

Organised jointly by the Indonesian Commission for Eradication of Corruption (KPK) and UNODC

Training on Corporate Liability

20-24 February 2017, Jakarta

Investigations

Dr. Tilman Hoppe

Former Judge, Germany

- С учетом налогов сумма составит 36,5 млрд. сум;
- Сумма консалтинга вызовет вопросы у контролирующих органов.

*5. Стабильно
6. Вопрос
через*

Конвертация 5-6 млн \$ в месяц – не входит в условия договора, т.к. то, что благодаря нам.

идеально, вопрос и др. потом уже
Ответ TS не поступил. Уточним.

не равняе пока!

4. По рекламной деятельности.

- Дополнительно – 3 раза в год спонсорство (в сумах) по Келажак Овози Садоси.
- Привезти какую-нибудь звезду. После выбора будет озвучено (в Великолепного Века).

Уме-Сага Брадтон и др. кометас? Играть сразу
Ответ TS от 31.07.2012 г: подтвердили согласие.

Комментарий. Для фиксации в Меморандуме о Взаимопонимании, ориентировочные цифры и сроки оплаты по спонсорству на каждое из мероприятий

5. Готовы ли подписывать Меморандум о Взаимопонимании?

не будет в рамках меморандума
Ответ TS от 31.07.2012 г: подтвердили согласие.

тыре миллиона) руб. 00 коп.

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ПОРУЧИТЕЛЬ
21" апреля 2010 г.

ЦЕ
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CEO JakarTelCom: Mark Penindo



Former Uzbekistan Head: Jerry Garuda



Style.Uz Art Week

122

Days To Go



October 22-27

[ABOUT THE PROJECT](#) [AGENDA](#) [ORGANIZERS](#) [PRESS CENTER](#) [GALLERY](#)
[MEDIA HIGHLIGHTS](#)

Organizers



Uzbekistan: Sting, Valentino and others are visiting Gulnara Karimova

09.10.2009 09:21 msk
Ferghana.Ru



On October 17, 2009 under *Art-Week Style.Uz-2009* project in Tashkent the opera house, named after Alisher Navoi, will host concert of legendary Sting. The ticket prices range from 2000000 to

4000000 sums (about \$1100-2200). For information, this is one or two annual salaries of the college teachers in **Uzbekistan**.

Chief organizer of the art Week is The Forum of Culture and Art of Uzbekistan, headed by **Gulnara Karimova**, the elder daughter of Uzbek President. This time inviting world-wide known Sting, the



Forum of Culture and Arts
of Uzbekistan Foundation
www.fondforum.uz

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Activity of the Fund Forum

The Forum of Culture and Arts of Uzbekistan Foundation, established in February 2004, is a voluntary self-controlled nongovernmental association of citizens and public organizations pursuing the goal of supporting domestic science, culture, education and sports.

The Fund Forum was given the goal of reviving the spiritual legacy and the national traditions of the Uzbek nation, boosting the creative potential of prominent public figures and culture professionals, providing support for young talents and crafts dynasties. The Fund Forum works to disseminate objective information about Uzbekistan's unique culture, rich historical legacy and diversity of its contemporary throughout the world. Similarly, it informs the Uzbek public of trends in world culture. The Fund accords significant attention to the uniting of efforts by diplomatic and public bodies to set up socio-humanitarian and universal ties among countries and diverse national entities.

Among the founders and trustees of the Fund are known figures of culture and arts from Uzbekistan and foreign countries: Gulnara Karimova, Doctor of political sciences, professor (Chairperson of Board of Trustees); Nabi Abdurakhmanov, Artistic Director of the Youth Theater



JakarTelCom

Key facts and figures

As of year-end 2012, unless otherwise indicated.

- From Norway to Nepal, we are present in Azerbaijan, Denmark, Estonia, Finland, Georgia, Kazakhstan, Latvia, Lithuania, Moldova, Nepal, Norway, Russia, Spain, Sweden, Tajikistan, Turkey and Uzbekistan.
- 182,1 million subscriptions (Q1, 2013)
- Extended Performance Satisfaction Index (EPSI) score: 74
- 27,211 employees worldwide (Q1, 2013)
- 44% of employees are women, 56% men

Latest / Current Available Information on Company:

	Operator	Jose Cubero
Incorporation No.	90191	Date Profile issued
Name	TAKILANT Limited	
Incorporation Date	January 2, 2004	
Type	PRIVATE COMPANY LIMITED BY SHARES	
Status		
Last Annual Return filed made up to	March 29, 2011	
Last Accounts filed made up to	December 31, 2011	
Registered Office	SUITES 41/42, VICTORIA HOUSE, 26 MAIN STREET, GIBRALTAR	

The authorised nominal share capital of the company is:
 GBP 2,000.00 divided into: 2000 ORDINARY shares of GBP 1 each

Total Number of
 Authorised Shares | 2,000.00

The issued nominal share capital of the company is:
 GBP 2.00 divided into: 2 ORDINARY shares of GBP 1 each

Total Number of
 Issued Shares | 2.00

If the company has issued any shares at a premium no such premium will appear on this profile, such information must be obtained from the Return of Allotments and/or the published accounts filed by the company at the Registry.

Shareholders

Name	GAYANE AVAKYAN
Address	APT. 16, 12 DISTRICT C2, TASHKENT, UZBEKISTAN

Swedish Telecom Took Shortcut in Central Asia

Published: Saturday, 29 December 2012 19:30 WRITTEN BY OCCRP



Daughter of the Uzbek President, Gulnara Karimova (left) and her assistant Gayane Avakyan at the Christian Dior Paris Fashion Week in 2012. Photo: Getty Images.

From: international@gibraltar-fiu.eu
To: fiu@kpk.go.id
Sent: Tuesday, February 16, 2017 1:47 PM
Subject: AW: AW: threshold reports

In response to your today's request about threshold reports concerning Takilent Ltd. we can con

13 December 2008	US\$320 million	from <u>JakarTelCom</u> , Indonesia
3 January 2009	US\$60 million	to <u>Panmoda Ltd</u> , London
4 March 2009	US\$60 million	to <u>Takilent Ltd.</u> account, <u>FinMonBank</u> , <u>HelsinkiHelsinki</u>
15 July 2009	US\$30 million	to <u>Panmoda Ltd</u> account, UBS, Zurich
1 August 2009	US\$50 million	to <u>Takilent Ltd.</u> account, UBS, Zurich
20 September 2009	US\$120 million	to <u>Takilent Ltd.</u> account, UBS, Geneva

Sincerely,

Georgii
Deputy Head



TeliaSonera's board reconfirms Group strategy and tightens risk management



TUE, OCT 16, 2012 17:00 CET

During a meeting today, TeliaSonera's board reconfirmed its commitment to the company's current strategy. The board takes full responsibility for existing and future investments. We will continue to be leading player in the Nordic and Baltic markets and will strengthen our operations in Central Asia.

Our presence in difficult markets such as Uzbekistan, Tajikistan and Kazakhstan contributes to the long term development of democracy and human rights. We build and provide infrastructure that enables people to communicate with each other and the rest of the world.

"The areas of telecommunications and human rights bring conflicts of interest and difficult decisions. However, the board is convinced that the positive aspects of mobile communications by far outweigh the negative aspects. It would not help the people of these countries if TeliaSonera was to withdraw", said the chairman of the board Anders Narvinger.

**JakarTel-
Com**

President
Uzbekistan

Daughter

Style.
Uz

Fund-
Forum

Assistant

Takilant
Gibraltar

Jakarta Daily

21 FEB 2017

KPK hits JakarTelCom with Record Fine

By JAMES BLOND

Jakarta On Wednesday, February 22, 2017, during the 2017 Parliamentary annual awards luncheon, UNODC's representative Rafael Reed awarded the KPK for its outstanding work in rooting out public corruption.

Member of Parliament Kenneth Polite, Eastern District, stated, "I thank the members of the KPK for their continued commitment to fighting public corruption. Our partnership with UNODC resulted in sending

United States, with the larger developing moose ecologies also poised to make gains. The largest percentage increase in moose will likely come from China", says McRobson, "The Chinese government has invested heavily in moose infrastructure over the past decade, and their commitment to macrofauna is beginning to pay dividends". Since 2004 China has expanded moose pasture from 1.5% of arable land to nearly 3.648% and moose numbers are expected to rise to 60,000 making China a net moose exporter for the first time. This is good news for neighbouring Mongolia, a barren moose-wasteland whose inhabitants nonetheless have an insatiable desire for the creatures. The increase in Beijing-Ulanbataar trade is anticipated to relieve pressure on the

Union's the Euro ity contr developmen populatio when th to europ Norway, but has in number with nur known lo for the te ularly th the last c As m researche science i year's fi scientific announce

Investigations:

- Internal
- External

Why **internal** investigations?

- Willingness to **cooperate**
- **Be ahead** of prosecutors

- Mitigate the **reputational** damage
- Allowing for respective **accrual** of funds.

- Increasing **business efficiency**.
- Obtaining **evidence** that management can use in court.

- Attorney-client privilege: investigation supervised by external lawyer is **confidential** information.

Evidence needs to be obtained **legally.**

- Can internal investigators go through **emails** on the work computer?
- Can internal investigators tail the private **movements** of an employee?

→ Internal investigation needs a formalised process

Step 1: Investigative **strategy**:

- Investigative hypothesis:

- If the allegations were true, which possible **offences** would this constitute?
- Under which concept could the **company** be liable?
 - Working relationship
 - Lack of supervision
 - Lack of prevention

What evidence will I need?

1. Master-servant liability

1.1. Working relationship

- Employment
- Consultancy
- Member of board or control body

1.2. “Benefit”

- “Benefit/profit obtained”: Article 4 Nr. 2 a SCR, or
- Benefit intended (“for the benefit”): Article 4 Nr. 2 a SCR

2. Management liability

2.1. Involvement in the crime: Article 4 Nr. 2 b SCR

2.2. Lack of supervision: Article 4 Nr. 2 b SCR

- Management
- Lack of prevention measures related to concrete crime

3. Lack of sufficient prevention
 - a. commitment from senior management and a clearly articulated policy against corruption;
 - b. a code of conduct and compliance policies and procedures;

- c. an internal oversight mechanism;
- d. risk assessments;

- e. trainings and continuing advice;
- f. availability of incentives and disciplinary measures;

- g. third-party due diligence;
- h. availability of confidential reporting and internal investigation mechanisms;

- i. periodic testing and review;
- j. pre-acquisition due diligence and post-acquisition integration.

Step 2: **Scoping**: who is the “custodian of evidence”?

- Organisational charts
- Job descriptions
- Internal control system
- Other documentation of business processes

- **Scoping interviews**
 - Where are emails stored?
 - Where are documents filed?
 - Who does backups and where are they kept?

- Who approves transactions with a sales manager?
- Who stores the documentation?

Step 3: Collecting **evidence**

- “Following the supervision trail”
 - who supervises what within the company and how?

- Collecting evidence
 - Documents
 - Forensic imaging of computers

- Witnesses
- Secret monitoring of communication and movements

Right or wrong? (1)

Investigators should always seek cooperation with management.

Right or wrong? (2)

Investigators should always investigate the natural person first, and then the legal person.

Right or wrong? (3)

Investigations of legal persons are more difficult than of natural persons.

Right or wrong? (4)

It is easier to investigate a small company than a big one.

Right or wrong? (5)

It is easier to investigate a national than an international company.

info@tilman-hoppe.de