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INTER-AMERICAN DRUG ABUSE  
CONTROL COMMISSION

**CICAD**

Secretariat for Multidimensional Security

**XLI MEETING OF THE GROUP OF EXPERTS FOR THE CONTROL OF MONEY LAUNDERING  
OCTOBER 1-2  
LIMA, PERU**

**OEA/Ser.L/XIV.4.41  
CICAD/LAVEX/doc.3/15  
12 August 2015  
Original: English**

**OPEN SOURCES OF INFORMATION AS A TOOL OF DEVELOPMENT FOR THE RESEARCH OF MONEY  
LAUNDERING AND THE FINANCING OF TERRORISM**

## **TERMS OF REFERENCE**

### **OPEN SOURCES OF INFORMATION AS A TOOL OF DEVELOPMENT FOR THE RESEARCH OF MONEY LAUNDERING AND THE FINANCING OF TERRORISM**

#### **1. BACKGROUND**

In the XL Meeting of the Group of Experts to Control Money Laundering, held from May 19 to 20, 2015, in Washington, DC, USA, there was a discussion regarding the proposal of the delegation of Peru. They raised a point concerning the development of a project that would consolidate the web pages Member States use in their LA/FT investigations.

On this point, Mr. Daniel Linares Ruesta, Mayor for Operational Analysis of the Department of Operational Analysis, Financial Intelligence Unit (FIU) of Peru made a presentation which showed how the FIU-Peru, in their research, used public access websites to obtain relevant information. He also highlighted that other security research agencies in other Member States have developed a similar practice. In this regard, the project's objective would be to consolidate all of these sites, in all OAS Member States, as a tool that would be available to all researchers. This would allow for all agencies to obtain relevant and timely information for their investigations, particularly if they involve individuals who are non-residents of the country where the research is being conducted.

It should be noted that the project involves the use of web pages that provide public information, which is both freely accessible and/or subject to payment or subscription. Confidential or classified information is not included in this project, given that it must be obtained through the appropriate channels.

After the XL Meeting of the Group of Experts for Money Laundering Control, it was agreed that the Peruvian delegation would present the terms of reference of the proposed project, for it to be transferred to the delegations. It was also agreed for its adoption to be discussed at the next meeting of the Group of Experts for Money Laundering Control, to be held in Lima in October.

#### **2. OBJECTIVE**

Develop a technological tool that provides researchers from Member States timely access (online) to relevant public information, from different web pages available freely or by subscription, concerning citizens, non-residents or foreign<sup>1</sup> companies under LAFT investigations.

No part of this project concerns confidential information or that protected by the laws of Member States.

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<sup>1</sup> Only considering Member States of the OAS.

### **3. JUSTIFICATION**

The information obtained from public access web pages is an important part of any LAFT investigation, and this information becomes more important if researchers have access to it in a timely manner.

However, experience tells us that researchers do not manage all of the public websites in their country where they can get useful information for their research. This lack of access or availability becomes more severe in regards to foreign individuals or companies, or ones that are non-residents in the country of research.

In this regard, there is a need on behalf of researchers to have on hand a list of public web pages, which offer relevant and timely information (online) about people and companies, domestic or foreign, which are the subject of their research.

This project proposes to address this need for access to information in a timely manner, providing a tool that allows researchers to check all available online web pages, whether in their country or abroad (other OAS Member States). These web pages can be publicly available and/or restricted<sup>2</sup>, based on the information they contain from the identification of individuals and/or companies, to police records, and information of an economic, corporate, commercial, credit, professional or trade nature, among others.

### **4. ACTIVITIES NEEDED TO DEVELOP THE PROJECT**

The aforementioned, consolidated list of web pages will be formed on the basis of lists provided by each Member State; therefore to develop this project, the commitment of Member State and their representatives to meet the following activities is essential:

#### 1) Preparatory Phase

- Designation of coordinators: Each country will appoint a "Coordinator Country" (CPa) which is responsible for managing the relationship of their country websites. The profile of the coordinator should be similar to a cabinet specialized in research analyst, either the FIU, police or prosecutors. Also, the Gelavex should appoint a "Project Coordinator" (CPr) who will be responsible for the project.
- Defining the type and characteristics of the web addresses: The CPr will define the categories and characteristics of web pages that are useful for the work of analysts and researchers. With this information the CPa will then perform the work in their countries.

#### 2) Compilation of Information Phase

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<sup>2</sup> Web pages that require payment or a subscription to access the public information they offer. Not including confidential or other legally protected information.

- Management to obtain web addresses: The CPa will identify, in their countries, all the web addresses that analysts or researchers use in developing their cases. It is recommended for meetings to be held with national agencies, such as prosecutors, police, customs, internal taxation, procurement, reporting, etc.

### 3) Consolidation Phase

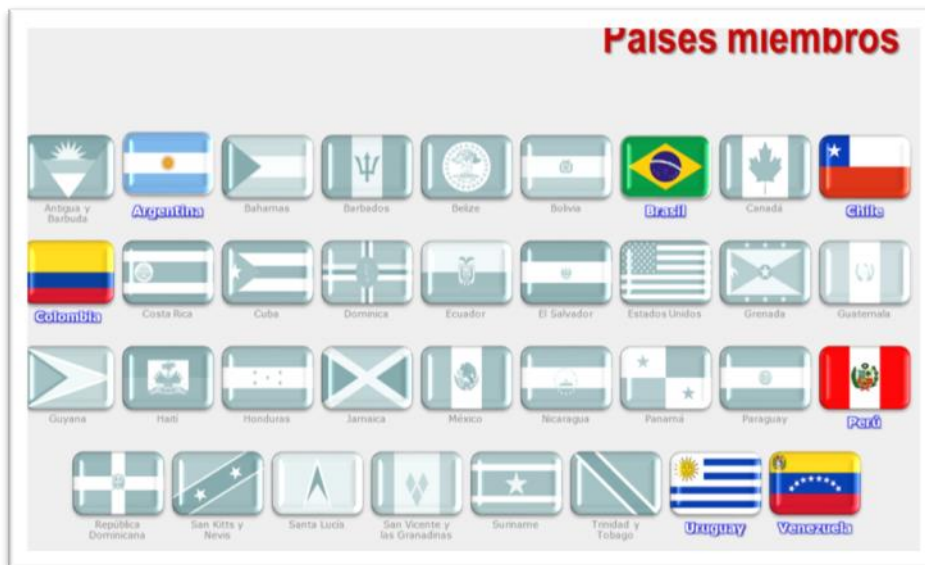
- Transfer and consolidation of information. On completion of the previous stage, the CPa will forward web addresses identified to the CPr, who will then be responsible for the collection, consolidation and validation of all web addresses provided by Member States.
- Tool delivery: The final product will be available to the Presidency of Gelavex, with the recommendation that it be uploaded to the CICAD website so that it is available to all investigators, prosecutors and analysts of Member States.

### 4) Broadcasting and Maintenance Phase

- Holding Workshops: There will be personal/virtual workshops help that will allow for the socializing and training of OAS Member States in the use of the tool, especially for websites that require complex interactions.
- Maintenance: It is important to indicate that the project will require the continued support of the CPa, as the lists should be reviewed from time to time to ensure the links are still valid and to update them if need be.

## 5. REPRESENTATION OF THE SUBJECT ENVIRONMENT PROJECT TOOL

The tool would work very simply. After pre-authentication (username and password) the user will find a screen showing all the Member States, similar to the following:



The user must then select the flag that corresponds to the person or company on which they want information. After this selection, another screen will present shortcuts to web pages of that country, classified by category, like the screen shown below (with Peru as an example). In this instance, the user would select the link they wanted to enter the web site where they can extract information.



## 6. LOGISTICS

- 2-day Event for full-time coordinators to gather for the Preparatory Phase of the project.
- 2-day Event for full-time coordinators to gather for the Consolidation Phase of the project.
- 2-day Event for full-time coordinators to gather for the Broadcasting Phase of the project.