



## **Virtual Currency Transactions: Anti-Money Laundering Measures Start to be Implemented**

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### **Introduction**

The market capitalization of virtual currencies<sup>1</sup> has been in the lower \$200 million range<sup>2</sup> since this summer after a sharp rise in price from the second half of 2017 and a collapse of the bubble in the beginning of 2018. Although it amounts to only a quarter of the size of immediately before the collapse of the bubble (about \$823 million), it still exceeds the level a year ago (about \$180 million at the end of October 2017). In addition, due to ICO<sup>3</sup> issues and listings, the number of virtual currencies has exceeded 2,000.

It has been pointed out that virtual currencies may be used for money laundering due to their anonymity. According to a report released by the Ciphertrace (a US data security company) in October 2018<sup>4</sup>, remittances which were revealed to be crime-related ones made via bitcoin had reached 380,155BTC (\$2.4 billion at current market price) between January 2009 and September 2018. Also, the total outflow due to virtual currency hacking etc. (the majority of which is expected to be money-laundered later) has amounted to \$927 million between January and September 2018, which is about 3.5 times bigger than in 2017. And the total damage in the whole year is estimated to exceed \$1 billion.

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<sup>1</sup> In recent years, words such as "virtual asset" and "crypto asset" are sometimes used. But, in this paper we use the term "virtual currency" for convenience.

<sup>2</sup> Refer to <https://coinmarketcap.com/>

<sup>3</sup> A method by which fund procurement applicants raise funds from investors by issuing "their own virtual currency (token)".

<sup>4</sup> Refer to [Cryptocurrency Anti-Money Laundering Report \(2018 Q3\)](#).

Chart1: Main Incidents of Virtual Currency Theft in 2018

Date	Victim		Country	Total Damage (\$ Min)	Cause of Spill Incident	Target
Jan 2018	Coincheck	Virtual Currency Exchange Trader	Japan	530.0	Hacking to the Exchange Trader	NEM(XEM)
Feb 2018	BitGrail	Virtual Currency Exchange Trader	Italy	195.0	Hacking to the Exchange Trader	Nano(XRB)
May 2018	Bitcoin Gold	Platform for Virtual Currency Transaction	–	over 18.0	"51% attack" (Vulnerability of the system)	BTG
June 2018	Coinrail	Virtual Currency Exchange Trader	S. Korea	over 40.0	Hacking to the Exchange Trader	NXPS/ATC/NPER
June 2018	Bithumb	Virtual Currency Exchange Trader	S. Korea	30.0	Hacking to the Exchange Trader	BTC/ETH etc
June 2018	Geth	Official Client Software for ETH	–	over 20.0	Vulnerability of the program	ETH
July 2018	Bancor	Virtual Currency Exchange Trader	Switzerland	23.5	Hacking to the Exchange Trader	ETH etc
Sep 2018	Zaif	Virtual Currency Exchange Trader	Japan	60.0	Hacking to the Exchange Trader	BTC/MONA/BCH

(Source: Various reports)

Turning the eyes to Japan, the National Police Agency's "Annual Report on Prevention of Transfer of Criminal Proceeds in FY2009"<sup>5</sup> states that notifications of "suspicious transactions" reported by virtual currency exchange service providers stood at 669 cases between April and December 2017.

In this paper, I would like to describe the possibility of utilization of virtual currency for money laundering, regulatory trends at home and abroad, and the future issues to be addressed.

## 1. Possibility of Utilizing Virtual Currencies for Money Laundering

Money laundering is the process of "washing" funds by repeated remittance to financial institution accounts, for the purpose of camouflaging the sources and flows of illegal funds obtained from drugs, illegal trade, or crime. In recent years, organized crime has become a threat to the international community. And, as the crime proceeds can be further used for organized crimes, each country is taking measures against money laundering to prevent it.

So, as an intergovernmental organization for promoting international cooperation and collaboration, the "Financial Action Task Force (FATF)" was established in 1989. Originally, its activity was primarily aimed at building a financial system for preventing money laundering related to drug and crime. But, since the terrorist attacks on the United States in September 2001, the institution is also working on promoting cooperation on international countermeasures against the provision of funds to terrorist organizations. Current main activities are as shown in Chart 2.

<sup>5</sup> Refer to [https://www.npa.go.jp/sosikihanzai/jafic/nenzihokoku/data/jafic\\_2017.pdf](https://www.npa.go.jp/sosikihanzai/jafic/nenzihokoku/data/jafic_2017.pdf). (Japanese)

Chart 2 : Main Activities of FATF

1	Set standards and promote effective implementation of legal, regulatory and operational measures for combating money laundering, terrorist financing and other related threats to the integrity of the international financial system.
2	Monitors the progress of its members in implementing necessary measures. (Members:37 / Observers:3)
3	Promotes the adoption and implementation of the FATF Recommendations globally to the non-members / non-observers.
4	Identification and publication of non-cooperative countries / areas for measures against money laundering, and requests for corrective measures.

(Source: FATF)

A virtual currency was born in 2009 based on the paper "*Bitcoin: A Peer-to-Peer Electronic Cash System*" published by Satoshi Nakamoto in 2008. The following two points are listed as its features.

- (i) No existence of object or cash (circulate only in the internet).
- (ii) Public organizations such as governments and central banks do not mediate in their creation or transactions (thus they can be issued without depending on government or central bank credit).

Bitcoin is the world's first virtual currency issued and circulated, and is still positioned as "a leading virtual currency" which accounts for more than 50% of market capitalization.

Though both bitcoin and cash (fiat currency) can be used for money laundering, their methods differ depending on their characteristics. For example, when cash is delivered by hand it is difficult to track its movements, such as in personal delivery, while it takes cost and time to prepare money in advance and transport it.

On the other hand, every transaction data on bitcoin is recorded on the blockchain including "how much of it moved from the sender address (equivalent to deposit account at a bank) to the recipient address". It is possible to grasp the flow, but the information about the owner of the address is not recorded on the blockchain. Therefore, it can be said that the virtual currencies including bitcoin are "highly anonymous". In addition, it can be said that these virtual currencies are problematic in that their cross-border movement is possible digitally in a short time and can be utilized for money laundering in a different way from cash.

## 2. FATF's Past Achievements

In June 2014, FATF published a report "*Virtual Currencies: Key Definitions and Potential AML/CFT Risks*" in which it for the first time focused on money laundering and other transactions using virtual currency. However, this report covered only the types of virtual

currencies (the difference between virtual currency and digital currency, whether it can or cannot be exchanged to fiat currency, difference between centralized type and decentralized type, etc.) and the cases of money laundering using virtual currency. Therefore, it was not clarified whether the virtual currency exchange service provider falls under the category of "financial institution" or "designated non-financial businesses and professions (DNFBPs)" to which the FATF Recommendations are applied.

Chart 3 : FATF Reports on Virtual Currencies

Issued Date	Name of the Report
June 2014	Virtual Currencies : Key Definitions and Potential AML/CFT Risks
June 2015	Guidance for a Risk-Based Approach to Virtual Currencies
July 2018	FATF Report to the G20 Finance Ministers and Central Bank Governors
Oct 2018	Regulation of Virtual Assets

(Source: FATF)

Therefore, the FATF published a "*Guidance for a Risk-Based Approach to Virtual Currencies*" (hereinafter "*guidance*") in June of the following year and indicated the regulation policy on the virtual currency market.

In the introduction part, it defined the position of the virtual currency exchange service providers as "the intersection that provides gateways to the regulated financial system", and clarified that the provider is a "financial institution" subject to the FATF Recommendations. And, in order for national authorities to address the risk of abuse of virtual currency transactions such as money laundering, clauses to be applied within the FATF Recommendations were specified (Chart 4).

Chart 4 : Application of FATF Recommendations to Countries and Competent Authorities / Covered Entities (Overview)

Number	Abstract of the Article (Request Matter)	Countries / Authorities	Covered Entities
Article 1	Activate to identify, understand, assess and mitigate the money laundering and terrorist financing risks.	○	○
Article 2	Develop the national coordination mechanisms on anti-money laundering and terrorist financing. Also, cooperate among authorities.	○	
Article 10 Article 22	Undertake customer due diligence (CDD).		○
Article 11	Keep records of all transactions for a minimum of 5 years.		○
Article 14	Establish a registration or a licencing system for natural and legal persons providing virtual currency exchange services between virtual currency and fiat currencies.	○	○

Number	Abstract of the Article (Request Matter)	Countries /Authorities	Covered Entities
Article 15	Identify and assess money laundering and terrorist financing risks relating to the development of new products, and new business practices.	○	○
Article 16	Establish the requirements for countries with respect to wire transfers (both cross-border and domestic).	○	
Article 18	Have overseas branches / subsidiaries also comply with the law concerning anti-money laundering and counter-terrorist financing of the country where headquarters are located.		○
Article 20	Report the "Suspicious Transactions".		○
Article 26	Consider amending legacy legal frameworks, as needed, to authorize effective anti-money laundering and terrorist financing regulations for decentralised virtual currency payment mechanisms.	○	
Article 35	Formulate effective, proportionate, and dissuasive sanctions.	○	
Article 40	International cooperation on money laundering and terrorist financing risks (include Article 37, 38, and 39).	○	

(Source: FATF)

However, unlike the "FATF Recommendations" where compliance obligations were placed on the member countries/regions, this guidance remained only as a "principle". So, the movement for each country to enact legislations on virtual currencies was generally slow.

### 3. Legal Improvement in Japan Concerning Virtual Currencies

#### (1) Improvement of legal system

In response to the above FATF guidance, Japan established the world's first comprehensive law on virtual currencies (effective from April 1st, 2017). Specifically, the following two legal systems were developed.

First, the "*Revision of Payment Services Act*" (hereinafter referred to as the "*Virtual Currency Act*") was established, and the virtual currency was defined as "one of the means of settlement different from the statutory currency such as yen, dollar, electronic money, prepaid card". In addition, it introduced a preregistration system for virtual currency exchange service providers dealing with it, and it required the providers to undertake business under the supervision of the government (FSA).

Chart 5 : Main Regulations of "Virtual Currency Act"

Article2	<p>Definitions of Virtual Currency</p> <p>(5)The term "Virtual Currency" as used in this Act means any of the following:</p> <p>(i) property value (limited to that which is recorded on an electronic device or any other object by electronic means, and excluding the Japanese currency, foreign currencies, and Currency-Denominated Assets; the same applies in the following item) which can be used in relation to unspecified persons for the purpose of paying consideration for the purchase or leasing of goods or the receipt of provision of services and can also be purchased from and sold to unspecified persons acting as counterparties, and which can be transferred by means of an electronic data processing system; and</p> <p>(ii) property value which can be mutually exchanged with what is set forth in the preceding item with unspecified persons acting as counterparties, and which can be transferred by means of an electronic data processing system.</p>
Article 63-2	<p>Registration of Virtual Currency Exchange Service Providers</p> <p>No person may engage in the Virtual Currency Exchange Service unless the person is registered with the Prime Minister.</p>
Article 63-10	<p>Measures for Customer Protection</p> <p>A Virtual Currency Exchange Service Provider must, pursuant to the provisions of Cabinet Office Order, provide explanation designed to prevent users from mistaking the Virtual Currency used in the business for the Japanese currency or a foreign currency, and information about fees and other terms and conditions of contracts pertaining to the Virtual Currency Exchange Service, and take other measures necessary for protecting the users of the Virtual Currency Exchange Service and ensuring the proper and secure conduct of the Virtual Currency Exchange Service.</p>
Article 63-11	<p>Management of Users' Property</p> <p>(1) A Virtual Currency Exchange Service Provider must, in connection with its Virtual Currency Exchange Service, manage the money or Virtual Currency of the users of the Virtual Currency Exchange Service separately from its own money or Virtual Currency, pursuant to the provisions of Cabinet Office Order.</p>

(Translated by the Japanese government)

Next, as countermeasures against money laundering on virtual currencies and countermeasures against terrorism, "Act on Prevention of Transfer of Criminal Proceeds" (hereinafter referred to as "Criminal Law") was revised. And, virtual currency exchange service providers were added as "specified business operator" to comply with the law.

Chart 6 : Main Regulations for the Virtual Currency Exchange Service Providers  
Specified in the Revised "Criminal Law"

Article2 (2)-31	Range of specific businesses Designate the virtual currency exchange service provider as "specific business"
Article4	Clerical work requiring confirmation at the time of dealing (Personal identification matters, transaction purpose, occupation / business content, real rulers, assets and income situation, etc.) " (1) Conclude contract with contents such as continuing and repeating virtual currency transaction (opening the account contract etc.) (2) Interchange and exchange of virtual currency exceeding JPY2mln (high risk transaction) (3) Transfer virtual currency for over JPY100thd.
Article6 and Article7	Creation and preservation obligation of transaction confirmation record, transaction record, etc. (1) It is necessary to immediately create these records after confirming transactions and trading. (2) These records shall be kept for <b>seven years from the date of termination</b> of the contract concerning the transaction.
Article8	Duty of notification of suspicious transaction (1) Notification is required if there is a doubt that the property received on the transaction is obtained by crime (not limited to money). (2) When there is a doubt that customers are conducting money laundering related transactions.
Article11	Improvement of in-house management system (1) Implementation of education and training on confirmation at the time of trading. (2) Preparation of regulations concerning implementation of measures such as confirmation at the time of transaction. (3) Full-time auditing and general manager. (4) Measures to be determined by law, etc., to be taken in consideration of the contents of the survey.

(Translated by IIMA)

(2) State of compliance of virtual currency exchange service providers

However, following the virtual money (NEM) theft incident at Coincheck Ltd. in January 2018, the FSA conducted a series of on-site inspections on virtual currency exchange service providers. And it found that many providers neither complies the currency law and the criminal law concerning the anti-money laundering measures. In response to this finding, in August 2018, the FSA announced "Issues Relating to Money Laundering and Terrorism Financing Measures of Virtual Currency Exchange Service Providers"<sup>6</sup> and revealed that the problems as shown in Chart 7 were recognized.

<sup>6</sup> Refer to <https://www.fsa.go.jp/news/30/20180817amlcft/20180817amlcft-1.pdf>.(Japanese)

Chart 7: Insufficient or No Compliance cases of Virtual Currency Exchange Service Providers

Even if trading a large number of virtual currencies over several times, <b>the service providers do not make confirmation at the time of transaction and judgment on necessity of notification of suspicious transactions.</b>
The service providers provide the virtual currency exchange service <b>without adequately implementing the transaction time confirmation based on laws and regulations.</b> Also, they <b>did not appropriately judge the necessity of reporting suspicious transactions.</b>
Service providers have not established an appropriate internal control system according to various risks such as money laundering and the risk of providing terrorist financing.
Service provider have not prepared a system to verify transactions at the time of trading. And they have not been conducting business operations based on internal regulations, such as conducting training for staff.
It is stated that the judgment of the spectators who have not judged the notification of suspicious transactions has been judged again and made a notification. But, <b>there was no person who fully understands the contents requested by the authorities</b> despite the guidance of the authorities.

(Translated by IIMA)

After that, the virtual currency exchange service providers who received these indications have sequentially implemented measures such as establishment of rules to verify investors and consumers who opened accounts with them, and sophistication of "suspicious transactions detection" function.

### (3) Issues left untouched in the Japanese law

As mentioned above, the establishment of the virtual currency law and amendment of the criminal law have fairly straightened the legal system, and the compliance situation will be improved in the future. However, even with the revisions of these two laws, it seems difficult to spread a net of money laundering control over all virtual currency transactions.

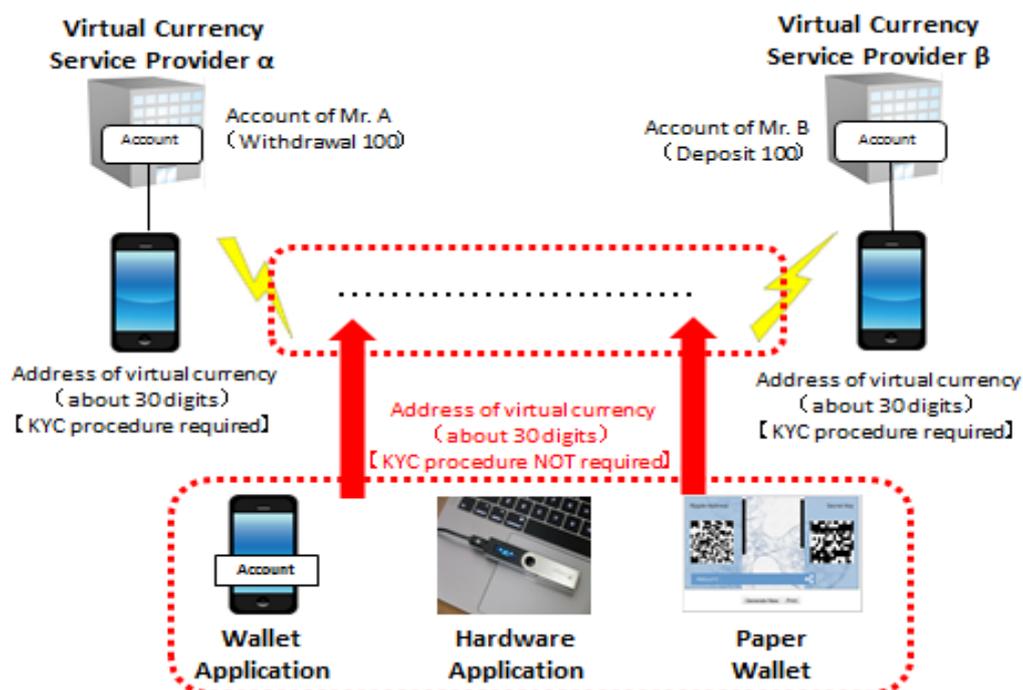
One of the reasons includes that, although the current criminal law (Article 4) stipulates that the obligation to verify transactions rises at the time of (i) to (iii) below, this obligation does not apply to other companies / applications than virtual currency exchange service providers.

- (i) When opening an account with a virtual currency exchange agent.
- (ii) When exchanging a certain amount of "legal (fiat) currency to virtual currency" or "virtual currency to virtual currency" using the account of the service providers.
- (iii) When dispensing / depositing a certain amount of virtual currency using the account of that service providers.

Therefore, when virtual currencies are transferred through the following applications (i) to (iii), their tracking becomes difficult.

- (i) "Wallet application": Stores virtual currency in smartphone application.
- (ii) "Hardware Wallet": Stores virtual currency in commercially available flash memory such as USB and hardware wallet.
- (iii) "Paper wallet": a method of transferring virtual currency information such as passwords to paper and restoring it.

Chart 8: Transactions that Use Wallet Application etc (Image Diagram)



(IIMA)

In addition, since only Japan and some other major countries have established the regulatory laws at this time, it is difficult to specify the individual / corporate name of the remitter (receiver) when virtual currencies are sent to accounts established by other virtual currency exchange service providers in the other countries (or when they are received from an account opened with the providers in another country).

In fact, according to a survey report by an analytical organization "PAID Strategies"<sup>7</sup>, only 32% of the surveyed major virtual currency exchange service providers and wallet providers in Europe and the United States were conducting verification procedure.

The above-mentioned vulnerability related to transaction verification obligations has also been pointed out by the participating members in the "Study Group on Virtual Currency

<sup>7</sup> Refer to [https://www.miteksystems.co.uk/sites/default/files/docs/Cryptocurrency\\_identity\\_Crisis\\_Whitepaper\\_web.pdf](https://www.miteksystems.co.uk/sites/default/files/docs/Cryptocurrency_identity_Crisis_Whitepaper_web.pdf).

Exchange Service Providers, etc."<sup>8</sup> which has been organized by the FSA from time to time since April 2018, and strengthening of relevant regulations is expected to be considered in the future.

#### **4. Trends in international virtual currency regulations since 2018**

As the trade of virtual currencies spread widely in 2017, the risks increased of abusing these settlement products and services for money laundering, and the momentum of establishing more binding international rules has also grown. Then, in 2018, as shown in Chart 1 above, a high-priced hacking incident occurred, and the FATF and G20 worked at strengthening the regulation of virtual currency trading in response to the possibility that it would be used for criminal funds.

##### (1) Joint statement of the "G20 Finance Minister / Central Bank Governors Meeting" in March 2018

In its joint statement of the G20 Finance Ministers and Central Bank Governors Meeting, held in Buenos Aires, Argentina<sup>9</sup>, Ministers and Governors acknowledged that "the virtual currencies (crypto-assets) raise issues with respect of consumer and investor protection, market integrity, tax evasion, money laundering and terrorist financing. They lack the key attributes of sovereign currencies." And the G20 members committed to implement the FATF standards as they apply to virtual currencies, look forward to the FATF review of those standards, and called on the FATF to advance global implementation. In addition, the G20 called on international standard-setting bodies (SSBs)<sup>10</sup> including the FATF to continue their monitoring of virtual currencies and their risks and asked the FSB, in consultation with other SSBs, including CPMI and IOSCO, and FATF to report in July 2018 on their work on virtual currencies.

##### (2) July 2018 Report of the FATF

Following the above request, the FATF released the "Report to the G20 Finance Ministers and Central Bank Governors" on July 24th. It announced that there is some difference in the regulatory situation of the virtual currency in the countries surveyed (3 countries prohibited the virtual currencies, 7 countries already enforced regulations, 2 countries reported suspicious transactions, 11 countries preparing regulations). Also, as the regulatory situation is rapidly changing, it said that tackling the situation with a globally consistent regulation could rather increase risks.

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<sup>8</sup> Refer to <https://www.fsa.go.jp/news/30/singi/kasoukenkyuukai.html>. (Japanese)

<sup>9</sup> Refer to [https://g20.org/sites/default/files/media/communique\\_fmcbg\\_march\\_2018.pdf](https://g20.org/sites/default/files/media/communique_fmcbg_march_2018.pdf) 「#9」.

<sup>10</sup> Committee on Payments and Market Infrastructures (CPMI) and the Basel Committee on Banking Supervision (BCBS) which are under the umbrella of the International Settlement Bank (BIS), and the International Organization of Securities Commissions (IOSCO).

Also, the FATF announced that it began in June to review its Guidance and Recommendations to determine if changes are necessary to clarify their application to virtual currencies. In particular, it said it will hold an intersessional meeting in September on how the "FATF Recommendations" apply to virtual currencies, and will consider in October detailed proposals (below (3)) to clarify the application of its Recommendations to activities involving virtual currencies and related businesses.

### (3) FATF report of October 2018

The FATF announced the "Regulation of Virtual Assets"<sup>11</sup> after the closing of the "FATF WEEK"<sup>12</sup> meeting organized in Paris from October 14th to 19th. There, it emphasized the needs for all countries to take coordinated action to prevent the use of virtual currencies for crime and terrorism, although the FATF had already issued guidance on virtual currencies in 2015.

In addition, the definitions on "virtual currencies / assets" and "virtual currency / asset service providers" were newly added to the FATF Recommendations. Then, the FATF encouraged national authorities to ensure that the virtual currency service providers are subject to anti-money laundering / counter-terrorist financing regulations such as ongoing monitoring, record-keeping, and reporting of suspicious transactions, etc. Also, the FATF requested the national authorities to introduce licensing or registration system for virtual currency service providers<sup>13</sup>.

In addition, the FATF declared that they will reconsider in the next 12 months whether various regulatory matters described in the FATF regulation standards are still appropriate in view of the virtual currency development and whether it is necessary to renew them or not.<sup>14</sup>

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<sup>11</sup> Refer to <http://www.fatf-gafi.org/publications/fatfrecommendations/documents/regulation-virtual-assets.html>

<sup>12</sup> More than 800 staff members from 204 government agencies around the world (including the IMF, the United Nations, and the World Bank) held discussions on 140 items of agenda on anti-money laundering and counter-terrorist financing measures.

<sup>13</sup> "Licensing or registration system for virtual currency service providers" was already mentioned in the "Guidance for a Risk-Based Approach to Virtual Currencies (Article #32)" (June 2015). It seems that the recent report reemphasized its importance.

<sup>14</sup> After that, the FATF president told to some of the media, "We plan to issue additional revision instructions of the FATF regulation standards by June 2019 so that enforcement in each country will reach the level expected by the FATF."

Chart 9: Amendments to the FATF Regulation Standards Made in October 2018

<p><b>Recommendation #15 : New Technologies</b> (Add the comments described below)</p> <p>To manage and mitigate the risks emerging from virtual assets, countries should ensure that virtual asset service providers are regulated for AML/CFT purposes, and licensed or registered and subject to effective systems for monitoring and ensuring compliance with the relevant measures called for in the FATF Recommendations.</p>
<p><b>GENERAL GLOSSARY</b> (Add new definitions "virtual asset" and "virtual asset service provider")</p> <p><b>【Virtual Asset】</b> A virtual asset is a digital representation of value that can be digitally traded, or transferred, and can be used for payment or investment purposes. Virtual assets do not include digital representations of fiat currencies, securities and other financial assets that are already covered elsewhere in the FATF Recommendations.</p> <hr/> <p><b>【Virtual Asset Service Providers】</b> Virtual asset service provider means any natural or legal person who is not covered elsewhere under the Recommendations, and as a business conducts one or more of the following activities or operations for or on behalf of another natural or legal person:</p> <ol style="list-style-type: none"> <li>i. exchange between virtual assets and fiat currencies</li> <li>ii. exchange between one or more forms of virtual assets</li> <li>iii. transfer of virtual assets</li> <li>iv. safekeeping and/or administration of virtual assets or instruments enabling control over virtual assets</li> <li>v. participation in and provision of financial services related to an issuer's offer and/or sale of a virtual asset</li> </ol>

(Source: FATF)

## Conclusion

As mentioned above, countermeasures against money laundering of virtual currencies have been steadily strengthened. Regulatory improvement is indispensable for building and maintaining a sound virtual currency market, and it can be said it is also a necessary process for the virtual currencies to be recognized as one kind of financial product in the long run.

However, it must be said that the speed of its strengthening is rather slow. Certainly, as some experts say, there is a doubt on its effectiveness even if formal regulations are set in the current environment where the definition and value of the virtual currencies have not been finalized yet. There is also a view that excessive regulations will hamper financial innovation. However, under the present circumstances where money laundering is increasing year by year, it is indispensable that the regulations will be strengthened as soon as possible.

Japan will host the G20 meetings in 2019. And the FATF Plenary Meeting (June 23rd - 29th)

is scheduled to be held so as to overlap the G20 Summit Meeting of the same year (June 28th - 29th) while the revision of the FATF Recommendations coming in June. Under these circumstances, Japan is required to coordinate discussions from the standpoint of the G20 presidency.

On October 24th, 2018, the "Japan Virtual Currency Exchange Association (JVCEA)" was approved by the FSA as an Accredited Fund Settlement Business Association under the Virtual Currency Act. In the future, as the country that established the laws concerning the virtual currencies for the first time in the world, it is expected that the Japanese authorities and industry organizations like the one mentioned above will work together to further strengthen the regulations and play a leading role in international discussions.

Chart 10: Major Coming Events Relating to Virtual Currency Regulations

Date	Name of the Meeting etc.	Venue
Nov. 30th - Dec. 1st 2018	13th G20 Summit	Buenos Aires (Argentina)
Feb. 17th - 22th 2019	FATF Plenary Meetings	Paris (France)
June 8th - 9th 2019	G20 Ministers of Finance and Central Governors	Fukuoka (Japan)
June 23rd - 28th 2019	FATF Plenary Meetings	USA (To Be Announced)
June 28th - 29th 2019	14th G20 Summit	Osaka (Japan)
June, 2019 (scheduled)	Revision of the "The FATF Recommendations"?	—
Oct. 13th - 18th 2019	FATF Plenary Meetings	Paris (France)

(Source: Various reports)

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