

Steering Committee

CHAIR: Benedetta Ubertazzi, Marta Ramat, Giulia Varisco & Mattia Rossi



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On behalf of the Steering Committee, we extend our sincere gratitude to the Chairs and the Support Team for their outstanding leadership and unwavering assistance throughout this year. Your guidance, diligent coordination, and dependable support have been essential to our progress and the successful delivery of our activities. We wish you and your families a peaceful holidays and a prosperous New Year.





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1.Game Committee

CHAIR: Fabrizia Bemer; Veronica Carbone; Iman Khodri

SUPPORT: Francesca Fragassi



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CO-DESIGNING THE 2025–2026 STEPPO ROLE PLAY WITH THE HIGH SCHOOL COMMITTEE



First alignment meeting held

- Formation of the **interdisciplinary working team**
- Presentation of the Role-Play structure (approved by Schools Committee and aligned with FSL program).

Core simulation format confirmed:

1. Preliminary session (*online*): case setup & team organization
2. Drafting phase (*online*): writing of procedural acts & critical use of generative AI
3. In-person simulation



Key novelty of Role-Play 2026: introduction of a critical use of generative AI within the simulation



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Timeline & Next Steps

TIMELINE & CASE MANAGEMENT (TOWARDS MARCH 25th)



SIMULATION DATE: MARCH 25, 2026



Working timeline

- Goal before Christmas stop: first draft of the case prepared and discussed within the working group;
- Post-holidays (*January*): meeting to finalize materials → **all content ready by early February** (to enable the carrying out of FSL-related activities);
- Early *March*: first online meeting with participants



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Today, on 17 December Veronica Carbone successfully defended her Master's thesis: *"STEPPO VR Game and the New Frontier of European Legal Training: Simulation of EPPO Cross-Border Investigations through a Virtual Reality Game."*



This work marks the culmination of an intensive multi-year effort and provides a significant contribution to the development of innovative training tools within the STEPPO framework.

We congratulate Veronica on this important academic milestone and acknowledge the value her research brings to the project.

Ad maiora!



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EPPO and EU Law

(Jean Monnet Centre of Excellence)

2.CREATE COMMITTEE

CHAIR: Iman Khodri, Veronica Carbone

VICE-CHAIR: Chiara Milano, Adriana Valladares, Francesca Fragassi, Melania Santoro



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Last month's activities:

Satisfaction survey

We conducted a **survey** to examine how members and chairs perceive communication, collaboration, and the overall functioning of the Center of Excellence.

The aim of the survey was to understand:

- the quality of communication within the Center
- members' ability to express ideas freely
- overall satisfaction with how the Center operates





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Survey's results:

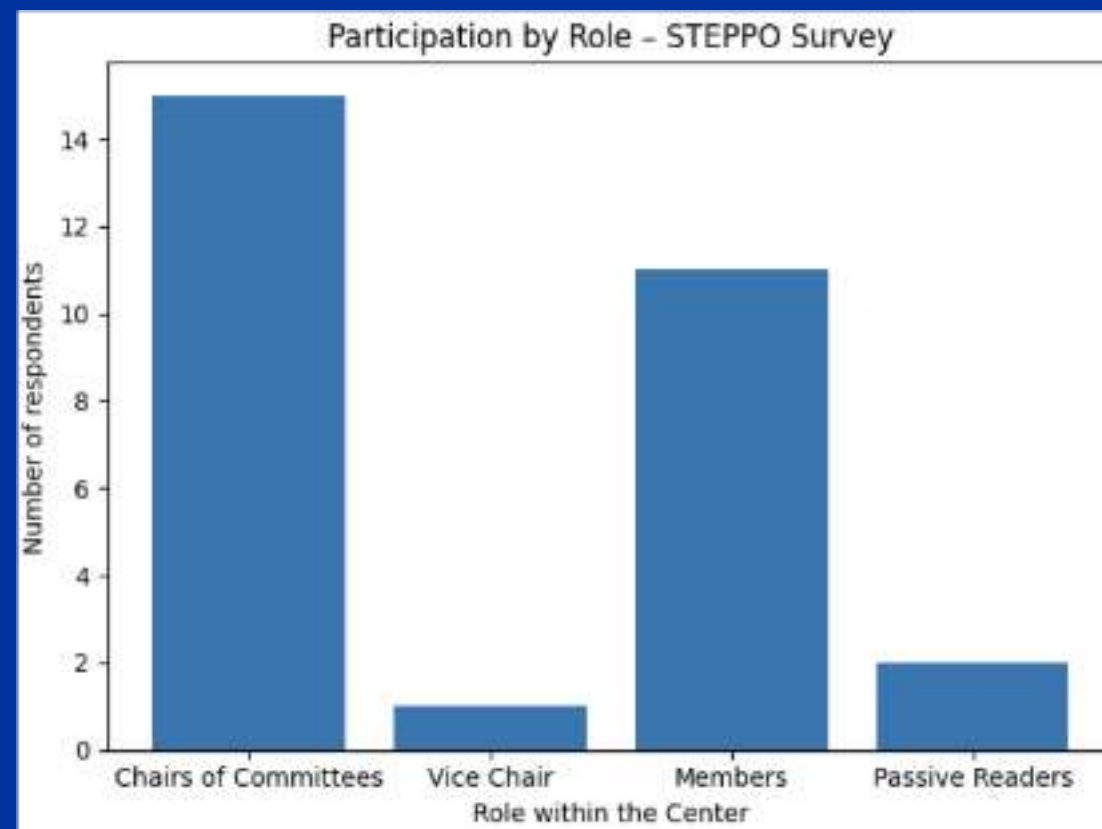
Participation

- Respondents: 30 members of the Center of Excellence
- Roles Represented:
 - 15 **Chairs** of Committees
 - 1 **Vice Chair**
 - 11 **Members**
 - 2 **Passive Readers**
- Seniority: from less than 1 year to over 3-4 years of involvement

Participants expressed **very high overall satisfaction** with STEPPO activities.

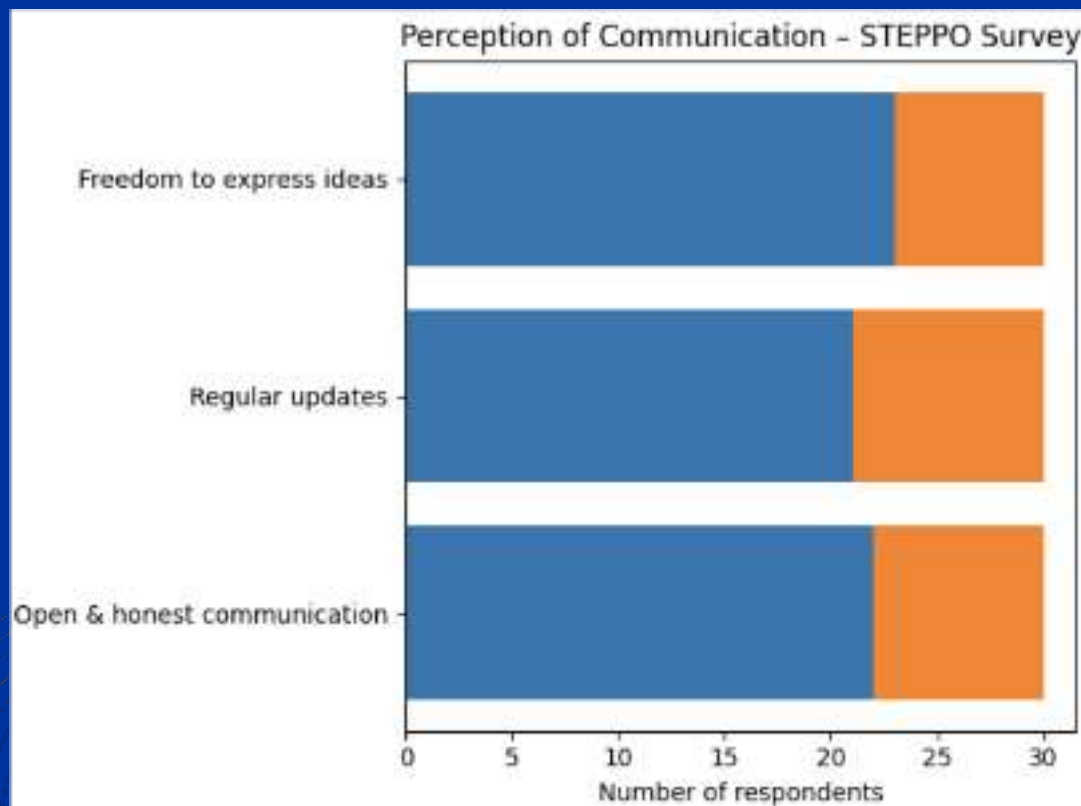
- The **large majority** reported being "*Extremely satisfied*"
- A smaller share reported being "*Somewhat satisfied*"
- **No significant negative evaluations** emerged

This result highlights a **strongly positive perception** of how the Center operates.





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Feedback on internal communication was overwhelmingly positive across all statements.

Most respondents **agreed or strongly agreed** that:

- Communication within the Center is open and transparent
- Information is shared regularly
- Members feel free to express ideas and opinions

These findings confirm a **collaborative and inclusive environment**.

Key Insights

Open and honest two-way communication
Strong sense of inclusion and meritocracy
High level of trust between members and chairs

💡 *Area for improvement:*

Some respondents suggested **strengthening communication flows** (e.g. clearer differentiation between roles and improved dissemination of meeting invitations, especially for overseas members).



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Other Activities & Future Initiatives

- **Creation of an institutional blog** to promote the **first edition of the Executive Anti-Money Laundering Programme** *"In Memory of Dr. Antonio Fortarezza"*, developed in collaboration with **Veda Formazione** and the **STEPPO Center of Excellence**, under the scientific direction of **Prof. Benedetta Ubertazzi**.

The blog was designed to disseminate information about the programme, its objectives, structure, and relevance in light of the upcoming **EU AML Package**.



- **Communication and outreach activities** carried out in cooperation with the **Connect Committee**, aimed at promoting the programme and STEPPO initiatives across **social media channels**, strengthening visibility and engagement with a wider academic and professional audience.





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3.Cybersecurity Strategic Committee

CHAIR: Marco Bacini

VICE-CHAIR: Giordana Ambrosino

SUPPORT: Maria Giulia Mariotti

MEMBERS: Alessio Vergnano; Marzia Catino; Aleksandra Lombardo; Yael Wuhl; Giulio Civitareale; Francesca Fragassi



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NEW BLOG POST UPLOADED



**TITLE: Global Cybersecurity Forum
Annual Meeting: A focus on the Next
Generation of Cyber Resilience**

Author: Maria Giulia Mariotti

Global leaders and decision-makers met in Riyadh to discuss the next challenges in cybersecurity



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Global Cybersecurity Forum Annual Meeting: A focus on the Next Generation of Cyber Resilience



Blog Author: Maria Giulia Mariotti

Last October, the annual Global Cybersecurity Forum took place in **Riyadh**, Saudi Arabia, bringing together Global Leaders and decision-makers to discuss the complex matter of **collaboration and priorities in the Cyberspace**.

One of the panels faced the “**Next Gen Cyber Resilience**”, with the presence of Dr. Marcus Fowler, CEO of **Dark Trace**, a British company that provides cybersecurity, and Ultan Mulligan, Chief Services Officer of the European Telecommunications Standards Institute (**ETSI**).



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UPCOMING BLOG POSTS



Upcoming blog post concerning the aspects of social network and taxation

Author: **Giulio Civitareale**



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STEPPO-Libera:

4. The Civil Society Role Committee

CHAIRS: Wisal Tayebi, Beatrice Pellegrino,
Simone Rossitto, Stefano Mattacchini



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BLOG PUBBLICATO



Il riutilizzo dei beni confiscati: il modello italiano esportato in Europa

- La legge Rognoni- La Torre
- La legge del 7 marzo 1996 n. 109 e il principio del riutilizzo sociale dei patrimoni criminali
- Esempi di riutilizzo sociale in Italia ed Europa



Prossime pubblicazioni

Elaborato di una studentessa relativo alle comunità monitoranti con un focus sull'iniziativa Open Olympics

- <https://www.simico.it/piano-delle-opere/>
- <https://archivio.cai.it/wp-content/uploads/2023/04/Documento-aggiuntivo-tavoli-regionali-MICO-26-SEG-AMB-6-2-23-2-2-w-1.pdf>



5. HIGH SCHOOL COMMITTEE



CHAIRS

ALESSANDRO FUMAGALLI: Civil lawyer and former headmaster of several middle and high schools

MICHELE MONOPOLI: Former Dean of Beccaria High School Milan

ANTONELLA IANNASCOLI: Mathematics and physics teacher at the Liceo Classico Cesare Beccaria in Milan

VERONICA CARBONE: law student

MEMBERS

ALESSANDRO COLOMBO, EGLE CONCINA, SAMUELE DI MARTINO, ARIANNA DUZ, BEATRICE

QUAGLIA, SAMANTHA NICOLE DE GUZMAN, MARIA CHIARA CAPPELLI, FRANCESCA FRAGASSI,

ADELE MINICHIELLO, SONIA M'GAYEDI, NICOLO' ELENi, GIULIA PAGANI, ANGELO SALIMBENI

(support)

FSL (ex PCTO)

The deadline for joining the FSL program offered by Steppo CoE has been extended to 12 December

Starting in February 2026, more than 100 students from secondary schools in Milan and its province will take part in lectures with professionals and practical activities focusing on the role of the EPPO and international cooperation in combating crime.





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PNRR



On 21 November, at Bicocca University, students from Liceo Parini (MB) attended a lecture and were introduced to the topics of international crime and current methods of combating it.

PNRR lessons continue to be provided to secondary school students





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IPM C. BECCARIA

The proposal for collaboration with the F. Rava Foundation has been renewed in order to define the new training program within the IPM C. Beccaria for the academic year **2025/2026**.



6. LAW ENFORCEMENT AGENCIES COMMITTEE

CHAIR: FLAVIA NDRIOLLARI

MEMBERS:

- Pietro Frisone
- Roberto Lupo
- Giulia Pagani
- Salvatore della Ragione
- Erica Bongiorno
- Teresa Scialla
- Gianluca di Biasi
- Andrea Sarra Fiore
- Paola dell'Orletta
- Ines Kaede Kikuchi
- Leonardo Petrozzi
- Luigi Vinciguerra
- Lukas Kuhl
- Pierangelo Seri
- Francesca Zucca
- Francesco Vitali
- Ferdinando Sorbilli



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Latest news on EPPO results

Broken wall operation



Last month, the Italian Financial Police (Guardia di Finanza) and the Customs Agency in Florence executed searches and preventive seizures as part of a transnational investigation into VAT fraud



According to investigations coordinated by EPPO offices in Turin and Bologna, a chinese criminal network imported goods into Italy under custom procedure 42 in order to sell them on the domestic market, evading VAT payments

Through false invoices and false transport documents, the criminal organisation simulated the transfer of goods to fictitious EU buyers (shell companies). Actually, the goods remained in Italy and were placed on the domestic market

CP 42 is a special customs regime established by EU legislation that allows importers of extra EU products to defer payment of VAT.

VAT must be paid in the EU country of final destination, rather than in the country where goods are released for free circulation



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In addition to this criminal scheme, the investigation also revealed abuse of customs procedure 45



The criminal organisation used apparently regular self-invoices to remove the goods from the VAT warehouse, simulating false intra-EU sales to evade VAT payments; the products were instead distributed illegally on Italian territory

CP 45 concerns the introduction of goods into EU territory destined for a VAT warehouse.

In VAT warehouses, goods are stored under tax suspension, which will be paid when they leave to be sold on the domestic market, or will not be due if they are destined for abroad





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Through the abuse of special customs procedures, the criminal organisation evaded VAT on imported goods and was able to place them on the market at lower prices, distorting competition

At present, **six preventive measures** have been executed by Italian financial police, including **two prison** and **four house arrest orders**.

Assets worth over **€19 million** have been seized

The investigation involved the cooperation of customs and police authorities in Italy, Czech Republic, Germany, Poland, Spain, Bulgaria and Hungary. The investigation was also supported by the European Anti-Fraud Office (OLAF) and Europol



Taxable transactions evading taxation amounts to **€90 million**



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EPPO and EU Law

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7. Newsletter and digital communication Committee

CHAIR: Paolo Maiolino

VICE-CHAIR: Luca Zappaterra



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Our work



DONE

December edition: 16° december 2025



SCHEDULED

Set up a think tank periodically to find out fresh initiatives for the newsletter

Currently working on the website improvements



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Interactive newsletter

EPPO and EU Law (Jean Monnet Centre of Excellence - EPPONET)

LE NOVITÀ DEL CENTRO D'ECCELLENZA STEPPO

LE NOVITÀ DEL CENTRO D'ECCELLENZA STEPPO

Do you like the newsletter?

Leave a comment!

You can do that on the steppo website or on the STEPPO whatsapp channel

Thank you!



Titolo: L'ingresso Della Professoressa Umberta Colella
Tommasi Nel Media Committee
Autore: Serena Perini
Comitato: Media Committee
Data: 10/11/2025

CLICCA QUI



Technology and Law for the safeguarding of Cultural
Heritage: a seminar about the role of EPPO
Autore: Francesca Marasi
Comitato: Art & Cultural Heritage Crimes Committee
Data: 10/11/2025

CLICCA QUI



EPPO and EU LAW **(Jean Monnet Centre of Excellence- EPPONFI)**

8. AUDIT COMMITTEE

CHAIR: Cesare Montagna, Giuseppe Mancini

VICE-CHAIR: Marzia Catino

Members: Marzia Catino, Serena Perini, Mattia Rossi



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GENERAL UPDATE



**We are pleased to welcome a new chair and member
of the Audit Committee,**

Dr. Giuseppe Mancini,

**Chair of the Anti-Money Laundering Commission of
the Milan Association of Chartered Accountants.**

Thank you for your valuable support.



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THIS MONTH
16/11/2025

“Customs Reform: Sanctioning Framework and Implications for the 231 Compliance System”
by Marzia Catino

The customs reform (Legislative Decrees 141/2024 and 81/2025) has realigned the Italian system with EU rules, giving a central role to the European Public Prosecutor’s Office (EPPO), since customs duties are EU own resources. The Customs Agency must report all violations above certain thresholds to the EPPO without assessing intent:

- intentional → criminal proceedings;
- negligent → administrative sanctions (80–150%).

The corrective decree raised the criminal threshold for import VAT to €100,000 while keeping the €10,000 threshold for customs duties, and redefined aggravating circumstances. Companies must update their 231 compliance models to address new customs risks and prevent smuggling-related offences.





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NEXT MONTH

“Amendments to Article 21 of Legislative Decree 231/2007: ‘Selective’ Access to the Register of Beneficial Owners” by Marzia Catino

Two regulatory interventions affect the structure of **Article 21 D.Lgs. 231/2007**:

1. the legislative decree definitively approved by the **Council of Ministers on 4 December 2025**, implementing **Article 74 of EU Directive 2024/1640**;
2. **L. 182/2025**, published in the Official Gazette on **3 December 2025**, which directly amends the article by introducing the **new letter f-bis)** concerning access by public administrations.





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NEXT ACTIVITIES

“Buffer Companies: shell companies used to conceal tax fraud” *by Marzia Catino*



Examination of the investigation conducted by EPPO and the Guardia di Finanza of Venice into buffer companies suspected of defrauding funds from the Recovery and Resilience Facility (RRF).

The EPPO case is a warning for the entire anti-money laundering (AML) prevention system. Buffer Companies escape ordinary filters because they do not display classic risk indicators. They appear to be regular clients, with adequate bank ratings and formally compliant financial statements.



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CENTRE OF EXCELLENCE

EPPO and EU LAW **(Jean Monnet Centre of Excellence- EPPONFI)**

9. EDITORIAL COMMITTEE

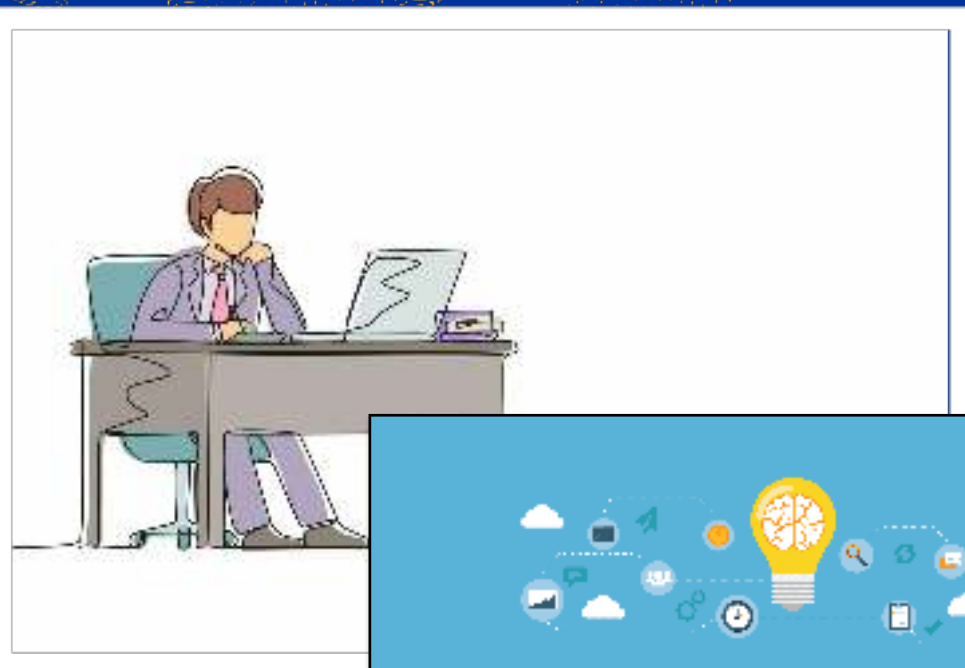
**CHAIR: CESARE MONTAGNA, MICHELE MONOPOLI, FRANCESCA VENINI,
GIULIA VARISCO**



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GENERAL UPDATE



13 BLOG WERE PUBLISHED

The committee is proceeding with a regular scheduling

**The editorial committee meets periodically via calls.
The committee is working on updating the website in
order to include all the correct data and information.**



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L'EPPO tra pratica e prospettiva: cosa ci raccontano le interviste del Comitato Interview

Nov 29, 2025 | Interviews Subcommittee

Author: Aleksandra Lombardo

Committee: Interviews Committee Date:



La competenza di EPPO in materia di reati tributari

Dic 7, 2025 | Prosecutors Subcommittee

Author: Pietro Suchan; Corrado Rossitto

Committee: Prosecutors Committee

A REALLY INTERESTING ARTICLE



Il commento del professore Enrico Traversa alla sentenza EPPO (C-292/23): lo scrutinio dei giudici nazionali sugli atti della Procura europea

Nov 19, 2025 | Academic Subcommittee

Author: Luca Zappaterra Committee:

Academic Committee Date: 19/11/2025

Riforma doganale: schema sanzionatorio e implicazioni del sistema 231

Nov 16, 2025 | Audit Institutions

Subcommittee

Author: Marzia Catino Committee: Audit

Institutions Committee Date: 16/11/2025

EPPO and EU Law (Jean Monnet Centre of Excellence - EPPONFI) 10. FORENSIC EXPERTS COMMITTEE

CHAIR: Fabrizia Bemmerl
VICE-CHAIR: Angela Scala
MEMBER : Francesca Zucca

Projects

1. The forensic Experts Committee has written a blog that will be published on the e-REX Project (European Register of Judicial Experts). The project was submitted by the European Expertise and Expert Institute (EEEI) under the EU call JUST-2025-JCOO, with the aim of strengthening judicial cooperation in civil and criminal matters.

2. Judicial experts are essential to court proceedings. However, different national rules for selection, recognition, and remuneration across Member States create obstacles to mutual trust and complicate cross-border cases.



AICEF is a non-profit association composed of highly qualified professionals who provide forensic expertise in both criminal and civil matters, acting as court-appointed as well as party-appointed experts.

A European Solution :

3. The e-REX Project aims to establish a central digital register of judicial experts in the EU, connected to national systems and supported by secure tools such as e-CODEX. By promoting transparency, common standards, and inclusivity, e-REX contributes to a more efficient and cohesive European area of justice.

For further details on the e-REX Project, please visit the official EEEI website :

<https://experts-institute.eu/en/projects/find-an-expert-en/e-rex-european-register-judicial-experts/>





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11. PROSECUTORS COMMITTEE

CHAIR: PIETRO SUCHAN

SUPPORT: CORRADO ROSSITTO



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Aggiornamento



Abbiamo scritto due blog
inerenti ad una fondamentale
sentenza della Corte
Cassazione(sent.44698/2024)
Prima ci siamo concentrati
sull'aspetto della competenza,
con il secondo blog
sull'aspetto della avocazione



L'aspetto dell'avvocazione

La Cassazione, con la sentenza 44968/2024 ha confermato la legittimità dell'avocazione delle indagini da parte dell'EPPO, respingendo l'argomento difensivo sulla mancanza di transnazionalità. Dagli atti risultavano collegamenti con più Stati membri, sufficienti per la competenza europea. L'esclusione dell'aggravante da parte del GIP non incideva su tale competenza. L'intervento dell'EPPO era giustificato e l'avocazione pienamente valida



L'aspetto della competenza



La Cassazione, nella stessa sentenza (44968/2024)ha affrontato anche l'aspetto della competenza. Ha chiarito che la competenza sorge anche solo il reato mostra elementi, anche solo indiziari sulla transnazionalità del reato, quindi, senza bisogno di una prova definitiva. La presenza di rapporti economici con più Stati ha giustificato l'intervento della Procura Europea , ritenuta la più idonea a condurre le indagini a livello transfrontaliero



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**Grazie mille per
l'attenzione e
buone feste dal
Prosecutors
committe!**





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EPP0 and EU Law

12. Banking, insurance and financial authorities Committee

**CHAIR: Lawyer Daniele
Alessandro Luison VICE-
CHAIR: Matteo Ianni**

NEWS OF THIS MONTH

ECB Proposal: *Simplifying EU Banking Regulation*

Main Objective	Why It Matters for EPPO
Streamline the EU banking regulatory framework by reducing unnecessary complexity while preserving financial resilience	Helps banks focus on risk-taking activities rather than compliance burden & Aims for a more efficient and resilient financial system across the EU.



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WHAT'S NEXT?

Key Themes for the Committee's Analysis and Sharing

AML / KYC

EU funds protection

Suspicious transactions

Cross-border fraud

Internal controls

GDPR & data sharing

Digital tools & AI

Data analytics

Joint investigations

Training & skill



Effective EPPO action relies on compliance, data sharing and digital capabilities



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UPCOMING BLOG POSTS

**“FROM DATA TO DIGITAL INDEPENDENCE:
WHY IT MATTERS AND HOW TO ACHIEVE IT”**

Alice Travaglin



“CHINESE UNDERBANKING”

Chiara Milano



These two blog posts will be authored during next month by master's law degree candidates who will be conducting their thesis research on these topics, which are of significant relevance to the European financial framework.

THANKS FOR YOUR ATTENTION



from the Banking, insurance and financial authorities Committee!



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EPPPO and EU Law

(Jean Monnet Centre of Excellence - EPPONFI)

13. Lawyers Committee

CHAIR: Federico Mamoli, Elena Tieghi

VICE-CHAIR: Wisal Tayebi



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European Lawyers Network Meeting

- Our firm hosted the meeting of the European lawyers' network.
- Avv. Guarnaschelli attended as a representative on the Lawyers' Committee
- An augmented-reality activity was carried out during the session.





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Cross-Team Collaboration

- Strong collaboration between the GameCom and LawyerCom initiatives.
- Very positive feedback from participants on the interdisciplinary approach.
- Avv. Mamoli contributed to the finalization of the STEPPO 2026 program.



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Training, STEPPO G Academic Engagement

- Excellent news: the course has been accredited once again by the Bar Association.
- Participating lawyers may obtain continuing legal education (CLE) credits.
- As part of STEPPO 2026, Avv. Mamoli will speak on 17 March on: "The Role of Lawyers and the Digitalization of Criminal Justice."
- A discussion roundtable on EPPO-related topics has been launched with professors from the Department of Criminal Law of the Economy at LUISS Guido Carli University (Rome).

ORDINE DEGLI AVVOCATI DI MILANO
30132 - MILANO (MI) - VIA FREGGIOLA, 2 - PIAZZA DOTT. GIUSTIZIA
TELEFONO 02 5492911 - FAX 02 54931447 - 02 55180001
www.ordineavvocati milano.it

MILANO, 8/25/2025

Prot. 008/11/2025

Spettabile
**UNIVERSITA' DEGLI STUDI DI MILANO -
BICOCCA (TAMARA ANTONI)**
PIAZZA DELL'ATENEUM NOVO 1
MILANO (MI)

IL CONSIGLIO DELL'ORDINE, nella seduta del 04/12/2025, preso atto della relazione della
Commissione Accreditamento della Attività Formative sulla nostra richiesta di ratificazione dell'Iniziativa
Scuola.

EPPO E DIRITTO DE. UN PASSO AVANTI NELL'INTEGRAZIONE.
dal 23/04/2026 al 10/05/2026.

Ha deliberato di approvare l'accreditamento con l'attribuzione di crediti CLE, 14 alla luce dei criteri stabiliti
negli artt. 13 e 20 del Regolamento CNP per la Formazione Continua.

Per l'attribuzione dei crediti viene richiesta la partecipazione ad almeno 100%
dell'attività formativa.

Si precisa che, al fine del divenimento personale, l'Ordine richiede di un foglio cartaceo delle presenze
con firma in arrivo o in uscita dei partecipanti e un file con i dati degli iscritti (nome, cognome, c.f., fine
di appartenenza), che dovranno essere consegnati all'Ordine entro 15 giorni dal termine dell'iniziativa.
Si precisa che gli attendi di partecipazione devono essere inviati solo ed esclusivamente agli indirizzi
non appartenenti al File di Milano.

Si conferma che la promozione dell'iniziativa è a carico dell'ente
dell'istituzione dell'iniziativa sul sito dell'Ordine fra gli eventi a
forze per la pubblicità degli eventi formativi da compilare e in
posta. formazione@ordineavvocati milano.it

Contatti utili:





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Communication, Promotion G Next Steps

- Proposal: create a blog post (idea by Avv. Tieghi) focusing on:
 - course accreditation;
 - the value of training for legal professionals.
- Avv. Mamoli continued an intense promotional activity for STEPPO at several pre-Christmas institutional events.
- In particular, he presented STEPPO's role and content at the pre-Christmas event organized by Centro Servizi Investigativi in Milan on 3 December.
- Additional topics may be developed as the project evolves.





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EPPPO and EU Law

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14. EU INSTITUTIONS SUBCOMMITTEE

CHAIR: Florin Razvan, Petr Klement

VICE-CHAIR: MIRIAM TESTA, GAIA MARAZZI, GIULIA VARISCO



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The future leadership of the EPPO and its likely next Chief Prosecutors



Andrés Ritter, currently the EU's Deputy prosecutor, could become ad head of the EPPO in October 2026, following a vote held on Wednesday in the European Parliament. Andrés Ritter, is a prosecutor with over 25 years of experience at home, he has specialised in white-collar crime and EU subsidy fraud.

MEPs backed Ritter's candidacy, with 22 votes in favour in the budget committee and 46 in the justice and home affairs committee. EU countries also choose him as their favorite candidate.



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EPPO INVESTIGATION: College of Europe & EU Commission Officials



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At the request of EPPO in Brussels, the rector and a senior staff member of the College of Europe in Bruges were detained, as well as a senior official from the European Commission. After the questioning by the Belgian federal Judicial Police they were formally charged and later released (not considered flight to risks).

ALLEGATIONS: procurement fraud and corruption, conflict of interest and violation of professional secrecy.

All persons are presumed innocent until proven guilty by the competent Belgian courts of law.



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THIS MONTH; we
published a blog post
about Peter Klement's new
position at OLAF.

NEXT ACTIVITIES: A blog exploring the
potential candidates for the next Chief
Prosecutor, highlighting the prominent
profile of Andres Ritter.

15. Academic Committee

CHAIR: A. Hernandez Lopez, I. Sticchi, E. Traversa

SUPPORTS: M. Ramat, M. Rossi, L. Zappaterra



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News and events



Steppo Module 2026

- Programme: almost finalised
- Start: **23 February**
- 4 members of the Academic Com involved



possible new member

PhD Student
from Miguel Hernández
University, Elche





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CJEU cases

Judgments & Opinions of AGs

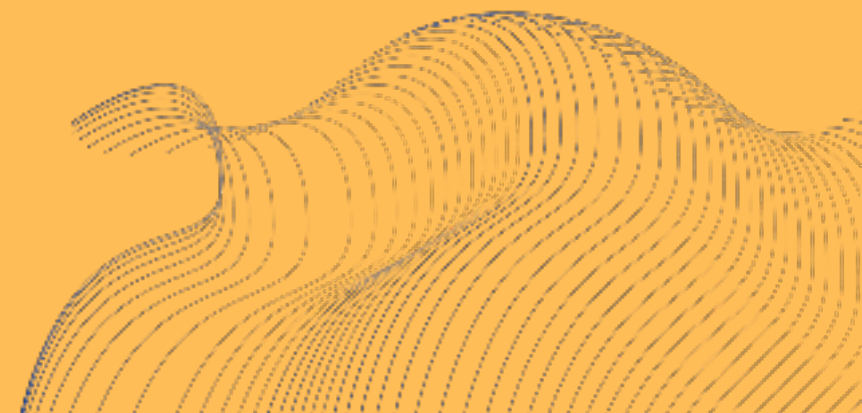
11/12, **Opinion** of AG Campos Sanchez Bordona in **C-655/24, *Latranov*** → confiscation of proceeds of crime ([LINK](#))

4/12, **Opinion** of AG Medina in **C-528/24, *Boothnesse*** → cooperation in criminal matters under the TCA ([LINK](#))

20/11, **Judgment** in **C-57/23, *Policejní prezidium (Storage of biometric and genetic data)*** → data retention by police authorities

Forthcoming Judgments

18/12, C-679/23 P, *WS and Others v Frontex (Opération de retour conjointe)* → non-contractual liability of an EU Agency cooperating with national authorities ([LINK](#))





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Literature



- Antonio Balsamo, *Il coordinamento tra la Procura generale della Corte di cassazione e la Procura Europea*, in *Sistema Penale*, 2025. [LINK](#)
- Radina Stoykova, *Future research directions: Can European criminal law survive the AI revolution?*, in *New Journal of European Criminal Law*, 2025. [LINK](#)
- Madeleine Merk & Breyli Luna Calzado, *Navigating the Risks of the Use of Digital Reporting and E-invoicing in the Age of Advanced Fraud Detection*, in *EC Tax Review*, 2025. [LINK](#)
- Maend Kullaj, *EU Justice and Home Affairs Framework for Accession Cooperation*, in *Eucrim*, 2025. [LINK](#)



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16. ART AND CULTURAL HERITAGE CRIMES COMMITTEE

CHAIRS: Andrzej Jakubowski, Lucas Iliński, Alicja Jagielska-Burduk,
Benedetta Ubertazzi

MEMBERS: Sherine Al Shallah, Francesca Marasi, Dimitri Eleni, Elisa Mazzilli



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PAST MONTH'S ACTIVITIES



On November 25th, Milano-Bicocca University host a seminar on the EPPO's role in combating cultural heritage crimes, focusing on digitalization and technology in investigations. Speakers include D Sherine Al Shallah, Prof. Andrzej Jakubowski, and Adina Hulubas.



Professor Sherine Al-Shallah



Dr. Andrzej Jakubowski



Dr. Adina Hulubas
(UNESCO facilitator)

The second part of the event included a round table and an open discussion, moderated by Professor Ubertazzi



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NEXT MONTHS' ACTIVITIES



TITLE:

*Heritage crimes as threats to the European Union's financial interests:
strategies for prevention and enforcement*

QUESTION:

How do crimes against cultural heritage affect the EU's financial interests, and which regulatory and operational strategies can be adopted, at the European level, to effectively prevent and combat them?

Over the coming months, Francesca Marasi, under the supervision and with the assistance of Chair Andrzej, will work on an academic paper on crimes against cultural property as crimes that harm the financial interests of the Union.





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NEW MEMBERS:



1. MATTEO PAOLETTI
2. WILLIAM LONG
3. ANDREI PROHIN

NEXT ACTIVITIES

The committee and its work will be represented at the final conference on 15 April.



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NEXT ACTIVITIES:



New blog entry by Andrzej Jakubowski about the arrest of a Russian archeologist in Warsaw.

Polish authorities have arrested a prominent Russian academic from St Petersburg's world-famous Hermitage Museum who is sought by Ukraine for allegedly conducting illegal excavations and partially destroying the ancient city of Myrmekion in Crimea.

Poland arrests Russian archaeologist wanted in Ukraine

4 days ago

Share Save

Adam Easton

BBC News Warsaw correspondent



Universal Images Group via Getty Images



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(Jean Monnet Centre of Excellence-EPPONFI)

17. National Institutions Committee

CHAIR: Gabriele Liberatore



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Ultime pubblicazioni

E' stato recentemente pubblicato su STEPPO l'articolo intitolato "La Commissione europea presenta la strategia per combattere le frodi IVA cross border", firma del dott. Gabriele Liberatore.



Il contributo approfondisce la nuova strategia ViDA (VAT in the Digital Age) della Commissione europea, volta a modernizzare il sistema IVA e rafforzare la lotta alle frodi transnazionali attraverso la digitalizzazione e la creazione del Central VIES.



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Nei prossimi mesi

Il comitato sta lavorando alla stesura di un nuovo blog, che verrà pubblicato prossimamente, dedicato alla candidatura di Roma come sede della nuova Autorità Europea delle Dogane, che rappresenterebbe un grande passo per l'Italia.





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EPPPO and EU Law

(Jean Monnet Centre of Excellence - EPPONFI)

18. Investigations and activities committee

CHAIR: Filip Siroky

VICE-CHAIR: Samuel Bolis



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Investigations and Activities Committee

MEMBERS:

CHAIR:

Dr. Filip Siroky:

expert investigator at the European
Public Prosecutor's Office in
Luxemburg.

VICE-CHAIR:

PhD Samuel Bolis:

Ph.D. in European Criminal Law, Lawyer
and former Lt. Colonel at Guardia di
Finanza.

MEMBERS:

- **Iman Khodri:** Law student
- **Sandra Grabmeier:** Law student
- **Annalisa Trabbia:** Law student



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BLOG OF THE MONTH:

The committee wrote the blog "**EPPO colpisce un network italiano dietro un sistema di falsi corsi di formazione da 40 milioni**" about one of the biggest frauds in the field of worker training courses, exposed by EPPO on November 27, 2025.

<https://www.eppo.europa.eu/en/media/news/italy-eppo-strikes-against-group-behind-eu40-million-eu-subsidy-fraud-scheme-involving>





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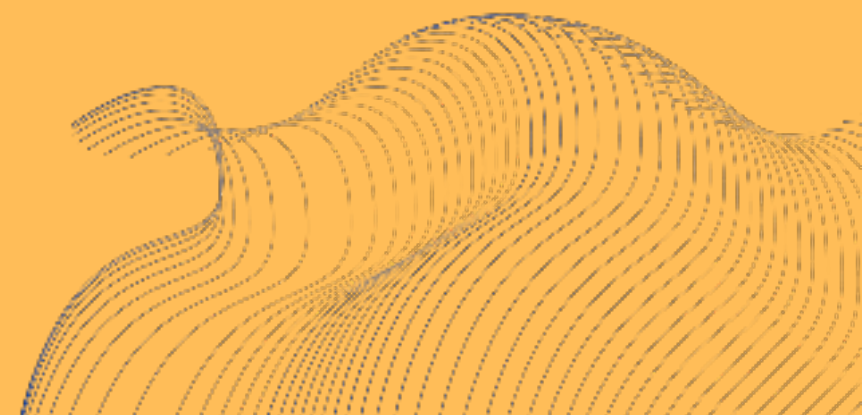
EUROPEAN
PUBLIC
PROSECUTOR'S
OFFICE



NEXT ACTIVITIES:

→ Annalisa Trabbia is writing a blog that will be published soon entitled “**DOGANE E PROCURA EUROPEA: L’IMPATTO DELLA RIFORMA ITALIANA SULLE INDAGINI DI EPPO**”.

The blog analyses how the recent Italian reform of the ADM has influenced EPPO investigations





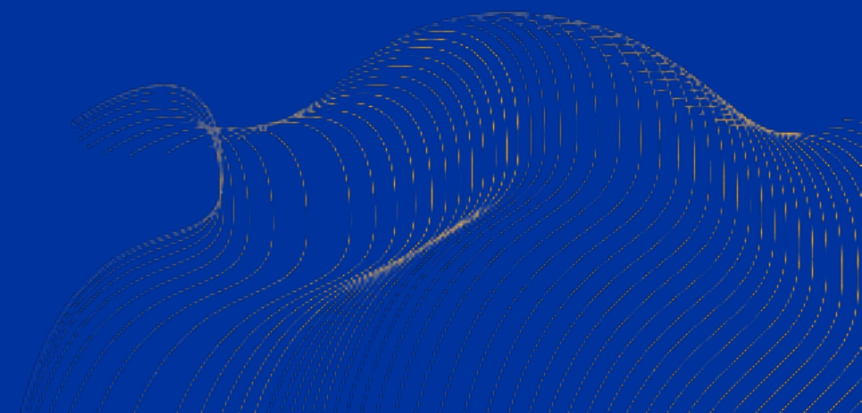
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<https://www.rainews.it/articoli/2025/12/ue-ex-ministra-mogherini-fermata-sospetta-frode-su-formazione-diplomatici-39385448-8458-4d6e-92e6-7605320380a1.html>

→ Simone Rossitto is writing a blog about a recent investigation involving former minister **Federica Mogherini**, who was detained along with other officials over alleged fraud and irregularities in the use of funds for the training of young EU diplomats.

**THANKS FOR YOUR
ATTENTION**





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19. Interview Committee

(Jean Monnet Centre of Excellence - EPPONFI)

CHAIR: Serena Cacciatore



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What was done?

During the last month, the Interviews Committee focused on identifying new professionals to interview.

In the meantime, on November 29, we published the article 'The EPPO between Practice and Perspective: What the Interview Committee's Interviews Tell Us'.

L'EPPO tra pratica e prospettiva: cosa ci raccontano le interviste del Comitato Interview

per l'EUROPEAN UNION



Autore: Alessandra Lazzarini
Comitato Interview/Committee
Data: 09/11/2024

We also completed the article 'The EPPO and Personal Data Protection: How the European Public Prosecutor's Office Is Changing the Way Cross-Border Fraud Is Investigated', which has already been included in this month's publication schedule.



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And in December?



“And in December? On December 9, the Committee, represented by **Dr. Aleksandra Lombardo**, had the opportunity to interview **Dr. Giovanni Barrocu** — currently an Associate Professor of Criminal Procedure at the University of Sassari.

During the conversation, several **critical issues concerning** the current trajectory of the European Public Prosecutor’s Office were raised, particularly in relation to procedural and defence safeguards.



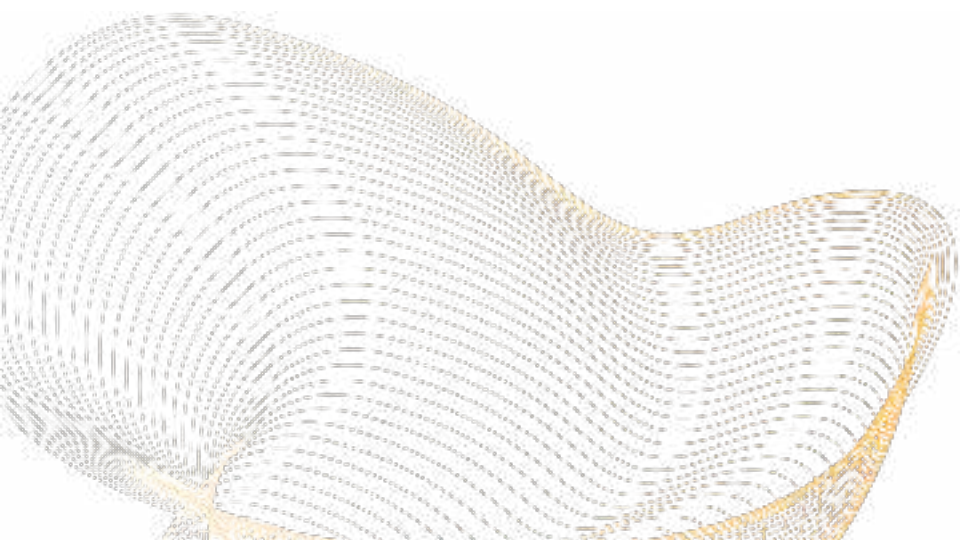
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What's on the agenda?

Next month, we will publish the article featuring the interview with Giovanni Barrocu, and we have already contacted a professional — the European Public Prosecutor's Office Delegate in Bari — with whom we will schedule an interview.

Thank you for the attention.





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20. INSIGHTS SOCIAL MEDIA

CHAIRS: Carlotta Eleni, Dimitri Eleni

MEMBERS: Beatrice Pellegrino, Wisal Tayebi



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INSTAGRAM

PROBLEMI

1. Mancata o incompleta fornitura delle frasi social che rallenta significativamente il lavoro. Delegare al nostro comitato la scelta delle frasi, pur se talvolta praticata, non è sostenibile.
2. Tempistiche di invio non sempre puntuali hanno inciso sulla calendarizzazione.

SOLUZIONI

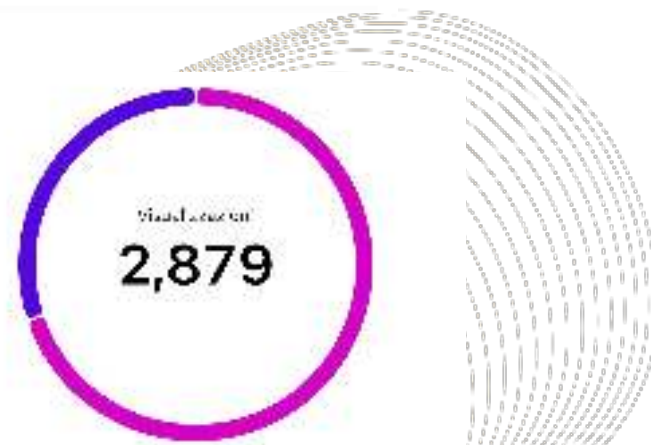
1. Condividere nuovamente le linee guida per la scelta delle frasi social.
2. Rispettare le scadenze (inviare il materiale uno o due giorni prima rispetto alla scadenza).

ANALISI INTERAZIONI

Il contenuto ha generato 2.879 visualizzazioni, con una buona percentuale di non follower (30,4%), segnale di una discreta esposizione verso nuovi utenti. Le interazioni totali indicano un buon coinvolgimento della community già acquisita.



• Follower 76,7%
• Non follower 23,3%



• Follower 65,6%
• Non follower 30,4%



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1.326

Impressioni

▼ 18,6% rispetto ai precedenti 28 giorni



I dati giornalieri sono registrati nel fuso orario UTC

Scoperta

1.326

Impressioni

18,6% rispetto ai precedenti...

362

Utenti raggiunti

25,7% rispetto ai precedenti...

Principali dati demografici dei follower?

Senior

Con questo livello di esperienza

43%

Milano

Da questa località

28%

LINKDIN

PROBLEMI

Le criticità riscontrate su LinkedIn risultano in linea con quelle già emerse su Instagram.

SOLUZIONI

Si ripropongono le medesime soluzioni già individuate per Instagram.

1. Condividere nuovamente le linee guida per la scelta delle frasi social.
2. Rispettare le scadenze (inviare il materiale uno o due giorni prima rispetto alla scadenza).

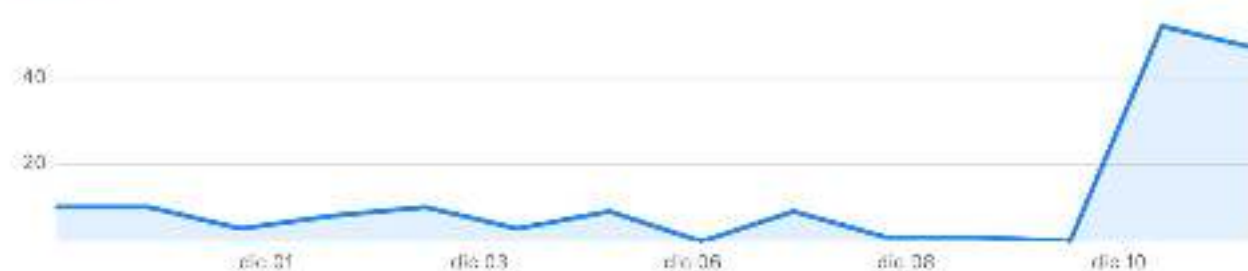
PUNTI DI FORZA

Le impressioni totali sono state **1.326**, in **calo del 18,6%**, segnale di una riduzione della visibilità dei contenuti pubblicati. Nonostante ciò, gli utenti raggiunti sono stati 362, con un aumento del 25,7%, indicando una migliore capacità di intercettare nuovi profili. L'andamento giornaliero mostra picchi in corrispondenza delle pubblicazioni, confermando l'importanza della continuità e della frequenza dei post.

FACEBOOK

175 Visualizzazioni

↓-60% dal giorno Nei 14 giorni precedenti



La pagina ha registrato 175 visualizzazioni, con una diminuzione del 60% rispetto al periodo precedente.

Questo calo è probabilmente dovuto ai problemi riscontrati con il rispetto della calendarizzazione che ha causato uno slittamento nelle pubblicazioni. Di conseguenza, sono stati pubblicati più post in un solo giorno, influenzando negativamente la distribuzione e l'interazione. Tuttavia, il picco di visualizzazioni a partire dal 10 dicembre suggerisce un recupero della visibilità, legato alla regolarizzazione delle pubblicazioni



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Il post che ha ottenuto il maggior numero di visualizzazioni è “L’underground banking cinese” con 5 visualizzazioni.

Problemi:

È il social meno utilizzato dagli utenti;

Soluzioni:

Utilizzare foto coinvolgenti che attirino l’attenzione degli utenti.

X



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Steppo_eulaw:
intervento di Roberto
Saviano presso l'U...
5462 visualizzazioni - 1 m...



The full video of the
closing conference:
EPPO and THE RU...
514 visualizzazioni - 2 mes...

SPOTIFY E YOUTUBE

Problemi:

1. I dati mostrano una chiara riduzione dell'engagement dopo la pubblicazione dei primi video, a causa della mancanza di una programmazione regolare e di contenuti nuovi.

Soluzioni:

1. Pubblicare anche su YouTube, non solo su Instagram, i video «Le Chicche della Settimana» creati dal Create Com.

Punti di forza:

Nonostante la mancanza di pubblicazioni si è registrato un aumento di 21 iscritti su Youtube.



Steppo EuLaw

@steppoelaw - 143 iscritti - 20 video

Siamo un think tank che si occupa della diffusione di EPPO la Procura Europea. ...altro

steppo-eulaw.com

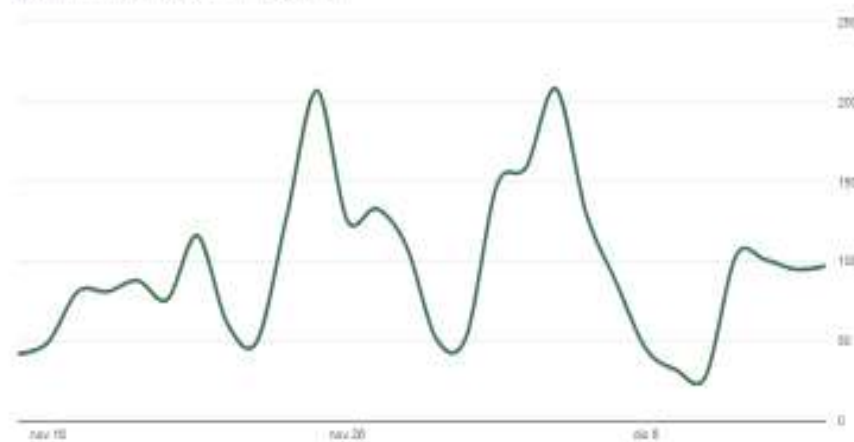
Iscriviti

SITO WEB

Tutti i Visitatori

2,5K

↑36% rispetto al periodo precedente di 28 giorni



Canali Località Dispositivi



Abbiamo registrato un aumento delle visite al sito del 36%. Il grafico evidenzia l'ingresso di utenti provenienti da altri Paesi (soprattutto in Cina con il 17,6% e 4,5% a Singapore), un segnale positivo in termini di espansione e capacità di raggiungere un pubblico internazionale.



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EPPO and EU Law

(Jean Monnet Centre of Excellence)

21. Agricultural and environmental frauds committee

CHAIR: Esther Muniz Espada

VICE-CHAIR: Samuel Bolis



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Agricultural and environmental frauds Committee

MEMBERS:

CHAIR:

Dra. Esther Muñiz Espada

Universidad de Valladolid

VICE-CHAIR:

Avv. Samuel Bolis

Ph.D. in European Criminal Law,
Lawyer and former Lt. Colonel at
Guardia di Finanza

MEMBERS:

- **Nicola Prota**, Confederazioni Italiana Agricoltori
- **Rocho Perteguer**, vocal de medioambiente del Colegio Nacional de Registradores
 - **Juan Manuel López Torres**
 - **Chiara Milano**, Law student
 - **Tarikwa Lanzara**, PhD candidate
- **Natalia Andrea Rossi Raggio**, Law student
 - **Angelo Salimbeni**, Law student
 - **Alessia Satta**, Law student
 - **Giulia Varisco**, Law student
 - **Anthony Zhilkin**, Law student



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Last month's activities:



Article Published:

- During the last month, the Committee published an article, authored by Chiara Milano, entitled: ***“Environmental Crimes and Laundering of EU Funds: The EU’s Response to Green Laundering”***

- The article examines the **link between environmental crimes and the laundering of EU funds**, with particular focus on green laundering schemes.
- It highlights how environmental offences may function as **instrumental activities for the misuse and concealment of European financial resources**.
- The paper analyses the **EU legal and institutional response**, stressing the need for coordinated action between environmental law, AML frameworks, and EU enforcement bodies.

<https://www.steppo-eulaw.com/2025/12/09/reati-ambientali-e-riciclaggio-di-fondi-europei-la-risposta-dellunione-al-green-laundering/>



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Ongoing activities:



Article in the Process of Publication:

- An article authored by **Avv. Samuel Bolis**, entitled: ***The Possible 'Instrumental' Competences of the European Public Prosecutor's Office*** is currently forthcoming for publication.

- The paper analyses the **extension of EPPO's jurisdiction beyond PIF crimes** when other offences are instrumental to EU financial fraud.
- It highlights **EPPO's competence over mafia-type and serious environmental crimes linked to CAP fraud**.
- CAP fraud affects not only EU finances but also **fair competition, social cohesion, and environmental protection**, supporting calls to expand EPPO's material jurisdiction.



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Next activities:

Blog in Development:

The Committee is currently working on a blog post curated by **Dr. Juan Manuel López Torres**, based on the article: ***“Organised Crime Infiltrates the CAP: €20 Million in Fraud in Italy”***

The blog focuses on how criminal organisations exploit structural weaknesses in EU agricultural funding and highlights the relevance of EU-level enforcement, particularly the role of the European Public Prosecutor’s Office, in addressing large-scale CAP fraud.





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Next activities:



The Committee will prepare two analytical articles focusing on recent developments related to EU agricultural funds and fraud risks. One is based on the news reported by EFE concerning arrests in Greece for large-scale fraud involving EU agricultural funds. The article will analyse:

- the **misuse of CAP resources**;
- the **role of organised criminal networks**;
- the **relevance of EPPO investigations** in protecting EU financial interests.



The other article is based on the report by La Repubblica on **clashes between farmers and police in Crete over EU subsidies**, the article will focus on:

- the social and economic consequences of suspending or delaying CAP payments;
- the link between fraud investigations and social unrest;
- the broader impact on trust in EU agricultural policies.

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22. Real Estate Transactions Committee

CHAIR: Marina Palmulli
Support: Alessandra Parisi

Othe committes' cooperation



First call held with
MediaCom on cooperation
in researching news, facts,
investigations for a
profitable blogs production
of the committees



Ideas for collaboration with
high school and lawyers
committees



Next meeting to be held with
Forensic Experts Commetee

EUROPEAN ASSOCIATION OF REAL ESTATE PROFESSIONS



European Association Of Real Estate Professions

Assembly to renew Association Provincial Bodies

- My contribution will be cooperation into Foreign Countries Committee
- Taking part to CEPI (European Association of Real estate Professions)

In 2026, Real Estate Committee's activities will focus on strengthening the collaboration with Media Committee and on developing calls and investigations involving accountants and court-appointed experts (CTU).



Focus on



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23. Judicial Bodies Committee

CHAIR: Arturo Iadecola



General Update

- **The committee highlights three new judgments by the Italian Court of Auditors on financial liability:**



Corte dei Conti Sardegna,
sentenza n. 158/2025



Corte dei conti Toscana, sentenza n. 115/2025



Corte dei conti Calabria, sentenza n. 226/2025





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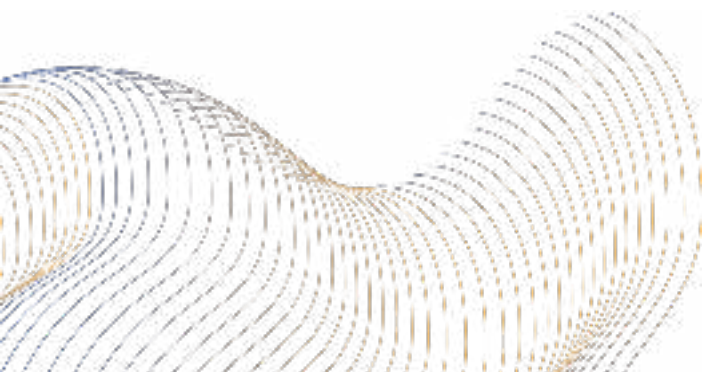
Corte dei Conti Toscana, sentenza n. 115/2025

- Undue receipt of public funds (POR FESR 2014-2020) → **financial liability**.
- **Structured fraudulent scheme** carried out through a consulting firm using false documentation.
- **Post-grant conduct** → funded project not completed and failure to repay the sum.
- **Mens rea**:
 - defence of **lack of intent** rejected
 - **conditional intent (dolus eventualis)** inferred from the beneficiary's post-grant conduct.





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Corte dei conti Sardegna, sentenza n. 158/2025

- **Financial liability** → undue receipt of EU funds, A.G.E.A. and A.R.G.E.A (2014–2018).
- **Conduct** → **False anti-mafia declarations** in breach of Legislative Decree No. 159/2011
- Criminal record certificate showed the entrepreneur was subject to **special surveillance**.
- Procedural conduct:
 - no defence or challenge to the facts.
- **Legal principle** → **Passive procedural conduct is not neutral**
- reliance on uncontested facts in line with settled case law



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Corte dei conti Calabria, sentenza n. 226/2025

- **Joint and several financial liability** of father (business owner) and son (acting as institore).
- **Damage: €19,286.73** to the Calabria Regional Agency for Agricultural Subsidies (ARCEA).
- **Beneficiary's ineligibility** → conviction for **mafia association** and special surveillance (Art. 67, Legislative Decree No. 159/2011).
- Fraudulent conduct → **false eligibility certifications**.
- **The defendants were ordered to compensate ARCEA**





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EPPO and EU Law

(Jean Monnet Centre of Excellence - EPPONFI)

24. Media Committee

CHAIR: Serena Perini

MEMBERS: Michele Monopoli, Alessandro Fumagalli, Umberta Colella Tommasi,
Andrea Guarnaschelli

This Month

Il caso Ranucci come paradigma libertà di informazione nell'Unione europea: il ruolo del European Media Freedom Act e i limiti di competenza dell'EPPO di fronte alla criminalità organizzata transnazionale.

Written by Umberta Colella Tommasi



Umberta Colella Tommasi has written an article about the attack on Sigfrido Ranucci, seeking to examine the connection between this episode and the critical condition that suffer the freedom of expression and information in Italy



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This Month



We have started to research contacts with major news outlets, including La Repubblica, Il Corriere, Il Giorno.

This first try is focused on a propose about the scholastic system and our activities with high school students.



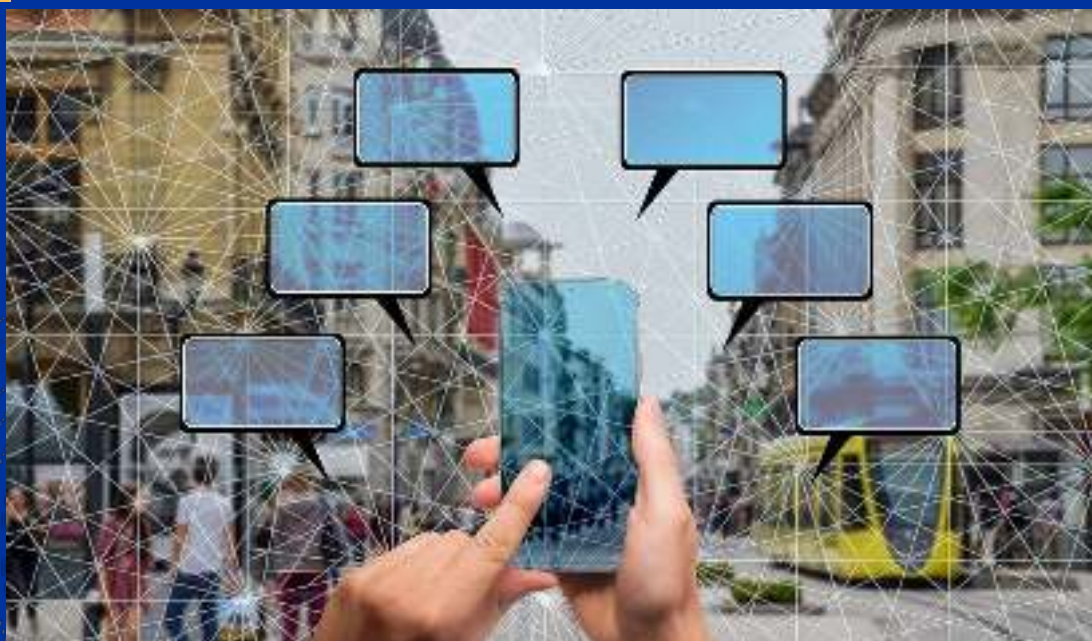
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We have sent four different emails to four journalists selected based on their areas of interest. In fact, they have published many articles about the school system, which is why we thought it could be appropriate to contact them.

We introduced our project about the new 'Formazione Scuola Lavoro' and our activities with high school students. We are now waiting for a reply.

Next Activities



Our primary goal is to build collaborations with the traditional medias. We'll keep searching for other contacts to reach out an editorial collaboration



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25. EPPO & FUNDS FOR SOCIAL COHESION COMMITTEE

Members

CHAIRS:

Dr. Francesco Testa

Delegate European Public Prosecutor in Rome

Luca Ferro

*Head of the Office of the Public Prosecutor in
Milan*

Dott.ssa Alessia Voinich

Ph.D. and Lawyer

MEMBERS:

Elena Tieghi

Lawyer

Mattia Rossi

Marta Benedetta Dimatteo



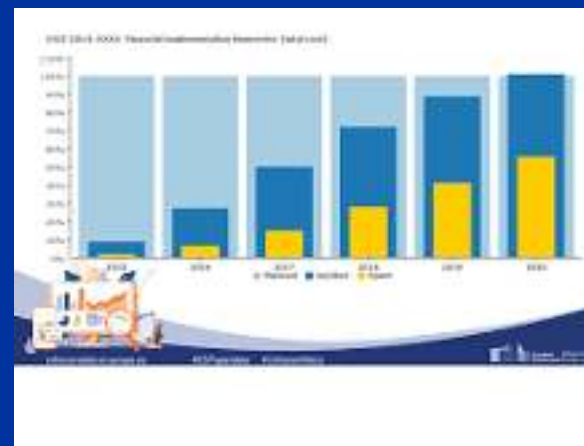
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The committee changed its name
from **EPPO & Immigration**
to
EPPO & Funds for Social Cohesion



The Committee has launched research activities in line with its new, expanded mandate.



This allows for a targeted assessment oh how **European Structural and Investement Funds can be better targed** and leveraged to maximize their impact in newly included areas.





We also continue to monitor developments regarding the Pact on Immigration and Asylum, with particular attention to the **Council's position on the new "Return Regulation».**

These developments contribute to defining the operational framework and future financial needs, directly influencing the programming and use of European funds such as the AMIF or newly introduced financial mechanisms.





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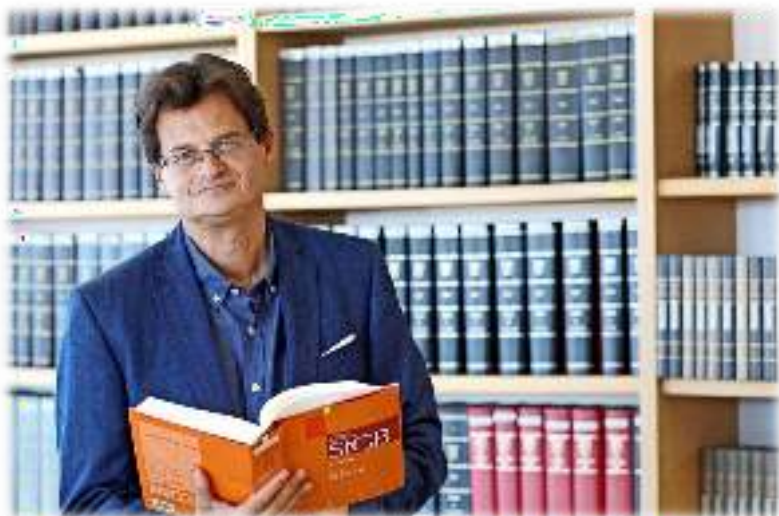
26. Collaborate Committee

CHAIR: Lorenzo Salazar

VICE-CHAIR: Veronica Carbone



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EU Chief Prosecutor: Upcoming Transition

- EPPO protects the EU's financial interests.
- Laura Codruța Kövesi's term ends in October 2026.
- Marc Ritter (Germany) provisionally endorsed by the European Parliament.
- Currently Deputy European Chief Prosecutor.
- Final appointment pending formal agreement among Parliament and Council.



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Upcoming Blog Publication on Marc Ritter

- Blog currently under publication.
- Focus on the profile of Marc Ritter.
- Analysis of profile, mandate, and priorities.
- Contribution to the debate on EPPO leadership.



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The Future of the EU Anti-Fraud Architecture

- Conference held in Luxembourg (November 2025).
- Evolution of EU anti-fraud governance.
- Central role of EPPO and OLAF.
- Digitalisation and new enforcement tools.

Table 1: The already agreed and in progress EU Crim work programme

Year	Topic	Policy and/or legislative work	Timeline	Policy and/or legislative work	Timeline	Policy and/or legislative work
2024	EU Crim Law	EU Crim Law	2024	EU Crim Law	2024	EU Crim Law

2024	EU Crim Law	EU Crim Law	2024	EU Crim Law	2024	EU Crim Law
2024	EU Crim Law	EU Crim Law	2024	EU Crim Law	2024	EU Crim Law

2024	EU Crim Law	EU Crim Law	2024	EU Crim Law	2024	EU Crim Law
2024	EU Crim Law	EU Crim Law	2024	EU Crim Law	2024	EU Crim Law

2024	EU Crim Law	EU Crim Law	2024	EU Crim Law	2024	EU Crim Law
2024	EU Crim Law	EU Crim Law	2024	EU Crim Law	2024	EU Crim Law

Next EUCrim issues

- Possibility to participate and give a contribute to EUCrim's activities.

2024	EU Crim Law	EU Crim Law	2024	EU Crim Law	2024	EU Crim Law
2024	EU Crim Law	EU Crim Law	2024	EU Crim Law	2024	EU Crim Law

1. Possible action 1: ...
2. Possible action 2: ...
3. Possible action 3: ...



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Key Challenges and Perspectives

- Coordination among EU anti-fraud bodies.
- Cross-border investigations.
- Legal and procedural challenges.
- Need for a more integrated framework.