these abuses are addressed, the Security Council recalls the importance of fully respecting the rights to freedom of religion or belief and freedom of expression and association of individuals in civil society. In this regard, the Security Council takes note of the relevant recommendation of the Financial Action Task Force.⁸

As this reflects, participants found great value in the process and expressed their view that the discussion begun through the project should continue into the future.

NOTES

¹ This discussion paper was prepared by the Center on Global Counterterrorism Cooperation (CGCC) in consultation with our organizing partners. Any errors or omissions are solely the responsibility of CGCC. The information in this paper should not be regarded as endorsed by, or reflecting the official position of the United Nations, the Counter-Terrorism Committee Executive Directorate (CTED), its bilateral partners, nor participating NGOs. The designations employed and the presentation of information in this discussion paper does not imply the expression of any opinion whatsoever on the part of the United Nations or CTED concerning the legal status of any country, territory, city, or area, or of its authorities or concerning the delimitation of its frontiers or boundaries.

² Other documents from this process are available on the CGCC website:
http://www.globalct.org/ourWork_projects_preventing_abuse.php.

³ For example, see: Asia-Pacific Group on Money Laundering (APG), *Typologies Report: NPO Sector Vulnerabilities* (2011), Fig. 1: Strategic Framework for NPO Regulation,” p.29, <http://www.apgml.org/documents/docs/6/NPO%20Sector%20Vulnerabilities.pdf>; Charity Commission of England and Wales (International Programme), “Building Blocks of Effective Regulation,” http://www.ngoregnet.org/About_effective_regulation/The_regulatory_bridge/Building_blocks_of_effective_reg.asp and; FATF, “Combating the Abuse of Non-Profit Organizations: International Best Practices,” October 2002.

⁴ This paragraph draws upon: Lester M. Salamon, S. Wojciech Sokolowski, and Regina List, “Global Civil Society: An Overview,” in *Global Civil Society: Dimensions of the Nonprofit Sector*, ed. Salamon, Sokolowski, and Associates (Bloomfield, Conn.: Kumarian Press, 2004), p.3 and Appendix C and; Lester M. Salamon, “Putting the Civil Society Sector on the Economic Map of the World,” *Annals of Public and Cooperative Economics* 81, no. 2 (2010): 187.

⁵ See Financial Action Task Force, “International Standards on Combating Money Laundering and the Financing of Terrorism & Proliferation – the FATF Recommendations,” 12 February 2012, <http://www.fatf-gafi.org/recommendations>.

⁶ The FATF defines an “NPO” as a “legal entity or organisation that primarily engages in raising or disbursing funds for purposes such as charitable, religious, cultural, education, social or fraternal purposes, or for the carrying out of other types of ‘good works.’” See Financial Action Task Force, *Interpretative Note to Special Recommendation VIII: Non-Profit Organizations*, February 2006, Paris, p. 2.

⁷ Bjorn S. Aamo, “Development of the Global Network and other key elements of FATF work under the Norwegian Presidency,” 3 December 2012, <http://www.fatf-gafi.org/documents/news/developmentoftheglobalnetworkandotherkeyelementsoffatfworkunderthenorwegianpresidency.html>.

⁸ United Nations Security Council, “Statement by the President of the Security Council,” S/PRST/2013/1, 15 January 2013.