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Predicate offense in money laundering cycle

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Abstract

The article is devoted to the specific topic of the study of the concept, essence, types and meaning of the crime underlying money laundering. Special attention is paid to the topical issues of judicial review under Article 209 of the Criminal Code of Ukraine on legalization (laundering) of criminally obtained property. The authors use general, intersectoral and special (sectoral) methods. The analysis of the judicial practice of Ukrainian courts, carried out by the authors, allows to state that the majority of cases of demanding criminal liability for money laundering occur either in case of existence of a conviction for an underlying offense or with simultaneous prosecution for both an underlying offense and money laundering. It is concluded that, the study of best practices in several countries gives grounds to suggest the possibility of prosecuting asset laundering as a separate criminal offense. Under such conditions, there will be no need to prosecute an underlying offense, especially if it is impossible to prove guilt for its commission.

Keywords: judicial review; judicial practice; predicate crime; legalization (laundering) of property; money laundering.

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Delito principal en el ciclo del blanqueo de capitales

Resumen

El artículo está dedicado al tema concreto del estudio del concepto, la esencia, los tipos y el significado del delito subyacente en el blanqueo de capitales. Se presta especial atención a las cuestiones de actualidad de la revisión judicial en virtud del artículo 209 del Código Penal de Ucrania sobre la legalización (blanqueo) de bienes obtenidos por medios delictivos. Los autores utilizan métodos generales, intersectoriales y especiales (sectoriales). El análisis de la práctica judicial de los tribunales de Ucrania, llevado a cabo por los autores, permite afirmar que la mayoría de los casos de exigencia de responsabilidad penal por blanqueo de capitales se producen o bien en caso de existencia de una condena por un delito subyacente o bien con un procesamiento simultáneo tanto por un delito subyacente como por blanqueo de capitales. Se concluye que, el estudio de las mejores prácticas de varios países da pie a sugerir la posibilidad de perseguir el blanqueo de bienes como un delito penal independiente. En tales condiciones, no habrá necesidad de enjuiciar un delito subyacente, especialmente si es imposible demostrar la culpabilidad por su comisión.

Palabras clave: revisión judicial; práctica judicial; delito subyacente; legalización (blanqueo) de bienes; blanqueo de dinero.

Introduction

Current globalization processes require a constant search for effective regulation of constantly new public relations, which is the main task of state policy. One of the main such tasks is criminal law policy in the fight against crime. To solve this problem, state institutions are being created, the law enforcement and judicial systems are being reformed, and Ukrainian legislation on criminal liability is constantly being improved (Vorobey *et al.,* 2022).

The current economic sphere of public life in Ukraine and its constant focus on European standards is met with some resistance by a part of the population that uses illegal ways of enrichment, which is why there is a negative trend of increasing the level of economic crime. Money laundering has become quite common due to its connection with the business environment. This phenomenon is used in illegal operations involving the trade in weapons, drugs, the financing of terrorism, the proliferation of weapons of mass destruction, etc.

The purpose of countering money laundering is to make this crime unprofitable (Mbila, 2019). The world community recognizes that money

laundering resulting from criminal or other illegal activities has become a global threat to economic security. Laundering of "dirty" money negatively affects the investment attractiveness of the country, contributes to increasing the level of the shadow economy, reduces the effectiveness of tax policy, undermines work financial sector of the economy (Zhyvko *et al.*, 2021).

However, money laundering is a very complex process by which proceeds of crime are transformed into "legitimate funds" (Korejo *et al.*, 2021).

The issue of countering money laundering in Ukraine is very relevant. This is confirmed by the existence of a broad regulatory framework to prevent this act, identify it, and bring the perpetrators to liability. New challenges and threats contribute to the development of appropriate mechanisms for responding to them.

Under the conditions of globalization, international and national financial and banking systems begin to function according to new principles, the development of information technology contributes to the emergence of new ways of legalizing income received in the shadow sector or from criminal activities. Subsequently, such trends contribute to the active spread of illegal activities leading to the receipt of dubious income, which can be used to finance criminal projects and international terrorism.

The issue of countering money laundering and the content of such criminal activities is given much attention in scientific research. This is due to the complexity of organizing the activities of law enforcement and judicial bodies to identify and investigate this criminal offense, the constant change in money laundering methods, and the problems of proving the commission of such criminal offenses and bringing perpetrators to justice.

The analysis of judicial practice will make it possible to identify the current state of the spread of this type of criminal offense, characterize the content of criminal activity in this area, and the difficulties that arise during the trial.

1. Methodology

The structure of the research methodology of legal phenomena is a multi-level system and consists of scientific principles cognition, dominant worldview, scientific type thinking, philosophical foundations, scientific paradigms, methodological approaches, and scientific methods (Tikhomirov, 2019). The key place in the complex structure of the methodology is occupied by the methods of scientific research. The correct combination of methods ensures the objectivity of scientific research.

The reliability of the obtained scientific results is ensured by the extensive use of methods of scientific knowledge. The normative-dogmatic method served as a methodological basis for studying domestic mechanism for judicial review of property laundering cases, which allowed to conduct a study of topical issues of judicial review under Article 209 of the Criminal Code of Ukraine regarding on legalization (laundering) of property obtained by criminal means.

The critical analysis made it possible to form conclusions and proposals for improving legal regulation based on the analysis of legislative sources. In our opinion, analyzing the provisions Article 209 of the Criminal Code of Ukraine, it is currently possible to consider court cases on legalization (laundering) of funds as a separate crime. Analytical and statistical methods allowed for analyzing court sentences and identifying trends in the context of predicate acts in the criminal cycle of money laundering. This article mainly relies on and court cases as the main sources of information.

In addition to choosing specific methods of scientific research, the methodology of legal research needs one more thing - finding the optimal ratio of empirical and theoretical. Until recently, legal science has shown increased attention to empirical research in the development and evaluation of law. However, one must agree with the special value of using not only empirical research methods in the evaluation of judicial practice, but also theories of social sciences (Kopcha, 2020).

2. Results and Discussion

• The Concept of a Predicate Offense

The effectiveness of developing criminological plans to counter crime in general and counter money laundering significantly depends on a qualitative quantitative and qualitative analysis of factors of criminal behavior. In the context of the study of money laundering, a special place is occupied by the predicate offense, which in fact is the initial stage in the cycle of criminal behavior. Money laundering becomes a kind of continuation of the first criminal act. Therefore, it is much more difficult to counteract money laundering. It is necessary to take into account both the first (predicate) offense and the second one. The range of such acts can be very wide. In the context of the theoretical analysis of the conceptual apparatus, it is necessary to explain the concept of “predicate offense”.

Money laundering is preceded by any criminal actions that directly or indirectly lead to its illegal acquisition. Honcharuk (2020) defines the definition of “predicate offense” under this construction. The lack of a legislative definition of this concept causes pluralism of scientific views.

As for the regulation, today there is a single regulatory approach to the definition of the concept of "predicate offense", which means any criminal offense, as a result of which income has appeared, which may become in the future the subject of criminal offenses related to money laundering, the list of which is specified in Article 6 of the Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (Council of Europe, 1990).

Regarding the approach of the judicial authorities, in the resolution of the plenum of the Supreme Court of Ukraine No. 5 dated April 15, 2005, which provisions are intended for the correct and unanimous application by the courts of legislation on liability for money laundering and due to issues, that appeared during the consideration of this category of cases. Even though the resolution was adopted in 2005, it can be stated that its provisions are still relevant in terms of general approaches to the interpretation of the "predicate offense" (On the practice of application by courts of the legislation on criminal liability for legalization (laundering) of proceeds from crime, 2005).

The previous version of Article 209 of the Criminal Code of Ukraine, which provides for liability for money laundering, contained a note to the article, paragraph 1 of which contained the definition of a predicate offense. The article contained the following provision: A socially dangerous illegal act that preceded money laundering, according to this article, is an act for which the Criminal Code of Ukraine provides for the main penalty in the form of imprisonment or a fine of more than three thousand non-taxable minimum incomes of citizens, or an act committed outside of Ukraine if it is recognized as a socially dangerous illegal act that preceded money laundering, according to the criminal law of the state where it was committed, and is a crime under the Criminal Code of Ukraine and as a result of the commission of which income was illegally obtained.

The current version of Article 209 of the Criminal Code of Ukraine does not describe a predicate offense. Still, the disposition indicates "property in respect of which factual circumstances indicate its receipt by criminal means." (The Criminal Code of Ukraine, 2001: part 1 of Article 209). Analysis of the latest version of the article makes it possible to determine the features of predicate offenses:

(1) a predicate offense is no longer necessarily a socially dangerous crime. Now it can be any offense. However, in our opinion, this approach is not justified. We are convinced that if the predicate offense was not a crime, the person could not be subject to criminal liability in the future. One of the main features of property that is the subject of a crime under Art. 209 of the Criminal Code, its immediate origin from another socially dangerous act that preceded legalization itself. That is, the subject of the crime is directly related to a certain predicate unlawful socially dangerous

act, its obligatory feature is criminal origin. In the legal theory of Ukrainian science, administrative offenses differ from criminal ones in the severity of the harm they cause. Thus, administrative offenses are socially harmful, and crimes are socially dangerous. A systematic interpretation of the legal theory allows refuting the approach about the possibility of recognizing an administrative offense as a predicate offense in money laundering.

(2) it is clarified that there is no need to prove a predicate offense. The illegal origin of property can be proved based on factual circumstances. Thus, the legislator once again emphasizes the need for strict compliance with the principles of belonging and admissibility of evidence during their collection and registration.

- **Procedural significance of the fact of committing a predicate offense**

In addition to the material significance and essence of the predicate offense, the procedural one also plays an important role. The first point of view is because "pre-trial investigation of money laundering is justified when a predicate offense is already being investigated" (Klepytskyy, 2002: 15).

Another argument is the opinion that from the moment of committing a crime under Article 209 of the Criminal Code of Ukraine until the entry into force of a guilty verdict for a predicate offense, a significant period may pass, which makes it impossible to withdraw income obtained by illegal means. It is also suggested that one of the mandatory conditions for qualifying an act on the grounds of committing a crime under Article 209 of the Criminal Code of Ukraine is the criminal origin of the income received. Thus, the author considers it expedient to investigate the main crime and the circumstances of money laundering (Pavlyutin, 2015).

The second point of view is that criminal prosecution for money laundering should be preceded by a court conviction for the main (predicate) offense. In confirmation of this, we will consider the provisions of scientists' research:

(1) it is essential to start proceedings under Article 209 of the Criminal Code of Ukraine only if a court verdict of guilty for a predicate offense comes into force, i.e., money laundering must be fully legally recognized for each specific case (Popovych, 2001: 397);

(2) a decision to prosecute for money laundering is not possible in the absence of a conviction for "predicate" offenses that have become a source of income intended for laundering because it is contrary to the principle of presumption of innocence (Arkusha, 2010);

(3) if it is sufficient for the perpetrators of a criminal offense to realize that they are carrying out actions with property obtained by illegal means, then "the person investigating such criminal activity for money laundering needs a legal basis (in this case, a guilty verdict) to bring the perpetrator to criminal liability under Article 209 of the Criminal Code of Ukraine".

On this occasion, the Resolution of the Plenum of the Supreme Court Of Ukraine No. 5 of April 15, 2005, notes that bringing a person to criminal liability under Article 209 of the Criminal Code is possible both if the fact of receiving funds or other property as a result of committing a predicate offense is established by the court in the relevant procedural documents (verdict or decisions, decisions on the exemption from criminal liability, on closing the case on non-rehabilitating grounds, etc.), and in the case when the person was not brought to criminal liability for the predicate offense.

In the latter case, a person is simultaneously brought to criminal liability for a predicate offense and for laundering of funds or other property obtained as a result of its commission, i.e., for the totality of these crimes, since the person is aware of laundering such funds (property) (On the practice of application by courts of the legislation on criminal liability for legalization (laundering) of proceeds from crime, 2005).

In the international judicial arena, there is a general practice where prosecutors focus on the criminal prosecution of a predicate offense and ignore the money laundering associated with it or do not consider it dominant at all (Netherlands, Belgium). This phenomenon occurs for various reasons. In some criminal cases, it is easier to satisfy a conviction for a predicate offense, for example, when the prosecutor has gathered enough evidence to bring charges for a predicate offense, but the financial evidence base, which is essential for bringing charges of money laundering, is insufficiently prepared.

Pre-trial investigation of money laundering and a predicate offense usually requires a lot of resources and time. In some jurisdictions, there is no incentive to bring money laundering charges because, in the end, the sentence will be nearly the same if the accused is charged with a "predicate offense" (Richardson and De Lucas Martín, 2021).

Such a simplified approach and the desire to improve success statistics in Ukraine is unacceptable in the international arena. After all, international standards provide for the possibility of investigating and bringing to criminal liability for money laundering as a separate crime. Based on the facts of unexplained enrichment or inconsistency in tax reporting, investigators can initiate an investigation into money laundering even if there is no direct evidence of a particular predicate offense.

In most foreign countries, the competent authorities care not only about the positive dynamics of statistics on "winning cases" but also about countering crime. This is confirmed by a ruling by the Supreme Court of the Netherlands, which clearly stated that in money laundering cases, it is not necessary to prove who, where, and when committed the predicate offense. The Amsterdam Court of Appeal issued a decision in 2013 (known as the "6-Step decision") that provides a brief description of the procedure for assessing at the national level the facts of money laundering when the predicate offense is unknown (Court of Appeal of Amsterdam: 11-01-2013, ECLI: NL: GHAMS: 2013: BY8481, 2013).

The Belgian Supreme Court ruled that the burden of the proof requirement of criminal and illegal origin is met if any legal origin is definitely excluded. Thus, the illegality of the origin of assets should be established there. Still, to make a decision, the criminal court does not have to know precisely which criminal act led to financial gain. It is sufficient for the court to exclude any legal origin with the help of the case file.

The Spanish Supreme Court ruled on the validity of indirect or indirect evidence in money laundering proceedings, provided that three requirements were met: there was unproven enrichment or financial transactions involving large amounts of money; no legitimate economic or business activity to explain such an increase; and the existence of a link to illegal activities (Richardson and De Lucas Martín, 2021).

Thus, from the results mentioned above of the study of the procedural significance of the fact of committing a predicate offense for bringing those responsible to justice for money laundering, with the passage of time and the introduction of appropriate changes to the disposition of this article there is no need to prove the commission of a predicate offense. Today, this issue requires additional research and the adoption of a new resolution of the plenum of the Supreme Court of Ukraine on the practice of applying the legislation on criminal liability by courts under Article 209 of the Criminal Code of Ukraine. The adoption of this decision will contribute to an adequate trial and the adoption of fair punishment for this offense.

- **Analysis of judicial practice on the commission of a predicate offense for bringing to criminal liability for money laundering**

The peculiarity of the crime, which is provided for in Article 209 of the Criminal Code of Ukraine, in the presence of previous criminal activity, which is a source of obtaining property (income), and various actions (acquisition, possession, use, disposal of property, carrying out a financial transaction, making a transaction with such property, etc.).

The analysis of judicial practice will allow identifying criminal activity that become elements of official statistics and will help to reveal the content of common predicate offenses and peculiarities of actions aimed at money laundering (Lysenko, 2021).

Analysis of judicial practice, mainly for 2019-2021 (more than 100 sentences from all regions of Ukraine), made it possible to state a fairly wide variety of criminal activities in the field of money laundering – from the simplest use of funds obtained by criminal actions for their own needs to special ways of hiding the source of monetary income using banking services, multiple transfers of funds to special accounts of enterprises, individual entrepreneurs created for this purpose.

The considered judicial materials made it possible to identify the most common predicate offenses that were presented by us in Table 1 (Predicate offenses in money laundering). The analysis of court cases shows that one of the "main" predicate offenses in judicial practice is crimes against property.

In the sphere of official and professional activities related to the provision of public services, criminal offenses are also frequent in the structure of predicate offenses. They are a source of funds for their laundering. In this case, the person was offered intermediary services to facilitate the receipt of a foreign passport by employees of the Krasnolymanskyi State Migration Service of Ukraine in the Donetsk region. As a result of the "assistance" provided, 16 thousand UAH was received. The court qualified these actions under Part 2 of Article 369-2 and Part 1 of Article 209 of the Criminal Code of Ukraine. These funds were later used for their own needs through the purchase of goods, etc (Slavyansk City District Court of Donetsk Region: 31-10-2019, sentence in the case № 1-кп/243/947/2019, 2019).

Among the most common cases, there are also cases of using third-party assistance to commit predicate offenses and then launder money. Such persons agree to be nominally the founder and director of the business entity, perform measures to open current accounts and receive funds for remote management of them (Pechersk District Court of Kyiv: 24-12-2020, sentence in the case № 757/12515/20-к, 2020). The same occurred in other court cases, where other persons performed financial and economic activities (Pechersk District Court of Kyiv: 29-03-2019, sentences in the case № 757/9882/19-к, 2019; Kherson City Court of Kherson Region: 05-06-2019, sentences in the case № 766/6200/19, 2019).

The analyzed court cases make it possible to show that among the ways of money laundering were both simple and complex financial ones, with the help of which it was possible to hide the criminal origin of funds (property), giving them the appearance of legal through receiving them from the sale of property, business activities, etc. Managers and direct organizers of money laundering schemes most often were not established by the pre-trial

investigation bodies. Only persons who directly performed actions aimed at money laundering were brought to criminal liability. In all the cases considered, the "performers" agreed to perform these actions for a certain monetary reward.

It is also important to note such a common method of money laundering as using bank accounts opened by individuals to conduct business (individual entrepreneurs). Such a scheme provides that for a certain monetary reward, a person is invited to open a bank account in a banking institution.

Among the court cases, some cases involve using third parties to commit a predicate offense and money laundering on the territory of other states. In the materials of a similar case, it is noted that in February 2019, a citizen of Ukraine, to improve his financial situation, was invited to participate in criminal activities involving money laundering. For this purpose, it was necessary to travel to the Czech Republic and open a current account in a banking institution. Funds were credited to the account under the guise of prepayment for the purchase of a truck. The money received fraudulently was cashed out and transferred to the persons who committed the predicate offense (Lipovets district court of Vinnytsia Region: 26-10-2020, sentence in the case № 136/947/20, 2020).

Conclusions

Summing up the above, we would like to note that the complex legal nature of money laundering complicates its detection and investigation. In addition, there are several objective and subjective reasons that hinder this process. Objective legislation includes imperfect and not unambiguous legislation, in particular, in the context of the interpretation of the concept of "predicate offense". Subjective reasons include the desire of law enforcement agencies, both those directly involved in investigations and employees of the prosecutor's office, to improve their performance indicators and therefore slow down the study.

The analysis of criminal court cases carried out by the authors has shown various money laundering methods – from simple to relatively complex financial schemes to conceal the illicit origin of money. To commit predicate offenses and direct actions to launder money, the organizers of criminal activity involve unauthorized persons, usually the perpetrators, who are brought to criminal liability.

Unlike the previous version of Article 209 of the Criminal Code of Ukraine, its current version does not contain the concept of a predicate offense. The involvement of the "predicate factor" in the elements of the

forensic characteristics of this category of crimes demonstrates that money laundering is an integral part of specific methods of illicit enrichment, which provide for a set of interrelated criminal actions, where laundering itself is the last part in this illegal activity.

In our opinion, analyzing the provisions of Article 209 of the Criminal Code of Ukraine, it is now possible to consider court cases on money laundering as a separate offense. This issue requires further research for an effective trial.

Bibliographic References

ARKUSHA, Larysa. 2010. Legalization (laundering) of proceeds from organized legal activities: characterization, detection, investigation. Odesa, Ukraine.

COUNCIL OF EUROPE. 1990. Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime. Council of Europe. Ratification 1997. Available online. In: https://zakon.rada.gov.ua/laws/show/995_029#Text. Consultation date: 01/11/2022.

CRIMINAL CODE OF UKRAINE. 2001. Law № 2341-III. Information of the Verkhovna Rada of Ukraine. No. 25-26. Available online. In: https://zakon.rada.gov.ua/laws/show/2341-14. Consultation date: 23/11/2022. (in Ukrainian).

GERECHTSHOF AMSTERDAM. 2013. ECLI:NL:GHAMS:2013:BY8481. Available online. In: https://www.recht.nl/rechtspraak/?ecli=ECLI:NL:GHAMS:2013:BY8481. Date of consultation: 25/02/23.

HONCHARUK, Vladyslav. 2020. "Types of predicate crimes in the domestic criminal legislation" In: Our law. No. 3, pp. 105-115.

KLEPYTSKYY, Ivan. 2002. Money laundering» in modern criminal law. State and law. Available online. In: http://www.oupi.ru/ilibr/kv/2.pdf. Consultation date: 10/11/2022. (In Russian).

KOPCHA, Vasyl. 2020. "Methodology of legal phenomenon research: concept, structure, tools" In: Journal of the Kyiv University of Law. No. 01, pp. 54-58.

KOREJO, Muhammad; RAJAMANICKAM, Ramalinggam; MD. SAID, Muhamad Helmi. 2021, «The concept of money laundering: a quest for legal definition» In: Journal of Money Laundering Control. Vol. 24, No. 4, pp. 725-736.

LYSENKO, Volodymyr. 2021. "Characteristics of criminal activity regarding legalization (laundering) of property obtained by criminal way (according to judicial practice)" In: Bulletin of Luhansk State University of Internal Affairs named after E.O. Didorenko. Vol. 94, No. 02, pp. 128-140.

MBILA, Chimamaka. 2019. Understanding the predicate offence of Money laundering; The Money laundering cycle, typologies and proffered solutions for banks to mitigate their risks to enabling money launderers. Available online. In: https://www.researchgate.net/publication/337245033_Understanding_the_predicate_offence_of_Money_laundering_The_Money_laundering_cycle_typologies_and_proffered_solutions_for_banks_to_mitigate_their_risks_to_enabling_money_launderers. Consultation date: 12/11/2022.

PAVLYUTIN, Yuriy. 2015. "Peculiarities of proving legalization (laundering) of proceeds from crime" In: South Ukrainian Law Journal. No. 03, pp. 169-172.

POPOVYCH, Volodymyr. 2001. Economic and criminological theory of de-shadowing of the economy. Irpen, Ukraine.

RESOLUTION OF THE PLENUM OF THE SUPREME COURT OF UKRAINE. 2005. On the practice of application by courts of the legislation on criminal liability for legalization (laundering) of proceeds from crime. Visnyk Verkhovnoho Sudu Ukrainy. No. 5. Available online. In: https://zakon.rada.gov.ua/laws/show/v0005700-05#Text. Consultation date: 12/11/2022.

RICHARDSON, Ian; DE LUCAS MARTÍN, Ignacio. 2021. Handbook on money laundering identification, investigation and prosecution for Ukraine. Available online. In: https://fiu.gov.ua/assets/userfiles/200/Typologies%20(International%20Studies)/ENG_Handbook%20on%20ML%20prosecution.pdf. Consultation date: 20/11/2022.

SENTENCE IN THE CASE № 136/947/20 (proceedings 1-кп/136/50/20). 2020. Lipovets district court of Vinnytsia region. Register of court decisions. Available online. In: https://reyestr.court.gov.ua/Review/92461108. Consultation date: 23/11/2022. (in Ukrainian).

SENTENCE IN THE CASE № 243/3955/19. 2019. Slavyansk City District Court of Donetsk Region. Register of court decisions. Available online. In: https://reyestr.court.gov.ua/Review/85305626 (2019, October, 31). Consultation date: 23/11/2022.

SENTENCE IN THE CASE № 757/12515/20-к. 2020. Pechersk District Court of Kyiv. Register of court decisions. Available online. In: https://reyestr.court.gov.ua/Review/93803612. Consultation date: 23/11/2022.

SENTENCE IN THE CASE № 757/502/19-к. 2019. Pechersk District Court of Kyiv. Register of court decisions. Available online. In: https://reyestr.court.gov.ua/Review/80449864 (2019, March, 13). Consultation date: 23/11/2022.

SENTENCE IN THE CASE № 757/9882/19-к. 2019. Pechersk District Court of Kyiv. Register of court decisions. Available online. In: https://reyestr.court.gov.ua/Review/81527076 (2019, March, 29). Consultation date: 23/11/2022.

SENTENCE IN THE CASE № 766/6200/19. 2019. Kherson City Court of Kherson Region. Register of court decisions. Available online. In: https://reyestr.court.gov.ua/Review/n82951199. Consultation date: 23/11/2022.

TIKHOMIROV, Denys. 2019. "The structure of the methodology of state policy research in the field of security" In: Philosophical and methodological problems of law. Vol. 18, No. 2, pp. 46-51.

VOROBEY, Petro; VOROBEY, Olena; MATVIICHUK, Valerii; NIEBYTOV, Andrii; KHAR, Inna. 2022. "Criminal law principles in the fight against crime" In: Amazonia Investiga. Vol. 49, No. 11, pp. 156-164.

ZHYVKO, Zinaida; RODCHENKO, Svetlana; VYSOTS'KA, Inna. 2021. "The impact of the legalization of proceeds of crime on economic security" In: Social and humanitarian bulletin. Vol. 37. pp. 48-51.

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