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Administrative Rules for the Reporting of Large-Value and Suspicious RMB Payment Transactions – PBOC President Instruction No 2, 2003 (PI 2)	2.075
Rules for Anti-money Laundering by Financial Institutions – PBOC President Instruction No 1, 2003 (PI 1)	2.075

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Criminal Law of China

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Bank Secrecy Act 1970 (31 USC 1051 *et seq*)

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National Prohibition Act 1919 (Volstead Act) Oct 28, 1919, ch. 85, 41 Stat 305	
Generally	1.004
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TABLE OF ARTICLES, REPORTS AND OTHER PUBLICATIONS

Articles

Baldwin, Gregory A, <i>The New Face of Money Laundering</i> , reproduced at http://www.hklaw.com/Publications/OtherPublication.asp? ArticleID=2242	1.008
Bank for International Settlements (BIS), “History of the Basel Committee and its Membership”, available at http://www.bis.org/bcbs/ history.htm	2.011
Bank for International Settlements (BIS), “Prevention of Criminal Use of the Banking System for the Purpose of Money-Laundering”, December 1988 available at http://www.bis.org/publ/ bcbsc137.pdf	4.004
Bartlett, Brent L, “The Negative Effects of Money Laundering on Economic Development” (Asian Development Bank, May 2002)	4.007
European Commission, “Money Laundering: Commission Proposes to Update and Improve Directive”, 30 June 2004 Generally	2.062
Fisher QC, Jonathon, “EU Directives”, in Clark, Andrew and Burrell, Peter, (eds), <i>A Practitioner’s Guide to International Money Laundering Law and Regulation</i> (City and Financial Publishing, 2003) p 217	2.055, 2.057
p 224	2.058
Krebsbach, Karen “Fear Factor: Insomnia. Night Sweats. Heat Palpitations.”, <i>US Banker</i> , December 2004, http://www.us-banker.com/article.html? id=20041201YK5RSFQK	6.003
Law Society of England and Wales, <i>The Guide Online</i> , Annex 3B(1) “Money Laundering Guidance”, at para 4.26, see http://www.lawsociety.org. uk/professional/conduct/guideonline/view=page.law?POLICYID=161548&PARENT=80	6.032
Lichtblau, Eric, “US Cautiously Begins to Seize Millions in Foreign Banks”, <i>The New York Times</i> , 30 May 2003, http://www.nytimes.com/2003/ 05/30/national/30PATR.html?th	2.096, 11.012
Macdonald, Elizabeth, “Crony Capitalism”, Forbes.com, 21 June 2004	4.025

- Molander, Roger C *et al* "Cyberpayments and Money Laundering: Problems and Promises" (Rand Corporation, 1998), see <http://www.rand.org/publications/MR/MR965/MR965.pdf> at p 5 3.043
- The Money Laundering Cycle* at UNODC website http://www.unodc.org/unodc/en/money_laundering_cycle.html 3.008
- O'Hara, Terence, "Riggs Uncovers Deep Ties to Pinochet: Internal Inquiry Finds Indications of Money Laundering", *Washington Post*, 20 November 2004, p AO1 5.016
- Pieth, Mark and Aiolfi, Gemma, "The Private Sector Becomes Active: The Wolfsberg Process" <http://www.wolfsberg-principles.com/pdf/wolfsbergprocess.pdf> 2.085
- Quirk, Peter J, "Money Laundering: Muddying the Macroeconomy", IMF, *Finance and Development*, March 1997 4.007, 4.009–4.013
- Scott, David, "Money Laundering and International Efforts to Fight It" in World Bank, *Public Policy for the Private Sector*, May 1995 3.041
- United Nations Security Council, *Conflict Diamonds – Sanctions and War* at <http://www.un.org/peace/africa/Diamond.html> 3.024
- The Washington Post*, Thursday, 10 June 2004, p EO1 8.030
- The Washington Post*, Tuesday, 5 October 2004, p EO2 8.030
- "What is the FATF?" http://www.FATF-gafi.org/document/45/0,2340,en_32250379_32236836_34313517_1_1_1,100.html 2.047

Reports

- The 2004 Progress Report: The OECD's Project on Harmful Tax Practices*, (Centre for Tax Policy and Administration OECD, 2004) p 4 4.031
- National Commission on Terrorist Attacks Upon the United States (the 9/11 Commission) Report* Generally 11.001
- OECD Report on Harmful Tax Competition*, May 1998 4.029
- Report of the Committee of Ministers of the Council of Europe*, June 1980 4.004
- Transparency International, *Global Corruption Report* (Berlin, 2004) 4.020
- Transparency International, *Transparency International Corruption Index 2004*, (Berlin, 2004) 4.020

Other Publications

- The Bluebook* 6.006, 6.007
- Explanatory Memorandum in respect of the United Nations Model Mutual Assistance in Criminal Matters Bill 2000 (UN Model Mutual Assistance Law) 6.040
- Hyland, Michael, "Corporate Culture" in Clark, Andrew and Burrell, Peter, (eds), *A Practitioner's Guide to International Money Laundering Law and Regulation* (City and Financial Publishing, 2003) p 53 **8.004**
- Law Society of England and Wales, *Guidance to Solicitors on Money Laundering Legislation*, 2000 6.006

TABLE OF CONVENTIONS, PROTOCOLS, TREATIES AND RESOLUTIONS

Conventions

1990 Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime (ETS No 141), Strasbourg, 8 November 1990	
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European Convention on Mutual Assistance in Criminal Matters (ETS No 030)	
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United Nations Security Council Resolution 1373 (2001), adopted by the
Security Council at its 4385th meeting, on 28 September 2001

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TABLE OF EC COUNCIL DIRECTIVES

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Directive 2001/97/EC of the European Parliament and of the Council of 4 December 2001 amending Council Directive 91/308/EEC on Prevention of the Use of the Financial System for the Purpose of Money Laundering

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First Council Banking Coordination Directive (77/780/EEC) of 12 December 1977

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First Life Assurance Directive (79/267/EEC) of 5 March 1979

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Second Council Directive (89/646/EEC) of 15 December 1989 on the Coordination of Laws, Regulations and Administrative Provisions Relating to the Taking Up and Pursuit of the Business of Credit Institutions (Second Banking Directive)

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Second Life Assurance Directive (90/619/EEC) of 8 November 1990

Generally 2.054

TABLE OF INTERNATIONAL STANDARDS AND GUIDELINES

Australia

Australian Standard 4360 Risk Management	8.057
--	-------

Basel Committee on Banking Supervision

Basel Committee on Banking Supervision, <i>Core Principles for Effective Banking Supervision</i> , September 1997	2.012
Basel Committee on Banking Supervision, <i>Core Principles Methodology</i> , October 1999	2.012
Basel Committee on Banking Supervision, <i>Prevention of Criminal Use of the Banking System for the Purpose of Money Laundering</i> , December 1988	
Generally	4.005, 4.015
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Egmont Group

Egmont Group, "Statement of Purpose of the Egmont Group of Financial Intelligence Units", as originally approved in Madrid on 24 June 1997 and amended The Hague 13 June 2001	2.081
---	-------

Financial Action Task Force on Money Laundering (FATF)

Best Practices Paper: Special Recommendation IX, "Combating the Abuse of Alternative Remittance Systems: International Best Practices", 29 June 2003	
Generally	3.036, 11.024
FATF, "Detecting and Preventing the Cross-Border Transportation of Cash by Terrorists and Other Criminals: International Best Practices", 12 February 2005	12.034
FATF Eight Special Recommendations on Terrorist Financing, 2001	
Generally	2.048, 2.051 , 2.052, 2.065, 3.006, 5.020, 5.026, 11.006, 11.017, 11.026, 11.032, 12.007, 12.008, 12.015, 12.031, 12.032, 12.035, 12.043, 12.044
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FATF Extraordinary Plenary on the Financing of Terrorism held in Washington, DC on 29 and 30 October 2001	11.017
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FATF Reports on Money Laundering Typologies (FATF Typologies Reports) Generally	2.055
FATF Special Recommendation IX, October 2004 Generally	2.051, 2.052 , 3.021, 4.019, 12.007, 12.015, 12.031, 12.032, 12.035, 12.043, 12.044
“FATF Strengthens Global Anti-Money Laundering and Anti-Terrorist Financing Campaign” (27 February 2004)	2.048
“FATF Tackles Terrorism Financing, Delists Guatemala”, 2 July 2004	2.048
“FATF Targets Cross-Border Cash Movements by Terrorists and Criminals”, 22 October 2004	2.052, 11.003, 11.025 , 11.026, 11.028
FATF Typologies Report 1997–1998, 12 February 1998 Generally	3.005, 5.005, 5.007
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FATF Typologies Report 2002–2003 Generally	3.024
p 15	3.047
FATF Typologies Report 2003–2004 p 18	5.014
FATF, “Freezing of Terrorist Assets – International Best Practices”, 3 October 2003	11.021

FATF, "How is Money Laundered?", see http://www.FATF-gafi.org/pages/0,2966,en_32250379_32235720_1_1_1_1_1,00.html	3.049
FATF, <i>2003–2004 Report on Money Laundering and Terrorist Financing Typologies</i> , 27 February 2004	
p 16	5.017
p 17	5.018
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FATF, Non-Cooperative Countries and Territories (NCCT) Reports	
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FATF-VII Report on Money Laundering Typologies, 28 June 1996	
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Forty Recommendations of the Financial Action Task Force on Money Laundering (FATF Forty Recommendations), 1990 version	
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Forty Recommendations of the Financial Action Task Force on Money Laundering (FATF Forty Recommendations), 1996 version	
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Interpretative Notes to the Forty Recommendations (2003), 1 December 2004	
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Interpretative Notes to the Nine Special Recommendations on Terrorist Financing, 12 January 2005	
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Money Laundering FAQ, FATF website http://www.FATF-gafi.org/ document/29/0,2340, en_32250379_32235720_33659613_1_1_1_1,00.html	3.040

Wolfsberg Standards

Wolfsberg Anti-Money Laundering Principles for Correspondent Banking, November 2002	2.085
Wolfsberg Anti-Money Laundering Principles for Private Banking, October 2000 (revised May 2002)	2.085
Wolfsberg Statement on Monitoring Screening and Searching, September 2003	2.085
Wolfsberg Statement on The Suppression of the Financing of Terrorism, January 2002	2.085