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Ensuring the effectiveness and accessibility of justice in criminal cases on the return of illegally acquired assets: prospects for the use of artificial intelligence tools

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Abstract:

Background: *The study analyzes the mechanisms for protecting public law interests in criminal cases involving the return of property assets, as a factor in ensuring the *accessibility and effectiveness of justice, through traditional methods and tactics of financial investigations, as well as using the capabilities of artificial intelligence technology. The authors rely on the provisions of the criminal procedure legislation of the Republic of Kazakhstan, which reflect the types and features of financial investigations, with an emphasis on the impact on the effectiveness and accessibility of justice. By identifying the mandatory features and elements of a financial investigation under the legislation of Kazakhstan, parallels are drawn with other types of financial investigations provided for in developed Western countries. The directions of using artificial intelligence tools in financial investigation are proposed. The works of scientists devoted to the analysis of the effectiveness of the institute of financial investigation in the return of illegally acquired assets are considered. The authors present in the article practical and empirical data available on the territory of the Republic of Kazakhstan in the context of the issue under consideration. Special attention is paid to international experience in* *implementing measures aimed at developing financial investigations, as well as criminal procedure standards and the experience of countries such as the Netherlands and Estonia. From all the works of scientists, a selection of those provisions has been made that, according to the authors, contribute to the formation and improvement of the Kazakh model of the institution of a full-fledged financial investigation, which allows protecting public interests in the context of ensuring the effectiveness and accessibility of justice.*

Metods: *The authors used a number of methods of scientific knowledge to achieve their goals and solve research problems, in particular, such methods as legal analysis (descriptive), comparative legal analysis, the method of legal modeling, as well as the method of comparative research. The analysis of the criminal procedure legislation of the Republic of Kazakhstan and institutional mechanisms for asset recovery was used to identify the specifics of the financial investigation in the context of the Kazakh experience. This analysis allows us to identify the features of financial investigations in the Republic of Kazakhstan, compare them with best practices, predict and suggest ways to introduce artificial intelligence technologies into these processes. The comparative legal analysis made it possible to compare models and procedures for the use of financial investigations in Western countries and in Kazakhstan, to formulate proposals for possible extrapolation. Attention is drawn to the doctrinal analysis of the concept of financial investigation, the author's approach to its understanding is highlighted in accordance with the FATF recommendations, which is of particular value for Kazakhstan. The formulated author's position can be adapted to improve the legal system of Kazakhstan, including as one of the factors ensuring the effectiveness and accessibility of justice through the protection of public interests. Specific cases have been studied within the framework of the procedure for the return of illegally acquired property, considered by the authorized bodies of the Republic of Kazakhstan, an analysis of legislation has been carried out, which has revealed the main trends in law enforcement practice that affect the effectiveness and accessibility of justice through the prism of ensuring public interests. A comprehensive study of the problem at various levels revealed the imperfection of the current model of the Kazakh institute of financial investigation and legal protection of public interests in the framework of the return of illegally acquired assets through the prism of ensuring the effectiveness and accessibility of justice.*

Results and Conclusion: *Creating conditions for a fair system for the return of illegally acquired assets (including using traditional investigative techniques and tactics, as well as using artificial intelligence technologies), ensuring effective and public financial investigations are among the factors ensuring the protection of public interests not only of the state, but also of society as a whole, and this Ultimately, it is one of the factors important in ensuring the effectiveness and accessibility of justice in cases of this category. The creation of an effective tool for the protection of public law interests makes it possible to provide a correct legal assessment of the activities of law enforcement agencies in returning illegally acquired assets to the country.*

Keywords: *access to justice, return of illegally acquired assets, financial crimes, parallel financial investigation, financial investigation under execution, digital technologies, artificial intelligence.*

JEL classification: K40, K22.

1. Introduction

Ensuring the effectiveness and accessibility of justice is a complex process that has various models and directions of implementation. One of the mechanisms for achieving the goals of criminal justice in cases of the return of illegally acquired assets is the protection of public interests in the process of conducting financial investigations. Developing this definition, we note that as a social community we can consider the "people" as the only source of power[1], and consequently, under public law interest, it is necessary to take into account, as a matter of priority, the interests of the people of Kazakhstan, who have a request for the efficiency of financing and its availability in cases of return of accumulated assets. In cases of this category, in order to achieve the goal of the investigation, the financial investigation, in its methodology and production tactics, should be aimed at meeting the needs of different social groups in financial and economic terms, which will ultimately affect the effectiveness of the administration of justice.

In Kazakhstan, the issue of introducing an independent chapter on financial investigation was raised long before the adoption of the Law of the Republic of Kazakhstan “On the return of illegally acquired assets to the state” and the introduction of amendments and additions to related laws in 2023.Doctor of Law, ex-chairman of the judicial panel for criminal cases of the Supreme Court of the Republic of Kazakhstan R.N. Yurchenko. and one of the authors of this article, Professor Akhpanov A.N. Even during the development of the draft Criminal Procedure Codes of the Republic of Kazakhstan in the 1997 and 2014 editions, the question of a separate chapter “Financial Investigation” was twice raised, and its draft was also developed[2]. We believe that today this proposal is still relevant, since the significance of such a structural innovation in the Criminal Procedure Code of the Republic of Kazakhstan is becoming increasingly obvious.

In the investigative practice of the Republic of Kazakhstan, as well as in the judicial one, at the moment, the effectiveness of criminal procedural and other mechanisms for identifying, searching, arresting, freezing, confiscating and returning illegally withdrawn assets still remains at a low level. At the same time, artificial intelligence technologies are not used enough to implement these mechanisms.

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[1] The Constitution of the Republic of Kazakhstan, adopted at the republican referendum on August 30, 1995. https://online.zakon.kz/Document/?doc_id=1005029, accessed September 10, 2024.

[2] Draft CPC of the Republic of Kazakhstan. – Almaty, 1997; chapter 71 "Financial Investigation" of the draft Code of Criminal Procedure of the Republic of Kazakhstan 2014 as amended by the Supreme Court of the Republic of Kazakhstan.

To compensate for the damage caused to the state, various measures are being taken at the initiative of the head of state of the Republic of Kazakhstan. At the end of 2023, the effectiveness of compensation for damage was 63%.Over the past two years, the amount of illegally acquired assets recovered has amounted to only $2.2 billion, most of which was carried out within the state. In contrast, relatively small amounts of assets were returned from abroad, only $589 million.This indicator is relative, since the assets transferred abroad and other “latent”, illegally obtained assets within the country, which belong to 162 individuals from the inner circle of the first President of the country, are not taken into account.

The main source of illegal enrichment is theft of budget funds. Other sources include financial corruption with the permission of government agencies (receipt of excess income through high interest rates, evasion of taxes on excess income, etc.), theft in the field of subsoil use, raider takeovers, legalization of illegal criminal proceeds, the results of illegal privatization.

In their research, Eleanor Gale and Jessica Kelly note that financial investigations typically lead to the discovery of other, previously unknown crimes and assets acquired with the proceeds of crime, which are therefore subject to confiscation.[3]. Helena Wood also highlights the special role of financial investigation in the fight against organised crime, emphasizing in her article that the commission of crimes and the use of proceeds from them leave a financial trail that can be tracked and used by law enforcement agencies through financial investigation.[4] According to Helena Wood, 'financial investigation' is often limited to the specific scope of 'financial crime' and is therefore often seen as simply a tool to combat fraud, money laundering and other specific 'financial' crimes, which leads to its misunderstanding. However, even in cases where financial investigation is meant to fall outside these limitations, it is often viewed as a tool for discovering assets that law enforcement agencies seek to confiscate as part of their investigations[5].

In line with the 'follow the money' principle, we believe that tracing both criminal and non-criminal money flows into an offender's lifestyle, travel and

[3] Eleanor Gale and Jessica Kelly (November 2018). Exploring the Role of the Financial Investigator (online resource) - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/753213/exploring-the-role-of-the-financial-investigator-research-brief-2018.pdf

[4] Helena Wood (2017). Every Transaction Leaves a Trace — The Role of Financial Investigation in Serious and Organised Crime Policing (online resource) - https://rusi.org/sites/default/files/201709_rusi_everytransactionleavesatrace_wood_web.pdf

[5] Michael Levi, ‘Drug Law Enforcement and Financial Investigation Strategies’, Modernising Drug Law Enforcement Report 5, International Drug Policy Consortium, September 2013, p. 1.

personal connections can provide useful evidence to support the investigation of a predicate offence.

The effectiveness of a financial investigation should be achieved through the implementation of a systematic approach to the methodology and tactics of investigating cases of the return of illegally acquired assets, which in today's realities should be associated with the use of artificial intelligence tools. In the context of the technological level of development of criminal mechanisms for withdrawing assets from the state budget, ignoring a systematic approach to financial investigation that has a doctrinal basis and integrates artificial intelligence technologies into its mechanisms is a risk area that can not only show a negative result in protecting public interests, but also have a negative impact on the effectiveness of justice, It also minimizes its accessibility to protect the public interests of various social groups in Kazakh society.

In the documents of international organizations such as the Financial Action Task Force (FATF), the Egmont Group, Financial Monitoring Services, etc., the main purpose of which is to curb illicit money trafficking, search for "dirty money" and counteract "anti-money laundering policy," a special terminology has been established, which can include such concepts as "financial intelligence" and a "financial investigation." Nevertheless, the practice of using these concepts has not allowed solving the problem of the lack of a normative definition of these definitions, and this is one of the significant factors influencing the doctrinal and normative understanding of the essence of the processes under consideration. The multitude of scientific approaches to understanding the essence of financial investigation and the formulation of this concept, the lack of a financial investigation methodology and other problems of theoretical and legal understanding of this criminal law institution do not correspond to the practical tasks facing the competent authorities and which the authors of the article see from the perspective of the research being implemented.

The issue of regulating the process of conducting financial investigations has recently received close attention, since a huge number of offenses are associated precisely with the extraction of benefits for criminals, then with the possibility of obtaining income from illegal activities and creating the appearance of its legal origin. State authorities are trying to improve the law and order situation by suppressing criminal intentions. If you do not allow the possibility of obtaining material benefits due to a committed offense, then there will be fewer intentions for its commission due to inexpediency from a financial point of view.

The main beneficiary of the effectiveness of the financial investigation of criminal cases on the return of illegally acquired assets is the people of Kazakhstan, who, according to the Constitution, are the owners of the country's main wealth –

land, its subsoil, water, flora and fauna, and other natural resources[6]. The State is only delegated the exercise of ownership rights. Consequently, the financial investigation of criminal cases on the return of illegally acquired assets is aimed at protecting the public and legal interests of the people of Kazakhstan. A high-quality financial investigation is the main factor in effective and accessible justice in cases of this category.

2 GOALS AND OBJECTIVES OF RESEARCH

The purpose of the study is to study and analyze mechanisms for protecting public law interests in criminal cases involving the return of property assets as a factor in ensuring the accessibility and effectiveness of justice.
Research objectives:
- to identify the causes of problems in conducting a financial investigation, taking into account the specifics of protecting public interests;
- to study traditional methods and tactics of conducting financial investigations, as well as using artificial intelligence tools;
- to develop various doctrinal concepts and new regulatory measures for financial investigation in Kazakhstan, including on the basis of comparative analysis;
- to substantiate the relationship between the protection of public law interests in the course of a financial investigation and ensuring the effectiveness and accessibility of justice in cases of the return of illegal assets;
- to identify the theoretical basis for conducting a financial investigation at the stage of execution of a sentence and propose new approaches to legal concepts, regulatory provisions that will ensure the protection of public law interests in criminal cases involving the return of illegally acquired property.

The main purpose of the Law of the Republic of Kazakhstan "On the Return of illegally Acquired Assets to the State" (hereinafter referred to as the Law) is to define legislative parameters for the return of illegally acquired assets.
A limited number of individuals and legal entities are subject to this Law. At the same time, individuals include persons who own unreasonable wealth, and in respect of whom there is information about:
1) holding a responsible public position or a position in the quasi-public sector, as well as administrative and governmental resources;
2) obtaining assets through administrative and governmental resources, or illegally creating favorable non-competitive business conditions.

This Law introduced effective measures against major corruption and oligopoly groups at the national and local levels. One of the novelties of the Law is to carry

[6] The Constitution of the Republic of Kazakhstan, adopted at the republican referendum on August 30, 1995. https://online .zakon.kz/Document/?doc_id=1005029

out work on asset recovery abroad. The Law established a voluntary or compulsory asset recovery procedure:

1. Voluntary return (agreements on the voluntary return of assets, settlement and procedural agreements, and other agreements) is carried out by way of gratuitous transfer of property belonging to them to the state (in the Law – a special state fund).

2. Compulsory return is carried out on the basis of judicial acts of the Republic of Kazakhstan, foreign states, or decisions of the competent authorities of foreign states.

- confiscation of illegally acquired assets in the framework of criminal proceedings based on court decisions;
- forced return of illegally acquired assets in the framework of civil proceedings based on court decisions recognizing assets as unjustified wealth and when the property is of criminal origin;
- confiscation based on decisions of courts or other authorized bodies of foreign countries.

As can be seen from the above legal norm, the compulsory asset recovery procedure is an essential part of the activities of the courts in the framework of the administration of justice in cases of this category. Consequently, the effectiveness of justice directly depends on the results of the financial investigation of cases involving the return of illegal assets.

The Law provides for the following algorithm of confiscation in the framework of civil proceedings.

First. If, based on the results of monitoring and analysis of information, the authorized body has reasonable doubts about the legality of the sources of acquisition of assets, the value of which exceeds 100 million US dollars.

Second. Based on the results of the review of the materials, the commission makes a recommendation on the inclusion or non-inclusion of the person in the register. In the event of a risk of asset withdrawal from the country, the authorized asset recovery authority sends an application to the court for provisional interim measures.

The third. The authorized body notifies the persons about their inclusion in the register and about the right to submit a declaration of assets.

Fourth. After submitting the declaration, the authorized body verifies the declarations and submits the results of the audit to the commission for consideration.

Fifth. The Commission makes recommendations on taking further measures (exclusion from the register, or taking further procedural measures provided for by the CPC and CPC).

Sixth. If a person is unable to confirm the origin of his assets by submitting a declaration, or fails to submit a declaration, such assets may be recognized as unjustified wealth and are subject to conversion to State revenue.

In the legal literature, attention is increasingly drawn to the imbalance of the rights of the suspect (accused) and the victim. To date, both in science and in practice, the protection of the rights of the suspect and the accused has been unreasonably given incomparably more attention than the rights of the victim. The tasks of the criminal process currently reflect, first of all, the relationship between the state and the person who has committed a criminal offense, and are formulated primarily from the perspective of state (public) interests.

It should be noted that earlier in the article by professor A.N. Akhpanov and M.M. Kulbaeva, the authors proposed implementing paragraph 3 of Article 9 of the 1966 International Covenant on Civil and Political Rights on the mandatory delivery of every detained suspect to an investigating judge into Kazakhstan's criminal procedure legislation, since the application of this norm in investigative and judicial practice will allow for the effective monitoring of every instance of illegal, unjustified detention and unjustified prosecution. In our opinion, this approach is also applicable during a financial investigation, because it is fundamentally important for protecting the rights and legitimate interests of the individual[7].

Since the freedoms, rights and legitimate interests of man and citizen in the Republic of Kazakhstan are recognized as the highest values, their protection, protection and restoration should become the main goal of the functioning of the legal system of our state. To this end, ensuring the constitutional rights and freedoms of the individual must find its primary embodiment in the tasks of criminal justice. In this regard, there is an increasing need for the simultaneous orientation of the criminal and criminal procedure legislation of Kazakhstan to restore the violated rights of the victim, as well as to establish a balance of punitive and restorative means of legal regulation. The return of illegal assets is the main goal of restoring and protecting the public and legal interests of the people of Kazakhstan, therefore, the synchronization of punitive and restorative means should take place through various legal and institutional instruments.

[7] Kulbaeva M, Akhpanov A 'Judicial Control over Criminally Remedial Measures of Restriction in Kazakhstan: Analysis and Evaluation of Draft Law of a New Three-Tier Model' 2022 4(16) Access to Justice in Eastern Europe 118-134. https://doi.org/10.33327/AJEE-18-5.4-n000426

Despite all the legislative innovations, the whole problem lies in the difficulty of proving the law enforcement agencies of the Republic of Kazakhstan, as well as in successfully challenging in the courts of foreign jurisdiction the illegality of the sources of origin and methods of acquiring assets in the areas of privatization, in the field of subsoil use, as well as in the difficulties in identifying the true ultimate beneficiaries[8].

The Law of the Republic of Kazakhstan "On Combating the Legalization (Laundering) of Criminally Obtained Incomes and the Financing of Terrorism" was adopted in 2009[9].However, when ratifying the 1990 Strasbourg Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime, the Parliament of Kazakhstan made reservations about the supremacy of the laws of the Republic of Kazakhstan over the convention, which served as the basis for refusing to accept the original text of the ratified law for storage.This circumstance led to the fact that the possibility of applying the norms of the Strasbourg Convention on the territory of the Republic of Kazakhstan was excluded[10].

3 PROTECTION OF PUBLIC LAW INTERESTS IN CRIMINAL CASES ON THE RETURN OF ILLEGALLY ACQUIRED ASSETS AS A FACTOR IN ENSURING THE EFFECTIVENESS AND ACCESSIBILITY OF JUSTICE

On July 12, 2023, the Republic of Kazakhstan adopted the Law "On the Return of Illegally Acquired Assets to the State" with a number of related laws and amendments to several codes[11]. Based on the results of the introduced innovations, the following activities were carried out within the framework of the adopted changes.

[8] Materials of the round table of the Elge Qaitaru Public Foundation on the topic "Asset recovery: search for practical solutions, legal aspects, international cooperation and global experience". – Almaty, 29.01.2024 // https://www.youtube.com/watch?v=HPUG53i2P7Y – Part 1 https://www.youtube.com/watch?v=1_YdNOrYzRo – Part 2., accessed September 18, 2024.

[9] The Law of the Republic of Kazakhstan dated 28.08.2009 № 191-IV "On countering the legalization (laundering) of proceeds from crime and the financing of terrorism" // IPS "Adilet" / [Electronic resource]. - Access mode: https://adilet.zan.kz/rus/docs/Z090000191 , accessed September 10, 2024

[10] The Law of the Republic of Kazakhstan dated 05/02/2011 No. 431-IV "On Ratification of the Convention on Laundering, Identification, Seizure and Confiscation of Proceeds from Crime" // IPS "Adilet" / [Electronic resource]. - Access mode: https://adilet.zan.kz/rus/docs/Z1100000431 , accessed September 10, 2024.

[11] The Law of the Republic of Kazakhstan dated 07/12/2023 No. 21-VIII SAM "On the return of illegally acquired assets to the state" // IPS "Adilet" / [Electronic resource]. - Access mode: https://adilet.zan.kz/rus/docs/Z2300000021 , accessed September 2, 2024.

Firstly, a special Commission on the return of assets to the state has been created, chaired by the Prime Minister and with the participation of members of the Government, Parliament, heads of law enforcement agencies and representatives of the public. At the level of this commission, the voluntary return of illegally withdrawn assets to the state is encouraged in a closed mode.In case of refusal to return, the prosecutor's office files a claim in court and this issue is resolved in accordance with civil proceedings. Along with this, the Commission's materials are transferred to the Asset Recovery Committee established under the Prosecutor General's Office. In turn, the prosecutor's office initiates pre-trial proceedings.At the same time, suspects, accused and defendants have the opportunity to enter into a procedural agreement with the prosecutor in the form of a plea bargain and the return of illegally acquired assets. This agreement can be concluded at any stage and phase of the proceedings before the court retires to the deliberation room.Since the interests of the state are represented by the prosecutor, the consent of the victim to conclude an agreement is not required. If the suspect, accused, defendant has fulfilled all the terms of the agreement, then a significant mitigation of punishment follows, up to and including exemption from criminal liability. This type of agreement has already begun to be used in practice in investigations and in courts.

According to legislative changes, assets of unexplained and dubious origin in the amount of more than 100 million dollars are subject to control. Checking the legality of their origin implies an analogue of Operation Clean Hands, which was carried out in the 1990s in Italy. At the same time, Kazakhstan is introducing a gradual universal declaration of citizens' income.

The Supreme Audit Chamber exercises control over the targeted use of returned assets in the interests of citizens of Kazakhstan. These funds are accumulated in a special fund, the activities of which, as well as the company managing it, are regulated by the Law "On the Return of Illegally Acquired Assets to the State".
A special state fund is understood to be a cash control account of the Government, opened in the treasury bodies, for the accumulation and sale of returned assets.The management company is an organization whose sole founder is the Government. The fund management company has the task of accepting the returned assets into ownership on behalf of the state, managing the assets, and ensuring the transfer of funds to a special state fund.

As of September 13, 2024, revenues to the fund reached 176.3 billion tenge. 5.7 billion tenge came from the Returned Asset Management Company LLP. Of this, 5.559 billion tenge was collected from the sale of assets, 159 million - from asset management. In accordance with the Budget Code, issues of distribution of funds from the Special State Fund are decided by the Republican Budget Commission without fail on the basis of proposals from central government bodies. The funds of the Special State Fund are spent on financing social projects aimed at healthcare, education, support for socially vulnerable groups of the population, people with disabilities, orphans, children without parental care, rural youth, the unemployed, single-industry towns, for the needs of residents of rural settlements, development communal and socio-cultural facilities, as well as for other projects determined by the Government of the Republic of Kazakhstan, including those related to the strengthening of economic projects and important areas, the creation (restoration) of industries needed to solve socio-economic issues.

In order for the process of reforming the law enforcement and judicial system of the Republic of Kazakhstan to be successful, it is necessary to solve the problem of complete identification, tracking, freezing and confiscation of assets of criminal origin in the form of money, valuables and property.For success, it is necessary to solve the problem when money, valuables and property of criminal origin are located abroad and a long time is needed to fully identify, track, initiate freezing and seizure, significantly exceeding the reasonable time of the pre-trial investigation. We believe that one of the procedural and legal mechanisms for ensuring public interests in the context of the problem under consideration is a proposal aimed at strengthening the effectiveness of justice in cases of this category. In particular, it is necessary to provide for the possibility of confiscation by a court of illegal assets transferred abroad in a separate proceeding – on the basis of an effective verdict in a criminal case involving a crime that is the basis for confiscation (institute of financial investigation) (by analogy with Chapter 16 of the Criminal Procedure Code of Estonia)[12].

Statistics can help identify existing gaps in the practical aspect and find out the impact of the investigation results on the prevention of crimes in this category and the relationship with sustainable asset laundering systems. For example, according to the data of the Asset Recovery Committee of the Prosecutor General's Office of the Republic of Kazakhstan, since the formation of the Committee (from October 5, 2023), the return of assets in the amount of more than 450 billion tenge has been approved for the year of operation, of which more than 300 billion tenge in money and more than 100 billion tenge in assets. 42 billion tenge was allocated for the launch of production of

[12] Decree of the President of the Republic of Kazakhstan dated October 15, 2021 No. 674 "On approval of the Concept of Legal Policy of the Republic of Kazakhstan until 2030" / [Electronic resource]. - Access mode: https://adilet.zan.kz/rus/docs/U2100000674 , accessed September 7, 2024.

investment projects and for the construction of social projects (schools, hospitals, etc.).

Meanwhile, when the Law “On the Return of Illegally Acquired Assets to the State” was adopted, Chapter 15-1 of the Code of Criminal Procedure on the so-called additional financial investigation at the stage of execution of the sentence was, unfortunately, excluded from the draft. It will be discussed below.

In order to implement the Concept until 2030, an Action Plan for the implementation of the Concept until 2030 was adopted, approved by the Decree of the Government of the Republic of Kazakhstan dated April 29, 2022. Paragraph 56 of the Action Plan provides for the development of a draft law that will introduce the institution of financial investigation.
In addition, the Republic of Kazakhstan will undergo the second round of Mutual assessment of the Eurasian Group on Countering Money Laundering and Financing of Terrorism (hereinafter - EAG) for compliance of national legislation with FATF Recommendations.

It should be noted that implementation of the FATF Standards is mandatory for any member country of the United Nations (UN) in accordance with UN Security Council Resolution (UNSCR) dated July 29, 2005 No. 1617.

In particular, the 30th FATF Recommendation, compliance with which is mandatory for Kazakhstan by virtue of a UN Security Council resolution, provides that in all cases involving serious, income-generating crimes, when considering cases of money laundering, predicate offenses and terrorist financing, authorized law enforcement officials authorities must conduct a parallel financial investigation on their own initiative [13].
The need for a systematic legal regulation of financial investigations is evidenced by data from international experts (Global Financial Integrity, USA) regarding capital outflow from Kazakhstan related to crime, including corruption, tax evasion and other illegal activities. However, data on the amount of capital illegally withdrawn from Kazakhstan is quite contradictory.
For example, a study by the Global Financial Integrity organization (hereinafter referred to as GFI) talks about $167.4 billion withdrawn only in the period 2004 - 2013. In their calculations, GFI experts identify falsifications of trade documents, which make it possible to withdraw and launder money, evade

[13] Explanatory Note to FAFT Recommendation 30 "Duties of Law Enforcement and Investigative Authorities" as amended in October 2018 / FATF Recommendations: International Standards on Countering Money Laundering, Terrorist Financing and Financing the Proliferation of Weapons of Mass Destruction / Translated from English — IUMCFM, 2012. — 191 p. Access mode: https://eurasiangroup.org/files/uploads/files/other_docs/FATF%20docs/rekomendacii-fatf-2019.pdf , accessed September 10, 2024.

taxes and duties, conceal profits in offshore accounts, etc. Another GFI study shows an annual gap in the value of commodity flows circulating between Kazakhstan and its trading partners of $8.5 billion, or more than $85 billion for the period 2009-2018.

The Tax Justice Network, in turn, records an annual capital outflow from Kazakhstan at the level of $212 million. And in 2021, she estimated the amount of wealth placed by Kazakhstanis offshore at $45.7 billion.

International experience also shows the importance of conducting a financial investigation based on a judicial act.

The experience of regulating the institution of financial investigations by the criminal procedural codes of the Netherlands and Estonia seems attractive.
In accordance with the experience of the Netherlands, the procedure for carrying out a financial investigation is regulated by Chapter 9 of the Code of Criminal Procedure of the Netherlands “Criminal Financial Investigation”, which consists of 7 articles[14].

Article 126 of the Dutch Code of Criminal Procedure states that if there is a suspicion of having committed a serious criminal offense for which a fifth category fine may be imposed and as a result of which significant financial gain may have been obtained, a criminal financial investigation can be initiated on the basis of a reasoned permission from the investigating judge at the request of the prosecutor tasked with uncovering the criminal offense.

This article also obliges the responsible prosecutor, at his own discretion or at the request of the court, to inform the court about the progress of the financial investigation.

Article 126a of the Dutch Code of Criminal Procedure defines the powers of an investigator related to conducting a financial investigation (the ability to request information from various entities regarding the available assets of a defendant or convicted person, etc.).

According to the Estonian experience, the procedure for conducting a financial investigation is regulated by Chapter 16-1 of the Estonian Code of Criminal Procedure "Proceedings for the confiscation of the means of committing a crime, the direct object of the crime and property obtained by criminal means", which consists of 10 articles. It is worth noting that the chapter was included in the code in December 2016.

[14] The Criminal Procedure Code of the Netherlands/ [Electronic resource]/Library of Congress.

It is noteworthy that this chapter allows for a financial investigation both during the investigation of the main criminal offense and in the two-year period after the entry into force of the conviction in the main criminal case (article 403-1). In case of special complexity or scope of circumstances related to confiscation, the Prosecutor's Office has the right to begin preparing a petition for confiscation in a separate proceeding[15].

Within the framework of confiscation proceedings, the use of conciliation proceedings is permitted (paragraph 3 of articles 403-6). At the same time, if the confiscation proceedings are conducted in parallel with the proceedings in the main criminal case, the court decides by its decision on confiscation at the request of the prosecutor's office after the entry into force of the verdict on the crime that is the basis for confiscation.

The experience of financial investigation in Ukraine is of particular interest. According to Ukrainian legislation, the purpose of a financial investigation from the very beginning should be to transform information obtained during the pre-trial investigation, taking into account the analysis of financial relationships, into evidence admissible in court and which can be used as a basis for conviction and return of illegally acquired assets[16].

In accordance with the Ukrainian criminal procedure legislation, the planning of initial investigative actions and tactical operations should ensure the fulfillment of tasks aimed at finding and preserving necessary documents and items that may have the value of physical evidence or to determine the damage caused by theft. The investigative and organizational actions taken in this regard are urgent and should be carried out as a matter of priority. The results of the initial investigative actions serve as the basis for detailing further investigations, as well as for forming a plan aimed at identifying and uncovering all episodes of the crime and its accomplices.

The main purpose of investigations is to obtain documentary evidence of each financial or business transaction related to money laundering and committed on behalf of or with the participation of a buffer or fictitious company. Before carrying out these investigative (search) actions, it is necessary to develop a detailed plan that should provide simultaneous temporary access to objects

[15] The Criminal Procedure Code of Estonia/ [Electronic resource]/ - Access mode:] https://www.juristaitab.ee/sites/default/files/seaduste-tolked/%D0%A3%D0%93%D0%9E%D0%9B%D0%9E%D0%92%D0%9D%D0%9E%D0%9F%D0%A0%D0%9E%D0%A6%D0%95%D0%A1%D0%A1%D0%A3%D0%90%D0%9B%D0%AC%D0%9D%D0%AB%D0%99%20%D0%9A%D0%9E%D0%94%D0%95%D0%9A%D0%A1% 2001.04.2023.pdf, accessed September 17, 2024.

[16] Lepsky S., researcher of the Department of Economic Security, National Academy of internal affairs (Kiev), on the subject of financial investigations and correlation with financial control //law and Life No. 3, 2014.

and documents, inspection, and search both in the bank's premises and in the conversion centers[17].

The Institute of Financial Investigation, as a set of criminal procedural rules governing legal relations within the framework of traditional and parallel pre-trial investigations, as well as during the execution of sentences, is designed to provide a procedural and legal basis for the domestic and international search, freezing, arrest, seizure and confiscation of criminally obtained funds and property, as well as criminal proceeds for which A penalty may be levied during the execution of a sentence in terms of a civil claim and confiscation of property.
We believe that a financial investigation can structurally have three consecutive and interrelated stages:
1) parallel financial investigation conducted alongside or as part of a (traditional, ordinary) preliminary investigation;
2) pre-trial proceedings on the confiscation of property obtained by criminal means before a court verdict (confiscation in rem) in the manner prescribed by Chapter 71 of the Code of Criminal Procedure of the Republic of Kazakhstan;
3) financial investigation on the basis of a court verdict that has entered into legal force (draft chapter 15-1 of the Code of Criminal Procedure of the Republic of Kazakhstan).

The regulatory legalization of the financial investigation and its gradation into the above-mentioned stages in the criminal procedure legislation of Kazakhstan is one of the most important factors in achieving the goals of justice, as well as ensuring public interests.

The parallel financial investigation model should be based on the FATF Recommendations. During investigative measures, primarily through the Economic Investigation Service of the Financial Monitoring Agency of the Republic of Kazakhstan, the main (traditional) pre-trial proceedings should be aimed at establishing the circumstances of the subject of evidence specified in part one of Article 113 of the Criminal Procedure Code of the Republic of Kazakhstan and the disposition of the incriminated article of the Special Part of the Criminal Code.

[17] Manual on certain aspects of financial investigations (analysis of financial relations) https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https%3A%2F%2Ffiu.gov.ua%2Fassets%2Fuserfiles%2F200%2FTypologies%2520(National%2520Studies%2C%2520Guidances%2520etc)%2FENG_FINANCIAL%2520INVESTIGATIONS%2520MANUAL.pdf&ved=2ahUKEwidwcnd1OeIAxU3BNsEHf7HBrsQFnoECBIQAQ_&usg=AOvVaw1FHuvyB262yRx2jBqACng8, accessed September 21, 2024.

In cases where the suspect has fled outside of Kazakhstan or has died, but the criminal case materials establish the subject of proof, the criminal origin of the assets, and their causal relationship with the offense, confiscation in rem is applied as a property confiscation of assets. Within the framework of the confiscation procedure in rem in Kazakhstan, a number of measures must be taken.

First of all, the practice of considering cases of this category needs to be improved, since only about 10 cases have been investigated and considered by the court since 2018. It is also necessary to expand the grounds for initiating this type of proceedings in order to improve criminal procedure legislation. We propose to introduce into the legislation the institution of ongoing parallel financial investigation and to activate the work of the International Legal Cooperation Service of the Prosecutor General's Office of the Republic of Kazakhstan, whose function is to return illegally transferred assets abroad.

We consider it advisable to introduce the third stage of financial investigation into the Criminal Procedure Code of the Republic of Kazakhstan at the stage of execution of the sentence, similar to the practice of the Netherlands[18]. In our opinion, the incorporation of the Dutch experience into Kazakh legislation will help improve the effectiveness of solving the tasks of comprehensive compensation for material damage caused by criminal offenses, confiscation of property, return of criminally acquired assets to the state, and seizure of proceeds from criminal assets.

One of the important steps in conducting a financial investigation is the procedure for searching for illegally withdrawn assets from the country. Within the framework of international cooperation, many States have joined the STAR Initiative (the Initiative for the Recovery of Stolen Assets). According to this Initiative, the participating countries need to bring national legislation into line in such a way as to facilitate the return of illegally withdrawn assets in practice. The Initiative also helps countries in collecting and sharing information on asset recovery, as well as in improving regulatory documents.

At the same time, the main problem in establishing illegally withdrawn assets remains the difficulty of proving the connection between the found assets and the criminal actions of intruders. In order to establish this connection, investigating authorities need to identify and find a link between the assets of the offenders and their illegal activities according to the "follow the money"

[18] The Conference of the States Parties to the UN Convention against Corruption. Review of the implementation of the UN Convention in the Netherlands. - - Spring, October 13-15, 2014. [electronic resource]. - Access mode: https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/ExecutiveSummaries/V1403532r.pdf , accessed September 12, 2024.

principle. In this aspect, the introduction of artificial intelligence into investigative tools can be of great help.

In November 2023, the Prosecutor General of the Republic of Kazakhstan announced at a meeting with the Head of State that it was planned to connect artificial intelligence to the search for assets illegally transferred abroad[19]. At an expanded Government meeting on January 28, 2025, K. Tokayev instructed to step up work on the development of artificial intelligence and its implementation in the activities of government agencies and national companies.[20].

The potential of artificial intelligence to detect illegal assets abroad and return them implies the following:

1. Search for illegal assets and their identification. The use of machine learning technologies based on big data analysis is aimed at searching for specified information based on comparison with the source data. The search algorithms will depend on the training methods and the system. The speed of artificial intelligence analysis of unstructured data, the search for patterns and causal relationships makes artificial intelligence tools competitively advantageous in comparison with human capabilities. In implementing the task of searching for illegal assets, the AI system can analyze large amounts of data on missing property from various sources (social networks, online ads, financial transactions, customs data, notary data, etc.) comparing them with data from law enforcement agencies involved in the search for illegal assets. The capabilities of AI systems in identifying illegal and illegal property are many times higher than the capabilities of the human resource of law enforcement agencies.

2. Digital vision focused on the search and identification of a given object or person by equipping audio and video equipment (cameras) artificial intelligence technologies. That is, the "camera detective" sees the image, analyzes it and recognizes the information in real time. AI systems integrated into video cameras placed on streets and in buildings, trained to analyze information obtained from various sources, can track the movement of missing property (not only property, but also people of interest in pre-trial or judicial proceedings).

3. Natural language processing (NLP). I-systems trained in natural language understanding extract relevant information from large amounts of textual, unstructured information. Using NLP to search for illegal assets

[19] Neural networks will search for assets illegally exported from Kazakhstan. https://tengrinews.kz/kazakhstan_news/neyroseti-budut-iskat-nezakonno-vyivezennyie-kazahstana-516683/?ysclid=m6gdhk1ojq264884389, accessed September 24, 2024.
[20] The Head of State instructed to accelerate the implementation of https://www.zakon.kz/tekhno/6465016-glava-gosudarstva-poruchil-forsirovat-vnedrenie-ii.html

allows you to analyze open information (news, articles, ads, social media posts, comments, and other resources). The purpose of the search is to mention the assets you are looking for, people associated with such assets, and identify systemic relationships between the property you are looking for and the data you are analyzing.

4. Predictive analytics. Training of I-systems to predict possible channels of illegal withdrawal of assets from the budget and their withdrawal abroad, including through affiliated structures. Predictive analytics has a preventive focus, and also allows you to effectively allocate law enforcement resources, create barriers to withdrawing money abroad, etc., and minimize possible risks.

The practice of using artificial intelligence in the process of countering the legalization of illegal income and the financing of terrorism is quite effective, which can be transformed into the search for illegal assets.

The days of "manual analysis" of banking transactions are a thing of the past. Today– this is the functionality of artificial intelligence. For example, Know Your Customer (KYC) technologies have trained AI systems that analyze customer behavior based on transaction data. That is, a client's action that falls out of the typical one falls into the risk zone, and the AI system automatically signals the need for verification.

Unlike the first technology, another artificial intelligence tool, the analysis of aggregated data, is aimed at processing a large amount of information. Experts rate this tool as more accurate and high-quality. However, this technology is imperfect, as it requires human involvement in the case of an AI system responding to a transaction that is not criminal, but similar to it.

According to the STAR Initiative, an important element in asset search is to create a profile of the entity whose assets are being searched. This should especially be done at the early stages of the investigation using artificial intelligence technologies to create clarity in the case. With the help of artificial intelligence, the following data can be established:

- information about the suspect's identity, including passport details, his pseudonyms and other affiliated information;
- information about family, close relatives and trusted persons, information about suspicious contacts;
- information about the location, extracts from entries in real estate registers, purchase and sale agreements and other property;
- available data on subscriber numbers, personal and work contacts, business connections;
- photos posted on various Internet sites, in social networks, profiles on social networks, data on available publications;
- results of academic and business activities, information about employment and other work contacts;

- all other information placed in the digital space is freely available.
This list is not exhaustive, because the boundaries of the application of artificial intelligence are expanding every year.

After forming the profile of the subject of the investigation, it is necessary to start searching for his financial assets directly. To do this, first of all, it is necessary to establish which methods of payments were made, up to the definition of specific transactions. It is also important to identify those involved or involved in the movement of criminal assets. Then it is advisable to find out the location of the assets, and in whose names, they are registered de jure and by whom they are de facto managed.

All these actions, when performed manually, take a lot of time and resources, while artificial intelligence will help save a lot of time and effectively conduct investigative and search activities.

The efficiency and accessibility of justice in cases of return of illegal assets can be the subject of analysis using AI systems to identify possible corruption risks.A study of individual court decisions that raise reasonable doubts about the impartiality of those making them shows that a decision motivated by corruption may objectively differ from the bulk of court decisions that nevertheless comply with criminal procedure law.Analysis of such decisions in their entirety using artificial intelligence technologies allows us to identify characteristic markers, the presence of which in court decisions provides grounds for asserting the existence of corruption risks.

We believe that the use of artificial intelligence technologies in the analysis of judicial acts in order to determine corruption risks in cases of recovery of illegal assets will be an important mechanism to ensure the accessibility of justice and its effectiveness in cases of this kind. Such an analysis of the activities of a law enforcement agency investigating criminal cases on the return of illegal assets using artificial intelligence tools also seems to be in demand and is aimed at protecting public interests.

4 CONCLUSIONS

In conclusion, I would like to note that the adoption of the authors' proposals will lead to the following expected legal and socio-economic consequences:

- the effectiveness and accessibility of justice in cases of the return of illegally acquired assets will be ensured;
- the corruption risks of justice in cases of recovery of illegal assets have been minimized through the use of artificial intelligence technologies;
- reducing the volume of the shadow economy, forecasting the risks of withdrawing money from the budget, through the use of artificial intelligence technologies;

- timely tracking and freezing of criminal assets that may later be confiscated in favor of the people of Kazakhstan and the state, including through the use of artificial intelligence technologies;
- compensation for damage caused to the state and the people of Kazhastan as a result of committing criminal offenses;
- improving the effectiveness of the anti-money laundering and terrorist financing system, including through the use of artificial intelligence technologies.

Thus, further improvement of criminal procedure legislation should be systematic, careful, selective and consistent, so as not to destroy the fundamental principles and standards of our criminal process, not to disorient investigative and judicial practice, not to reject established legal traditions and established procedural culture. It is necessary to go not from the norms of law, including foreign and international, into practice, but on the contrary, from practice through pilot testing into legal regulation. An urgent area is the introduction of artificial intelligence tools and their regulatory legalization in pre-trial and judicial proceedings, as well as at the stage of execution of a sentence.

We believe that ensuring the effectiveness and integrity of justice through the protection of public law interests in criminal cases involving the return of illegally acquired assets should be implemented through a comprehensive combination of traditional methods and tactics of financial investigation and artificial intelligence tools.

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