



USAID
FROM THE AMERICAN PEOPLE



Anti-Money Laundering and Combating Financing of Terrorism Regional Initiative Implementation Plan

August 2011

This publication was produced for review by the United States Agency for International Development. It was prepared for the Partners for Financial Stability (PFS) Project, delivery order number EEM-I-00-07-00005-00 implemented by Deloitte Consulting, LLP

Anti-Money Laundering and Combating Financing of Terrorism

Regional Initiative Implementation Plan

USAID PARTNERS FOR FINANCIAL STABILITY (PFS) PROJECT

CONTRACT NUMBER: AID-EEM-I-00-07-00005-00

TASK ORDER NUMBER: AID-OAA-TO-10-00022

DELOITTE CONSULTING, LLP

USAID/E&E/ECONOMIC GROWTH/MARKET TRANSITION

August 2011

DISCLAIMER

The report made possible by the support of the American People through the United States Agency for International Development (USAID). The contents of this report are the sole responsibility of Deloitte Consulting, LLP and do not necessarily reflect the views of USAID or the United States Government.

Table of Contents

1. EXECUTIVE SUMMARY	1
<i>Table 1: “Overview of Regional Initiative on Preventing Money Laundering and the Financing of Terrorism”</i>	2
2. THE DEVELOPMENT CHALLENGE	3
3. OBJECTIVES OF REGIONAL INITIATIVE	4
4. PARTNERSHIPS	5
5. PROPOSED ACTIVITIES	5
6. EXPECTED OUTCOMES	8
7. MONITORING PLAN	8
<i>Table 2: “AML/CFT Regional Initiative Monitoring Plan”</i>	9

Deleted

Acronyms

AML	Anti-Money Laundering
CFT	Combating the financing of terrorism
CTED	UN Counter-Terrorism Executive Directorate
E&E	Economic Growth in the Europe and Eurasia Bureau
EAG	Eurasian Group on combating money laundering and financing of terrorism
FATF	Financial Action Task Force
FBI	Federal Bureau of Investigation
FinCEN	Financial Crimes Enforcement Network
FIU	Financial Intelligence Units
GPML	Global Program against Money-Laundering
ML	Money laundering
IMF	International Monetary Fund
OPDAT	US Department of Justice
OSCE	Organization for Security and Co-Operation in Europe
OTA	US Department of Treasury - Office of Technical Assistance
PFS	Partners for Financial Stability
RIIP	Regional Initiative Implementation Plan
SAR	Suspicious activity report
SEE	Southeast Europe
SSI	Strategic surveillance initiative
TF	Terrorist financing
UN	United Nations
USAID	United States Agency for International Development

About PFS

The United States Agency for International Development (USAID) Partners for Financial Stability (PFS) Program is led by the Office of Economic Growth in the Europe and Eurasia Bureau (E&E). The project addresses the challenges facing the financial sector in 12 Partner Countries: Albania, Bosnia and Herzegovina, Kosovo, Macedonia, Montenegro and Serbia (Southeastern Europe) as well as Armenia, Azerbaijan, Belarus, Georgia, Moldova, and Ukraine (Eurasia). Other countries in the E&E region that are considered USAID ‘graduates’ serve as Mentor Countries in the PFS Program. The PFS Program is designed to complement the work of the bilateral USAID missions’ Economic Growth programs in the region by bringing together regional players to address regional challenges.

PFS Program activities include benchmarking studies, conferences, knowledge sharing, research and technical assistance. The PFS Program addresses the challenges of the financial systems in these regions, working in a broad range of subject areas including anti-money laundering, banking and non-bank financial regulation, supervision and institutional rehabilitation, corporate governance, financial literacy, access to finance and implementation of international standards in financial sector reporting.

1. Executive Summary

Financial Intelligence Units (FIUs) are the most important national institutions in the worldwide fight against money laundering and combating the financing of terrorism (AML/CFT): crimes which can undermine the integrity and stability of financial institutions and systems, discourage foreign investment, and distort international capital flows. Emerging markets with strong AML/CFT regimes are able to enhance the integrity and stability of their financial sectors. This not only facilitates these countries' further integration into the global financial system but also helps strengthen governance. In an increasingly interconnected world, the problems presented by these crimes are global. The national systems in place to prevent money laundering and terrorism financing must consider both international as well as regional perspectives.

The primary objective of this Regional Initiative Implementation Plan (RIIP) is to strengthen the institutional capacity of FIUs across Eurasia and Southeast Europe (SEE) to effectively implement international standards and best practices in preventing money laundering and the financing of terrorism. A combination of virtual and in-person regional workshops and training programs will be conducted to achieve this goal. An overarching component of these activities will be the transfer of expertise and information sharing from mentor countries with peers in beneficiary countries.

An overview of regional initiative is provided below.

Table 1: “Overview of Regional Initiative on Preventing Money Laundering and the Financing of Terrorism”

Objective	Partnerships	Activity	Outcome	Monitoring
Improve the strategies and effectiveness of FIUs and systems for prevention of ML/TF	<ul style="list-style-type: none"> • FIUs from mentor and beneficiary countries • OSCE • US Treasury Dept MoneyVal • UN • IMF • World Bank • EC 	1. Assist the PFS Beneficiary Countries in conducting National Risk Assessments consistent with international standards through regional conferences , online meetings, and technical workshops of FIUs	Improved capacity in PFS beneficiary countries to identify sources of risk for ML/TF	Number of PFS beneficiary countries conducting National Risk Assessments that meet international standards
		2. Support a regional conference on “Anti-money laundering and combating financing of terrorism: global trends and country cases” in Baku, Azerbaijan (Feb 2011)		Number of FIU officials participating at PFS knowledge-sharing events
		3. Support the regional AML/CFT training center in Serbia (based on demand and availability of resources)		Number of FIU staff, obligors and supervisors trained in analysis of suspicious activities related to ML/FT at the regional training center
Develop capacities of FIUs and obligors to prevent and detect financing of terrorism	<ul style="list-style-type: none"> • FIU and Bank staff • Analysts from mentor and beneficiary countries • UN, IMF, World Bank, OSCE, FBI, US Treasury Dept., US Justice Dept. 	4. Conduct regional workshops (one each in SEE and Eurasia) for FIUs and banks on CFT Other demand-driven activities	Increased capacity of FIUs and obligors to prevent and detect financing of terrorism	An increase in the number of CFT related SARs filed with FIUs after PFS regional workshops.
Improve FIUs’ ability to conduct AML/CFT supervision of accountants and auditors	<ul style="list-style-type: none"> • FIU supervisors • Supervisors from other government entities (for instance, central banks) 	5. Support experts from mentor countries to participate in regional technical workshops for FIUs on AML/CFT supervision of accountants and auditors	Increased capacity of FIUs to conduct AML/CFT supervision of accountants and auditors	An increased adoption of new supervisory practices by supervisors participating in training workshop.

2. The Development Challenge

The international community has made the fight against money laundering and terrorist financing a priority. Money laundering and terrorist financing activities can undermine the integrity and stability of financial institutions and systems, discourage foreign investment, and distort international capital flows. In an increasingly interconnected world, the problems presented by these activities are global, as are the links between financial stability and financial integrity. Money launderers exploit differences between national anti-money laundering laws and systems, and are especially attracted to jurisdictions with weak or ineffective controls where they can move their funds more easily. Moreover, problems in one country can quickly spread to other countries in the region or in other parts of the world.

According to the International Monetary Fund (IMF), criminals exploit the global financial system to launder trillions of dollars from illicit crimes each year. Most of this laundered money ends up back in the hands of criminals who use the proceeds to perpetuate crimes including drug and human trafficking, political corruption, and tax evasion. Terrorists also manipulate the world's financial systems to finance their activities. Money laundering is a process by which the illicit source of assets obtained or generated by criminal activity is concealed to obscure the link between the funds and the original criminal activity. Terrorist activities may also be financed with funds that represent the proceeds of illegal activities. Perpetrators of these activities constantly seek new ways to launder the funds in order to use them without drawing the attention of authorities to the source of the funds and the links with the underlying crimes.

Financial Intelligence Units (FIUs) are the most important national institutions in fighting money laundering and terrorism financing and are the central government organization responsible for coordinating a country's strategy for fighting these crimes. FIUs with strong institutional capacity are able to design and implement effective AML/CFT regimes which help protect a country's financial sector integrity and stability and strengthen governance and fiscal administration.

In late 2010 / early 2011, PFS undertook a study of FIUs in the beneficiary countries and identified a number of challenges and gaps common to the PFS countries:

- ***The need to conduct National Risk Assessments of ML/TF.*** A national ML/TF risk assessment is an organized and systematic effort to identify and evaluate the sources and methods of money laundering and terrorist financing and weaknesses in the AML/CFT systems and other vulnerabilities that have an impact, either direct or indirect, on the country conducting the assessment.¹ To support the goal of producing a global threat assessment, the February 2008 FATF plenary initiated the Strategic Surveillance Initiative (SSI). The SSI process includes aggregating existing national ML/TF risk assessments, surveying FATF and FATF-style regional body members regarding emerging trends and high priority ML/TF risks, fact-finding by the FATF Secretariat, and discussion in the FATF Working Group on Typologies.

Although depth of coverage may differ, a national ML/TF risk assessment is a process that typically presents information on:

- The nature and scale of ML/TF and related predicate crimes (i.e. the threat).

¹ FATF 'Money Laundering & Terrorist Financing Risk Assessment Strategies', June 2008

- Weaknesses in AML/CFT systems and controls and other features of a jurisdiction that make it attractive to money launderers and terrorist financiers (i.e. the vulnerability).

The national ML/TF risk assessment should be an input to a national strategy, as part of the country's overall AML/CFT risk management process. A relatively small number of countries have conducted a national assessment of money laundering and/or terrorist financing, and the SEE and Eurasia countries will need assistance to go through the process of developing their own National Risk Assessments in order to improve their systems of prevention and detection of ML/TF.

- ***The need to ramp up training on combating the financing of terrorism.*** According to the conclusions of a recent regional conference of FIUs (Baku, February 2011), the risks of terrorism financing in the SEE and Eurasia region are currently less imminent than the risks of money laundering. However, MoneyVal² reports note that there has been an increased risk that charities and not-for-profit organizations can be used to distribute funds used to support terrorist activities. FIU analysts need case study centered training that (1) provides real life examples of how financial systems and charities can be used to fund terrorism and, (2) demonstrates how to recognize a financial transaction that is related to financing of terrorism.
- ***The difficulty in coordinating the activities of the numerous public sector supervisory authorities and private sector stakeholders (AML/CFT reporting obligors) involved in preventing money laundering and terrorism financing.*** In SEE and Eurasia, money laundering schemes are executed mainly through real estate transactions, privatization processes, and the banking system, followed by the securities markets, insurance and exchange bureaus. Prosecutors, tax police, staff from the Ministry of Finance, Securities Regulators, and Customs Departments as supervisory bodies, and compliance officers from banks, insurance companies, brokers, real estate agents as obligors are only some of the players the FIU must work with to coordinate a strategy for preventing these crimes. With improved planning and preparation, FIUs will be better able to manage the daunting task of effectively and efficiently orchestrating a national AML/CFT plan involving all these stakeholders.

3. Objectives of Regional Initiative

The primary objective of this PFS regional initiative will be to ***strengthen the institutional capacity of FIUs across Eurasia and SEE to effectively implement international standards and best practices in preventing money laundering and the financing of terrorism.***

The intermediate objectives are:

Intermediate Objective 1 – Improve the strategies and effectiveness of FIUs and systems for prevention of ML/TF

Intermediate Objective 2 – Develop capacities of FIUs and obligors to prevent and detect financing of terrorism

² MONEYVAL was established in September 1997 by the Committee of Ministers of the Council of Europe to conduct self and mutual assessment exercises of the anti-money laundering measures in place in Council of Europe member states, which are not members of the Financial Action Task Force (FATF). FATF is an intergovernmental organization founded in 1989 by the G7. The purpose of the FATF is to develop policies to combat money laundering and terrorist financing.

Intermediate Objective 3 – Improve FIUs’ ability to conduct AML/CFT supervision of accountants and auditors

4. Partnerships

The PFS Program will cooperate with the FIUs in the PFS beneficiary and mentor countries and will coordinate efforts with the institutions listed below.

To optimize results and share costs, PFS will jointly organize training and co-sponsor conferences with the following organizations:

- Organization for Security and Co-Operation in Europe (OSCE)
- United Nations Office for Drugs and Crime (UNODC), The Global Program against Money-Laundering, Proceeds of Crime and the Financing of Terrorism (GPML)
- The World Bank
- International Monetary Fund (IMF)
- Eurasian Group on combating money laundering and financing of terrorism (EAG)
- UN Counter-Terrorism Executive Directorate (CTED)

PFS will also contact the following US government organizations to coordinate the delivery of AML/CFT technical assistance programs:

- US Department of Justice (OPDAT)
- US Department of Treasury - Office of Technical Assistance (OTA), and others.
- Financial Crimes Enforcement Network –(FinCEN)
- Federal Bureau of Investigation (FBI)

Each of the institutions listed has specific expertise and knowledge to share with counterparts in PFS Program beneficiary countries.

5. Proposed Activities

Given the array of high-priority challenges and gaps in the financial sector in Southeast Europe and Eurasia, PFS must make effective use of a limited amount of funding to address needs relating to AML/CFT. The main thrust of the Regional Initiative will thus relate to the first activity, conducting National Risk Assessments. The second most important priority, providing training on prevention of terrorism financing, will be addressed through Activity 2. The third activity supports / addresses the challenge of coordinating supervision over the various reporting obligors.

Activity 1: Assist the process of conducting National Risk Assessments for SEE and Eurasia countries

Rationale: PFS will support SEE and Eurasia countries in the process of conducting National Risk Assessments related to ML/TF. A national ML/TF risk assessment is an organized and systematic effort to identify and evaluate the sources and methods of money laundering and terrorist financing and weaknesses in the AML/CFT systems.

A national ML/TF risk assessment is regarded as “fundamental background information” to assist supervisors, law enforcement authorities, the financial intelligence unit (FIU), and financial institutions. This requires that competent authorities periodically renew their awareness of current

money laundering and terrorist financing methods and reassess the effectiveness of established safeguards.

Such an assessment may involve multiple public sector offices working together with or without the private sector, or it may involve one or more individual agencies working independently to assess specific aspects of the country's ML/TF situation.

OSCE is planning to provide technical support for SEE and Eurasia countries in conducting this process, and PFS will contribute expert resources and other support in partnership with OSCE. PFS will further define the details of the partnership with OSCE over the next months, keeping activities within the planned budget for AML. In general, this activity will involve:

Supporting the FIU Development Workshop hosted by OSCE, The Egmont Group, and the Armenian FIU in Yerevan, Armenia, July 14-15, 2011. PFS consultant Kenneth Volandes led two institutional capacity building strategy sessions during the workshop, and representatives from PFS Beneficiary countries Serbia and Armenia shared their recent experience in building AML/CFT systems and processes. Further, PFS used this meeting as an opportunity to begin mapping out a partnership strategy with OSCE and other donors.

- PFS, together with OSCE, will schedule a round of self-assessments or peer assessments, and workshops to discuss, and follow up by PFS, OSCE, or mentor country advisors. This could be organized in different ways depending on the plan made with the participating countries:
 - A PFS or other expert could lead the process of conducting the assessments in cooperation with each country and compiling the results and a recommended action plan which would then be shared in a regional event, or
 - Self-assessments or peer-assessments could be prepared by participating countries and findings shared with the working group for further elaboration and training.
- PFS and/or OSCE will organize follow-up workshops or online meetings (via PFS web portal) to support implementation of action plans to address issues identified in NRAs.
- PFS will consider partnering with OSCE and /or other donors for other regional meetings where conducting or follow-through on NRAs could be supported.

Activity 2: Support regional conference on “Anti-money laundering and combating financing of terrorism: global trends and country cases” in Baku, Azerbaijan (February 2011)

Rationale: The Azerbaijan FIU is the youngest FIU of all SEE and Eurasia countries, founded in 2009. The FIU is to be considered for membership to the Egmont Group in the plenary meeting in 2011. The Azerbaijan FIU demonstrated progress in implementation of FATF recommendations, and it initiated organization of the regional conference to exchange their progress with the countries from the region and learn about their experience in the process of implementation of FATF recommendations. This activity assists Azerbaijan in the process of applying for membership to the Egmont Group and promotes exchange of experience between countries from the region.

In October 2010, Money Val decided to remove Azerbaijan from the FATF list of countries requiring "special attention". In order to assist Azerbaijan in the process of implementation of FATF recommendations and applying for membership to the Egmont Group, to promote exchange of experience, best practices, as well as case studies between countries from the region, in February 2011 PFS supported organization of regional conference in Baku, Azerbaijan. The main organizer was the Baku Mission along with a number of other donor organizations.

Activity 3: Support development of a regional training center in a PFS beneficiary or mentor country (based on demand and availability of resources)

Training in preventing terrorism financing, as well as in other AML/CFT topics, can occur at a PFS supported training center in one of the PFS countries. For example, PFS might provide demand driven technical assistance to the Serbian FIU which plans to develop a regional training center to be used to train FIU staff, obligors and supervisors. For instance, PFS consultants could assist in developing the center's CFT training materials, which can also be used during regional training and seminars hosted by the center.

Activity 4: Regional workshops on prevention of terrorism financing

Rationale: One of the conclusions of the last SEE regional conference was to put special emphasis on the prevention of the financing of terrorism. All the PFS countries would benefit from specialized training in CFT, as this is a relatively new area of expertise.

There is a need to improve the capacity of FIUs to detect financing of terrorism, as well as the capacity of banks to recognize suspicion of FT. To date there has been very limited training on prevention of terrorism financing both in the SEE and Eurasia. PFS will support or organize the following activities in both SEE and Eurasia:

- *A regional workshop on prevention and detection of terrorism financing for FIUs.* FIU analysts would benefit from knowledge sharing in the form of case studies that provide criteria to evaluate whether a financial transaction was being used to support terrorist activities. FIUs from the region have knowledge about differences between ML and FT (amounts and motives are generally different). The workshop should help analysts learn how to detect FT. PFS will provide an expert in this area, for instance:
 - A prosecutor that worked on a FT case that can talk about the process of investigation, collection of evidence, or;
 - An FBI/FinCEN expert (or other) with specialized practical knowledge of FT
- *A regional workshop on prevention and detection of terrorism financing for banks.* The FIUs and banks from the SEE and Eurasia region have little knowledge about detecting FT. Banks are submitting 'suspicious activity report' (SARs)³ to FIUs, so it is essential that their capacities are increased to identify suspicious transactions related to FT. Training could be delivered by the same expert that will train the FIUs. The regional training could be organized in cooperation with Bankers' Associations.
- *Other demand driven activities*

Activity 5: Regional technical workshop for FIUs on AML/CFT supervision of accountants and auditors

Rationale: Several FIUs in SEE and Eurasia region were recently granted power to carry out on-site supervision of the implementation of AML/CFT laws by entities obligated to file and report SARs, including accountants and auditors. The FIUs will hire new staff for the new Supervision Departments. The FIUs have good knowledge about general supervision, so regional training on supervision will focus on specific technical areas.

³ A Suspicious Activity Report (SAR) is a document that financial institutions must file with the FIUs following a suspected incident of money laundering or fraud.

In order to strengthen FIUs' capacity to fulfill their new supervisory responsibilities, PFS will support experts from mentor countries to participate in regional technical workshops for FIUs on how to perform supervision of accountants and auditors. The workshops will address how to detect if an accountant/auditor failed to report a SAR, the risk-based approach, and improving the quality of data reported in SARs. The workshop should provide answers related to this specialized supervision topic, and be specifically related to these obligor groups. PFS will provide an expert in this area of supervision (possibly from a mentor country whose FIU performs supervision of these obligor groups or from another supervisory body that supervises these obligors related to AML/CFT).

6. Expected Outcomes

Outcomes of this regional initiative are expected to include:

- Improved capacity in PFS beneficiary countries to identify sources of risk for ML/TF
- Increased capacity of FIUs and obligors to prevent and detect financing of terrorism
- Increased capacity of FIUs to conduct AML/CFT supervision of accountants and auditors

7. Monitoring Plan

This section of the Regional Initiative Implementation Plan outlines how PFS will measure and monitor whether PFS activities are on track and contribute to the achievement of Regional Initiative Outcomes.

PFS will track the results of this Regional Initiative as part of its PFS PMP, using various data sources, such as PFS assessments and benchmarking studies, international institutions data reporting, counterpart self-assessments and reporting. PFS will also use surveys to measure overall satisfaction with PFS events amongst stakeholders (for example, after study tours or knowledge-sharing events), and thereby also gauge future demand for PFS initiatives/interventions. PFS will track cost-sharing amounts and percentages by the beneficiaries of the activities and by other co-financing organizations. Beneficiaries' and other organizations' willingness to share in the costs of PFS activities is a strong indicator of the usefulness of the events.

The Monitoring Plan below highlights the existing PMP indicators to which this Regional Initiative will contribute; as well as specific indicators at the Regional Initiative's Objective level (outcome-type indicators), and Activity level (output-type indicators).

Table 2: “AML/CFT Regional Initiative Monitoring Plan“

Project Level Indicators		
Notional Budget: \$200,000		
<p>RIIP Primary Objective: To strengthen the institutional capacity of FIUs across Eurasia and SEE in order to help FIUs to effectively implement international standards and best practices in preventing money laundering and the financing of terrorism.</p>		
<p>RIIP Intermediate Objective 1: Improve the strategies and effectiveness of FIUs and systems for prevention of ML/TF</p>	<p>RIIP Intermediate Objective 2: Develop capacities of FIUs and obligors to prevent and detect financing of terrorism</p>	<p>RIIP Intermediate Objective 3: Improve FIUs’ ability to conduct AML/CFT supervision of accountants and auditors</p>
<p>Number of PFS beneficiary countries conducting National Risk Assessments that meet international standards Unit of measure: Regionally consolidated cumulative number of National Risk Assessments conducted by PFS beneficiary countries.</p>	<p>An increase in the number of CFT related SARs filed with FIUs after PFS regional workshops. Unit of Measure: An increase in a number of CFT related SARs filed within a six-month period after PFS regional workshops, as compared to a three-month period prior to regional workshop. Data provided by FIU at the time of registering for regional workshop to establish baseline.</p>	<p>An increased adoption of new supervisory practices by supervisors as determined by a PFS administered survey after regional technical workshops Unit of measure: PFS administered survey 3 months after regional technical workshops to gauge participants’ opinion about adopting new supervisory practices (range 1-5, minimal to significant adoption of new supervisory practices).</p>

Activity Level Indicators			
Activity	Activity Indicator(s)	Related RIIP Objective(s)	Related PMP Objective(s)
Activity #1: Assist the PFS Beneficiary Countries in conducting National Risk Assessments consistent with international standards through regional conferences , online meetings, and technical workshops of FIUs	Number of regional events to support National Risk Assessment conducted in partnership with OSCE and/or other international and bilateral organizations	RIIP Intermediate Objective 1: Improve the strategies and effectiveness of FIUs and systems for prevention of ML/TF	Sub IR 1.2: Increased harmonization of policies and practices with international standards. Sub IR 1.3: Increased institutional capacity of financial sector actors
	Number of FIU staff of RFS Beneficiary countries trained in conducting National Risk Assessments that meet international standards		
	Number of National Risk Assessment that PFS advisors have reviewed/ provided recommendations in order to ensure adherence to international standards		
Activity #2: Support regional conference on “Anti-money laundering and combating financing of terrorism: global trends and country cases” in Baku, Azerbaijan (Feb. 2011)	Number of FIU officials from PFS Beneficiary countries participating at the regional conference in Baku		
Activity #3: Support for regional AML/CFT training center in Serbia (based on demand and availability of resources)	Number of FIU staff, obligors and supervisors trained in analysis of suspicious activities related to ML/FT at the regional training center		
	Number of partnerships established with the regional training center to provide regional AML/CFT training programs following international standards and leading practices		
Activity #4: Support two regional workshops (one each in SEE and Eurasia) for FIUs and banks on CFT	Number of FIU officials and obligors trained at regional workshops in detection of financial transactions used to support terrorist activities and preparation of SARs.	RIIP Intermediate Objective 2: Develop capacities of FIUs and obligors to prevent and detect financing of terrorism	Sub IR 1.3: Increased institutional capacity of financial sector actors
Activity #5: Supporting experts from mentor countries to participate in regional technical workshops for FIUs on AML/CFT supervision of accountants and auditors	Number of FIU officials from PFS Beneficiary countries trained on performing AML/CFT supervision of accountants and auditors	RIIP Intermediate Objective 3: Improve FIUs’ ability to conduct AML/CFT supervision of accountants and auditors	Sub IR 1.3: Increased institutional capacity of financial sector actors

Partners for Financial Stability (PFS)
1919 N. Lynn Street
Arlington, VA 22209
Phone: +1 571 882 5000
Fax: +1 571 882 5100