



ANTI-MONEY LAUNDERING AND COUNTERING THE FINANCING OF TERRORISM (AML/CFT) NEWSLETTER FOR CENTRAL ASIA

Issue 15, November 2005
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Calendar

- 1 Financial Investigation Techniques (Anti-Money Laundering Course) for Kazakhstani Financial Police**
Dates: 4-8 December 2006
Organizer/s: US Embassy in Kazakhstan, International Narcotics and Law Enforcement (INL)
Location: Financial Police Academy, Astana, Kazakhstan
Contact Information: Elena Beskrovnaya, beskrovnayae@state.gov
- 2 EurAsian Group (EAG) Plenary, Donor Meeting and Private Sector Consultations**
Dates: 12-15 December 2006
Organizer/s: EurAsian Group (EAG)
Location: Moscow, Russian Federation
Contact Information: Victor Kochenov, info@euroasiangroup.org
- 3 AML/CFT Workshop for Uzbek Supervisory and Law Enforcement Officials (session three of six)**
Date: 5 December 2006
Organizer/s: UNODC and World Bank
Location: Tashkent, Uzbekistan
Contact Information: Cari Votava, cvotava@worldbank.org
- 4 AML/CFT Workshop for Kazakhstani Supervisory Officials (sessions four and five of six)**
Date: 8 December 2006
Organizer/s: UNODC and World Bank
Location: Almaty, Kazakhstan
Contact Information: Cari Votava, cvotava@worldbank.org
- 5 Workshop on the Role and Function of a Financial Intelligence Unit (FIU)**
Date: 13-14 March 2007
Organizer/s: UNODC and World Bank
Location: Dushanbe, Tajikistan
Contact Information: Cari Votava, cvotava@worldbank.org

Contributions to this newsletter are welcome. To submit information for inclusion or to be added to or removed from the distribution list, please contact Shane Michael Riedel at shanemichael.riedel@unodc.org.



The Editorial Team of the AML/CFT Newsletter for Central Asia is pleased to wish readers a very happy holiday season. In recognition of the winter holidays, a joint December/January newsletter will be issued in January 2007.

AML/CFT Developments in Central Asia

Afghanistan



Afghanistan is developing its anti-money laundering and combating the financing of terrorism system. Afghanistan has enacted anti-money laundering and combating the financing of terrorism laws, but has yet to fully establish a Financial Intelligence Unit (FIU).

Afghanistan is an observer member of the EurAsian Group (EAG).

Belarus



Belarus has recently adopted legislative amendments to make the FIU fully operational and to fulfill the criteria for membership in the Egmont Group.

Belarus is a member of EAG.

China



China has recently amended its AML/CFT law to include a wider variety of predicate offenses (see related news article). The FATF/EAG on-site evaluation mission by which China was considered for FATF membership took place in November 2006.

China is a member of EAG, and an observer member of the FATF.

Kazakhstan



The Kazakhstani AML/CFT draft law remains under consideration in the Parliament.

Kazakhstan is a member of EAG.

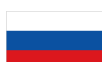
Kyrgyzstan



Kyrgyzstan recently participated in mutual evaluation conducted by EAG. Kyrgyzstan has formed an FIU and is currently drafting a regulatory framework and amendments to the AML law.

Kyrgyzstan is a member of EAG.

Russia



Russia has passed amendments to the AML/CFT law on confiscation of assets and has ratified protocol amending the European Convention on Suppression of Terrorism.

Russia is a member of FATF and MONEYVAL/Council of Europe, and currently chairs EAG.

Tajikistan



A draft AML/CFT law is being considered in by the Government.

Tajikistan is a member of EAG.

Turkmenistan



The current government action plans calls for the drafting of an AML/CFT law in the coming year.



Uzbekistan adopted an AML/CFT law in 2004 and is currently in the process of creating an FIU under the General Prosecutor's Office.

Uzbekistan is a member of EAG.

Technical Assistance Update

A **NATO Advanced Research Workshop** entitled **“Invisible Threats: Security of Financial Systems in the Caucasus and Central Asia”** was held on 10-12 October 2006 in Bishkek, Kyrgyzstan.

The OSCE Centre in Almaty, together with the Foreign Ministry of Kazakhstan, the Agency on the Fight against Economic and Corruption Crime and Transparency Kazakhstan, organized a **roundtable discussion on “Improving measures to combat corruption in the private sector”** in Astana, Kazakhstan on 17 October, 2006.

FIU	Financial Intelligence Unit
FATF	Financial Action Task Force
FSRB	FATF-Style Regional Bodies
EAG	EurAsian Group
TANA	Technical Assistance Needs Assessment

On behalf of EBRD and funded by the Swiss Government, TvT Compliance Ltd. delivered a **Regional AML/CFT Seminar for Participants from CIS Countries** on 24 and 25 October 2006 in Bishkek, Kyrgyzstan. The training seminar included presentations by AML/CFT experts from Austria, Georgia, Kyrgyzstan, Russia and Switzerland on “Analysis of Post-Soviet Money Laundering Typologies and the Experience of the Russian Federation in implementing an AML/CFT system,” “The Due Diligence Process: Identification, Beneficial Ownership and Monitoring of Business Relations,” “Detecting and Reporting of Suspicious Transactions,” “Organization of an AML Compliance Office,” “Politically Exposed Persons,” and Fighting Money Laundering and Terrorist Financing in Kyrgyzstan.”

Forty-five participants from Armenia, Azerbaijan, Belarus, Georgia, Moldova, Kazakhstan, Kyrgyzstan, Tajikistan and Uzbekistan and five representatives of International Organizations attended the seminar. Participants represented financial institutions in the region, FIUs, supervisory agencies, prosecutorial authorities and policymakers. The seminar helped to increase awareness of the threats of money laundering and terrorist financing in the region and provided for a forum for sharing of experience with practitioners on how to address these challenges.

The American Bar Association Central European and Eurasian Law Initiative (ABA/CEELI) Central Asian Republic Regional Anti-Corruption Advisor (CAR RACA) program, in connection with the national television station of Kyrgyzstan, presented a **Nationally-Televised Public Forum on the New Kyrgyz AML/CFT Law**. The program included a panel discussion with a studio audience, “man in the street” interviews, and pre-recorded interviews with experts. The in-studio panelists included the Prosecutor General of Kyrgyzstan, the Deputy Finance Minister/Chairwoman of the Kyrgyz Financial Intelligence Service, and the Acting President of the Union of Banks of Kyrgyzstan. The one-on-one interviews included experts from the World Bank, the Kyrgyz Stock Exchange and the Kyrgyz International Business Council.

The program provided the public with an overview of the new law, addressed current money laundering issues in Kyrgyzstan and discussed the steps that need to be taken to successfully implement the law. The one hour program premiered in Russian during prime time on October 27. The Kyrgyz language version aired during primetime on November 5. The CAR RACA program is funded by the U.S. Department of State and the U.S. Department of Justice.

The World Bank and UNODC delivered the second in a series of six **AML/CFT Workshops for Supervisory and Law Enforcement Officials** on 7 November in Tashkent, Uzbekistan. Similar workshops were conducted in Almaty, Kazakhstan and Bishkek, Kyrgyzstan on 10 and 21 November, respectively.

Representatives from the Central Asia Regional Information and Coordination Center (CARICC) offered a presentation at the **Technical Assistance Coordination meeting in Almaty, Kazakhstan** on 13 November. CARICC is the regional entity assisting in organizing and coordinating joint international operations to combat illicit drug trafficking. Planning to become operational in 2008, it

will also provide collection, storage, protection, analysis, and sharing of information with member governments (Azerbaijan, Kazakhstan, Kyrgyzstan, Russian Federation, Tajikistan, Turkmenistan and Uzbekistan) and international law enforcement bodies. As CARICC will serve as a regional center for coordinating drug trafficking efforts and sharing of information and intelligence, countries currently establishing FIUs should consider establishing mechanisms for cooperation with CARICC.

The World Bank and UNODC met with the Chairman of the Kyrgyz Accounting Chamber and conducted a half-day **AML/CFT Training Session for Kyrgyz Accounting Chamber staff** on 22 November in Bishkek, Kyrgyzstan. Topics discussed included: the role of the Accounting Chamber in National AML/CFT efforts, whether the Accounting Chamber should be obliged to report suspicious transactions to the FIU, the role of the Accounting Chamber in an inter-agency task force and the need for training of the Accounting Chamber staff on international accounting standards.

EurAsian Group (EAG)

A joint FATF/EAG Experts Meeting on Money Laundering and Terrorist Financing Typologies was held in Shanghai, China on 28 -30 Nov. The meeting was attended by the law enforcement, prosecutorial and financial supervisory authorities representing more than 40 countries. The meeting was divided into four workshops which discussed the known and perceived methods and trends (i) of terrorism financing, (ii) of laundering the proceeds of Missing Trader Intra-Community Carousel Fraud, (iii) of laundering the proceeds of drug trafficking, and (iv) of laundering money through the real estate sector.

Each workshop developed relevant recommendations, identified intelligence gaps and needs for further investigation and made the proposals for further efforts of the project teams. EAG led the workshop on laundering of the proceeds of drug trafficking. Marat Seksembaev, a prosecutor of the General Prosecutor's Office of Kazakhstan, together with a FATF/EAG project leader presented the main report, which was very well received by the participants, who underlined the high quality of the report and its practical value. Olga Zudova, a UNODC Senior Legal Adviser, contributed to the report and to the workshop by consulting with the project leader and providing him with the required materials, revising the draft report and delivering a presentation on trafficking drugs from Afghanistan, including the related UNODC response.

EAG Plenary and Donor Meeting, as well as Private Sector Consultations, took place on 12-15 December, 2006 in Moscow.



www.eurasiangroup.org

<u>Schedule of EAG Country Evaluations (and evaluating entity):</u>		
Kyrgyzstan	(EAG)	December 2006
Tajikistan:	(World Bank)	March 2007
Kazakhstan:	(EAG)	First Half 2007
Russia:	(EAG, FATF, MONEYVAL)	Second Half 2007
Belarus:	(EAG)	Fourth Quarter 2008
Uzbekistan:	(EAG)	Fourth Quarter 2008

**Activities of the International Organization of Supreme Audit Institutions
Anti-Money Laundering Task Force**

by Barbara I. Keller, US Government Accountability Office
on behalf of the International Organization of Supreme Audit Institutions (INTOSAI)

The International Organization of Supreme Audit Institutions (INTOSAI) is the professional organization of national agencies responsible for auditing government revenue and spending. INTOSAI provides its members with opportunities to share information and experiences about the auditing and evaluation challenges facing them in today's global environment. INTOSAI's



more than 180 members consist of supreme audit institutions (SAI) from countries that belong to the United Nations or its specialized agencies.

INTOSAI has a number of working groups and task forces that focus on issues of interest or concern in their regions. Because of its members' concerns about detecting and deterring money laundering, INTOSAI created an anti-money laundering (AML) task force in October 2002. The task force has met four times, with the last meeting being held in Lima, Peru, the home of its chairman, Dr. Genaro Matute, in early March 2005.

The task force has 3 objectives:

- to promote international cooperation by identifying existing multilateral cooperative organizations, encouraging involvement by non-participating nations and establishing INTOSAI relations with international organizations;
- to identify and share policies/strategies by identifying existing guidelines promulgated by other international organizations and relevant reports issued by other organizations and establishing a Web link for INTOSAI members to use to share AML practices, procedures, and activities; and
- to design and promote SAI policies, strategies, and actions to evaluate and control the AML system in individual countries by defining general guidelines to develop policies, identifying appropriate activities, and promoting training and exchange programs.

As one of its activities under objective 2, the task force held a 2-day AML symposium in June 2006 in Moscow hosted by the Audit Chamber of the Russian Federation. The theme of the symposium was the role of SAIs in the development and implementation of national policies and procedures in the fight against international money laundering. Speakers on day one included many government and international organization representatives involved in the fight against money laundering, who spoke about their roles in this effort. Day two's speakers were mostly SAI representatives, including a number of heads of audit offices, who made presentations on the work that they are involved in regarding money laundering and corruption and how they work with other organizations that share the same concerns. A number of the presentations were by SAI representatives from Central Asian countries.

It was clear from the presentations that the role of each SAI depended greatly on its country's stage of economic development and type of government. Some SAIs were focused on auditing the process their governments had in place to guard against money laundering while others were much more focused on auditing the use of public funds and trying to fight corruption. One of the future challenges for the task force is to design guidelines and provide information on AML strategies and training that will be useful for SAIs in their various roles in this field.

The symposium was an excellent opportunity for all in attendance to learn from each other and to share ideas, especially ideas on how participants could work together more closely in the future. At the end of the symposium, the task force chairman summed up the conclusions he believed were reached through the 2 days of presentations and networking:

There is widespread recognition of corruption and the possible use of state resources in money laundering. Most countries have been instituting frameworks to identify suspicious accounts.

The roles of the World Bank, United Nations, INTERPOL and other international organizations are important for SAIs in several ways and can help build up legal frameworks and provide contacts and training on AML.

More international cooperation is required to follow up on public accounts.

SAIs can have different roles in AML, and each SAI needs to do its own evaluation of what's needed and choose a strategy in accordance with its own situation.

The development of effectiveness measurements for AML will help SAIs develop their own strategies for designing their activities.

More training programs are needed in different countries to help design appropriate measures. The private sector has been leading in AML training and has approaches that SAIs can draw on.

For additional information, contact: Barbara I. Keller, Assistant Director, Financial Markets and Community Investment, kellerbi@gao.gov.

AML/CFT Case Study

The Renolds family was successful in the real estate business, earning a significant level of income each year. Several members of the Renolds family, all foreign nationals, opened a number of bank accounts in a local bank. Following the opening of these accounts, different deposits in the form of cheques and cash were made into the accounts in amounts totaling more than US\$1,700,000. The funds were collated into a single account and transferred onwards to an account in another country. In response to bank inquiries, the family said that these transfers abroad were to facilitate the purchase of real estate in that country.

However, within two months of the transfer, the funds came back into the central account in a different currency and were immediately transferred, in yet another currency, to the account of a third person overseas who had no apparent link to either the family or real estate business.

As a result of all the various fund movements, the bank was unsure about the true origin of the money and reported the case to the national FIU. After examining the account records, the FIU concluded that the transactions were suspicious enough to forward to the judicial authorities. At time of writing, the judicial authorities had frozen the accounts and had commenced further investigations.

Suspicious Indicators:

1. Unusual explanation for business/account activity
2. Atypical or uneconomical fund movement within account
3. Fund movements to unknown third parties

This case has been adapted from the "FIU's in Action," a compilation of 100 sanitized cases from Egmont Group members. The full version is available at www.egmontgroup.org.



Media Summary

Regional News

SCO and CSTO to hold first joint exercises in 2007

Interfax – 2 November

It was announced that Shanghai Cooperation Organization – Regional Anti-Terrorism Structure (SCO RATS) and Collective Security Treaty Organizations (CSTO) will stage their first-ever joint tactical exercises, Rubezh 2007, to be held in Kazakhstan and China next year. The exercises will involve the CSTO's rapid reaction forces and aircrafts from the Russian base in Kant, Kyrgyzstan, in addition to RATS's forces.

Poppy 2006 uncovers cannabis farms in northern Tajikistan

Avesta – 11 November

The counter-narcotics operation "Poppy 2006" had discovered major cannabis plantations in the high mountain villages in the north of Tajikistan, primarily in the Mastchoh-i Kuhi, Istaravshan, and Bobojon Ghafurov districts. The poppy operation is carried out from late spring to late autumn every year.

Eighth summit for the leaders of Central Asian countries held in Turkey

Times of Central Asia – 16 November

The Presidents of Kyrgyzstan, Kazakhstan, Turkmenistan, Uzbekistan and Azerbaijan visited Turkey for the 8th summit for the leaders of Central Asian countries. Discussions explored the possibility of a Turkic Commonwealth.

Experts express concern over Afghan narcotics and terrorist financing

ANI – 22 November

With the Taliban's narcotics trade almost touching the three billion dollar mark annually, experts from both Afghanistan and abroad have expressed concern on the evolving trend. They draw a parallel between the Taliban and the FARC, Colombia's notorious Leftist insurgent group that draws much of its funding through the drug trade. According to them, both the Taliban and the FARC got their start protecting peasants from corrupt governments, and both initially fought narcotics traffic but then levied taxes on the trade for much-needed cash.

Police and military officials in Afghanistan say that the Taliban has been more and more depending on drug trade. "There is no question at all that the Taliban has been increasingly involved both directly and indirectly in narcotics," the Christian Science Monitor (CSM) quoted Seth Jones, an analyst at the Rand Corporation, a US-based non-profit making institution addressing the challenges being faced by public and private sectors around the world. According to the paper, there has been growing evidence that the Taliban and their allies are moving beyond taxing the trade to protecting opium shipments, running heroin labs, and even organising farm output in areas they control.

"It's reached the point where about half of the opium we seize in the provinces has some link to the Taliban," says Gen. Ali Shah Paktiawal, the director of the anti-criminal branch of the Kabul police.

Another senior Afghan security official said that the captured Taliban have confessed that "most funding comes from drugs".

"People should be concerned about the FARCification of the Taliban. It does not take a lot of drug money to fund their terrorist operations," says a senior Western counter-narcotics official. Many experts believe the Taliban has always been dependent on the poppy trade.

Declassified US State Department records show that two major narco-traffickers now in US custody, Baz Mohammed and Bashir Noorzai, sat on the original five-member Taliban shura, or leadership council.

"The Taliban rose to power by co-opting Afghan heroin," said an unidentified US official.

Amid the debate as to how much of the Taliban's funding is being done through drugs trade, some say that donations from wealthy Arabs and financial support from Pakistan make up a larger portion of the Taliban's financing than heroin.

"I don't believe Mullah Omar and his top counsel are involved, but they have clearly allowed trafficking to happen," the report quoted an unnamed Western official as saying.

Differentiating the Taliban's funding methodology from that of al Qaeda, the paper said that Osama bin Laden has instructed his people not to get wrapped up in narcotics, apparently fearing it would harm his movement.

"Some say that Osama [bin Laden] and his people have specifically stayed away from it," said the Western official.

Afghanistan under Taliban again would be 'black hole for terrorism'

Agence France Presse – 24 November

If NATO were to allow Afghanistan to fall under Taliban rule again, the country would become a "black hole for terrorism training", the alliance's Secretary General Jaap de Hoop Scheffer has said, according to The Daily Telegraph.

"I am absolutely convinced that if we allowed Afghanistan to fall back into Taliban rule it would become a failed state again and a black hole for terrorism training," Scheffer said, speaking from NATO headquarters in Brussels.

"Who knows that the terrorists are not going to hit nations that they have not yet hit? That's why you see me strongly motivated -- that is the message I will give at Riga," Scheffer said, referring to an upcoming NATO summit in Riga, Latvia.

"What is our first priority? It is Afghanistan."

Scheffer said, however, that NATO could do better in Afghanistan if it had more forces, and said he was doing everything he could to get commitments for more troops.

"If you ask me, Secretary General, are you entirely happy and satisfied with the forces at the moment? I say no, we should and could do more. Some of our allies can and should do more."

While getting caveats in place on fighting troops lifted is a priority to Scheffer, "we also need more forces and I am in the process of doing everything I can to get them."

The NATO secretary general also said that he forecast international forces, including non-alliance troops, staying in Afghanistan for "more than a generation".

U.N. sees Afghan drug battle faltering

Seattle Times – 30 November

Afghanistan's criminal underworld has compromised key government officials who protect drug traffickers, allowing a flourishing opium trade that will not be stamped out for a generation, an ominous U.N. report released Tuesday said.

The fight against opium production has achieved only limited success, mostly because

of corruption, the joint report from the World Bank and the United Nations Office on Drugs and Crime said.

The findings show a "probability of high-level (government) involvement" in drugs, said Doris Buddenberg, the UNODC's Afghanistan representative and co-editor of the report.

The report in particular presented a strong indictment of the Interior Ministry, which runs the country's police, and said Afghanistan's criminal underworld could not operate without the support of the political "upperworld."

"The majority of police chiefs are involved," one senior police officer told the report's authors on condition of anonymity. "If you are not, you will be threatened to be killed and replaced."

The spokesman for the counternarcotics ministry said there is no evidence high-ranking officials are involved in Afghanistan's drug trade.

Poppy cultivation and the heroin it produces has become a major problem in Afghanistan, providing funds for the Taliban insurgency that has caused the deaths of more than 3,700 people this year.

Opium production in Afghanistan rose 49 percent this year to 6,100 metric tons. The harvest provided more than 90 percent of the world's opium supply and was worth more than \$3.1 billion.

The 210-page report, titled "Afghanistan's Drug Industry," is the first comprehensive assessment of the country's drug production. Instead of sustained declines in cultivation,

successful efforts to reduce poppy growing in one province often lead to increases elsewhere, the report found.

Poppies take up less than 4 percent of the total cultivated area in Afghanistan, and most districts do not grow opium, the report said.

But the \$3.1 billion export value of last year's crop accounted for about one-third of total economic activity in the country, and about 13 percent of Afghans are involved in the trade.

Russia tells top business to help fight terrorism

Reuters – 29 November

Russian Foreign Minister Sergei Lavrov told some of the globe's most influential businesses on Wednesday they must take more responsibility in the fight against terrorism.

Top decision makers from companies such as European aerospace maker EADS, U.S.-based Citigroup and oil producer BP gathered in Moscow to swap ideas on how business can fight extremist violence.

"Only with the participation of state and business can terrorism be contained," Lavrov told about 450 delegates at a conference Moscow hosted as part of its chairmanship of the Group of Eight industrial nations.

"I believe we should begin with the priority sectors of transport, energy, cyberspace and infrastructure," he said.

The conference was to endorse a "strategy for partnerships between states and businesses to counter terrorism" on Thursday.

International News

Global improvements clear FATF NCCT list FATF Plenary Summary – 13 October

Myanmar has become the final country to be removed from the list of countries and territories not cooperating in the international fight against money laundering. The Financial Action Task Force (FATF) has determined that Myanmar has made good progress in implementing its anti-money laundering system.

The FATF will continue to monitor Myanmar during the coming year to ensure it makes further progress. In particular the FATF has

advised Myanmar to enhance regulation of the financial sector, including the securities industry, and to ensure that dealers in precious metals and precious stones follow anti-money laundering requirements.

The FATF's Non-Cooperative Countries and Territories (NCCT) process has been very successful. All 23 jurisdictions that were listed as NCCTs in 2000 and 2001 are no longer on the NCCT list as they have made significant progress and many others strengthened their anti-money laundering and counter-terrorist financing systems to ensure they would not be listed by the FATF as non-cooperative.

China amends AML law

Xinhua – 31 October

China's top legislature adopted an anti-money laundering law that broadens the definition of money-laundering crimes to include accepting bribes.

The definition of money laundering has been expanded to include corruption and bribe taking, violating financial management regulations and financial fraud.

The law is expected to come into effect on 1 January 2007.

Previously, the law only identified drug trafficking, organized crime, terrorist crimes and smuggling as money laundering crimes.

China's officials and analysts believed the coverage is too narrow. They called for stepping up efforts to combat money laundering, which has risen in recent years along with activities such as embezzlement, drug trafficking and other smuggling.

The law demands financial and some non-financial institutions to maintain record on clients and transaction records and to report large and suspect transactions.

The People's Bank of China, or central bank, is the nerve centre of the anti-money laundering campaign. Its provincial branch offices are authorized to investigate suspect fund transfers of financial institutions.

The law demands financial and certain non-financial institutions to keep identity information of clients and transaction records, report large and suspicious transactions.

The law offers a legal basis for checking the flow of cash of corrupt officials, said Lang Sheng, a official on criminal law with the NPC Standing Committee.

The move is designed to widen the net to monitor the illicit flow of money to combat money laundering.

The law also pledges to step up coordination with other countries to combat global money laundering, promising to exchange information with international anti-money laundering organizations.

According to the China Anti-Money Laundering Monitoring and Analysis Centre, an office under the central bank set up in 2004, 683 suspicious money laundering cases had been reported to the police by the end of 2005.

Publications and Websites of Interest

<http://www.unodc.org>

Official website of the UNODC. (In English, Russian, Spanish)

<http://www.worldbank.org/amlcft>

World Bank's AML/CFT website. (In English)

<http://www.imolin.org>

International Money Laundering Information Network (In English, with some Russian)

<http://www.euroasiangroup.org>

The EurAsian Group is the FATF-Style Regional Body serving Central Asia. (In English and Russian)

<http://www.egmontgroup.org>

The Egmont Group is the international network of FIUs which work together to deter international money laundering efforts. (In English)

<http://www.fatf-gafi.org>

Financial Action Task Force Against Money Laundering (FATF). (In English and French)

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