



C/2023/312

30.10.2023

**Request for a preliminary ruling from the Administratīvā rajona tiesa (Latvia) lodged on 8 August 2023 — SIA Laimz v Izložu un azartspēļu uzraudzības inspekcija**

**(Case C-509/23, Laimz)**

(C/2023/312)

*Language of the case: Latvian*

**Referring court**

Administratīvā rajona tiesa

**Parties to the main proceedings**

*Applicant:* SIA Laimz

*Defendant:* Izložu un azartspēļu uzraudzības inspekcija

**Questions referred**

1. Must point 11(a) of Article 3 of Directive 2015/849 <sup>(1)</sup> be interpreted as meaning that an individual may be regarded as being a close associate of a politically exposed person solely on the ground that those persons form part of the same public body, without regard to any other circumstances?
2. Must [point 9 of Article 3] of Directive 2015/849 be interpreted as meaning that, in order to determine whether a person is a politically exposed person, it is necessary to determine whether that person holds one of the positions referred to in that article and, in addition, to carry out an investigation and verify that this is a high-ranking position rather than a middle-ranking or more junior position?
3. Must Article 45(1) of Directive 2015/849, read in conjunction with paragraph 8 of that same article, be interpreted as meaning that Member States must allow the obliged entities referred to in Article 2(1) of Directive 2015/849, which are regarded as companies in the same group, to share information with each other, including by concluding information sharing agreements and ensuring the reciprocal flow and mutual enforceability of information, in order to attain the objectives of Directive 2015/849?
4. Does Article 45(1) and (8) of Directive 2015/849, read in conjunction with points 12 and 15 of Article 3 of that directive, allow such information, or decisions, to be used and enforced in several undertakings belonging to the same group, those being decisions adopted, within that group, by the senior management of an undertaking belonging to that group?
5. Must Article 14(5) of Directive 2015/849, read in conjunction with Article 8(2) thereof, be interpreted as meaning that an obliged entity is not under an obligation to apply customer due diligence measures to existing customers if neither the time limit laid down in national law nor the time limit imposed by the internal control procedures for the application of new due diligence measures has expired, and the obliged entity is unaware of any new circumstances that might affect the risk assessment carried out in relation to the customer concerned?
6. Must the obligation which Article 11(d) of Directive 2015/849 imposes on obliged entities to apply customer due diligence measures where, upon the collection of winnings, the wagering of a stake, or both, the transaction amounts in total to EUR 2 000 or more, whether the transaction is carried out in a single operation or in several operations which appear to be linked, be interpreted as meaning that such measures must be applied every time the total amount of the transaction reaches EUR 2 000, irrespective of how long it is before the sum of EUR 2 000 laid down in that provision is reached again?

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<sup>(1)</sup> Directive (EU) 2015/849 of the European Parliament and of the Council of 20 May 2015 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, amending Regulation (EU) No 648/2012 of the European Parliament and of the Council, and repealing Directive 2005/60/EC of the European Parliament and of the Council and Commission Directive 2006/70/EC (OJ 2015 L 141, 73, p. 1).