



COMANDO GENERALE DELLA GUARDIA DI FINANZA
II REPARTO
COORDINAMENTO INFORMATIVO E RELAZIONI INTERNAZIONALI
UFFICIO ANALISI

Torino 14 ottobre 2019



COMPETENZE DELL'UFFICIO ANALISI

riservata al
Comando Generale

rivolta a fenomeni e
tendenze



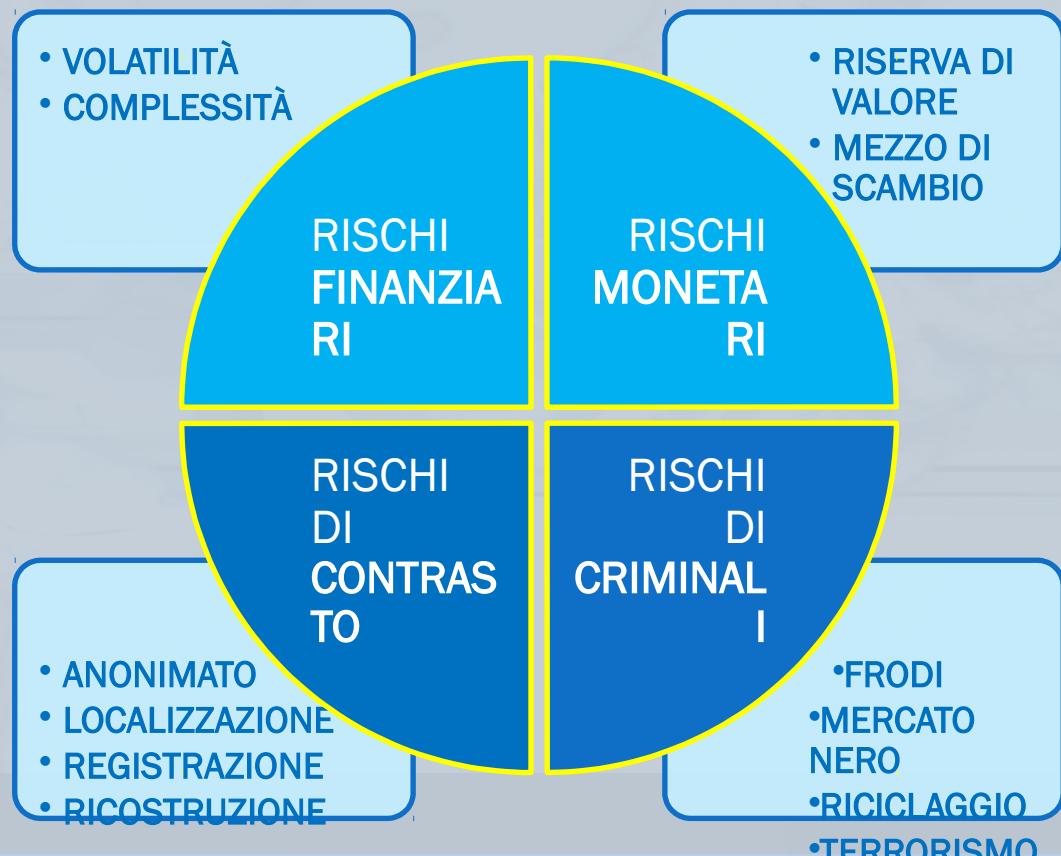


Lady Florence Norman
Central London
1916

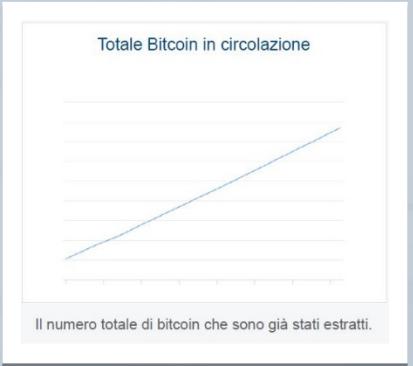




BRAINSTORMING

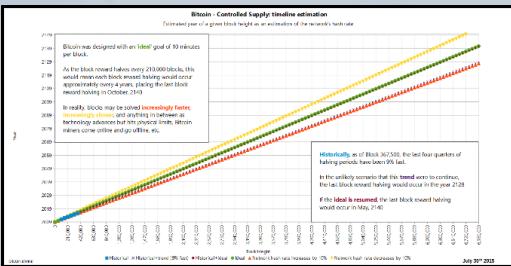


VALORE INTRINSECO



Secondo il sito [www.blockchain.com...](http://www.blockchain.com)

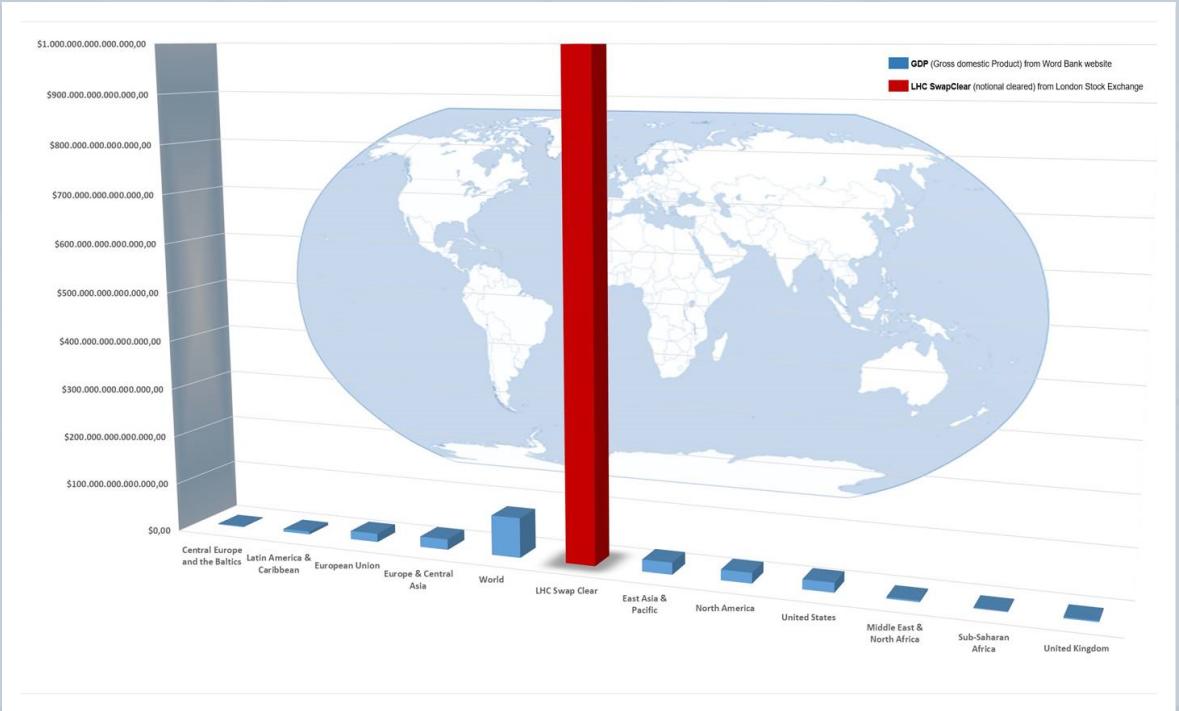
al 20 agosto 2019 sono stati estratti
17,883,850 BTC



sono rimasti **3,114,550 BTC** ed è previsto l'esaurimento della estrazione per l'anno **2140**



RAPPORTO CON L'ECONOMIA REALE?





RISCHI CRIMINALI



Guardia di Finanza

STUDY
For the TERR committee

European Parliament

Virtual currencies and terrorist financing: assessing the risks and evaluating responses

Counter-Terrorism

Policy Department for Citizens' Rights
Directorate General for Internal Policies
PE 604570 - May 2018

EN

FATF

FATF REPORT

Emerging Terrorist Financing Risks

October 2015



FATF

GUIDANCE FOR A RISK-BASED APPROACH

VIRTUAL ASSETS AND VIRTUAL ASSET SERVICE PROVIDERS

JUNE 2019



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FONTE: FINANCIAL ACTION TASK FORCE, VIRTUAL CURRENCIES: KEY DEFINITION AND POTENTIAL AML/CFT RISKS

TWO CRIMINAL GROUPS DISMANTLED FOR LAUNDERING EUR 2.5 MILLION THROUGH SMURFING AND CRYPTOCURRENCIES

11 July 2018
Press Release

Europol has supported the Spanish Guardia Civil and the National Police of Colombia in dismantling two criminal organisations involved in large-scale money laundering. It is estimated that the EUR 2.5 million have been laundered by using different methods, such as smurfing and cryptocurrencies.

28 members of the group were arrested – mainly from Spain, Colombia and Venezuela – and twelve investigated. 19 houses were searched and seized – 9 in Spain, 12 in Colombia, and 7 in Venezuela – and approximately 100 mobile phones, computers and banking and financial documents. Also, numerous virtual wallets used by the criminal organisations to launder the cash were seized to avoid further laundering attempts.

Europol supported the operation by facilitating information exchange and by deploying four experts to Spain to work with a police officer and a Spanish Justice Prosecutor (District Court X) – this allowed for a direct cross-check of the data gathered during the course of the actions against Europol databases, as well as the exchange of data from the mobile and computer devices seized for forensic analysis.

"SMURFING" TO LAUNDER THE MONEY

The investigation began in January 2017 when Colombian authorities warned about a Colombian family with ties to drug trafficking that was operating in the Spanish city of Cartagena. The Spanish Guardia Civil verified the existence of a criminal organisation operating in Spain and dedicated to laundering their money earned by other criminal groups who were operating in various locations in Spain and France. The criminal network picked up the illicit proceeds, split them and moved them in small term bank accounts held in known tax havens.

VIRTUAL WALLETS AND CRYPTOCURRENCIES

Among the criminal groups they collected the money from, investigators also identified a secret network operating in Madrid (Spain). The secret network was receiving large sums of cash from other criminal groups, in addition to illegal services related to drug trafficking or crimes against the heritage in Spain. The groups used cryptocurrency exchanges to move large amounts of money from cash into cryptocurrencies, like Bitcoin and Altcoins, and then transferred them to other virtual wallets controlled by the criminal groups, which used the same – like Bitcoind – to send proceeds to South America. This allows



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Transaction

Transaction [409f521a7bfbc067b9fce59ae7511c38f0ede3223b0b225dbd63d16bdaeb246a](#)

[409f521a7bfbc067b9fce59ae7511c38f0ede3223b0b225dbd63d16bdaeb246a](#)

mined May 24, 2019 2:21:16 AM

392FrJonffYonuKWcq6sXmz7bJcf7aF5jF 0.05326703 BTC



3LqRFhXgV92fKTBNvY761fFz9Lp2gzBsDY 0.007374 BTC

0.007374 BTC

3EuPGCLevSDB3T1xKFoGS1PmcjmoPKYBE7 0.04539737 BTC

0.04539737 BTC

FEE: 0.00049566 BTC

13 CONFIRMATIONS

0.05277137 BTC

Summary

Size 138 (bytes)

Fee Rate 0.0035917391304347823 BTC per kB

Received Time May 24, 2019 2:21:16 AM

Mined Time May 24, 2019 2:21:16 AM

Included in Block 0000000000000000000000000043b3a068eba528c44ceb495c995600b2911c46c2847c4

LockTime 577480





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Guardia di Finanza

AUTORITÀ?

Libro contabile
distribuito
blockchain

Verifica e
decriptazione
miners

Mixing services

*Virtual
currency
exchanger*

Wallet
providers

Localizzazione
server

PAESI NON
COLLABORATI
VI?



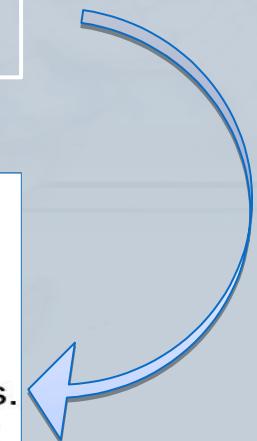
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Financial Action Task Force

A febbraio 2019 si sono concluse le ultime
MUTUAL EVALUATIONS condotte su 70 differenti
Paesi

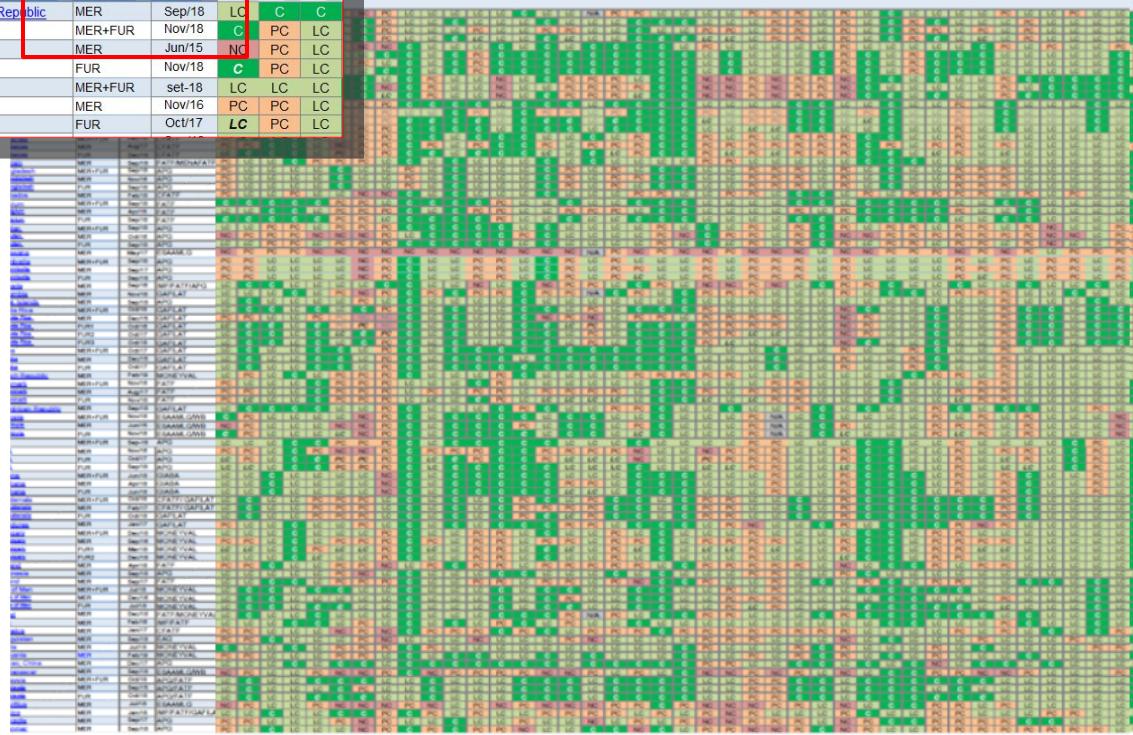
C	Compliant
LC	Largely compliant - There are only minor shortcomings.
PC	Partially compliant - There are moderate shortcomings.
NC	Non-compliant - There are major shortcomings.
NA	Not applicable - A requirement does not apply, due to the structural, legal or institutional features of the country.





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Jurisdiction (click on the country name to go to the report on www.fatf-gafi.org)	Report Type	Report Date	R.1	R.2	R.3
Dominican Republic	MER	Sep/18	LC	C	C
Ethiopia	MER+FUR	Nov/18	C	PC	LC
Ethiopia	MER	Jun/15	NC	PC	LC
Fiji	FUR	Nov/18	C	PC	LC
Fiji	MER+FUR	set-18	LC	LC	LC
Fiji	MER	Nov/16	PC	PC	LC
Fiji	FUR	Oct/17	LC	PC	LC





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DECRETO LEGISLATIVO 25 MAGGIO 2017, N.90

Art.1, comma 2,
lettera qq
D.lgs. 231/2007

qq) valuta virtuale: la rappresentazione digitale di valore, non emessa da una banca centrale o da un'autorità pubblica, non necessariamente collegata a una valuta avente corso legale, utilizzata come mezzo di scambio per l'acquisto di beni e servizi e trasferita, archiviata e negoziata elettronicamente.

Art.3, comma 5,
lettera i
D.lgs. 231/2007

i) i prestatori di servizi relativi all'utilizzo di valuta virtuale, limitatamente allo svolgimento dell'attività di conversione di valute virtuali da ovvero in valute aventi corso forzoso.

Vigilanza affidata alla Guardia di Finanza





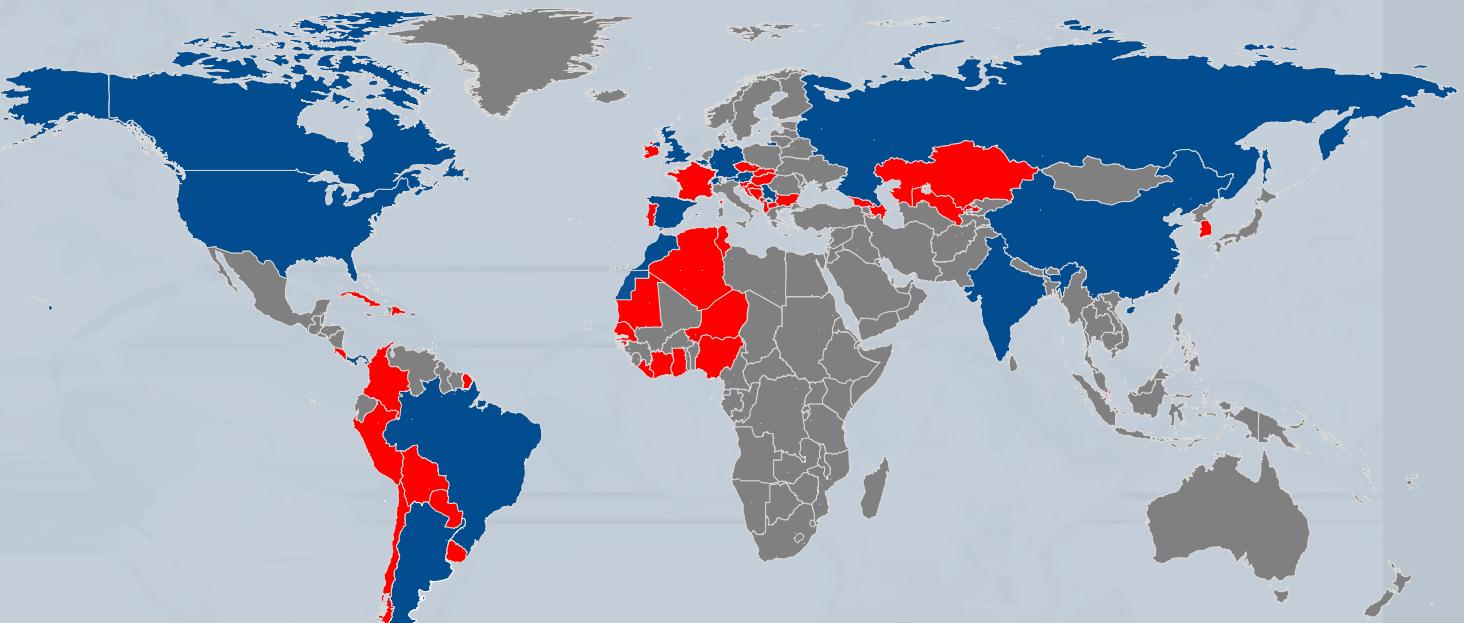
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VERSIONE IN
CONSULTAZIONI

DIRETTIVA NR. 2018/843/UE V DIRETTIVA AML/CTF (DA RECEPIRE ENTRO IL 10 GENNAIO 2020)

- g) all'articolo 1, comma 2, lettera ff), dopo le parole “*a titolo professionale,*” sono aggiunte le seguenti “anche online,” e dopo le parole “*aventi corso legale*” sono aggiunte le seguenti “o in rappresentazioni digitali di valore, ivi comprese quelle convertibili in altre valute virtuali nonché i servizi di emissione, collocamento, trasferimento e compensazione e ogni altro servizio funzionale all’acquisizione, alla negoziazione o all’intermediazione delle valute medesime”;
- h) all'articolo 1, comma 2, dopo la lettera ff) è aggiunta la seguente:
“ff-bis) prestatori di servizi di portafoglio digitale: ogni persona fisica o giuridica che fornisce a terzi, a titolo professionale, anche online, servizi di salvaguardia di chiavi crittografiche private per conto dei propri clienti, al fine di detenere, memorizzare e trasferire valute virtuali;”
- u) all'articolo 3, comma 5, dopo la lettera i) è aggiunta la seguente:
“i-bis) i prestatori di servizi di portafoglio digitale”.





ACCREDITAMENTI

PRINCIPALI

Paesi: 14

Organizzazioni Internazionali:



Ufficiali G. di F. *Esperti distaccati*

ACCREDITAMENTI

SECONDARI

Paesii 43

Paesi: 13 Organizzazioni Internazionali: 3





CONCLUSIONI

L'innovazione tecnologica è necessaria ed inevitabile

Ai numerosi pregi sono connessi alcuni rischi

L'assessment ai rischi deve essere di carattere sovranazionale

La G. di F. è protagonista della rete di protezione internazionale





GRAZIE!