COUNTERING THE FINANCING OF TERRORISM

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ABSTRACT. Development of the global network and other key elements of the systems of countering the financing of terrorism in the Russian Federation.

In this article authors explore the global network and other key elements of the systems of countering the financing of terrorism in the Russian Federation in respect of the aspect of increasing the efficiency of its functioning. They analyze the key problems of anti-terrorism legislation of the Russian Federation and trends of their implementation at both international and national levels.

In the article the authors note that combating the financing of terrorism, including criminal law measures, is considered as one of the most important tools for combating terrorism in general. That’s why the introduction in the criminal legislation of Russian Federation of such type of the crime as «Contributing to Terrorist Activity», which provides for the financing of terrorism as an alternative act, is not accidental.

The article analyzes the key issues of the compliance control of countering the financing of terrorism in the Russian Federation. It particularly examines the problems of observance of human rights in the implementation of the financial institutions in the Russian Federation in respect of the financing of terrorism.

KEYWORDS: financing of terrorism, freezing of terrorist assets, the recommendations of the FATF, FATF STANDARDS and next round of mutual evaluations, the international sanctions, compliance controls to counter the financing of terrorism.

INTRODUCTION

Terrorism poses a threat to international peace and security, development of friendly relations between countries, preserving territorial integrity of the countries, their political, economic and social stability, as well as the exercise of fundamental human and civil rights and freedoms, including the right to life [1].

International community, realizing the danger of terrorism and seeking to develop effective measures to prevent it, has adopted a number of documents, including the United Nations conventions (for example, the International Convention against the Taking of Hostages, the International Convention for the Suppression of Terrorist Bombings, the International Convention for the Suppression of the Financing of Terrorism), the Shanghai
Convention on Combating Terrorism, Separatism and Extremism, the Council of Europe Convention on the Prevention of Terrorism, and others.

The international documents state that terrorism under no circumstances can be justified by considerations of political, philosophical, ideological, racial, ethnic, religious or other nature, and persons guilty of committing acts of terrorism and other crimes provided for by the abovementioned conventions should be held liable in accordance with the law and they should be punished in accordance with the gravity of the crimes committed. At the same time, measures to prevent or suppress such crimes should be taken while respecting the rule of law and democratic values, human rights and fundamental freedoms, as well as other provisions of international law.


The problems of financing in the field of countering terrorism are divided into two main groups of problems, belonging to which is determined, first of all, by understanding of the scope and content of countering terrorism.

The first group of problems of financing includes all activities related to the forecasting, prevention and countering the threats of terrorism in traditional areas of human activity, as well as the readiness of managers and specialists of organizations and departments directly involved in counterterrorism activities and enterprises of any form of ownership to respond adequately and in a timely manner to unpredictable and unexpected threats of terrorists. Each country solves these problems depending on the understanding by the governing body and public of the significance of the threats of terrorist acts and financial abilities of this country.

As for the problems of the second group, they include preventive measures which are necessary but do not have quick effect, as they are solved in the economic and social spheres of countries, peoples and entire continents.

At the national level, the FEDERAL LAW ON COUNTERING THE LEGALIZATION (LAUNDERING) OF INCOME RECEIVED IN CRIMINAL WAY AND THE FINANCING OF TERRORISM [2] is also a legislative base, on the basis of Art. 3 of it the financing of terrorism is defined as the provision or collection of funds or provision of financial services with the knowledge that they are intended to finance organization, preparation and commitment of at least one of the crimes provided for by articles 205, 205.1, 205.2, 205.3, 205.4, 205.5, 206, 208, 211, 220, 221, 277, 278, 279, 360 and 361 of the Criminal Code of the Russian Federation, or for financing or other material support of a person aimed at committing at least one of these crimes, or to provide an organized group, an illegal armed group or a criminal association (criminal organization) created to commit at least one of these crimes.

In 2005, the Federal Service for Financial Monitoring was established in the Russian Federation [3], where the Office for Counteracting the Financing of Terrorism operates. The current and effective documents of the President of the Russian Federation include, first of all, the Decree of the President of the Russian Federation as of June 13, 2012 No. 808 “Issues of the Federal Service for Financial Monitoring”. Thus, Regulation 1 of this document specifies that Rosfinmonitoring (Federal Service for Financial Monitoring of the Russian Federation) is a federal executive body that performs functions to counteract the legalization (laundering) of incomes received in criminal way, financing of terrorism and financing the spread of weapons...
of mass destruction, to develop public policy and statutory regulation in this area, to coordinate the relevant activities of other federal executive bodies, other state bodies and organizations, as well as the functions of a national center for assessing threats to national security arising from the performance of transactions with funds or other property, and to develop measures to counter these threats. This document, essentially, grants the structure of Rosfinmonitoring an unlimited range of rights and powers to control any movement of funds between legal entities and individuals, has supervisory and monitoring functions, requests any information on transactions (in accordance with the established procedure), and carries out its own qualification, that is, it gives a legal assessment of financial transactions as those having signs of a crime, as well as adopts its own regulations, blocks accounts of organizations, together with the Central Bank of the Russian Federation generates lists of unreliable contractors, impose other sanctions.

The next stage in the development of countering to the financing of terrorism was the draft law No. 46 as of July 6, 2016 (beginning of action of the edition as of December 21, 2016). After analyzing the innovations, we see that the legislator introduced a change related to the mandatory establishment of beneficial owners of legal entities. Thus, Article 6 was amended by Article 6.1 - Obligations of a legal entity to disclose information about its beneficial owners. This amendment obliges legal entities: to have information about their beneficial owners, to establish them, regularly, but at least once, to renew and document the information received. As well as to keep information about their beneficial owners and about the measures taken to establish information about them. The received and documented information, or information about the measures taken to establish information about its beneficial owners, the legal entity is obliged to transmit, upon the request, to the authorized body, tax authorities or other federal executive body authorized by the Government of the Russian Federation.

In accordance with the provisions of the second paragraph of clause 2 of Article 6 of the Federal Law as of August 7, 2001, No. 115-FZ “On Countering the Legalization (Laundering) of Income Received in Criminal Way and Financing the Terrorism” (hereinafter - Federal Law No. 115-FZ) and the Rules for definition of the list of organizations and individuals for whom there is evidence of their involvement in extremist activities or terrorism and informing this list to organizations that carry out transactions with money or other property and individual entrepreneurs, approved by the Decree of the Russian Federation as of June 08, 2015, No. 804 (hereinafter - the Rules), the Federal Service for Financial Monitoring generates a list of organizations and individuals in respect of which there is evidence of their involvement in extremist activities or terrorism. At the website of Rosfinmonitoring, there is an official list consisting of Russian and foreign legal entities and individuals for whom there is evidence of their involvement in extremist or terrorist activities. As of July 19, 2017, this list consists of 7,524 individuals of the Russian Federation and 87 legal entities, as well as 411 foreign individuals and 91 foreign legal entities. The indicated legal entities and individuals are included in this list only on the basis of information from state authorities. This information contains data on the grounds provided for in clauses 2.1 and 2.2 of Article 6 of the Federal Law “On Countering the Legalization (Laundering) of Income Received in Criminal Way and the Financing of Terrorism,” as well as for the purpose of “leveling out risks”. Having analyzed this list of Russian and foreign legal entities, it can be concluded that over 80 percent of all organizations recognized by the state as involved in terrorist and extremist activities are represented by either non-profit, radical religious organizations or legal entities specially created to finance terrorist organizations, which are part of the ISIL structure. Often, such organizations did not hide their purpose,
which can be seen from the names of legal entities containing terms such as: AlKaeda, Jihad, Jamaat and similar.

In February 2017, Rosfinmonitoring within the framework of providing the transparency of public service, declared the main goals and objectives. So, in accordance with the strategic goal of countering the financing of terrorism and Financing the spread of weapons of mass destruction, it is proposed to solve several problems. The most important are: expansion of the system of resistance to and prevention of the financing of terrorism, improving the process of monitoring the risks of financing the terrorist activities of non-profit organizations, as well as improving the works aimed at countering the financing of ITO ISIL and other international terrorist organizations.

Also, together with Rosfinmonitoring, the Central Bank of the Russian Federation (hereinafter - the Bank of Russia) makes a list of unreliable customers. In practice, financial relations with individuals and organizations included in the list of “unreliable” are terminated, banks are prohibited from making financial transactions with such organizations, accounts of such organizations can be frozen. The information provided allows us to conclude that openness of the measures to counter the financing of terrorism and the open publication of such results is an effective measure in the fight against the terrorism.

Thus, countering the financing of terrorism is an independent direction of financial monitoring, which involves several specific procedures for clients and transactions which they conduct.

Among the procedures aimed at countering the financing of terrorism, first of all, it is necessary to note the responsibility of a financial monitoring agent when identifying customers/beneficiaries to check them for coincidence with the List of terrorists and extremists.

The financial monitoring agents, when identifying customers and their beneficiaries, compare the identity details of the customers/beneficiaries (legal entities and individuals), as well as the founders and managers (sole executive body) of the legal entity with the List of terrorists and extremists.

It should also be noted that in order to classify an operation or transaction as an operation related to the financing of terrorism, a complete matching the identity details of a person with the details specified in the List of Terrorists and Extremists is required.

The grounds for including an organization or individual in the said List are:
— entered into legal force decision of the court of the Russian Federation to liquidate or ban the activities of the organization regarding its involvement in extremist activity or terrorism;
— entered into legal force verdict of the court of the Russian Federation on finding the person guilty of committing at least one of the crimes provided for in articles 205, 205.1, 205.2, 205.3, 205.4, 205.5, 206, 208, 211, 220, 221, 277, 278, 279, 280, 282, 282.1, 282.2 and 360 of the Criminal Code of the Russian Federation;
— decision of the Prosecutor General of the Russian Federation, subordinate to him/her prosecutor or federal executive body in the field of state registration (its respective territorial body) to suspend activities of the organization in connection with their application to the court with a claim to hold the organization responsible for extremist activity;
— procedural decision to find a person suspected of committing at least one of the crimes provided for in Articles 205, 205.1, 205.2, 205.3, 205.4, 205.5, 206, 208, 211, 220, 221, 277, 278, 279, 280, 282, 282.1, 282.2 and 360 of the Criminal Code of the Russian Federation;
— decision of the investigator to involve a person as defendant for commitment at least one of the crimes provided for in Articles 205, 205.1, 205.2, 205.3, 205.4, 205.5, 206, 208, 211, 220, 221, 277, 278, 279, 280, 282, 282.1, 282.2 and 360 of the Criminal Code of the Russian Federation;
— lists of organizations and individuals associated with terrorist organizations or terrorists compiled by international organizations fighting against the terrorism or bodies authorized by them and recognized by the Russian Federation;
— recognized in the Russian Federation in accordance with international treaties of the Russian Federation and federal laws, sentences or decisions of courts and decisions of other competent bodies of foreign countries regarding organizations or individuals engaged in terrorist activities.

Inclusion of an individual or legal entity in the List of terrorists and extremists does not entail the duty of the financial monitoring agent to refuse to provide any services, including financial services. At the same time, for the purposes of managing the risk of involvement in the legalization (laundering) of criminal income and financing of terrorism, the acceptance for servicing such a client/beneficiary entails the mandatory assignment of a high level of risk of involvement in the legalization (laundering) of criminal income or the financing of terrorist activities.

The procedure for determining and bringing to the knowledge of financial monitoring agents the List of terrorists and extremists is governed by Decree of the Government of the Russian Federation as of January 18, 2003 No. 27 “On Approving the Regulation on the Procedure for Determining the List of Organizations and Individuals Regarding Which There is Information on Their Participation in Extremist Activity, and Bringing This List to the Knowledge of Organizations that Carry Out Transactions with Money or Other Property” [4]. At the same time, information on organizations and individuals included in the said List shall be posted on the Internet on the official website of the authorized body and published in official periodicals determined by the Government of the Russian Federation.

The duty of the financial monitoring agent is to implement measures to freeze (block) money or other property immediately, but not later than the next working day from the date of posting on the official website of Rosfinmonitoring the information on inclusion of an organization or individual in the List of terrorists and extremists or from the day of posting on the Internet on the official website of the authorized body the decision on application of measures to freeze (block) money or other property, owned by the organization or individual in respect of whom there are reasonable grounds to suspect their involvement in terrorist activities (including the financing of terrorism) if there are no grounds for their inclusion in the List, to inform immediately Rosfinmonitoring of the measures taken [5].

The activity of Rosfinmonitoring [6] in counteracting the financing of terrorism in 2015 was carried out in the context of external challenges and threats, primarily from the international terrorist organization “Islamic State of Iraq and the Levant” (hereinafter - ISIL), including its propaganda and organizational activities at the territory of the Russian Federation.

As a result of cooperation with law enforcement agencies, over 7.7 thousand financial investigations were carried out. At the same time, over 3,500 people were checked for cooperation with international terrorist organizations, including ISIL.

Also, extension of the List of organizations and individuals for whom there is evidence of their involvement in extremist activities or terrorism (which we already mentioned above) can be considered as the result of this cooperation in 2015.
In 2015, 3,019 accounts of persons involved in the List were frozen for a total amount of about 37 million rubles.

Within the framework of a comprehensive solution of the issues for countering the financing of the terrorism, an active interdepartmental interaction continued in 2015, primarily through various coordinating bodies (the Security Council of the Russian Federation, the National Antiterrorism Committee, and various interagency working groups). There were consultations with the private sector on strengthening monitoring of transactions related to the risks of financing the terrorism. The “matrix of indicators” developed by the financial intelligence to improve the quality of work of organizations aimed at identifying the risks of financing the terrorism was presented to representatives of financial institutions.

The approach proposed by Rosfinmonitoring implies systematization of identifiers along the directions: processes associated with formation of radical ideology (centers of radical propaganda, recruiters, informal groups, NGOs, religious centers, etc.), directly terrorists (acting and joined) and their environment, terrorism sponsorship economics (legal and shadow - oil, weapons trade, kidnapping, etc.). The profile of a suspicious transaction proposed by the financial intelligence contains clear criteria for determining the degree of “suspicion” of a client, considering geography and used payment instruments.

At the international level, the work to suppress financial support of terrorists was created within the framework of joint efforts with foreign partners - both through the FATF, EAG (FATF-type regional group), Council of the Heads of Financial Intelligence Units of the CIS (CHFIU CIS), the Egmont Group, BRICS and through the constant broadening of cooperation with foreign financial intelligences.

Rosfinmonitoring experts contributed to the FATF research “Sources of ISIL funding”, the report on the results of which was adopted at the plenary session of the Group in February 2015. In particular, the document includes the materials of the Russian financial intelligence disclosing the typology of financing ISIL using non-profit organizations and collecting donations through the Internet.

The proposals put forward by the Russian Federation during the FATF emergency session which took place in Paris in December 2015, it is worth mentioning the call to focus global efforts on suppressing the financing and provision of any material aid to ISIL, ensuring compliance with the relevant provisions of the UN Security Council Resolution 2199. This, above all, implies a proposal to include in the FATF standards new binding paragraphs of this resolution, which are aimed at combating ISIL and contain several fundamentally new issues which were not previously covered. Russian financial intelligence suggested adding a new term to the FATF glossary – “economic resources”, which can be transferred or used by terrorists, and provide for their freezing. Resolution 2199 contains a detailed definition of these resources, which include oil, products of its processing, other natural resources and any other assets that can be obtained with their help.

In addition, Russia intends to seek application of harsh measures to financial institutions, consciously violating the sanctions regime. The resolution prescribes the adoption of effective measures to block the access of ISIL to the international financial system. In this regard, the Russian Federation intends to require that financial institutions establish clear obligations to identify and suppress the attempts to use them by ISIL to obtain or transfer income from the sale of the resources which are subject of freeze, receipt of donations, purchase weapons and carrying out any financial transactions.

An important aspect of the position of Russia is the intention to oblige international community to criminalize trade with the “Islamic State”. Introduction of the concept of
“terrorist financing crimes” in the criminal codes of the FATF member countries will allow considering the purchase and sale of “terrorist” oil as a conscious act of sponsoring ISIL.

Rosfinmonitoring intends to further strengthen its efforts in the overall fight against the terrorism: to identify new sources and channels of financing of ISIL, to develop measures for their suppression, paying special attention to the training centers for terrorist and their financing [6].

Russian researchers of problems connected with the financing of radical organizations that conduct terrorist activities or use terrorist methods in armed struggle note that studying this problem is not an easy task. It is complicated many times when it comes to radical Islamic groups. One of the most acute problems was their financial self-sufficiency. In the past, radical groups that used terrorist methods represented relatively marginal forces and needed constant supply from any country. Now, modern transnational terrorist networks have successfully switched to self-financing and have stable sources of obtaining their own funds. It is caused by the significant role of a religious component of their ideology, organizational structure, daily activities and financing itself [7].

The system of financing Islamic groups, including radical groups, was not formed under the influence of random circumstances, but to a considerable extent was a derivative of their ideology. The basis for financing the majority of radical Islamic groups is income, initially received as religious donations. After the end of the Cold War, religious and political organizations, especially Islamist ones, had a more stable financial base than all secular groups with nationalist, leftist or any other orientation. Moreover, Islamist associations (for example, Hamas in the Palestinian territories) enjoy the reputation of organizations that are less corrupt than any others.

It is natural that at the national level the Russian Federation imposes criminal responsibility for the financing of terrorism - Article 205.1 of the Criminal Code of the Russian Federation - Assistance to terrorist activities. Part 4 of the regulation under consideration establishes criminal responsibility for organizing the financing of terrorism, which is punished by imprisonment for a term of fifteen to twenty years, with custodial restraint for a period from one to two years, or life imprisonment. On the basis of paragraph 1 of the note to this regulation, under the term financing the terrorism, this Code means the provision or collection of funds or provision of financial services with the knowledge that they are aimed at financing the organization, preparation or commitment of at least one of the crimes provided for in Articles 205, 205.1, 205.2, 205.3, 205.4, 205.5, 206, 208, 211, 220, 221, 277, 278, 279 and 360 of this Code, or at financing or other material support of a person for the purpose of committing at least one of these crimes, or at supply of organized group, illegal armed formation, a criminal association (criminal organization), established or being established to commit at least one of these crimes.


Paragraph 16 of the Resolution of the Plenum of the Supreme Court of the Russian Federation as of February 9, 2012 No. 1 of Moscow “On some issues of judicial practice in criminal cases of a terrorist nature” Financing of terrorism should comprise provision of financial services, supply or not only collection of funds (in cash or cashless form), but also material assets (for example, items of uniforms, equipment, means of communication) with the knowledge that they are intended to finance organization, preparation or commitment at
least one of the crimes provided for in articles 205, 2051, 2052, 206, 208, 211, 277, 278, 279 and 360 of the Criminal Code of the Russian Federation, or to provide an organized group, an illegal armed group, a criminal association (criminal organization), created for the commitment of at least one of the specified crimes (for example, systematic deductions or a one-time contribution to the general fund, purchase of real estate or payment of its rent, provision of funds intended for bribing officials).

With regard to the problem of financing the counteraction of terrorist activities, the events in the Pankisi Gorge, the gorge in the north of Georgia, located in the Akhmeta municipality of Georgia in the upper Alazani river, cause the greatest concern for society at the regional level. The gorge is located at a distance of 60 km parallel to the Georgian-Russian border, and is separated from it by a mountain range. The length of the gorge is 28 kilometers, width - about five kilometers.

In the Pankisi Gorge, mostly Kistinians live - the so-called Chechens from Georgia, who are descendants of immigrants of the 16th-19th centuries. There are also Georgian and Ossetian settlements. In the 1990s, refugees from Chechnya who left it during the First Chechen War settled here. As of February 2008, about 600 refugees from Chechnya lived in the Gorge. As of June 2000, there were about 6,500 people [8].

During the Second Chechen War, along with civilians, militants including detachments of Ruslan Gelayev took refuge in the gorge. By the midsummer of 2004, by efforts of Georgian special forces and the Russian Federal Security Service, the Pankisi Gorge was completely cleared of members of the military groups. But despite this, the militants continued to use the Pankisi Gorge as their base until August 2008, [9] when during the war some part of them were killed, and other left for the territory of Dagestan and Ingushetia [10].

Leaders of international terrorist organizations are interested in destabilizing the situation in the North Caucasus. “The programs of international terrorism suppose destabilizing the situation in the region, which they (international terrorists) are engaged in,” Y.B. Yevkurov said [11].

According to different data from 50 to 200 residents of the Pankisi Gorge went to fight as part of the Islamic State militants in 2012-2014. On January 26, 2016, the Head of the Ministry of Foreign Affairs of the Russian Federation said that Russia had information that the illicit Islamic State group used the Pankisi Gorge in Georgia in its own interests. This statement was made by the Head of the Ministry of Foreign Affairs of Russia Sergei Lavrov at the press conference. However, this statement was not confirmed later, on January 30, the US Ambassador to Tbilisi Jan Kelly and Georgian President Georgiy Margvelashvili visited the Pankisi Gorge, where they talked with local residents. The Georgian leader did not comment on the statement of Lavrov. The American diplomat said: “The United States very closely cooperate with Georgia in the fight against terrorism. Once again, I want to note that there is no terrorist base in Pankisi” [12].

According to news agencies [13], the fight against the terrorism is the main priority of the Service of State Security of Georgia, established in 2015. The report of the Head of the Service of State Security of Georgia states that the SSS constantly exchanged with agencies of partner countries information of members of the terrorist organizations and/or those wishing to move by transit.

“Georgia does not belong to the countries with high risk of terrorist attack, but there are certain challenges in this direction. The “Islamic State” and other extremist groups have acquired a certain number of supporters in certain regions of Georgia. Propagators of radical ideology try to take advantage of religious views and little public awareness”, the report says.
The Service of State Security constantly fights against the spread of influence of terrorists and in 2016 it took a series of measures aimed at identifying individuals associated with terrorist organizations, as well as the facts of possibility of using Georgia for transit to Syria and Iraq for fighting on the side of terrorists.

During 2016 the Service of State Security actively worked to identify the facts of financing of terrorist organizations and their interests under the cover of business and charitable organizations.

“We revealed up to 20 foreign citizens who founded legal entities involved in the suspicious financial activity. On July 2, 2016, the criminal prosecution of a Georgian citizen was initiated under part 1 of Article 331 of the Criminal Code, which implies the financing of terrorism,” the report says.

CONCLUSION

Despite these statements, no matter how much Georgian authorities assure that the “Chechen” section of its border is closed, it is from there that during fifteen years terrorists in the North Caucasus are being supplied by militants and ammunition. Russian counterintelligence has repeatedly recorded contacts of the intelligence and the Ministry of State Security of Georgia with Chechen extremists and military leaders (meetings took place in the village of Duisi) and transfer of weapons to them. It was in Georgia in February 2000 that a meeting of the ideologist of Chechen terrorists Movladi Udugov with the personal representative of bin Laden took place, at which they discussed an issue of transferring weapons, ammunition and militants to Chechnya.

According to the Ministry of Foreign Affairs of the Russian Federation, a “representative office of the Republic of Ichkeria” and a terrorist information center functioned in Georgian capital in those days, and involved up to 100 people. In a full view of Georgian authorities, these structures financed military groups, organized supply of weapons, ammunition, treatment of wounded militants, their transfer to third countries, and the propagandistic support of terrorists.

According to the Ministry of Internal Affairs of Russia, over 60 international extremist organizations, about 100 foreign companies and dozens of banking groups provide material, financial and other assistance to terrorists who chose the North Caucasus as their target. Offices of most of them are located in the US and Europe. Only in the United States about fifty organizations are involved in collection of funds for North Caucasian extremists.

International cooperation in fight against the financing of terrorism is important. Being a coordinator of activities of all law enforcement agencies in the fight against organized criminal groups of a terrorist nature, the prosecutor’s office systematically analyzes progress and results of the fight against organized criminal groups, pays attention to improving the forms of coordination and interaction of law enforcement agencies in fight against extremism and terrorism, including its financing.

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