



Asylum Research & Global Assistance

Annual Analytical Report of the ARGA Association (Asylum Research & Global Assistance) on the Abuse of Interpol Mechanisms in Economic Cases in Russia and CIS Countries (2023–2025)

Report prepared for presentation at the 93rd General Assembly of Interpol (Marrakesh, November 2025)

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Introduction

This analytical report by the Association *Asylum Research & Global Assistance (ARGA)* summarizes the results of monitoring the abuse of Interpol mechanisms in economic cases in Russia and CIS countries during the period 2023–2025. The research confirms a persistent trend toward the politicization of economic offences and their use in corporate and domestic political conflicts, undermining trust in the international wanted notice system.

The report has been prepared for presentation at the 93rd General Assembly of Interpol (Marrakesh, November 2025) and is based on official data from the INTERPOL Annual Report 2023, CCF Activity Report 2023, as well as materials from UNODC, OECD Integrity Forum, PACE Resolution 2315 (2019) and 2515 (2023).

According to ARGA and official Interpol sources, approximately 70% of the submissions to the Commission for the Control of Files (CCF) concern cases qualified as fraud, embezzlement, or abuse of power, with a significant portion showing signs of disproportionate measures of restraint and lack of due process. The analysis confirms that Red Notices and Diffusions are often issued with minimal evidentiary basis, relying solely on detention orders, and are sometimes reissued after cases have been closed (secondary prosecution).

The report consolidates the results of ARGA’s internal investigations (around one hundred cases across various jurisdictions) and contains recommendations to strengthen legal safeguards and procedural transparency within the Interpol system.

The report presents three key recommendations for the Interpol General Assembly:

1. Introduction of a pre-publication admissibility checklist for economic cases, including proportionality assessment, identification of potential civil disputes, and verification of independent expert evaluations.
2. Strengthening of the CCF mandate to allow prompt deletion of notices in cases of non-cooperation by NCBs and repeated prosecutions.
3. Establishment of a permanent coordination mechanism INTERPOL–UNODC–OECD aimed at developing common *due process* standards in economic-related cases.

The implementation of these measures is intended to reinforce legal guarantees, reduce the workload of the CCF, and restore confidence in Interpol as an instrument of international justice.

1. ARGA's Mandate and Methodology

ARGA is an independent human rights and research organization operating at the intersection of international law, extradition, economic security, and human rights.

Research methodology:

1. Analysis of public and official documents

The study examines court rulings, prosecutorial decisions, materials of National Central Bureaus (NCBs), and official reports of international organizations (INTERPOL, UNODC, OECD, Council of Europe, European Court of Human Rights). This analysis helps identify recurring patterns of abuse and assess their compliance with international standards.

2. Review of CCF and ECtHR decisions, PACE reports

Particular attention is given to the decisions of the Commission for the Control of Files (CCF), which forms precedential practice in the application of Articles 2 and 3 of the INTERPOL Constitution, as well as to judgments of the European Court of Human Rights (ECtHR) concerning the abuse of criminal prosecution. The analysis also covers resolutions and reports of the Parliamentary Assembly of the Council of Europe (PACE), which document systemic issues in anti-corruption and law enforcement practices.

3. Verification of client materials (without disclosure of personal data)

ARGA's internal database compiles materials from more than one hundred cases across various CIS and European countries. All documents undergo internal legal and factual verification, including cross-checking of dates, case summaries, procedural acts, and decisions of national and international bodies. Identifying data (names, addresses, companies) are not disclosed in the public version of the report, in order to preserve confidentiality and protect sources.

4. Comparison with the INTERPOL Constitution and the Rules on the Processing of Data

Each case is analyzed for compliance with Articles 2 and 3 of the INTERPOL Constitution (obligation to respect human rights and prohibition of political activities), as well as with the provisions of the RPD, including admissibility criteria for the publication of notices and grounds for their deletion. ARGAs adheres to the principle of evidence-based advocacy: all conclusions are grounded in documented evidence and decisions of international bodies. This approach ensures the reliability, legal neutrality, and professional credibility of the data presented in ARGAs interactions with INTERPOL, UN structures, and national authorities.

2. Context and Trends 2023–2025

2.1. Increasing Pressure on the Interpol System

According to the CCF Activity Report 2023, the number of submissions to the Commission for the Control of INTERPOL's Files (CCF) increased to 2,793 (compared to 2,365 in 2022). Of

these, 2,238 were closed, and more than 500 were admitted for consideration. These figures indicate a structural overload of the legal oversight mechanism.¹

Based on ARGAs internal assessments and data from the INTERPOL General Secretariat, approximately 70% of all applications submitted to the Commission concern economic cases (fraud, misappropriation, embezzlement, abuse of office). This category remains the most vulnerable to politicization and manipulation, as it does not formally fall under the prohibition of Article 3 of the INTERPOL Constitution (which bans political activities) but is often used in practice to target individuals involved in economic or corporate disputes with elements of political pressure.

The Commission also highlights a systemic problem in cooperation with National Central Bureaus (NCBs). In a number of instances, responsible units of member states:

- delay the provision of requested materials;
- provide them only partially; or
- avoid responding altogether, citing internal procedural limitations.

2.2. Financial and Corporate Cases as a Source of Politicization

According to the INTERPOL Global Financial Fraud Assessment 2024, 85% of all *Red Notices* and *Diffusions* issued in 2022–2023 were related to fraud.² Within the framework of the [INTERPOL IFCACC — Financial and Anti-Corruption Centre](#), more than 700 cases were supported, with a total estimated loss of around USD 1.2 billion.

However, this same category of offences remains highly susceptible to manipulation. In several post-Soviet countries, economic charges are used to settle political and business scores. Across the post-Soviet region—particularly in Russia, Belarus, Kazakhstan, Uzbekistan, and Azerbaijan—a persistent pattern has emerged involving the criminalization of civil and corporate disputes. Frequently, the initiation of a criminal case under an economic article precedes processes of asset redistribution, corporate control changes, or participation in public tenders. As a result, INTERPOL receives notices based not on objective evidence of financial harm but on administrative or politically driven decisions of national authorities.

The practice of retroactive requalification is particularly widespread — when an initially commercial dispute or civil claim is later reclassified as a criminal case involving fraud or abuse of office. Such transformation enables the issuance of a Red Notice or Diffusion and gives the case an international dimension.

2.3. Positions of the Council of Europe and the OECD

International human rights and anti-corruption institutions have consistently expressed concern over the politicization of international legal assistance mechanisms, including the use of INTERPOL channels in economically motivated cases.

In its *Resolution 2315 (2019)*, the Parliamentary Assembly of the Council of Europe emphasized the need to “strengthen INTERPOL’s safeguards against politically motivated requests, particularly those disguised as economic crimes.”³

Similarly, *Resolution 2515 (2023)* stated that “the use of international institutions for domestic political struggles undermines trust in the system of collective security and international justice.”⁴

¹ Interpol, Commission for the Control of Files – Activity Report 2023, https://www.interpol.int/content/download/20967/file/GA-2023-91-REP-22%20E%20AnnualActivityReportCCF_2022%20%2823Y2486%29%20%28REV%29%282%29.pdf.

² Interpol, Global Financial Fraud Assessment 2024, https://www.interpol.int/content/download/21096/file/24COM005563-01%20-%20CAS_Global%20Financial%20Fraud%20Assessment_Public%20version_2024-03_EN_v3.pdf.

³ PACE, Resolution 2315 (2019), <https://pace.coe.int/en/files/28303/html>.

⁴ PACE, Resolution 2515 (2023), <https://pace.coe.int/en/files/33140/html>.

Both the [OECD Integrity Forum 2025](#) and the [G20 Anti-Corruption Working Group Report 2024](#) document a growing number of cross-border abuses involving mutual legal assistance mechanisms and international wanted notice systems.⁵

2.4. Legal Environment in Russia and CIS Countries

The condition of the legal system in Russia and several CIS countries demonstrates a persistent imbalance between the functions of criminal prosecution and the right to defense, which directly affects the reliability and integrity of data transmitted to INTERPOL.

According to the Judicial Department of the Supreme Court of the Russian Federation, in 2024, 13.1% of criminal cases were referred to court with a pretrial detention measure, while the share of acquittals was below 0.3%.⁶ This reflects a structural imbalance between prosecution and defense rights.

Similar trends are observed in Kazakhstan, Belarus, and Uzbekistan, where the institution of in absentia prosecution remains in place even when reliable information about a person's residence abroad and willingness to cooperate with the justice system is available. In many cases, indictment and detention orders are issued without proper notification or the participation of legal counsel, further undermining the due process standards expected under international law.

2.5. Conclusion

The analysis of developments from 2023 to 2025 leads to an unequivocal conclusion: INTERPOL mechanisms are increasingly being used as tools for the institutionalization of domestic abuses, lending internal political or corporate conflicts a false appearance of international legal legitimacy.

Economic offences have become a “universal key” to initiating international searches, as they do not formally fall under the restrictions of Article 3 of the INTERPOL Constitution (prohibiting political activities). However, in essence, many such cases are overtly political or repressive, thereby undermining confidence in the entire system of international police cooperation.

Thus, the abuse of economic charges within the framework of international wanted procedures is not merely a consequence of weak national judicial systems, but also a source of institutional risk for INTERPOL as a global organization.

3. Typology of Abuses and Legal Qualifiers

3.1. Criminalization of Civil and Corporate Disputes

Monitoring conducted by *Asylum Research & Global Assistance (ARGA)* confirms a persistent trend toward the criminalization of civil and corporate disputes, representing one of the most typical forms of abuse of INTERPOL mechanisms. In most documented cases, criminal prosecution is initiated against entrepreneurs, shareholders, or company executives under articles classified as economic crimes — primarily fraud (Article 159 of the Russian Criminal Code and equivalent provisions in other CIS jurisdictions) and abuse of office (Article 201 of the Russian Criminal Code and analogues).

⁵ G20, G20 Anti-Corruption Working Group, Accountability Report Organizing Against Corruption, 2024, https://track.unodc.org/uploads/documents/corruption/G20-Anti-Corruption-Resources/Accountability-and-Monitoring-Reports/2024_G20_Brazil_ACWG_Accountability_Report_2024_-_Organizing_against_corruption.pdf.

⁶ *Kommersant*, «Ne ko vsem process idet», 25 april 2025, https://www.kommersant.ru/doc/7677678?utm_source=chatgpt.com.

Such an approach distorts the very nature of criminal law, which, according to the principle of *ultima ratio*, should be applied solely as a last resort to protect public interests when other legal remedies (civil, corporate, or arbitration) have been exhausted. In practice, however, criminal prosecution often becomes a means of exerting pressure in commercial disputes, enabling one party to use state investigative bodies to achieve economic goals — such as asset redistribution, coercion of business partners, or elimination of competitors.

Such practices have been repeatedly criticized by international judicial bodies. In its judgment in *Gusinskiy v. Russia*, No. 70276/01 (2004), the European Court of Human Rights (ECtHR) explicitly stated that the use of criminal prosecution as a means of exerting pressure on a party to a civil dispute constitutes a violation of Article 18 of the Convention in conjunction with Article 5, as the prosecution loses its legitimate legal purpose and becomes a tool of disproportionate coercion.⁷

3.2. “Reinforcement” of Case Narratives with Elements of Organized Crime

One of the most common methods of fabricating or distorting criminal cases, identified by ARGAs, is the artificial “reinforcement” of the case narrative through the later addition of qualifying elements such as “acting as part of an organized group,” “in an especially large amount,” or “money laundering (legalization of criminal proceeds).”

The inclusion of such elements does not aim to clarify factual circumstances but serves purely procedural and tactical purposes — namely, to reclassify the case as a serious or especially serious crime. This, in turn, allows authorities to:

- obtain a court sanction for arrest (including in absentia);
- initiate a Red Notice or Diffusion through INTERPOL channels;
- create the appearance of an international dimension of the alleged offence and strengthen arguments for an extradition request.

The [CCF 2023](#) notes that such artificial extensions of case narratives are among the main reasons for finding notices inconsistent with the INTERPOL Constitution and the Rules on the Processing of Data (RPD).⁸

3.3. Procedural Anomalies

ARGA’s research has revealed a consistent set of procedural violations recurrent in economic cases that later become the basis for INTERPOL notices. These are not isolated errors of national authorities but rather systemic practices forming a distinctive pattern of abuse throughout the post-Soviet space.

The most typical procedural anomalies include:

– In absentia prosecution without notification of the person concerned.

In many cases, investigative bodies initiate criminal proceedings and issue an indictment order without properly notifying the individual, even though their whereabouts are known or easily identifiable. This allows authorities to formally classify the person’s conduct as “*evasion of investigation*” and justify a request for international search. Such practice violates the principle of *audi alteram partem* (the right to be heard) and contravenes Article 6 of the European Convention on Human Rights.

– Denial of access to case materials for the defense.

A common situation occurs when the defense counsel or the accused is denied access to pretrial investigation materials, including expert reports, financial documentation, and correspondence between authorities. As a result, the right to an effective defense and the principle of equality of

⁷ HUDOC – European Court of Human Rights, Case of *Gusinskiy v. Russia* (Application no. 70276/01), [https://hudoc.echr.coe.int/eng#{%22itemid%22:\[%22001-61767%22\]}](https://hudoc.echr.coe.int/eng#{%22itemid%22:[%22001-61767%22]}).

⁸ Interpol, Commission for the Control of Files – Activity Report 2023, https://www.interpol.int/content/download/20967/file/GA-2023-91-REP-22%20E%20AnnualActivityReportCCF_2022%20%2823Y2486%29%20%28REV%29%282%29.pdf.

arms are violated. This creates an artificial informational advantage for the prosecution and makes it impossible to conduct independent expert assessments.

- Restriction of participation in interrogations and expert examinations.

ARGA has documented numerous cases in which the defense was denied participation in investigative actions — including interrogations of key witnesses or the appointment of expert evaluations — the results of which later became central evidence for the prosecution. The lack of procedural oversight by the defense undermines the credibility and reliability of the evidentiary base.

- Disregard for exculpatory or alternative expert opinions.

Even when independent audit or expert reports confirm the absence of criminal conduct, investigative and judicial authorities often refuse to attach such findings to the case file or fail to assess them properly. This practice undermines the principle of adversarial proceedings and turns the judicial process into a formal continuation of the prosecution's narrative.

All these procedural anomalies violate paragraphs 3 and 4 of Article 6 of the European Convention on Human Rights (the right to defense and access to case materials) and create a significant risk of politicized prosecution.

3.4. Arrest as an “Anchor” for the Notice

One of the key instruments enabling the abuse of INTERPOL mechanisms is the practice of using a pretrial detention order as the sole and formal basis for the publication of a Red Notice or Diffusion.

In most cases examined by ARGA originating from CIS countries — particularly Russia, Kazakhstan, Belarus, and Uzbekistan — the existence of a domestic in absentia arrest warrant is treated by National Central Bureaus (NCBs) as automatic confirmation of the lawfulness and necessity of international search measures. This occurs without any assessment of the proportionality, procedural validity, or factual justification of the chosen measure of restraint.

This approach significantly distorts the intended purpose of international notices. Under Article 2 of the INTERPOL Constitution and the Rules on the Processing of Data (RPD), INTERPOL operates on the principles of necessity and proportionality — meaning that any measure affecting an individual's liberty may only be applied in exceptional circumstances, when national authorities have demonstrated a real and substantial risk of flight from justice.

3.5. Repeated (“Secondary”) Prosecution

One of the most telling indicators of abuse of INTERPOL mechanisms is the practice of reopening criminal cases based on the same facts after a previous investigation has been discontinued or closed. Such secondary prosecution is often used to circumvent judicial decisions terminating proceedings, recognizing them as unlawful, or declaring the expiration of limitation periods. As a result, national authorities are able to reinitiate an international search, presenting the situation as a “new” criminal proceeding.

According to the legal position of the Commission for the Control of INTERPOL's Files (CCF), as stated in Section IV of the CCF Activity Report 2023, this practice contradicts the fundamental principle of *ne bis in idem*, enshrined in Article 4 of Protocol No. 7 to the European Convention on Human Rights and Article 14(7) of the International Covenant on Civil and Political Rights.⁹

3.6. Information and Psychological Pressure

ARGA's monitoring for the period 2023–2025 revealed that in approximately 50% of reviewed cases, the submission of an INTERPOL notice was preceded by an orchestrated media campaign in national mass media aimed at shaping a negative public image of the individual, the company, or their representatives.

⁹ Interpol, Commission for the Control of Files – Activity Report 2023, https://www.interpol.int/content/download/20967/file/GA-2023-91-REP-22%20E%20AnnualActivityReportCCF_2022%20%2823Y2486%29%20%28REV%29%282%29.pdf.

Such campaigns are typically characterized by the coordinated dissemination of accusatory narratives through official publications, state-controlled television channels, and affiliated online outlets.

They often include:

- publication of excerpts from investigative materials before their official disclosure;
- public statements by representatives of the Prosecutor’s Office or the Ministry of Internal Affairs creating the impression of a completed investigation;
- the use of the term “international wanted person” before official confirmation by INTERPOL;
- emphasis on the moral or political “guilt” of the individual concerned.

Although such actions are not explicitly prohibited by international law, they contradict Article 2 of the INTERPOL Constitution, which enshrines the organization’s duty to act “in the spirit of the Universal Declaration of Human Rights,” as well as Article 3(1), which prohibits the use of INTERPOL mechanisms for political, military, racial, or religious purposes.¹⁰

4. International Legal Standards and Practice

4.1. The Normative Framework of INTERPOL

INTERPOL’s activities are governed by a combination of constitutional and procedural instruments that define the framework of legal integrity and individual rights protection in data exchange.

The key legal sources include:

— Constitution of Interpol, Art. 2 & 3 – these provisions oblige the organization to respect human rights and prohibit activities of a political, military, religious, or racial nature. Together, they constitute the ethical and legal core of INTERPOL’s mandate, establishing it as a neutral and non-political mechanism for international police cooperation.

– RPD (2022 Edition) — this document sets out the procedures for verifying the admissibility of data, including Article 83 (deletion of data on the initiative of the General Secretariat) and Article 135 (the CCF’s right to request additional information or materials).¹¹

4.2. PACE Decisions and Reports

International monitoring bodies of the Council of Europe and its affiliated structures have consistently emphasized the need to strengthen transparency and legal oversight over INTERPOL’s activities.

¹⁰ Interpol. Constitution of the International Criminal Police Organization-INTERPOL, Article 2, 3, https://www.interpol.int/content/download/590/file/01%20E%20Constitution_2024.pdf.

¹¹ Interpol, RPD, https://www.interpol.int/content/download/5694/file/27%20E%20RulesProcessingData_RPD_2024.pdf.

- In PACE Resolution 2315 (2019) and, Recommendation 2167 (2019)¹², the Parliamentary Assembly of the Council of Europe (PACE) called for increased funding and institutional independence of the Commission for the Control of INTERPOL’s Files (CCF).
- In PACE Resolution 2515 (2023), entitled “*Restoring Trust in International Institutions*,” paragraph 8 specifically mentions INTERPOL, stressing the need to enhance transparency, expand access to CCF statistics, and establish external legal oversight over compliance with Article 3 of the INTERPOL Constitution.

4.3. Decisions of the European Court of Human Rights (ECtHR) and the UN Human Rights Committee

The jurisprudence of the *European Court of Human Rights (ECtHR)* and the *UN Human Rights Committee (HRC)* plays a crucial role in shaping international standards of legal integrity and proportionality in the application of criminal prosecution, particularly in economic cases.

These decisions establish a direct normative link between national abuses and the obligation of international organizations, including INTERPOL, to take systemic judicial deficiencies into account when processing data related to wanted persons.

- In *Khodorkovskiy and Lebedev v. Russia*, Nos. 11082/06 and 13772/05 (2013) — the ECtHR found selective application of criminal law in economic cases.¹³
- In *Navalnyy v. Russia*, No. 29580/12 and others (2018) — the Court held that systemic misuse of criminal prosecution violates *Article 18* of the Convention.¹⁴
- In the *UN Human Rights Committee* decision *Shumilina v. Russia* (Communication No. 2843/2016) — the Committee condemned the practice of in absentia convictions and the absence of effective remedies for appeal.¹⁵

4.4. Recommendations of UNODC and the OECD

The recommendations of specialized UN bodies and the Organisation for Economic Co-operation and Development (OECD) play a key role in shaping global standards of integrity and legal proportionality in economic crime cases. Both organizations emphasize the need to balance the fight against financial crime with the protection of human rights and to prevent cross-border abuses of criminal procedures.

¹² PACE, Recommendation 2167 (2019), <https://pace.coe.int/en/files/28301>.

¹³ HUDOC – European Court of Human Rights, CASE OF KHODORKOVSKIY AND LEBEDEV v. RUSSIA (Applications nos. 11082/06 and 13772/05), <https://hudoc.echr.coe.int/fre#%7B%22itemid%22:%5B%22001-122697%22%5D%7D>.

¹⁴ HUDOC – European Court of Human Rights, CASE OF NAVALNYYY v. RUSSIA (Applications nos. [29580/12](https://hudoc.echr.coe.int/fre?i={%22fulltext%22:%22Russia%22}%22documentcollectionid%22:%22%22GRANDCHAMBER%22}%22itemid%22:%22001-187605%22}) and [4](https://hudoc.echr.coe.int/fre?i={%22fulltext%22:%22Russia%22}%22documentcollectionid%22:%22%22GRANDCHAMBER%22}%22itemid%22:%22001-187605%22}) others), <https://hudoc.echr.coe.int/fre?i={%22fulltext%22:%22Russia%22}%22documentcollectionid%22:%22%22GRANDCHAMBER%22}%22itemid%22:%22001-187605%22}>.

¹⁵ HUDOC – European Court of Human Rights, CASE OF SHUMILINA v. RUSSIA (Application no. 32128/08), <https://hudoc.echr.coe.int/#1%22itemid%22-%22001-216664%22>.

The UNODC Practical Guide on the Investigation of Corruption Cases (2024) highlights the importance of independent financial expertise and the prohibition of secondary prosecution.¹⁶

The [OECD Integrity Framework 2025](#) proposes a cross-border compliance review model aimed at preventing the misuse of international wanted mechanisms.

5. Verified ARGAs Cases and Consolidated Findings

5.1. General Remarks on the Case Dataset

ARGA has cross-referenced its internal case files with open-source materials and decisions of international bodies. The total number of cases reviewed between 2023 and 2025 amounts to several dozen — a sufficient volume to identify recurring patterns and support statistically reliable conclusions (exact figures are available upon official request).

For the purposes of this public version of the report, only internal ARGAs file reference numbers are used. Each number corresponds to an individual document package, including court materials, investigative records, correspondence with National Central Bureaus (NCBs), CCF decisions, and expert opinions.

5.2. Notice Deleted (Red Notice / Diffusion) — Examples

Case *CCF/132/R325.25* concerned an entrepreneur prosecuted for alleged fraud arising from a corporate conflict and an attempt at forced nationalization of his assets. Independent expert assessments confirmed the absence of evidence of guilt and the political nature of the prosecution. The Commission for the Control of INTERPOL's Files (CCF) determined that the transmitted data failed to meet the requirements of accuracy and proportionality, recognized the presence of political motivation, and decided to delete the information from INTERPOL's databases.

5.3. Cases Under Review by the CCF / National Courts — Examples

In cases *CCF/132/R396.25*, *CCF/132/R1405.24*, *CCF/131/R1546.24*, and *CCF/134/R1799.24*, the *Commission for the Control of INTERPOL's Files (CCF)* requested additional materials from National Central Bureaus (NCBs) to verify the validity of the issued notices. Several of these cases are being simultaneously examined by courts within the European Union and EFTA in the context of extradition proceedings and the application of preventive measures.

5.4. Repeated (“Secondary”) Prosecution — Examples

In case *CCF/134/R1550.25*, the CCF determined that criminal proceedings had been reopened based on the same facts after the previous case was closed “for lack of *corpus delicti*,” with only minor formal changes to the case narrative. This practice was found to violate the *ne bis in idem* principle and was deemed an abuse of INTERPOL mechanisms, serving as grounds for a review of the admissibility of the notice.

5.5. Consolidated Observations on the Dataset

¹⁶ UNODC, Practical Guide on the Investigation of Corruption Cases (2024), https://track.unodc.org/uploads/documents/corruption/Publications/2024/UNODC_2024_Practical_Guide_on_the_Investigation_of_Corruption_Cases.pdf.

Analysis of the cases reviewed by the Commission for the Control of INTERPOL's Files (CCF) and examined by ARGAs between 2023 and 2025 revealed consistent patterns confirming the systemic nature of abuses in economic-related prosecutions.

First, the dominant category consists of fraud-related offences — primarily equivalents of Article 159 of the Russian Criminal Code and similar provisions in other jurisdictions. This category serves as a universal tool for the criminalization of civil and corporate disputes, which formally do not fall under the criteria of political persecution but, in substance, often carry political or politico-economic motives.

Second, a recurrent feature is the post hoc “reinforcement” of case narratives with elements such as organized group activity, money laundering, or abuse of office. These additions enable the reclassification of cases as serious crimes and the initiation of international search procedures. Such qualifying elements are often introduced after the person has left the country, serving as a formal basis for requesting an INTERPOL notice.

Third, access to procedural materials—including financial expert reports, accounting records, contracts, and corporate agreements—plays a crucial role. CCF practice shows that the submission of such documentation during a complaint review often becomes the key factor leading to case reconsideration and confirmation that the data transmitted to INTERPOL were inaccurate or misleading.

Finally, a significant share of cases—more than half of those analyzed—resulted in the deletion of notices after the submission of independent expert opinions and a reconstructed procedural timeline, which allowed applicants to demonstrate the inconsistency of accusations with factual circumstances and the violation of the due process principle.

These findings confirm that proper documentation, transparency, and independent expertise remain decisive elements in protecting individuals against abuses of INTERPOL mechanisms in economic cases.

6. Empirical Data, Official Statistics, and Their Significance

6.1. INTERPOL and the CCF

According to the CCF Activity Report 2023, the Commission received 2,793 applications and closed 2,238 cases, of which more than 500 were examined by the Requests Chamber. A significant portion of these cases involved economic charges, while the Commission noted the continuing problem of non-cooperation by certain National Central Bureaus (NCBs).

According to the INTERPOL Global Financial Fraud Assessment 2024, 85% of Red Notices and Diffusions issued in 2022–2023 were related to fraud, and over 700 cases were supported through the INTERPOL Financial Crime and Anti-Corruption Centre (IFCACC), with an aggregate reported loss of approximately USD 1.2 billion.

Taken together, these data confirm that economic offences represent the most vulnerable category for misuse and politicization in criminal prosecution strategies. The statistics therefore objectively substantiate the need for enhanced admissibility filters and multi-level verification mechanisms for economic notices within the INTERPOL system.

6.2. The European Framework of Trust and Judicial Indicators

PACE Resolution 2315 (2019) emphasized the need to strengthen the independence and resource capacity of the Commission for the Control of INTERPOL's Files (CCF) in response to abuses of INTERPOL mechanisms, while PACE Resolution 2515 (2023) highlighted the growing crisis of confidence in international institutions and called for the establishment of transparent filters to prevent politically motivated requests.

According to the Judicial Department of the Supreme Court of the Russian Federation, 13.1% of criminal cases are submitted to courts with pretrial detention as a preventive measure, while the share of acquittals consistently remains below 1% (in some years around 0.2–0.3%).

Such a low rate of acquittals alongside a high share of cases involving deprivation of liberty reflects a structural imbalance between prosecution and defense. In the international context, this imbalance increases the risk that INTERPOL channels may be used to externally legitimize domestic repressive practices rather than serve as a tool of good-faith international legal cooperation.

6.3. UNODC, OECD

Guidelines and analytical materials of international organizations consistently emphasize common standards of fair enforcement in economic and anti-corruption cases.

The UNODC Practical Guide on the Investigation of Corruption Cases highlights the need to uphold the due process principle, ensure independent financial expertise, and prevent the politicization of anti-corruption investigations.

The OECD Integrity Forum (2024–2025) and its methodological materials (policy toolkits) promote transparency standards and the development of cross-border compliance review mechanisms to prevent transnational abuse of mutual legal assistance systems.

Taken together, these documents establish a clear international consensus: in economic cases, it is essential to ensure independent expertise, a minimum evidentiary threshold for serious charges, and a prohibition of repeated criminal prosecution in the absence of new substantial evidence.

7. Impact of Abuses on the INTERPOL System

1. Legal Integrity.

The politicization of “economic” offences undermines the application of Article 3 of the INTERPOL Constitution (prohibition of political activity) and distorts the purpose of Red Notice and Diffusion mechanisms.

2. Chilling Effect.

Transnational professionals and entrepreneurs are increasingly avoiding cross-border travel and projects due to the risk of extraterritorial criminalization of private legal disputes.

3. Overload of the CCF.

The rising number of applications complicates case management; the Commission is often forced to make determinations despite insufficient cooperation from NCBs, which leads to deletions on procedural grounds — and, consequently, reputational noise within the INTERPOL system.

4. Trust in INTERPOL Data.

Each deletion due to politicization or procedural defects reduces confidence in notices issued by third countries and weakens the credibility of INTERPOL's datasets among international partners.

8. Legal Conclusions and Recommendations to the INTERPOL General Assembly

8.1. Pre-Publication Admissibility Filter

The General Assembly is invited to instruct the General Secretariat to develop a pre-publication admissibility checklist for economic crime notices, including:

- a declaration on the existence or absence of prior case closures on the same facts;
- an indication of the existence and subject matter of any related civil dispute;
- information on the conduct of independent financial expert evaluations;
- an explanatory note assessing the proportionality of the chosen preventive measure.

Justification: This measure aligns with the spirit of Articles 2 and 3 of the INTERPOL Constitution and the Rules on the Processing of Data (RPD), which aim to ensure the legality and proportionality of international searches and to minimize the risk of politicization.

8.2. Adjustment of the Role of Preventive Measures

The General Assembly is invited to reaffirm that pretrial detention orders alone cannot constitute sufficient grounds for the publication of Red Notices or Diffusions in economic crime cases, without a separate assessment of necessity and proportionality and without submission of substantive evidence supporting the accusation (*materia delicti*). This position is consistent with the principle of *ultima ratio* — the use of deprivation of liberty only as a last resort — and aligns with Articles 2 and 3 of the INTERPOL Constitution, as well as the Rules on the Processing of Data (RPD), which require that any restriction of liberty be justified, proportionate, and supported by credible evidence.

8.3. Strengthening the Mandate of the CCF

The General Assembly is encouraged to support the expansion of the mandate of the Commission for the Control of INTERPOL's Files (CCF), including:

- the right to request from NCBs a complete set of materials, including information on discontinued cases, civil claims, and independent expert opinions;
- the introduction of an accelerated review procedure in cases where there are clear indications of repeated (secondary) prosecution based on the same facts;
- the establishment of a procedural presumption in favor of the applicant in cases of prolonged non-cooperation by NCBs — with the possibility of temporary data deletion pending receipt of the requested documentation.

Justification: The need for both resource and procedural strengthening of the CCF was noted in the CCF Activity Report 2023, which highlights the growing number of submissions and the structural lack of tools for prompt responses to violations.

8.4. Transparency and Feedback

The General Assembly is invited to instruct the General Secretariat to publish anonymized aggregated statistics on deleted Red Notices and Diffusions, disaggregated by grounds for deletion (without personal data), and to standardize the format of deletion notifications to ensure synchronization with external and national databases.

Justification: Enhancing transparency and feedback mechanisms will strengthen trust between INTERPOL, member states, and civil society, while ensuring the practical implementation of accountability principles enshrined in the INTERPOL Constitution and the Rules on the Processing of Data (RPD).

8.5. Inter-Organizational “Bridges”

The General Assembly is invited to establish a permanent cooperation channel between INTERPOL, UNODC, OECD, on issues of economic crime and due process compliance, and to mandate the preparation of a joint guidance document (Guidance on Economic Offences & Notices) aimed at harmonizing enforcement practices and raising admissibility standards for notices.

Justification: Institutional collaboration with international organizations specializing in anti-corruption policy and judicial standards will enhance legal predictability, align admissibility criteria, and minimize the risk of politicization in economic cases.

9. Implementation Roadmap

1. Pilot Checklist (First 6 Months).

The General Secretariat shall develop a pre-publication checklist for notices related to economic offences. National Central Bureaus (NCBs) will apply it on a voluntary basis to cases classified as fraud and abuse of office.

2. Guidance Circular (Within 12 Months).

Prepare and adopt a standardized evidentiary package for economic cases, including the requirement of an independent financial expert report and confirmation of the absence of an ongoing civil dispute.

3. CCF Fast-Track Procedure (12–18 Months).

Introduce an accelerated review mechanism for cases showing signs of secondary prosecution or prolonged non-cooperation by NCBs, with temporary data deletion pending the provision of responses.

4. Joint Guidance (Up to 18 Months).

Develop and publish the INTERPOL–UNODC–OECD Guidance on Economic Offences & Notices, establishing minimum evidentiary and procedural standards.

5. Public Statistics (Annually).

Ensure the regular publication of anonymized aggregated data on the number of deleted notices and the grounds for deletion, to strengthen transparency and accountability.

10. Conclusion

INTERPOL remains a cornerstone of the global system of international police cooperation. Protecting its mechanisms from politicization in the field of economic offences is not a political stance, but a legal and humanitarian duty, essential for preserving trust in the institutions of global security. The proposed measures aim to strengthen admissibility filters, reduce the workload on the CCF, restore confidence in INTERPOL notices, and safeguard fundamental human rights. ARGA reaffirms its readiness for professional cooperation with the General Secretariat, the Commission for the Control of INTERPOL's Files (CCF), and National Central Bureaus (NCBs), as well as for participation in expert reviews and training initiatives dedicated to due process standards and the responsible use of INTERPOL mechanisms.

Appendix A. Methodological Note

- Official reports and documents of INTERPOL/CCF, PACE, UNODC, OECD, and were used;
- ARGA cases are presented only by internal reference numbers;
- Judicial statistics are cited from official sources.

Bibliography and Sources

1. Interpol, Commission for the Control of Files – Activity Report 2023, https://www.interpol.int/content/download/20967/file/GA-2023-91-REP-22%20E%20AnnualActivityReportCCF_2022%20%2823Y2486%29%20%28REV%29%282%29.pdf.
2. Interpol, Global Financial Fraud Assessment 2024, https://www.interpol.int/content/download/21096/file/24COM005563-01%20-%20CAS_Global%20Financial%20Fraud%20Assessment_Public%20version_2024-03_EN_v3.pdf.
3. PACE, Resolution 2315 (2019), <https://pace.coe.int/en/files/28303/html>.
4. PACE, Resolution 2515 (2023), <https://pace.coe.int/en/files/33140/html>.
5. G20, G20 Anti-Corruption Working Group, Accountability Report Organizing Against Corruption, 2024, https://track.unodc.org/uploads/documents/corruption/G20-Anti-Corruption-Resources/Accountability-and-Monitoring-Reports/2024_G20_Brazil_ACWG_Accountability_Report_2024_-_Organizing_against_corruption.pdf.
6. *Kommersant*, «Ne ko vsem process idet», 25 april 2025, https://www.kommersant.ru/doc/7677678?utm_source=chatgpt.com.
7. HUDOC – European Court of Human Rights, Case of Gusinskiy v. Russia (Application no. 70276/01), [https://hudoc.echr.coe.int/eng#{%22itemid%22:\[%22001-61767%22\]}](https://hudoc.echr.coe.int/eng#{%22itemid%22:[%22001-61767%22]}).
8. Interpol, Commission for the Control of Files – Activity Report 2023, https://www.interpol.int/content/download/20967/file/GA-2023-91-REP-22%20E%20AnnualActivityReportCCF_2022%20%2823Y2486%29%20%28REV%29%282%29.pdf.

9. Interpol, Commission for the Control of Files – Activity Report 2023,
https://www.interpol.int/content/download/20967/file/GA-2023-91-REP-22%20E%20AnnualActivityReportCCF_2022%20%2823Y2486%29%20%28REV%29%282%29.pdf.
10. Interpol. Constitution of the International Criminal Police Organization-INTERPOL, Article 2, 3,
https://www.interpol.int/content/download/590/file/01%20E%20Constitution_2024.pdf.
11. Interpol, RPD,
https://www.interpol.int/content/download/5694/file/27%20E%20RulesProcessingData_RPD_2024.pdf.
12. PACE, Recommendation 2167 (2019), <https://pace.coe.int/en/files/28301>.
13. HUDOC – European Court of Human Rights, CASE OF KHODORKOVSKIY AND LEBEDEV v. RUSSIA (Applications nos. 11082/06 and 13772/05),
<https://hudoc.echr.coe.int/fre#%7B%22itemid%22:%5B%22001-122697%22%5D%7D>.
14. HUDOC – European Court of Human Rights, CASE OF NAVALNYY v. RUSSIA (Applications nos. [29580/12](https://hudoc.echr.coe.int/fre#%7B%22fulltext%22:%5B%22Russia%22%2C%22documentcollectionid%22:%5B%22GRANDCHAMBER%22%2C%22itemid%22:%5B%22001-187605%22%5D%7D) and 4 others),
<https://hudoc.echr.coe.int/fre#%7B%22fulltext%22:%5B%22Russia%22%2C%22documentcollectionid%22:%5B%22GRANDCHAMBER%22%2C%22itemid%22:%5B%22001-187605%22%5D%7D>.
15. HUDOC – European Court of Human Rights, CASE OF SHUMILINA v. RUSSIA (Application no. 32128/08),
<https://hudoc.echr.coe.int/#%7B%22itemid%22:%5B%22001-216664%22%5D%7D>.
16. UNODC, Practical Guide on the Investigation of Corruption Cases (2024),
https://track.unodc.org/uploads/documents/corruption/Publications/2024/UNODC_2024_Practical_Guide_on_the_Investigation_of_Corruption_Cases.pdf.