



**ASSET REGISTERS  
BEST PRACTICES IN TRANSPARENCY,  
ACCOUNTABILITY AND  
PARTICIPATION**

**CIFAR POLICY BRIEF**



Paper prepared by Althaf Ali (CiFAR) and reviewed by Jackson Oldfield (CiFAR). The author has made reasonable steps to ensure that the content is accurate.

CiFAR - Civil Forum for Asset Recovery e.V. and the authors are solely responsible for the contents of this publication.

Published: 2024, CiFAR – Civil Forum for Asset Recovery e.V.  
CiFAR – Civil Forum for Asset Recovery e.V.  
Köpenicker Str. 147, Berlin, Germany, [cifar.eu](http://cifar.eu)

Cover picture: provided by Pixabay through a Pixabay Licence for free commercial usage without attribution.

## EXECUTIVE SUMMARY

Effective registration of seized and confiscated assets is an essential component of an asset recovery mechanism. This paper examines the practice and legal frameworks in place for asset registration and explores international guidelines, best practice, and examples from various jurisdictions to highlight key elements for effective asset management.

Within this report, we identify several best practices for maintaining asset registers;

1. Asset registration must be embedded within a solid legal framework.
2. Centralized databases are critical in tracking assets across all phases of management, reducing data duplication, and ensuring accuracy.
3. The use of ICT is crucial for processing large volumes of data efficiently and facilitating real-time updates.
4. Data entry should involve contributions from various agencies involved in asset management, with clear protocols and timelines for updating information.
5. To ensure data integrity, only authorized personnel should have access to modify the database, and all changes must be recorded to maintain transparency and security.
6. Public access to certain data should exist to foster transparency, accountability, and public trust, while discouraging mismanagement and corruption.

In summary, successful asset management relies on developing a centralized, ICT-based database system that tracks, records, and manages asset information throughout the entire recovery process and allows for public oversight of the system. By adhering to best practices and international guidelines, countries can enhance the efficiency, transparency, and accountability of their asset recovery mechanisms.

## INTRODUCTION

In 2013, authorities in Colombia began to seize assets linked to a fraud ring, which had embezzled over a billion dollars from the tax office of Colombia (DIAN).<sup>1</sup> The embezzlement is estimated to have cost DIAN around USD 1.5 billion. The newspaper, *El Espectador*, reported that prosecutors had begun to track bank accounts, properties and tax returns of more than 50 people implicated in the case, including close associates of Blanca Jazmin Becerra, who was found guilty in 2012 for one of the largest fraud cases in the country costing the tax office approximately USD 26 million.<sup>2</sup>

Related to this and other cases, in 2019 Colombia was reportedly managing more assets seized than virtually any country globally. It was estimated that the country had roughly 64,000 assets in its inventory, including real estate, furniture, companies, livestock, and others. This included iconic assets that had been around for many years including the Chinauta Resort, which is 30 years old.<sup>3</sup>

For countries with several and complicated assets like Colombia, but also any country actively involved in asset recovery, a robust asset management regime is imperative for successful administration of the confiscated proceeds of crime. Within this, asset registration and asset inventory management are key functions of any asset recovery mechanism.

In order to maintain public trust and confidence, this system should be transparent and accessible to the extent possible. It should be able to record and process all inventory data throughout the asset recovery process. The data maintained must also be effective in its use for cooperation between both national and international investigations and officials and

the public should be able to track assets.

This paper observes and identifies the functions of such an inventory system, including the legal frameworks to establish the system. It also looks at and discusses best practices that could be used as guidance for the functioning of the asset register mechanism and identifies a series of best practices when it comes to asset registers.

It begins with an outline of international frameworks and best practice guidelines for the establishment and maintenance of an asset registry. It then considers key points that makes an asset registration system effective, particularly looking at the legal framework, the inventory system and access to databases. It identifies from this best practice in maintaining asset registers.

# INTERNATIONAL FRAMEWORKS AND GUIDELINES

The function of the inventory and registration processes in the overall management of any asset recovery mechanism is significant. It is for this reason various international and regional bodies dealing with asset recovery have emphasized the importance of establishing an effective system.

Article 31(3) of the United Nations Convention Against Corruption (UNCAC) requires States Parties to the Convention to: "adopt, in accordance with their domestic law, such legislative and other measures as may be necessary to regulate the administration by the competent authorities of frozen, seized or confiscated property covered by the Convention".<sup>4</sup>

In line with this article of the convention, in 2019 the Conference of the States Parties to the UNCAC adopted non-binding guidelines on the management of frozen, seized and confiscated assets.<sup>5</sup> These guidelines aim to assist States Parties in their efforts to address the challenges faced in the management of frozen, seized and confiscated assets at the national level.

Guideline 13 of the resolutions reads:

Having central asset registration systems and databases in place throughout the asset management process is instrumental in accountably managing seized, frozen and confiscated assets. Therefore, States may wish to consider establishing information technology systems and databases for asset registration, as appropriate.<sup>6</sup>

Additionally, a 2017 study by the United Nations Office on Drug and Crime (UNODC)<sup>7</sup> highlights that:

...in the early stages of developing asset management capacity, countries have developed fairly rudimentary data-capturing and data-storage mechanisms. As the system matures, it becomes harder to maintain accurate record of all property subject to seizure and confiscation orders. The need to improve or develop ever-more sophisticated capacity to maintain, access and keep the data reliable and secure increases.<sup>8</sup>

International organisations and other groups specialising in corruption have also issued guidelines on asset registration mechanisms.

- » The G8 guidelines on asset management, Best Practices for the Administration of Seized Assets (2005), identifies that: "States should consider the use of information technology (IT) systems for the administration of seized property. Appropriate financial and property administration IT systems can, for example, be extremely useful for tracking and managing inventory or for meeting expenses associated with seized property as well as for maintaining a transparent and accountable system".<sup>9</sup>

- » The Financial Action Task Force (FATF) Guidance A FATF guide on Best Practices on Confiscation and a Framework for On-going Work on Asset Recovery (2012) highlight the importance of having a mechanism of record keeping and tracking to ensuring transparency, as well as assessing the effectiveness of the system.<sup>10</sup>

In addition to this, regional bodies such as the Organization of American States (OAS) have issued directives and guidelines on the establishment of asset recovery management systems with robust inventory mechanisms.<sup>11</sup>

# WHAT MAKES AN ASSET REGISTER EFFECTIVE? EXAMPLES FROM VARIOUS JURISDICTIONS.

Maintaining correct and up to date information of seized and confiscated assets is required throughout any asset recovery mechanism from the start to the very end. This is important for efficiency and transparent management of confiscated assets.

While the exact nature of these practices in different jurisdictions may vary, the main principles and functions remain similar.

## ESTABLISHING A LEGAL FRAMEWORK

Asset register functions must be prescribed in law so that the implementing authorities tasked with maintaining an asset register have the legal authority to carry out their tasks.

### Honduras

In Honduras, the Office for the Administration of Seized Assets (OABI) is the central operates as an agency under the authority of the Public Ministry, reporting directly to the Attorney General of the Republic.<sup>12</sup>

Decree No. 27-2010, also known as the Law on the Administration of Seized Assets (Ley Sobre Administración de Bienes Incautados) that establishes the agency also mandates the agency with the task of keeping asset registers via databases.<sup>13</sup>

Article 10 of the legislation states: "the OABI maintains databases to keep updated records of the assets, objects, products and instruments that are insured, in abandonment and/or confiscated."

This gives OABI the power to maintain the database with all asset register information on it.<sup>14</sup>

## INVENTORY SYSTEM IN DATABASES

As mentioned above, in 2005, a working group of the G8, suggested that: "States should consider the use of information technology (IT) systems for the administration of seized property. Appropriate financial and property administration IT systems can, for example, be extremely useful for tracking and managing inventory or for meeting expenses associated with seized property as well as for maintaining a transparent and accountable system. States may also wish to use such IT systems for the administration of confiscated property".<sup>15</sup>

The Camden Asset Recovery Inter-agency Network (CARIN), also emphasizes on the use of databases as a tool in asset recovery. The recommendations of the CARIN to the EU on "Promoting the Creation of National Asset Recovery Offices and the Effective Management of Seized and Confiscated Assets" mentions the establishment of centralized databases to track all assets seized or restrained for confiscation.<sup>16</sup>

The Organization of American States (OAS) has also on various occasions emphasised the need for asset registries of seized property. In a 2011 report, it stated that:

States should consider using software to maintain a registry of seized and forfeited assets, sometimes called Asset Management Systems (AMS). This technological tool will be used to record income, transfers, judicial proceedings, legal situation, identification of objects, and the location of each asset in custody, in order to permit quick verification of its

current status. An AMS also will permit the generation of reports on the amount of real estate and personal property, as well as the preparation of statistics on assets seized and forfeited, accountability, management costs, and financial statements. It also seeks to promote transparency and good governance in management of seized and forfeited assets, because the data recorded in the system will be subject to public scrutiny.<sup>17</sup>

Most authorities for asset recovery now have a database component with the data managed either manually or using IT software.<sup>18</sup> The countries which participated in the OAS study conducted in 2014 all reported to having a centralised database for collection of information on confiscated and seized assets.<sup>19</sup>

### Bolivia

In Bolivia, the DIRCABI (Dirección de Registro, Control y Administración de Bienes Incautados) is the central agency responsible for managing, controlling, and monetizing assets that have been seized or confiscated in connection with criminal activities, particularly those related to illicit drug trafficking in Bolivia. This organization operates under the Ministerio de Gobierno (Ministry of Government) of Bolivia and plays a central role in handling assets that are subject to forfeiture throughout the judicial process. These assets often include vehicles, properties, and other items used in or derived from criminal activities.<sup>20</sup>

Maintenance of accurate and up-to-date records of all assets, items, products, or instruments held by the authority is crucial to its function. These records should thoroughly document any changes to the items or their legal status.

The requirements for the registry that the Directorate must maintain are outlined in Article 29 of DIRCABI.<sup>21</sup>

This includes maintaining the following information:

1. Identification of the criminal proceeding that serves as the legal basis for the seizure;
2. A copy of the seizure order;
3. Certificate of provisional filing;
4. A copy of the expert's technical report;
5. A copy of the certificate of receipt;
6. An inventory of the seized assets, specifying their type and condition;
7. Date and time of receipt;
8. Date and time of registration;
9. Name of the person responsible for entering the information into the registry;

The registry must be continuously updated with any judicial or administrative orders regarding the management, incidents, or final disposition of the asset. It is maintained using the online IT software of the DIRCABI and edited throughout the different processes of asset recovery management.

### Indonesia

Indonesia has several institutions that manage confiscated assets and is a good example of a jurisdiction without an integrated database for asset management. These institutions include: the Directorate General of State Assets (DJKN), the Asset Recovery Center (PPA), and the State Confiscated Goods Storage House (Rupbasan).<sup>22</sup>

Each of these bodies has a different asset or confiscated goods management system that is not integrated with each other. In managing confiscated state assets, the DJKN receives semi-annual and annual reports of state confiscated goods from the Attorney General's Office, the Corruption Eradication Committee, and

the Audit Office. The preparation of this report is carried out manually and using a supporting application system. DJKN has a Miscellaneous State Assets Module (KNL) application that can be accessed by DJKN and the Attorney General's Office.<sup>23</sup>

The Asset Recovery Centre, PPA is backed by the Asset Recovery Secured-data System (ARSSYS). ARSSYS contains a collection and database that is also connected to the various law enforcement institutions in Indonesia including the Attorney General's Office and the Ministry of Finance according to their needs.<sup>24</sup>

Meanwhile, Rupbasan also has a state confiscated goods management system, namely the Correctional Database System (SDP). There are other subsidiary provincial databases created for each facility of the Rupbasan, which works on management of state confiscated goods and includes processes for receipt, registration, classification and placement, maintenance, security, transfer, and expenditure.<sup>25</sup>

### Thailand

In Thailand a centralised database is used. The responsible authority for asset recovery, according to the Ministerial Regulation on Anti-Money Laundering Office's Organization of Work, of December 2007, is the Asset Management Bureau (AMB).<sup>26</sup> AMB's duties include drawing up an accounting system for seized or attached property, to store and maintain seized or attached property, and to establish the asset management system.<sup>27</sup>

The AMB utilizes an IT software known as the Consolidated Asset Tracking System (AMCATS) to transparently record and manage all data related to confiscated and seized assets. AMCATS documents key information, including the asset's name, value, associated case, seizure order, storage location, generated income, and maintenance costs. When applicable, it also includes details about the asset's auction

or official use. This software enables AMB to efficiently generate reports and statistics, maintain an inventory, and manage expenses.<sup>28</sup>

### Uzbekistan

In Uzbekistan, multiple institutions are involved in the confiscation, maintenance and disposal of illicit gains. However, the data is managed in a unified database.<sup>29</sup>

The Resolution of the President of the Republic of Uzbekistan dated March 12, 2019, No. PP-4236, as of October 1, 2019, meant that the one of the institutions within the asset recovery regime, the Enforcement Bureau, was mandated to create a unified electronic database where the enforcement documents are stored.<sup>30</sup>

The Enforcement Bureau should receive all the information regarding confiscation orders from the criminal courts. The documents each received a security code for data security and the progress of enforcement can be captured in real time on the system. All documents exchanged between the Bureau and the criminal courts are digitalised.<sup>31</sup>

### ACCESS TO DATABASES

Another important aspect is the persons who have access to the databases to edit and update the information. In different jurisdictions however this works differs widely.

### Bulgaria

In Bulgaria, the civil confiscation regime (forfeiture), is overseen by the Commission on Countering Corruption and Illegal Assets Forfeiture (CCCI AF). Under Article 170 para. 1 of CCFIAPA, the Electronic Register for Secured Assets holds information about assets from confiscation until the end of the forfeiture procedure. The register helps other law enforcement institutions in their work.<sup>32</sup>

While different law enforcement authorities, such as the prosecution services and police, can access the register, only the CCIAF staff can input the data. These institutions send a list of users; the users access a web-based interface and they register themselves. Then the system administrator checks the registration and authorises access. CCCIAF can edit, while external users can read only.<sup>33</sup>

### France

In France, the Agence de Gestion et de Recouvrement des Avoirs Saisis et Confisqués (AGRASC) is the office mandated to recover illicit gains. AGRASC is a unique system such that the public administrative body is directed by a magistrate of the judiciary and has exclusive jurisdiction in the management of seized assets in France.<sup>34</sup>

Access to AGRASC's database is limited to AGRASC staff only. They can log into the system via a web application. The IT company that developed the AGRASC software has limited access for technical maintenance. AGRASC members must have certain security clearances to access the system, and the level of access to all or part of the system is determined by the security clearance.<sup>35</sup>

### Bolivia

In some cases, the responsible asset recovery office also maintains public access through websites and other methods to increase transparency and accountability through public engagement.

Bolivia's DIRCABI is an example of that. It maintains a public website ([dircabi.mingobierno.gob.bo](http://dircabi.mingobierno.gob.bo)), which contains information on the various functions of the DIRCABI and the legal framework of DIRCABI. It also contains important information generated using the databases for the public, including reports and other news. Moreover, the public can also access

auctions in the final process of asset disposal.

# BEST PRACTICES IN MAINTAINING ASSET REGISTERS

Although the international conventions and other regional bodies and interagency networks working on asset recovery have repeatedly urged countries to establish specialized agencies for managing seized and confiscated assets and has discussed their functions, financial sustainability, and operational aspects, it has provided little guidance on the methods for collecting and managing data.

The OAS in its 2014 report Analysis of data collection systems on seized and confiscated assets of illegal origin in OAS Member States provides extensive and detailed recommendations on maintaining asset registers and information systems pertaining to Asset Recovery regimes, while the Payback project cofounded by the Internal Security Fund of the European Union was also able to identify various problems and recommend best practices to information collection and maintenance in asset management systems of EU countries. Using the findings of these reports, along with secondary research on asset recovery offices in various jurisdictions and their asset registry mechanisms, some best practices on maintaining an proper asset register can be observed.

## LEGAL FRAMEWORK FOR INVENTORY SYSTEMS

In every jurisdiction, specific legislation on asset recovery serves as the foundation for asset registers. These laws and regulations must provide specific guidance for asset registration, inclusive of data collection and maintaining inventory. The laws and secondary regulations should provide detailed legal mechanisms for how to collect data, how to preserve it and who has access to it, etc. Embedding asset registration within the legal framework gives authority and legitimacy to the

asset recovery authorities and provides authorities with clear procedures for confiscation and recording and preservation of data.

## CENTRALIZED DATABASE

Centralised and unified databases must cover all the phases of asset management. Centralising helps to ensure that there is no duplication of data and resources and ensures accuracy. These databases must be maintained by legally mandated asset recovery offices. The databases must always have detailed inventory on registered assets in every phase of asset management, including investigation, restraint / seizure, confiscation and disposal.

## USE OF INFORMATION TECHNOLOGY

Use of information technology in the maintenance of the database is necessary for processing large amounts of information accurately and efficiently. Such databases that can store and process information about each asset, such as its description, legal status, financial value, and ownership details can streamline the asset management system and recovery process. These systems allow for real-time updates and ensure that the data remains current throughout the asset's lifecycle.

## DATA ENTRY

Agencies involved in asset management, such as law enforcement, judiciary, asset management entities, and financial authorities, must contribute data to the centralized database. There must be specific guidance on the types of data to be collected, during confiscation, disposal, etc, and the format for submission, and timelines for updating information to ensure the uniformity of data.

## **AUTHORIZED AND SPECIALIZED DATA MANAGEMENT**

There must be specialized trained personnel responsible for data entry and management, with strict access controls to protect sensitive information. The ability to modify the data should be restricted to authorized individuals only to prevent any inconsistencies and inaccuracies. The database should include the ability to log and record all changes made by who made them and when they occurred, to ensure that the system is transparent and secure.

## **SEARCHABLE, TRACEABLE, AND EXPORTABLE DATA**

The database must be designed to support advanced search capabilities. Authorities must be able to retrieve information based on various criteria such as asset type, year, confiscation order, and associated individuals or cases. This is significant for streamlining the use of information for investigative, administrative, and statistical purposes. The data must also be exportable and able to generate statistics needed for policy formulation, public dissemination, etc

## **PUBLIC ACCESS FOR TRANSPARENCY**

Public access to certain data and information on the asset registers is important to demonstrate transparency and accountability. This allows for scrutiny by the public, media and civil society and for the fostering of trust in the system, as well as to discourage mismanagement and corruption. Public access can be facilitated through the dissemination of reports, online websites, and limited access to databases.

## CONCLUSIONS

Asset registration is one of the crucial functions for the effective management of seized and confiscated assets. It is particularly important to maintain up-to-date and accurate information in databases, using information technology for streamlining the process.

The main key factor in successful asset management is the development of a centralized, ICT-based database system that can accurately track, record, and manage asset information throughout the entire recovery process. This is crucial for processing large volumes of data, supporting real-time updates, and enhancing transparency through public access to certain information.

Best practices identified include establishing legal frameworks for inventory systems, using centralized databases, implementing strict data management protocols, and ensuring transparency through public access.

## REFERENCES

- 1 InSight Crime. (2024, September 30). Colombia asset seizures expose \$15 billion financial crime ring. InSight Crime. <https://insightcrime.org/news/brief/colombia-asset-seizures-expose-15-bn-financial-crime-ring/> (accessed on 9th October 2024)
- 2 El Espectador. (2011, June 14). Investigan a posible cerebro de desfalco a la DIAN. El Espectador. <https://www.elespectador.com/judicial/investigacion-a-posible-cerebro-de-desfalco-a-la-dian-articulo-284525/> (accessed on 9th October 2024)
- 3 El Tiempo. (2020, January 29). Más de la mitad de los inmuebles incautados al narcotráfico están invadidos, revela la SAE. El Tiempo. <https://www.eltiempo.com/justicia/conflicto-y-narcotrafico/mas-de-la-mitad-de-los-inmuebles-incautados-al-narcotrafico-estan-invadidos-revela-la-sae-441408> (accessed on 9th October 2024)
- 4 United Nations. (2004). United Nations Convention against Corruption. <https://www.unodc.org/unodc/en/treaties/CAC/> (accessed on 9th October 2024)
- 5 United Nations Office on Drugs and Crime. (2018, November 12-14). Implementation review group: Review of the implementation of the United Nations Convention against Corruption. <https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/12-14November2018/V1807476e.pdf> (accessed on 9th October 2024)
- 6 Ibid, page 10.
- 7 United Nations Office on Drugs and Crime. (2017, August 24-25). Open-ended intergovernmental working group on the prevention of corruption: Conclusions and recommendations. <https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/workinggroup2/2017-August-24-25/V1705952e.pdf> (accessed on 9th October 2024)
- 8 Ibid, page 63
- 9 G8 Lyon/Roma Group Criminal Legal Affairs Subgroup (2005). G-8 best practices for the administration of assets (p. 2). [https://star.worldbank.org/sites/default/files/2023-03/E2\\_G-8\\_Best\\_Practices\\_for\\_the\\_Administration\\_of\\_Assets.pdf](https://star.worldbank.org/sites/default/files/2023-03/E2_G-8_Best_Practices_for_the_Administration_of_Assets.pdf) (accessed on 9th October 2024)
- 10 Financial Action Task Force. (2012, October 19). Best practices on confiscation (Recommendations 4 and 38) and a framework for ongoing work on asset recovery. <https://www.fatf-gafi.org/content/dam/fatf-gafi/guidance/Best%20Practices%20on%20Confiscation%20and%20a%20Framework%20for%20Ongoing%20Work%20on%20Asset%20Recovery.pdf> (accessed on 9th October 2024)
- 11 Organization of American States. (2014). Analysis of systems for the collection of data on seized and forfeited assets of illicit origin in the member states of the OAS. <https://www.oas.org/cicaddocs/Document.aspx?Id=2912> (accessed 09th October 2024)
- 12 Oficina Administradora de Bienes Incautados(OABI). <https://oabi.gob.hn/> (Accessed 9th October 2024)
- 13 Honduras. Congreso Nacional. (2010). Ley sobre privación definitiva del dominio de bienes de origen ilícito. <https://www.tsc.gob.hn/web/leyes/Ley%20sobre%20privaci%C3%B3n%20definitiva%20del%20dominio%20de%20bienes%20de%20origen%20il%C3%ADcito.pdf> (Accessed on 9th October 224)
- 14 Ibid
- 15 Organization of American States. (2014). (n.11), p. 3.
- 16 European Commission. (2018, March 12). Impact assessment accompanying the document proposal for a directive of the European Parliament and of the Council on combating fraud and counterfeiting of non-cash means of payment. <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX%3A52018SC0114> (accessed 9th October 2024)
- 17 Organization of American States. (2011). Asset Management Systems in Latin America and Best Practices Document on Management of Seized and Forfeited Assets. <https://star.worldbank.org/sites/default/files/2023-11/Manual%20Bienes%20Decomisados%20-%20BIDAL.pdf%20-%20Organization%20of%20...%20%281%29-compressed.pdf>
- 18 Bostwick, L., Bartlett, N., Cronje, H., & Abernathy, T. J. III. (2023, December 7). Managing seized and confiscated assets: A guide for practitioners. (p.56) <https://star.worldbank.org/publications/managing-seized-and-confiscated-assets-guide-practitioners> (accessed 09th October 2024)
- 19 Organization of American States. (2014). Analysis of systems for the collection of data on seized and forfeited assets of illicit origin in the member states of the OAS. <https://www.oas.org/cicaddocs/Document.aspx?Id=2912> (accessed 09th October 2024)
- 20 Organization of American States. (2011). Asset Management Systems in Latin America and Best Practices Document on Management of Seized and Forfeited Assets. (p.34) <https://star.worldbank.org/sites/default/files/2023-11/Manual%20Bienes%20Decomisados%20-%20BIDAL.pdf%20-%20Organization%20of%20...%20%281%29-compressed.pdf>
- 21 Ibid, p.55
- 22 Ayuningsih, I. R. (2023). Pengelolaan aset yang dirampas melalui mekanisme non-conviction based asset forfeiture: Suatu perbandingan Indonesia-Thailand [Management of confiscated assets through non-conviction based asset forfeiture mechanisms: An Indonesia-Thailand comparison]. Direktorat Jenderal Kekayaan Negara. <https://www.djkn.kemenkeu.go.id/kawil-lampungbengkulu/baca-artikel/16101/Pengelolaan-Aset-yang-Dirampas-melalui-Mekanisme-Non-Conviction-Based-Asset-Forfeiture-Suatu-Perbandingan-Indonesia-Thailand.html> (accessed on 09 October 2024)
- 23 Ibid
- 24 Ibid
- 25 Ibid
- 26 World Bank. (2009). Stolen asset recovery: A good practices guide for non-conviction based asset forfeiture. <https://issuu.com/world.bank.publications/docs/g780821378908/193> (accessed 09th October 2024)
- 27 Ibid page 189
- 28 Asia-Pacific Economic Cooperation. (2015). Best practices in investigating and prosecuting corruption: APEC handbook. (p.149) [https://www.apec.org/docs/default-source/Publications/2015/10/Best-Practices-in-Investigating-and-Prosecuting-Corruption/APEC-Handbook-Final-September-2015\\_ed2.pdf](https://www.apec.org/docs/default-source/Publications/2015/10/Best-Practices-in-Investigating-and-Prosecuting-Corruption/APEC-Handbook-Final-September-2015_ed2.pdf) (accessed 09th October 2024)

29 United Nations Office on Drugs and Crime. (2023). Management and disposal of confiscated assets. [https://www.unodc.org/roca/uploads/documents/2023/Management\\_and\\_Disposal\\_Confiscated\\_Assets.pdf](https://www.unodc.org/roca/uploads/documents/2023/Management_and_Disposal_Confiscated_Assets.pdf) (accessed 09th October 2024)

30 Ibid

31 Ibid

32 Di Nicola, Andrea, Barbara Vettori, and Marco Angheben. 2018. "Payback: Towards a EU Data Management System for Seized Assets." [http://www.project-payback.eu/pdf/eCrime\\_Research\\_Reports-05.pdf](http://www.project-payback.eu/pdf/eCrime_Research_Reports-05.pdf) (accessed 09th October 2024)

33 Ibid p.10

34 Ibid, p.13

35 Ibid, p.13



