Barbara Vettori[*]

MOVING CONFISCATION POLICIES FORWARD: DATABASES TO SUPPORT ASSET MANAGEMENT IN THE EU

Abstract

Over the past decades, many EU and non EU countries have amended their legislative and institutional framework on proceeds from crime confiscation to deprive criminals of their assets more effectively and to better manage and dispose of them. There are still, however, some under-researched issues that could greatly enhance the effectiveness and efficiency of confiscation policies. One of these issues is the contribution that databases could give to asset management and disposal. This article responds to the following questions: which supranational standards/recommendations regarding the setting up of databases to support asset management have been developed so far? Which Member States do have a database on seized and confiscated assets? What are their strengths and weaknesses? What are the ways forward in this area?

Key words: *databases on seized and confiscated assets in the EU, supranational standards, PAYBACK Study*

I. INTRODUCTION

Over the past decades, supranational standards[1] have been developed on seizure and confiscation, with a view to increase the efficiency of asset management and disposal.[2] Many

[*] Barbara Vettori, PhD., Assistant Professor of Criminology at the Faculty of Political and Social Sciences, Catholic University of Milan (Italy).

[1] See, for example, the 2010 Justice and Home Affairs Council Conclusions on confiscation and asset recovery and the 2010 Commission Communication on an EU Internal Security Strategy (COM(2010) 673 final). Also Directive 2014/42/EU deals with the topic. Article 7 requires Member States to take "the necessary measures to enable the freezing of property with a view to possible subsequent confiscation. Those measures [...] shall include urgent action to be taken when necessary in order to preserve property". Article 10 invites Member States to take the measures necessary to ensure the adequate management of property frozen with a view to possible subsequent confiscation, including the establishment of centralised offices/a set of specialised offices/equivalent mechanisms, as well as the possibility to sell or transfer property where necessary. Also, the Financial Action Task Force (FATF) recommended countries to implement a program for efficiently managing frozen property and, where necessary, disposing of it. See FATF, *Best Practices Paper. Best practices on confiscation (recommendations 4 and 38) and a framework for ongoing work on asset recovery*, FATF/OECD, Paris, October 2012, pp. 9-10.

[2] At the end of any judicial procedure aimed at removing the proceeds from crime, the issue of what to do with them arises. These issues are dealt with in the disposal phase, which is the phase in which a final confiscation order is enforced and confiscated assets are disposed of.

countries have set up Asset Management Offices (AMOs), to ensure the adequate management of seized and provisionally confiscated assets pending judicial proceedings. However, there has been so far little discussion about how ICT tools can support asset management and disposal. The better one knows the assets, the better they can be managed. Still, very little attention has been paid so far to how the structured and regular collection of data on seized and confiscated assets in a database can boost confiscation policies.

This article answers the following questions: which supranational standards/recommendations regarding the setting up of databases to support asset management have been developed so far (section 2)? Which Member States do have a database on seized and confiscated assets (section 3)? What are the strengths and weaknesses of these databases (section 4)? What are the ways forward in this area (section 5)? In answering these questions, the article presents the results of the EU-funded Study *PAYBACK: Towards a EU Data Management System for Seized Assets*.[3] Some conclusions are finally drawn (section 6).

II. SUPRANATIONAL STANDARDS/RECOMMENDATIONS REGARDING THE SETTING UP OF DATABASES TO SUPPORT ASSET MANAGEMENT

Notwithstanding the establishment of AMOs in many EU[4] and non EU countries, "there have been few instructions on how they should collect and manage data".[5]

The first institution taking a position on this issue was, in 2005, the Criminal Legal Affairs working group of the G8, which 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".[6]

The Camden Asset Recovery Inter-agency Network (CARIN), which is an informal network of law enforcement and judicial practitioners in the field of asset tracing, freezing, seizure and

[3] The EU-funded Study *PAYBACK: Towards a EU Data Management System for Seized Assets* developed an innovative ICT tool aimed at improving the daily management of seized and provisionally confiscated assets, and tested it as a prototype in selected Member States. The Study, which lasted 30 months, ended in July 2018. It was coordinated by the eCrime research group of the Faculty of Law of the University of Trento and carried out in cooperation with CSD (BG), INHESJ (FR), CRJ (RO), Fondazione Nazionale dei Commercialisti (IT), and with the support of the following associate partners: AGRASC (FR); CAB (IE); Commission on Illegal Assets Forfeiture (BG); COSC (BE); Asset Management Section, Ministry of Interior (CZ); Openbaar Ministerie, Functioneel Parket (NL); Rome Tribunal (IT). It was co-financed by the European Commission under the ISFP 2014 programme. Barbara Vettori took part in it as Project Manager and researcher.

[4] According to a recent report by the European Commission, "13 Member States (Belgium, Bulgaria, Czechia, Ireland, Greece, Spain, France, Croatia, Italy, Luxembourg, Netherlands, Portugal, Romania) have set up, or are in the process of setting up, Asset Management Offices (AMOs) to ensure the management of frozen property in order to preserve its economic value". See European Commission, *Report from the Commission to the European Parliament and the Council - Asset recovery and confiscation: Ensuring that crime does not pay*, Brussels, 2 June 2020, p. 12, COM(2020) 217 final, available at https://ec.europa.eu/home-affairs/sites/default/files/what-we-do/policies/european-agenda-security/20200602_com-2020-217-commission-report_en.pdf.

[5] Organización de los Estados Americanos, *Analysis of Systems for the Collection of Data on Seized and Forfeited Assets of Illicit Origin in the Member States of the OAS*, 2014, p. 8, available at http://cicad.oas.org/apps/document.aspx?id=2978.

[6] G8 Lyon/Roma Group Criminal Legal Affairs Subgroup, *G8 Best Practices for the Administration of Seized Assets*, 27 April 2005, p. 3.

confiscation, also regards databases as a key tool. The recommendations of the 2008 CARIN General Assembly on "Promoting the Creation of National Asset Recovery Offices and the Effective Management of Seized and Confiscated Assets" stressed, in respect to AMOs, the importance of establishing a centralized database to track all assets seized or restrained for confiscation.

In 2011 the Organización de los Estados Americanos (OAS) also dealt with registries of seized and forfeited property and 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 the management of seized and forfeited assets, because the data recorded in the system will be subject to public scrutiny".[7] OAS clearly identified the three different types of benefits brought about by these systems, i.e. support to asset management activities, statistical production and promotion of transparency/accountability of the whole management process. In 2014, OAS developed some detailed recommendations in this field, that are herein summed up:

- information should be collected by a centralized agency and in a centralized, customized, structured database;
- all agencies involved in confiscation proceedings (from investigation to disposal) should input data;
- information shall be updated by specialized personnel, and the ability to change information in the database should be granted only to authorized personnel;
- for each asset a description should be available, as well as information on its physical location, owner, condition and value at the time of seizure; also, a serial number should be attributed to each asset when taken into custody;
- the updated total number of assets, total number of assets by description and by category should be publicly available.[8]

The setting up of dedicated databases is also recommended, at the EU level, in the report of the ARO (Asset Recovery Offices) Sub-group on Asset Management, set up in 2013 within the ARO Platform.

The topic has more recently been dealt with by UNODC, which in 2017 recognised 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 an accurate record of all property subject to seizure and confiscation orders. The need to improve or develop an ever-more sophisticated capacity to maintain, access and keep the data reliable and secure increases".[9] As a result, UNODC suggested to promote further

---

[7] Organización de los Estados Americanos, *Asset Management Systems in Latin America and Best Practices Document on Management of Seized and Forfeited Assets*, 2011, p. 127, available at http://www.cicad.oas.org/lavado_activos/grupoExpertos/Decomiso%20y%20ED/Manual%20Bienes%20Decomisados%20-%20BIDAL.pdf.

[8] Organización de los Estados Americanos, *Analysis of Systems for the Collection of Data on Seized and Forfeited Assets of Illicit Origin in the Member States of the OAS*, 2014, pp. 38-40.

[9] UNODC, *Effective management and disposal of seized and confiscated assets*, UNODC, Vienna, 2017, p. 59, available at https://www.unodc.org/documents/corruption/Publications/2017/17-07000_ebook_sr.pdf.

discussion on the topic of electronic databases to improve information management on restrained and confiscated property, with a special focus on good practices in this field.[10]

III. MAPPING EXISTING DATABASES ON SEIZED ASSETS IN THE EU[11]

Moving now to EU countries, according to a review of existing databases carried out within the EU-funded Study PAYBACK, most of them have a database in place, though not always dedicated and/or not always comprehensive in terms of information gathered.

A database exists in Belgium, Cyprus (with information on a relevant court order, type and value of the assets), the Czech Republic (with a dedicated database still in its infancy), Greece (not dedicated database), France, Germany (at Land level), Ireland, Italy, Lithuania, Netherlands (the Seized Goods Portal), Portugal (info on type of assets, location, evaluation, probative value, etc.), Romania (an integrated IT system was recently set up by *Agenția Națională de Administrare a Bunurilor Indisponibilizate*, in cooperation with the Basel Institute on Governance, Switzerland), Spain, Slovenia (kept by local courts), United Kingdom (JARD). A database does not exist in Denmark, Latvia and Sweden.

The key experiences are now discussed in more detail.

In *Belgium*, a key actor in the management of seized assets is the Central Office for Seizure and Confiscation (COSC), which was set up by law of 26 March 2003, amended by law of 4 February 2018. COSC is charged by law to set up a mechanism to collect data on seized and confiscated assets. COSC currently uses a desktop application to register information on seized assets, as well as on related proceedings and persons. This system is called DELFI and is a basic application supporting simple data storage; very few data elaboration can be performed. Since this application is old fashioned and does not support daily asset management, COSC is about to migrate to a new system implemented with Microsoft Navision.

Regarding *Bulgaria*, the focus is here on the civil confiscation regime, which is managed by the Commission on Countering Corruption and Illegal Assets Forfeiture (CCCIAF). The key regulation is the Counteracting Corruption and Forfeiture of Illegally Acquired Property Act (CCFIAPA). As per article 170 para 1 of CCFIAPA, the Electronic Register for Secured Assets contains information about assets from freezing until the end of the civil forfeiture procedure. It was set up in 2016 as a web application and is managed by CCCIAF. The key problem affecting the database is its slowness.

In the *Czech Republic*, there are two relevant databases: the police database (IS ETŘ - *Informační Systém – Elektronické Trestní Řízení*) and the database of the Centre for Seized Assets (CSA), still in its infancy. Both entities are in fact involved in asset management; the police do not in fact have the resources to manage all of them, and therefore the vast majority are managed by CSAs, that has been operational since 01.01.2017, within the Ministry of Interior.

In *France*, since its creation in 2010 AGRASC (*Agence de gestion et de recouvrement des avoirs saisis et confisqués*) has registered and traced its files on an Access database, designed in-house, called Base AGRASC. The main goal of the database is to ensure the total traceability of data in

[10] UNODC, *Effective management and disposal of seized and confiscated assets*, UNODC, Vienna, 2017, p. 67.

[11] Sections 3, 4 and 5 are based on the following publication, which is the final report of the PAYBACK Study: Di Nicola A., Vettori B., Angheben M., *PAYBACK: Towards a EU Data Management System for Seized Assets*, eCrime Research Reports, n. 5, Università degli Studi di Trento, Trento, 2018, available at http://www.project-payback.eu/pdf/eCrime_Research_Reports-05.pdf. For more information about the Study see http://www.project-payback.eu/.

connection with seizures and confiscations. It also makes it possible to upload all scanned court documents. A project to redesign this database was launched in 2014 with twofold purpose: identical functionalities (but without ACCESS) and integration into the Ministry of Justice IT system to ensure better IT security.

With reference to *Ireland*, the focus is here on the civil confiscation regime envisaged by the Proceeds of Crime Act 1996 (and following amendments). The relevant database is CSSOAccess. It provides information on an asset-by-asset basis and was created in 2012 by the Criminal Assets Bureau (CAB). It was developed within the Bureau by the then head of the Chief State Solicitors Office (Criminal Assets Section), to provide information as part of a requirement under a Management Information Framework project not targeting assets, but rather the management of legal files. Management information for assets was subsequently developed.

In *Italy* there is a database run by ANBSC (*Agenzia nazionale per l'amministrazione e la destinazione dei beni sequestrati e confiscati alla criminalità organizzata*) at the national level and a variety of databases at the court level. It was decided to focus here on the database of the Rome Tribunal since it is a particularly promising and interesting experience. It was set up in 2014 for operational purposes and maps all assets seized by the Tribunal (any typology). The database - which is supported by software developed by Aste Giudiziarie INLINEA S.p.A. - was created in two months, and at no cost: two officers from Guardia di Finanza developed it; Aste Giudiziarie created the software for free.

With reference to the *Netherlands*, there are two data collection systems on seized assets, one is for the case (Compas/GPS), and one is for goods that have to be logistically moved from one place to another (*Beslagportaal* – Seized Goods Portal, henceforth SGP). The focus is here on SGP, which is under the responsibility of the Movable Goods Agency (*Domeinen Roerende Zaken* - DRZ), within the Ministry of Finance. This Agency executes the public prosecutor's decisions regarding seized assets. The development of SGP, a web-based application, started under the responsibility of DRZ on 4 June 2012, in cooperation with the Police and the Public Prosecutor. On 1 December 2012 all Chain Confiscation Houses - which are the 18 depots at the police where assets are stored and registered - were connected to SGP.

In *Spain* seized assets can be managed either directly by the judicial bodies or by the Office for Asset Recovery and Management *(Oficina de Recuperación y Gestión de Activo*s, ORGA). The EXPORGA database was set up by ORGA in 2016, based on article 10 of Royal Decree 948/2015. All assets managed by the Office shall be recorded in EXPORGA, an inventory of seized and confiscated assets, with information about their nature and value and a description of any management intervention. The first version of the application was in Access 2010. It was followed in 2017 by a computer application in a Web environment.

IV. COMPARING EXISTING DATABASES ON SEIZED ASSETS IN THE EU

The databases described in the previous section are herein compared by looking at their strengths and weaknesses (see Table 1).

Table 1 – Strengths and weaknesses of existing databases on seized assets in the EU

Country (and related db)	*Strengths*	*Weaknesses*
Belgium (DELFI)	• gathers detailed information about seized assets, and related proceedings and actors	• static repository of information about seized assets • does not produce any statistical and

		graphical output; it does not allow any data elaboration • communication problems between police and COSC (e.g. police inventory/no asset at COSC; no police inventory/asset at COSC) • no automatic alerts
Bulgaria (Electronic Register for Secured Assets)	• in principle, the database shall support the civil confiscation regime and promote interagency cooperation	• slowness • limited use of the db by inspectors, due to its slowness (they continue to mostly work on paper) • the db is underused and unable to support daily asset management • technical issues (one reason for the system's slowness is the hardware on which the system runs) • extracting precise information about an entity (court decision, person, asset) is difficult since the db stores almost everything in a text description field • no automatic production of statistics, graphs or maps; users shall export data into excel format and then produce graphical results by hand from the excel suite • no alerts envisaged
Czech Republic (IS ETŘ (police db) and CSA db)	Police db: • one integrated system • speediness • automatic transfer of data to a variety of modules • user friendly CSA db: • more capable than the police db to support daily management activities, in principle	Police db: • implementation problems (training, data collection, incomplete files due to human inaccuracy). So, for example, final court decisions are sometimes not inputted due to court omission to notify the decision or to failure to register by police officers • limited availability of graphs • no automatic production of reports to measure asset management efficiency • no automatic alerts • limited use of available information on asset valuation to support asset management CSA db: • still in its infancy (consists now of an excel file with few variables of interest)
France (Base AGRASC)	• data input is easy to do (even though a bit tedious) • designed to respond optimally to AGRASC needs • all docs are scanned and uploaded into the db	• currently, no automatic production of reports intended to measure asset management efficiency (but an ongoing process) • limited automatic alerts incorporated • limited production of outputs

	• allows AGRASC to see the evolution of all the assets the Agency is in charge of	
Ireland (CSSOAccess)	• the system produces reports in a timely fashion tailored for the needs of the office	• the system is person critical. It was designed and maintained by the current Bureau Legal Officer • more focused on the management of legal files than on the management of assets
Italy (db of the Rome Tribunal)	• gathers very detailed information on the assets and on related criticalities (e.g. parallel proceedings, mortgages, bankruptcy), thus allowing better planning of interventions • few people insert data (2), thus ensuring data quality and consistency • accessible to registered users, to promote prompt management. These users include LEAs and other entities, such as Libera (that supports allocation of the assets by identifying suitable users) and the national bank association (to ensure that seized and confiscated companies can keep having access to credit)	• exact asset location is not always registered, and when this is done it is in a text description field • pictures of the assets can be uploaded, but this is not always done • no automatic alerts incorporated • limited and burdensome production of outputs • most fields are not mandatory, so data quality and completeness is person sensitive • limited use of available asset valuation data
Netherlands (Seized Goods Portal)	• gives a good overview of seized assets (lots of details) • it makes it possible for several partners to work together in one system • constantly under development, based on the needs; soon will register other types of goods (not only movable ones)	• issues related to implementation, knowledge of the people who work with the system etc. • does not keep track of the exact location of the assets over time • does not include pictures of the assets at different times of the procedure • limited use of available asset valuation data • limited automatic alerts incorporated
Spain (EXPORGA)	• access is relatively cheap and programming easy • DB development specifically targeted to ORGA needs and future developments	• limits related to Access (e.g. no web access, data limit set to 2 Gb; in terms of data security) • limited outputs can be generated • limited automatic alerts

Source: Di Nicola A., Vettori B., Angheben M. (2018, pp. 21-22).

The following conclusions can be drawn:

- there is a great variety of ICT arrangements across the EU, with countries at different stages of development (some with a structured database, others with databases in their infancy);
- existing databases are continuously evolving, based on the needs of relevant national institutions (transition from one db to another or redesign e.g. BE, IE, FR, NL);

- existing databases are closely connected to national regulations, institutional building arrangements, available resources;
- there is a scant level of completeness and quality of key data: so for example, a key information such as the exact location of seized assets at a given time is not a mandatory field (e.g. in IT, NL), and is not updated;
- existing databases are based on different ICT solutions, e.g. web-based vs. Access;
- in most cases, current databases do not envisage any automatic alerts;
- in most cases the production of statistics, graphs and maps is limited/unfriendly;
- in most cases current databases do not envisage any automatic production of reports intended to measure asset management efficiency;
- in most cases, current databases make limited use of available asset valuation data to inform asset management activities.

V. WAYS FORWARD

Based on the review of current databases in the EU, the PAYBACK Study identified the following areas of interest to improve current systems:

1. *the exact location of seized assets throughout the procedure*: seized and provisionally confiscated assets amount to thousands and thousands in every country. Lack of precise and updated information about their whereabouts can result in the inability to track them, especially within warehouses, and could result in liabilities of the managing agency. This happened, for example, in the Netherlands, where several cars under seizure got lost, and the Ombudsman took a stance to protect citizens' rights, producing a report to the Government titled *Where is my car?*[12] Any given database should therefore make it possible to know the precise location of seized and provisionally confiscated assets, distinguishing between a) in-door location (e.g. of movable assets stored in deposits) and b) map location;
2. *the economic value of seized assets over time*: a common problem across the EU is the quick depreciation of seized property pending judicial proceedings. Keeping track of changes in their value is essential to understand when something shall be done about them and what sort of actions should be taken to preserve their value. Any given database should therefore make it possible to understand changes in value, and to accurately track management costs over time;
3. *seized assets' conditions over time*: different assets' conditions require different interventions. Moreover, once an asset is taken into custody by an entity, this is legally responsible for it. Keeping track of assets' conditions is important not only to orient timely management interventions, but also to allocate responsibility for damage, considering that a given property may be taken under custody by different actors throughout the judicial proceedings. Any given database should therefore make it possible to know seized assets' conditions by gathering and storing pictures, videos and any other relevant document, uploaded at different times, so as to know the exact conditions of a given asset at any time;

[12] See De Nationale ombudsman, *WAAR IS MIJN AUTO? Rapport over de uitvoeringspraktijk van inbeslagname van voorwerpen*, 2016, The Hague, available at https://www.nationaleombudsman.nl/system/files/onderzoek/2016075%20Rapport%20over%20uitvoeringspraktijk%20inbeslagname%20voorwerpen.pdf.

4. *automatic alerts*: according to the stakeholders interviewed in the context of the PAYBACK Study, a key feature of an ideal database are alerts, to automatically inform actors involved in asset management activities about e.g. changes in a given asset's value and/or conditions requiring immediate action, approaching deadlines, upcoming tasks.

As a result, the PAYBACK Study developed the prototype of a Data Management System (DMS) made up of three modules:

- geolocalisation: this module allows the localisation of an asset either as a point on a map (e.g. a real estate property) or as a 3D object in a model representing buildings, cabinets, etc. Locating assets on a map along with other elements (schools, police stations, etc.) can also orient asset disposal so as to respond to the needs of a given area;
- report & alert: this module creates graphs showing how the value of an asset (or group of assets) changes over time. It can also display management costs and net value (calculated as the difference between value and management costs) over time. In these cases, the x-value on the graph is a date. However, it can be whatever one wishes: e.g. a court or judicial administrator, showing how many assets are managed by a given actor, shedding light on workload and performance issues. Based on data analysis, the module is able to predict future asset values and activate a notification system to inform the user of value changes below a threshold;
- photos, videos & more: this module makes it possible to upload and display images/files related to an asset and to represent them on a timeline. It also records how assets' conditions change over time.

The PAYBACK DMS is the first ICT tool for the collection, management and automatic analysis of data on seized assets that could be implemented in all Member States (and beyond) to increase the efficiency of asset management. It can assist both countries in having a database in place looking for new functionalities and countries not yet having one; it is in fact composed of four solutions, ranging from one providing basic features to a complete solution. Its key features are flexibility and easy and full integration in pre-existing systems. Also, the PAYBACK DMS has been designed so as to be accessible to the highest number of countries: its APIs are based on open-source third-party libraries. In order to further enhance accessibility of the prototype, in agreement with the European Commission the PAYBACK consortium decided to make the prototype available to all countries free of charge.

VI. CONCLUSIONS

Confiscation policies have come a long way in many countries across the world. This article suggests to move these policies further forward by promoting database performance improvement.

The "know your customer" approach developed within the anti-money laundering domain could be fruitfully moved into the asset recovery domain since a "know your assets" philosophy seems key to asset management and disposal. Only a detailed and continuously updated knowledge of what is managed can promote timely, effective and efficient interventions. A comprehensive data collection system like the one suggested in the framework of the PAYBACK Study could bring about many benefits, such as:

- increased effectiveness of freezing/seizure procedures, in terms of better pre-seizure planning, knowledge-based choice of storing solutions and asset management actions

(what to do, when and how is best to do it), better management of critical assets, reduction of management costs, reduced depreciation, quicker sale/provisional assignment of assets;
- as a result of the previous point, increased effectiveness of confiscation and disposal procedures;
- increased accountability of AMOs and other relevant agencies, via the statistics produced by such a system;
- better assessment of performance issues, e.g. via the functionalities provided by the discussed report & alert module, which amongst other things, can create graphs showing, for example, how many assets (and therefore the workload) are managed by a given actor (e.g. court, judicial administrator);
- institutional continuity within a given AMO/other competent agency, since it provides a given entity, in the mid and long run, with an objective standard (backed, in time, by thousands and thousands of records) to asset management decisions.

The key challenge is now for EU (and non-EU) countries to move in this direction.

Bibliography:

1. De Nationale ombudsman, *WAAR IS MIJN AUTO? Rapport over de uitvoeringspraktijk van inbeslagname van voorwerpen*, 2016, The Hague, available at https://www.nationaleombudsman.nl/system/files/onderzoek/2016075%20Rapport%20over%20uitvoeringspraktijk%20inbeslagname%20voorwerpen.pdf.
2. Di Nicola A., Vettori B., Angheben M., *PAYBACK. Towards a EU Data Management System for Seized Assets*, eCrime Research Reports, n. 5, Università degli Studi di Trento, Trento, 2018, available at http://www.project-payback.eu/pdf/eCrime_Research_Reports-05.pdf.
3. European Commission, *Report from the Commission to the European Parliament and the Council "Asset recovery and confiscation: Ensuring that crime does not pay"*, Brussels, 2 June 2020, COM(2020) 217 final.
4. FATF, *Best Practices Paper. Best practices on confiscation (recommendations 4 and 38) and a framework for ongoing work on asset recovery*, FATF/OECD, Paris, October 2012.
5. G8 Lyon/Roma Group Criminal Legal Affairs Subgroup, *G8 Best Practices for the Administration of Seized Assets,* 27 April 2005.
6. Organización de los Estados Americanos, *Analysis of Systems for the Collection of Data on Seized and Forfeited Assets of Illicit Origin in the Member States of the OAS*, 2014, available at http://cicad.oas.org/apps/document.aspx?id=2978.
7. Organización de los Estados Americanos, *Asset Management Systems in Latin America and Best Practices Document on Management of Seized and Forfeited Assets*, 2011, available at http://www.cicad.oas.org/lavado_activos/grupoExpertos/Decomiso%20y%20ED/Manual%20Bienes%20Decomisados%20-%20BIDAL.pdf.
8. UNODC, *Effective management and disposal of seized and confiscated assets*, UNODC, Vienna, 2017, available at https://www.unodc.org/documents/corruption/Publications/2017/17-07000_ebook_sr.pdf.