

Use of financial institutions instruments for the legalization of funds

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Abstract—The article based on the analysis of literature and legislation explored the use of various financial instruments, such as accounts opened in banks, both for real and for nominees, loan processing, use of cash desks (currency exchange points) and others. The article also reflect, a number of topical theoretical and practical aspects of the studied issues, such as: the use of a common banking market tool, such as plastic cards that can be used by almost all the actors involved in money laundering, including in illicit drug trafficking. There is also a unified approach to the composition and content of measures to counter the free movement of criminal capital across national borders using the opportunities provided by national banking systems and financial instruments, money transfer systems and other national and international financial institutions.

Keywords—organized crime, legalization of criminal income, depository institutions, operating cash, face accounts, illegal migration, human trafficking, extortion, fraud, counterfeiting, legalization of drug proceeds, drug traffickers, financial institutions of the country, FATF, ASDP

I. INTRODUCTION

Organized crime actively uses traditional methods such as threats and violence to protect and expand its activities, which could disrupt the dynamics of the legal market, resulting in economic instability.

New forms of organized crime have led to an increase in volumes and improved schemes to legalize criminal proceeds. Money laundering is a criminal activity with an international scope. Commercial and financial enterprises that may be involved in this purpose include deposit institutions, [1] operating cashregisters (currencyexchange offices), securities corporations and Real estate. It uses various financial instruments [2] and methods such as the use of multiple accounts, offices and institutions in a single operation to legalize criminal income; forged documents to open accounts; applying to fictitious operating cash registers for bank deposit of large amounts of cash; buying securities through

fictitious accounts; setting up to cover legitimate full-fledged or nominally functioning companies; use of bearer shareholder certificates. In addition, criminals in their illegal activities use such a common financial market tool as plastic cards, which can be used by almost all participants in drug trafficking as buyers and sellers alike. The plastic card account can be opened to a person who is informed about the nature of the money received, as well as to a fake individual. Law enforcement agencies have identified a number of cases of drug traffickers using plastic card accounts, both to accumulate money and to further spend the received funds, including for payments for drugs, as well as payment of goods, services purchased for personal gain. All this makes it difficult to document the investigation, provides for the possibility of illegal transfers of finances abroad and the concealment of their true source. agencies, significant amounts of this kind of cash fall into the main area of cash circulation.

II. MATERIALS AND METHODS

Such a large business as drug trafficking forces the organizers of this type of criminal industry to maintain a high degree of conspiracy to ensure the successful operation of the drug money laundering system. Increasingly, criminal communities are entrusting such tasks to professionals specializing in this matter, which is due to the vital need to find new methods to avoid control by law enforcement agencies, and these methods are becoming more complex [3].

Analysis of the situation allows us to say with a high degree of certainty that the main sources (objects) of legalization of drug profits today in the Russian Federation are:

1. Discos;
2. Wholesale and retail (shops, commercial tents, restaurants, bars, etc.);
3. services, and in it accordingly: intermediary firms; Gas stations; Travel agencies; workshops repairing cars, electronics, etc.; Car wash;

4. Industrial enterprises;
5. commercial banks.

Comparison of domestic sources of drug money laundering with foreign ones indicates a greater similarity.

It should be noted that the specifics of drug groups operating in the Russian Federation, most of which are ethnic and transnational, make it much more difficult to prove the legalization of their income from drug trafficking. Drug dealers do not use cashless payments and Bank transfers such as Western Union, preferring alternative payment systems such as Hawala, which provide cheapness, reliability and complete confidentiality of financial operations [4].

The greatest economic danger is the involvement of Russian drug traffickers in the laundering of criminal proceeds by transnational drug syndicates. This is due to the large volumes of legalized funds, the size of which reaches tens of millions of Dollars. Despite the fact that some of these funds come from drug trafficking in Russia, the legalization process is usually carried out abroad, where accomplices of Russian drug traffickers already have established systems of laundering drug profits. At the same time, well-known schemes of giving a legitimate appearance to legalized funds are used: trusts and investment companies registered in offshore jurisdictions are used; legalized funds are actively invested in luxury real estate in the countries of Europe and America [5].

Equally dangerous is the infusion of criminal money from abroad into the national economy. In this regard, an important area of opposition to the legalization of drug profits is the detection, suppression and disclosure of the facts of laundering in the Russian Federation by foreign nationals participating in transnational drug groups of the proceeds of the drug trafficking obtained abroad. It is no secret that Russia's economy needs foreign investment. In this regard, the Government is making significant efforts to improve the investment climate. Using this, transnational drug groups are investing money from drug trafficking in other countries in the most lucrative sectors of the Russian economy, posing a threat to the country's economic security.

However, thanks to the work of financial control bodies, as well as established cooperation with foreign partners, Russian law enforcement agencies are able to identify and suppress such facts. Thus, in 2013, the internal affairs authorities in criminal cases related to drug trafficking, the actions of the accused in 372 cases additionally qualified under Art. 174.1 Criminal Code of the Russian Federation (legalization (laundering) of money). Currently, criminal cases are in the investigation, for which additional qualifications are planned under Art. 174 Criminal Code of the Russian Federation and art. 174.1 CRIMINAL CODE OF THE RUSSIAN FEDERATION [6].

It should be taken into account that money laundering usually involves evasion of income declaration, tax evasion and/or forgery of documents.

The strategy to combat the legalization of income from the drug industry should be based on the principle of economic incompatibility of legal capital and capital acquired as a result of criminal activities of drug-trafficking organizations and other types of organized crime, which means the fundamental impossibility of coexistence of legal and criminal capitals, their mutual aggressiveness and points to the ultimate goal of eliminating criminal capitalands and capitals of the shadow economy as a financial criminal communities.

The principle of economic incompatibility should be supported by two other principles: counter-activity and expediency. In the first case, it is meant to be adequate to the state's efforts against the influence on the socio-economic and political life of the country of illegally acquired capital. In the second case, it will be necessary in the list of large-scale measures to prevent and suppress the drug trade to choose those nodes in protection from organized crime, which can cause more damage to criminality than the damage done on this operation of human efforts and logistical costs of the state.

III. DISCUSSION

In order to develop unified approaches to the composition and content of measures to counter the free movement of criminal capital across national borders, using the opportunities provided by national banking systems, cash systems transfers and other national and international financial institutions, it is necessary to investigate the financial flows generated by financial transactions in the territories of neighbouring States and the financial flows generated by the financial transactions of the neighbouring states. non-cash transfer of funds. It should be assumed that any transaction with money or other property obtained by criminal means can and should qualify in the criminal process as money laundering.

Financial institutions that carry out cross-border transfers of individuals in a number of states in accordance with national law

People's Republic of China:

Credit organizations.

The international system of transfers such as Western Union, Money Gram...

The Postal Service.

Lithuanian Republic:

Credit organizations.

The international system of transfers such as Western Union, Money Gram...

Postal institutions of the republic.

Armenia:

Credit organizations.

Organizations licensed by the Central Bank of the Republic

Armenia to carry out money transfers that receive money and payments without opening bank accounts.

Belarus:

Credit organizations.

International translation systems such as Western Union, BLYKO,

MoneyGram, Migom...

Postal organizations.

Moldova:

Financial institutions (commercial banks).

The international system of transfers such as Western Union, Money Gram, Web Money etc.

The state-owned company Posta Moldova.

The Russian Federation:

Credit organizations.

International translation systems such as Western Union, BLYKO,

MoneyGram, Migom...

Russia Post.

Ukraine:

Credit organizations.

National licensed and international translation systems such as Western Union, BIKO, Money Gram, Migom...

IV. NATIONAL POSTAL OPERATOR

We see that all of these countries have the same mechanisms and systems for cross-border transfers of individuals. Let us assume that other (primarily alternative) systems do not have a certain legal status and operate outside the legal field, which means that there is no formal authorization and a formal ban on such a Activities. The second (prohibition) plays a key role because, in accordance with the legal concept of the listed countries, everything that is not prohibited by law is allowed.

A comparative analysis of information on national mechanisms for legal regulation of cross-border transfers of individuals indicates that all of these countries have almost identical standards in banking and foreign exchange regulation and counter-money laundering.

The legislative and regulatory framework for cross-border remittances by individuals is defined as a set of

banking and banking laws and banking regulations foreign exchange legislation, and anti-money laundering and terrorist financing legislation.

There are some differences. In particular, in Ukraine, regulation of payment and remittance systems is carried out in accordance with the Ukrainian Payment Systems and Transfer Act, which was developed by the National Bank in September 2007. Ukraine has issued a Regulation on the registration of membership contracts or participation in international payment systems established by resident banks, and harmonization of rules of transfer systems. Only in Ukraine, the regulation of this aspect of the functioning of the national financial services market has been elevated to the rank of the Law.

There are also some differences in national legislation in the regulation of the amount of money for a single transaction that can be transferred to a country. The volume of incoming financial transfers through remittance systems is not limited. As for the special rules governing financial monitoring systems to counter revenue laundering, they are also virtually the same, as most are based on a system of international standards, FATF in the form of 40/9 recommendations.

Perhaps the only aspect seen as a weakness in the legal regulation of this segment of the financial services market is the legislator's "inattention" to the problems of financial control over alternative payment systems such as WebMoney, as well as a complete lack of attention to various virtual gaming and payment systems such as Internet Casino or Internet Money.

We believe it is necessary to give a brief description of the most famous and common system - WebMoney - in order to describe the opportunities it can provide to unscrupulous participants in financial markets and criminals, using it for money laundering purposes. WebMoney is an international alternative "non-bank" payment system. convert to any existing currency at both the entrance and exit of the system. The system has the ability to transfer money to any country (where it exists) both in bank accounts and in cash. It works both as a cash exchange point and cashless for virtual (electronic) money and back. The exception is non-cash funds on credit cards - it is impossible to get money from a credit card into the system, so provided by the security system. At the same time, transferring money from the system to a credit card is a perfectly normal, non-suspicious operation. This system is also an accounting system, as the main means of payment in it today is a virtual transfer bill. Derived. You can put money in your virtual wallet in a variety of ways: bank transfer, postal or telegraph translation, through a system of money transfers (such as Western Union) in cash.

Generally speaking, the WebMoney system can probably be considered as an upgraded version of the famous hawala, which will be discussed below, and its activity depends significantly on the level of intellectual development potential participant. There is no legitimate legal scheme for the web Moneysystem, as we have already noted, in the countries participating in the study

of the problem of cross-border transfers of individuals. operates outside the legal field.

Indeed, such a system (electronic money) provides great opportunities for criminals, without harming the system itself, to money laundering by their completely uncontrolled de-administration, or the free conversion of virtual money into cash, transfer to any country in the world, without explaining the purpose of either changing the shape of assets or non-cash movement. Criminals are free to move virtual currency around the world, mix criminal money with legal, etc. all the classic stages of laundering dirty money, or using funds to pay for black-and-trade goods, direct them to finance terrorism.

All the current state control mechanisms are powerless and unable to detect evidence of money laundering or financing of terrorism using the capabilities of electronic money-based payment systems.

A special "line" in the legal regulatory system is the rules of national legislation on countering the legalization of criminal proceeds and the financing of terrorism (AAP/FT) of a number of EAG member and observer countries, which determine responsibility of financial institutions to monitor the sources of money and operations of public officials, including foreign public officials, as well as relatives of public officials of national jurisdiction. Such rules have been introduced into the legislation of Lithuania, Moldova and China. Russian law currently contains a rule relating to foreign public officials. The issue of officials of the Russian Federation relates to the area of anti-corruption legislation [7].

V. RESULTS

To date, there has been some experience of investigations into the financial activity of individuals on the cross-border transfer channel. The result of this experience is a list of identified signs of suspicion of the international transfer itself, as well as the prior international transfer of financial activities indicating the possible use of cross-border transactions for the purpose of laundering criminal proceeds. The list is presented as the following main signs (indicators) of suspicion.

A. Splitting transactions when using bank accounts

Fear of falling into the sight of law enforcement and financial intelligence causes participants in suspicious financial activities to crush the total amount of transfers of funds outside the national jurisdiction: by time, at the place of the operation, Subjects of translation. The basis for suspicions about the criminal origin of funds transferred abroad is the results of analysis of the totality of operations. For example, (a) transfers from one individual to several in the absence of clear indications of a relationship between the sender and the recipient; b) Transfers from multiple individuals alone in the absence of clear signs of kinship between the senders and the recipient; (c) Making the same type of transfers by one person through different operators; d) regularity in time; (d) The absence of surges in transfer volumes in a series of

transactions (virtually equal amounts), regardless of where, by whom and to whom the transfers are made.

B. The funds transferred belong to members of the same ethnic diaspora

The reluctance of the true owners of criminal income to share with other criminal communities created on the basis of ethnicity, the desire to preserve incognito areas of their criminal activities, to disguise the sources of funds under ordinary economic activities and not falling into the sight of law enforcement agencies and/or financial intelligence, makes them specifically select from their environment professional "launderers". Only those with strong connections in the banking sector who are well aware of the laws and mechanisms of the financial services sector can play such a role in cross-border transfers, which are separated from the extraction process. criminal income and to which law enforcement agencies cannot make claims simply on the grounds that they make regular and substantial international transfers. The basis for suspicions about the criminal origin of funds transferred abroad are the results of the analysis of the totality of transactions carried out by such clandestine bankers not only on the channel of cross-border transfers, but also on the domestic financial market. For example, (a) The small amounts of cross-border transfers of outgoing "domestic" financial transfers indicate possible settlements between community members or the laundering of some funds in the domestic financial market; b) significant sums accumulated in the accounts (accounts) of an underground banker coming to him from the same circle of persons; (c) The transfer of funds to an underground banker in cash into their accounts as a trading proceeds or without identification; d) the regularity of internal transfers to the account of an underground banker, roughly equal to the amount of single transactions.

1. Cross-border transfers by individuals are made to the accounts of individuals or entities in third-country banks known as "transit territories" and "transit banks".

2. Large amounts of regular cross-border transfers on non-commercial payments (donation, material assistance, financial assistance, etc.).

3. The use of goods into the customs territory of national jurisdiction as grounds for payments related to commercial activities.

4. Individuals make international settlements on securities transactions (stocks, bonds, bills, etc.).

5. Revealed during the financial investigation, the fact that participants used cross-border transfers of fictitious identity documents (lost passports, stolen documents).

6. Cross-border proxy transactions.

These signs have been identified, among other things, by singling out the most commonly used by individuals for cross-border banking translation of the wording of international transfer payments. Individuals who come from national jurisdiction and its territory

use the same type of translation sign, which more or less identifies the purpose of the transfers. This is a private transfer (Private transfer), gift, financial assistance, transfer of own funds (restocking, non-resident income, etc.), salary, investment/dividends, provision/repayment of the loan, contract, payment of goods/ services, insin:

The types of economic activity most commonly used by individuals to possible camouflage the actual sources of income channeled abroad through the cross-border transfer channel, depending on the legal system, traditions of national jurisdiction, conditions of economic activity of individuals are: provision of various types of services, construction, wholesale and retail trade (including border trade), production of various types of agricultural other types of private enterprise that are not prohibited by national law.

In addition, the so-called "illegal migration" - individuals illegally located in the territory of national jurisdiction - is a significant problem. For cross-border outbound money transfers, this category of persons is usually used by operators of clandestine banking business. The latter, in turn, have wholesale trade or other non-prohibited economic activities as a cover for illegal banking activities, which are not actually engaged. As part of this activity, criminally acquired capital is mixed with money of legitimate origin. Separating legitimate and criminal proceeds is a very complex task, requiring a thorough financial investigation of each situation that has raised suspicion of law enforcement and/or financial intelligence.

Transit cross-border financial flows are another problem. The development of approaches to this problem depends in large part on the level of international cooperation, which includes constant information exchange, international investigations and other types of cooperation.

First of all, it should be noted that cross-border transfers of individuals and the financial flows they form risk areas of the following types:

1. The risk of involving the country's financial institutions in the international circulation of proceeds of crime and, as a result, the application of international sanctions against that country, undermines the international authority of the state.
2. Risk of undermining public and business confidence in the country's financial system.
3. Risk of reproduction, increasing economic and political influence of organized crime
4. The risk of reducing the effectiveness of management in the field of foreign economic activity and destabilizing the system of external debt management.
5. The risk of turning the cross-border transfer system into an effective channel for financing terrorist activities in various countries and laundering criminal capital earned in the course of committing particularly

dangerous international crimes - drug trafficking, international arms trade, etc.

According to experts, the effectiveness of financial monitoring of transactions related to non-cash cross-border transfers of funds by individuals is currently about 18-20%. In other words, Russian financial intelligence "sees" about 20% of all cross-border transactions of individuals. This represents a visible (on operations to be monitored) the volume of cross-border transfers (incoming and outgoing) of approximately US\$ 8 billion.

In accordance with Russian law, as well as with the laws of many other countries, in the framework of primary monitoring, cross-border operations of individuals are assessed mainly for signs of suspicion, because there are very few criteria for selecting such operations under mandatory controls. This suggests that the quality of the internal control services of financial intermediaries in the implementation of basic domestic programmes plays an important role in the system of detection of cross-border transactions that are worthy of financial intelligence. Control.

In other words, the problem of cross-border transfers of individuals (or involving individuals) takes on the traits of a complex problem affecting the various aspects of the functioning of the entire national anti-money laundering system and related financing of terrorism. Improvements require both special measures to regulate the activities of all participants in the national system of such opposition, as well as legislative and other regulatory regulation of financial services markets. However, special measures taken under the Anti-Money Laundering and Terrorism Financing (FTA) legislation should be given priority here. Other measures, in particular tightening the rules of regulation of financial market participants, can lead to the opposite effect, complicate the financial and economic activities of conscientious participants and their relations with the state and society.

VI. ALTERNATIVE REMITTANCE SYSTEMS (ARS/ASDP)

According to FATF terminology, the ASDP refers to the *money/value transfer system (MVT/SPD)*. one location and the corresponding amount is paid in cash or in another form to the beneficiary elsewhere by sending a message, transferring or through a network of mutual settlements, to which the money/value transfer system [8] refers. *While the LDS as a whole actually covers the full range of financial services used to transfer money, from banks to systems operating entirely or partially outside traditional banking channels, the ACDC concerns financial services to transfer money carried out only outside traditional banking channels [8].*

While the ASDP mechanism may be complex, the modus operandi works very much in the way the Majority of THE ADAs works, similar to those used by traditional banks to transfer funds.

The ACDC can safely exist outside the banking system due to a number of advantages, including

mainly cultural traditions, accessibility, absence of class discrimination, cost and speed. Most ASDPs transfer money at a lower cost and in a shorter period of time. Some ASDMs may provide services where there are no traditional banking channels (at the location of the sender and/or recipient). In countries with a high proportion of immigrants, immigrants are always more trusting, especially when the person providing money transfer services belongs to the same ethnic or immigrant community. Some customers may even use the ASDW without compliance with the requirements of customer identification and proper verification procedures (NPCs) to avoid attracting the attention of the authorities. The reasons for encouraging people to use the ACDC vary considerably because of the vast variety of their species.

UN statistics show that there are 200 million immigrants and foreign workers who need cross-border remittance services. The ACDC is one of the main channels for money transfer, especially in developing countries. It is projected that, as a result of the increasing involvement of these countries in globalization, it is reasonable to expect that the market share of the ACD will decline in the coming decades.

The ways in which the ACDC is regulated in different jurisdictions differ significantly. At one end of the range there are countries that require a banking license for all institutions that transfer money, and at the other there are no regulatory requirements for the ASDP at all. The vast majority of countries are between these two extremes and apply a certain regulatory regime to those who make remittances outside the banking sector.

VII. ASDP IN THE EURASIAN REGION

Thanks to its participation in the international financial system, the region is undoubtedly a major and expanding market for international remittances. The Eurasian region is one of the main suppliers not only of the labour force working abroad, but also of sources of immigration. It is well known that remittances made directly by people depend on the migration activity of the population.

The ASDP operating in the Eurasian region is mainly in the following categories:

1. Franchise multinational companies;
2. Franchise national companies;
3. ACDC hidden inside another company;
4. hidden ASDP.

VIII. ASDP IN RUSSIA

It is well known that remittances made directly by people depend on the migration activity of the population. In Russia, after the collapse of the Soviet Union and the creation of the Russian Federation and to the population of the country increased, only due to officially registered migrants, by 7.6 million people, which is 5.3% of the population. has also increased. 2004 rIn this regard, in recent years the remittance

market in Russia has been characterized by steady growth.

The main countries from which remittances are made to Russia are: the United States, Germany, Italy. At the same time, remittances sent from Russia significantly exceed the corresponding revenues. The resulting negative remittance balance, which has been steadily increasing in recent years, demonstrates Russia's great role in providing employment for countries with lower economic potential. According to remittance systems and the Russian Postal Service, the bulk of remittances from Russia are to Ukraine, Uzbekistan, Tajikistan, Armenia, Azerbaijan, Georgia and Moldova.

As for incoming flows, the most significant funds come in the form of pay, as Russia is an exporting country for highly skilled professionals to developed countries.

The vast majority of registered cross-border transfers of individuals in the Russian Federation are accounted for by official (licensed) international and Russian remittance systems. Major international operators were among the first to enter the Russian remittance market. A wide network of customer service points around the world has enabled them to quickly gain a significant share of the Russian market. Most Russian systems have been formed in the last few years. Almost all Russian market operators were formed on the basis of credit organizations, which became their settlement centers.

A fairly wide network of branches and bank branches served as the basis for the formation of the largest Russian systems. Currently, 15 remittance systems operate in the Russian Federation: Anelik, Contact, Inter Express, Migom, MoneyGram, PrivatMoney, Ria Envia, STB-Expres, Travelex Worldwide Money Ltd, UNIStream, VIP Money Transfer, Western Union, Fast Mail, Guta Sprint, Golden Crown. In addition to these systems, cross-border remittances of individuals are carried out by credit organizations licensed by the Bank of Russia to conduct foreign currency transactions.

Procedurally, transactions to transfer money through alternative systems differ little from bank transfers. However, the latter have so far had a lower rate of translation and less geographical coverage. All transfers through systems, as well as bank transfers, are characterized by a high degree of transparency. Information on most systems is regularly published in the media: their tariffs, delivery speed, service points and performance.

Postal transfers are another official channel for transferring money. In accordance with Russian law, they are carried out by the Federal State Unitary Enterprise " Russian Post. Among the main advantages of this type of transfers are: the large number of post offices available in areas where there are no banking organizations, as well as high public confidence in this organization as a result of long-term period of its

existence and development, during which postal service was the only way to carry out translations.

At the same time, in the case of the Russian specifics, it is possible to speak mainly not about illegal systems of alternative remittances, but about informal ways of transferring money from migrant workers from Russia to their families abroad.

Informal ways of transferring money include:

1. imports (exports) of cash through migrants themselves or authorized persons (e.g., the earnings of several migrants are transferred to one authorized migrant who returns to his home country);
2. transporting cash through transport workers (drivers, train conductors).

The practice of transferring money through relatives and acquaintances is especially popular within the national diaspora. Citizens of the countries of the Caucasus, Central Asia and Ukraine often use this method.

The main reasons for the use of informal means of transferring money to migrant workers are:

3. lack of documents necessary to carry out the transfer (most temporary illegal migrants);
4. distrust of banking services due to poor knowledge of banking procedures;
5. difficulties in communicating with bank operators related to poor knowledge of Russian by migrants and low literacy.

Also, a significant reason for the use of informal means of transferring money by migrant workers is the high enough commission charged by international remittance systems.

Thus, the informal methods of cross-border transfer of funds discussed above are subject to the IX Special Recommendation of FATF (cash couriers) and are therefore subject to control in accordance with its provisions.

IX. REGULATION OF THE ASDP IN RUSSIA

In Russia, organizations must obtain licenses before making remittances to their clients. Remittances are subject to Federal Law No.115-FH "On countering the legalization (laundering) of proceeds of crime and financing of terrorism," as well as the 40-9 recommendations of FATF. Remittance organizations must ensure mandatory internal monitoring, identification of customers, submit to the authorized authority (Rosfin monitoring) information on mandatory monitoring and suspicious to comply with the deadlines for storing the record-keeping of operations.

Thus, unlicensed money transfer systems in the Russian Federation, in accordance with the classification given in the "FATF Typologies for UP/FT 2004-2005", fall into the category of "illegal". Compliance with the above standards is ensured by the

constant monitoring provided by Rosfin monitoring, the Bank of Russia and law enforcement agencies.

X. CONCLUSION

The variety of illegal financial schemes is amazing. In order to carry out a large-scale illegal operation with weapons, drugs or other criminal goods, criminals usually pay for it first, and finances can be transferred through highly respected organizations, including branches of national Banks. The criminal, having made a criminal transaction, can make payment through an underground "banker" similar to the previously described method, but there are options when he does not need to send money abroad. And here for him the need to maintain anonymity becomes the dominant one. In this case, an underground "banker" in the interests of the criminal can make any financial transactions in branches of legal credit and financial institutions, using the entire set of banking services, without naming their clients.

Such clandestine "banking" operations have a negative impact on the development of the criminal situation, negatively affect the political stability and development of the economy of states. In these circumstances, it is clear that traditional ways of state financial control are ineffective in this case. The real tool by which it is possible to detect latent crimes of an economic nature is operational and investigative activities.

Given that these types of crimes are at the intersection of the interests of various state structures (financial intelligence, tax authorities, individuals, drug control, security, etc.), information about them requires its comprehensive working out together. At the national level, inter-agency approach is crucial.

Given the transnational nature of this criminal phenomenon, significant progress in the fight against it can only be expected by raising international cooperation in this area to a proper height. It is extremely important to organize a systematic exchange of relevant operational and analytical information, as well as modern methods of identifying, documenting and investigating these crimes. It seems that on the basis of generalization of data on clandestine financial and financial structures in the near future it is possible to conduct joint international operations to expose fraudsters. Such collective measures can have a devastating impact on the economic component of terrorism and transnational organized crime.

In the organization of the fight against ethnic crime it is necessary to take into account not only the socio-economic conditions in which it develops, but also the ethno-psychological and social characteristics of peoples and nations, their religion, language, culture, etc. Effective work in this area is not possible without the close cooperation of law enforcement agencies with the financial intelligence units (PFI), which has some experience in the area in question and has significant Potential.

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