

ILLICIT Enrichment And Asset Recovery: Comparative Lessons And Legislative Pathways For Uzbekistan

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Abstract

This article analyses illicit enrichment under Article 20 of the United Nations Convention against Corruption (UNCAC) and Financial Action Task Force (FATF) guidance, comparing criminalization in different jurisdictions, as well as unexplained-wealth models worldwide. It highlights shared features, such as presumption of illicit origin, reasonable suspicion, and no need to prove a predicate offence. It argues that Uzbekistan should adopt a illicit-enrichment offence with asset-declaration enforcement to strengthen deterrence, asset recovery, and the rule of law.

Keywords: Illicit enrichment, predicate offence, suspicion, declaration, legal framework.

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1. Introduction

Asset recovery has emerged as a cornerstone of global anti-corruption strategies, reflecting the commitments of states under instruments such as the United Nations Convention against Corruption (UNCAC) and the Financial Action Task Force (FATF) recommendations. For Uzbekistan, a country undergoing profound legal and institutional reforms, effective asset recovery is a vital mechanism for safeguarding public resources, reinforcing the rule of law, combating corruption and strengthening public trust in government institutions.

According to the United Nations Office on Drugs and Crime (UNODC), less than one percent of global illicit financial flows are detected and recovered by states. This trend shows that it is a process full of challenges and restrictions.

Over the past decade, Uzbekistan has adopted a series of legislative and policy measures to address financial crime, improve transparency, and facilitate international cooperation in the tracing, freezing, confiscation, and repatriation of illicit assets. However important gaps remain between domestic practice and global standards. These gaps, which range from establishing criminal liability for illicit enrichment to the procedure of asset recovery, limit the country's ability to fully realize the preventive and deterrent functions of combating corruption.

Article 20 of the UNCAC introduces the concept of illicit enrichment, defined as "a significant increase in the assets of a public official that he or she cannot reasonably explain in relation to his or her lawful income", and calls each State Party to consider criminalizing such conduct when committed intentionally. This provision represents

a pivotal, yet contested, instrument in the global fight against corruption. The offence of illicit enrichment serves as a preventive and deterrent mechanism by targeting unexplained wealth accumulation that often signals bribery, embezzlement, or abuse of office.

The Republic of Uzbekistan acceded to the United Nations Convention against Corruption (New York, 31 October 2003) in 2008 by adopting the Law “On the Accession of the Republic of Uzbekistan to the United Nations Convention against Corruption”. In this regard, the Republic of Uzbekistan did not enter any reservation or written declaration aimed at exempting the application of this article or altering its legal effect.

Notably, the draft Law “On the Adoption of the Criminal Code of the Republic of Uzbekistan” (ID-29646), developed by the Prosecutor’s General Office of the Republic of Uzbekistan, proposed introducing liability for the offence of illicit enrichment as Article 271 of the new edition of the Criminal Code. However, it has not been adopted to date.

At the expanded meeting on anti-corruption measures held on 5 March 2025, the President of the Republic of Uzbekistan emphasized the need to consider introducing liability for illicit enrichment.

Comparative legal practice reveals a divergent landscape in how jurisdictions operationalize Article 20 of the UNCAC, reflecting different constitutional traditions and policy priorities. Several countries adopted direct criminalization of illicit enrichment, as exemplified by France, where Article 321-6 of the Penal Code imposes liability when an individual cannot justify the existence of assets consistent with their lifestyle or prove the lawful origin of property in their possession.

In China, Article 395 of the Criminal Code similarly targets “significant discrepancies” between lawful income and actual assets or expenditures. A civil servant must explain the source of such wealth; failure to do so renders the excess “illegal gains”, subject to confiscation and criminal liability. Importantly, Chinese law adds a preventive layer by obligating officials to declare overseas bank deposits and sanctioning nondisclosure, thus directly addressing transnational concealment of corrupt proceeds.

Armenia’s Criminal Code (Art. 310(1)) and its Law “On Public Service” introduce an offence of illicit enrichment triggered when declared wealth significantly outstrips

legal income and is unaccompanied by evidence of a predicate offence. Kyrgyzstan’s Article 340 follows a similar model but focuses on enrichment “within the last two years of service,” including property transferred to relatives or third parties.

Other jurisdictions integrate illicit enrichment into special anti-corruption statutes. India’s Prevention of Corruption Act, Part 13, characterizes as “criminal misconduct” any disproportionate asset accumulation by a public servant that cannot be reasonably explained. Hong Kong’s Prevention of Bribery Ordinance (Cap. 201, Section 10) likewise criminalizes possession of unexplained property, defining the offence through the maintenance of a lifestyle or control of property beyond one’s official emoluments, unless a satisfactory explanation is provided to the court. Bhutan adopts a nearly parallel approach in Section 60 of its Anti-Corruption Act, covering civil servants and employees of entities using public resources while offering an explicit exculpatory defense for those able to prove the lawful source of their wealth.

The necessity of establishing such liability has been substantiated by various scholars, and among national researchers the scientific works of O. Ismoilov, B. Zokirov, Sh. Jalolov, and B. Shamsutdinov can be particularly highlighted.

This issue has also been reflected in the works of researchers operating within the Commonwealth of Independent States (CIS) countries. Some of them have published scientific studies concerning the absence of such liability in national legislation or the necessity of its introduction, while others have addressed specific aspects of the practical application of such provisions.

In numerous studies by foreign researchers, various aspects of illicit enrichment have likewise been examined, and their views have been expressed regarding the criminalization of such acts.

Several matters should be addressed while introducing criminal responsibility for illicit enrichment in national legislations. The analysis of provisions established in the legislation of foreign countries regarding illicit enrichment shows that there is no requirement to prove the specific offence or related criminal activity (predicate offence) that led to the illicit enrichment. In other words, the mere possession of illicit assets is treated as an independent act and constitutes grounds for liability.

In the Decree of the President of the Republic of Uzbekistan No. PF-6252 dated 28 June 2021, the term "predicate offences" was used in the context of combating the legalization (laundering) of proceeds of crime, meaning the underlying offences from which such proceeds subject to laundering are derived.

Through this term, it is established that any offence provided for in the Criminal Code of the Republic of Uzbekistan, the commission of which results in the illicit enrichment, is to be understood as a predicate offence.

According to the fifth-round monitoring report published in 2024 within the framework of the OECD Istanbul Action Plan, the absence of criminal liability for illicit enrichment and the fact that it is recognized only in connection with a predicate offence were identified as shortcomings.

The second important feature of such cases is the existence of "reasonable suspicion" (or *prima facie* evidence). This means that reasonable suspicion arises as to the lawful origin of all types of property owned by a person. Various circumstances may give rise to such reasonable suspicion. For example, Section 362B of the UK Proceeds of Crime Act presumes illicit origin when known lawful income is insufficient, or property exceeds £50,000. Switzerland's national legislation defines somewhat different concepts. For instance, Article 15 of the Federal Act on the Freezing and the Restitution of Illicit Assets held by Foreign Politically Exposed Persons (PEPs) sets a presumption when wealth grows disproportionately amid high corruption.

In this regard declarations received by special authorities can be helpful. The 2022 Civil Service Law introduced mandatory income and asset declarations, but full implementation remains pending (the State Register of Civil Service Positions has not yet been approved). Draft laws establishing a comprehensive declaration regime and liability for illicit enrichment have not been adopted. While declarations alone are not sufficient, they are a critical early-warning tool when combined with verification and enforcement.

Another important issue in this regard relates to the process of asset recovery, namely the confiscation of these assets. According to Part 5 of Article 211 of the Criminal Procedure Code of the Republic of Uzbekistan, money and other assets acquired through criminal means shall, by court judgment, be used to compensate for the property damage caused by the crime. If the person who

suffered the property damage is not identified, such funds and assets shall be transferred to the benefit of the state. At the same time, within the scope of the committed crimes, any property, proprietary rights, or income derived from them that were directly or indirectly obtained as a result of criminal activity, as well as any property used as a weapon, means, or material base in the commission of the crime, must be confiscated to the benefit of the state in accordance with the established procedure.

In addition, Article 285 of the Criminal Procedure Code provides that money, items, and other assets acquired through criminal means by the accused shall, by court judgment, be used to compensate for the property damage caused. Any amount remaining after compensation must be transferred to the benefit of the state. Furthermore, if the property that constitutes the object of the crime is found in the possession of third parties, confiscated from them, and returned to its rightful owner, the money, items, and other assets obtained by the accused through the sale of such property shall, by court judgment, be transferred to state ownership. At the same time, the convicted person must be informed of the right to bring a civil claim, under civil court procedures, to recover damages resulting from the return of the property to the bona fide owner. In this context, it should be particularly emphasized that, in the process of recovering illicit assets, the primary requirement is to prove that the assets were obtained because of the commission of a crime.

Article 289 of the Criminal Procedure Code stipulates that if property whose private ownership is prohibited is recognized as material evidence in a case, and if such property was unlawfully acquired by the owner, it shall be confiscated. In other words, by a court decision and without compensation, the right to own, use, and dispose of such property shall be transferred to the relevant state body or legal entity authorized to possess it. According to Article 290 of the Criminal Procedure Code, to ensure the execution of the part of a judgment relating to a civil claim and other property-related recoveries, the investigator, inquiry officer, or court is obliged to seize the property of the suspect, accused, defendant, and civilly liable person, as well as property recognized as material evidence. It should also be noted that, to conceal the transfer of ownership, the accused or defendant may formally register such property in the name of third parties rather than in their own name. If no evidence is found to prove such circumstances, the issues of seizing

and confiscating the property remain unresolved.

A distinct model appears in Western Australia, where Part 4 of the Criminal Property Confiscation Act 2000 introduces a civil-confiscation regime, also known as civil forfeiture or *in rem* forfeiture focused on “unexplained wealth”. Section 144 measures the total value of a person’s wealth against their lawfully acquired wealth, permitting confiscation without the need to prove a specific underlying crime. Although formally non-criminal (several researchers argue that such proceedings are criminal in nature), such regimes achieve a functional equivalent to illicit enrichment statutes by reversing the burden of proof in civil proceedings and by severing the link between criminal conviction and property deprivation.

Moreover, there is more useful tools in comparison with *in personam* proceedings such as non-conviction-based confiscation (NCB confiscation) possibilities. NCB confiscation is especially important for cases where a criminal trial cannot be held (death, flight, immunity, or lack of evidence for conviction). However, legislation of Uzbekistan does not have clauses related to civil confiscation nor NCB confiscation.

2. Conclusion

In conclusion, this comparative analysis reveals that successful criminalization of illicit enrichment transcends jurisdictional boundaries and legal traditions, offering Uzbekistan a proven framework for strengthening its anti-corruption architecture. The convergence of approaches across diverse system demonstrates that effective asset recovery depends not on uniform implementation but on shared principles: establishing rebuttable presumptions of illicit origin, requiring reasonable suspicion rather than proof of specific predicate offenses, and maintaining robust procedural safeguards.

For Uzbekistan, these international lessons carry importance given the country’s ongoing legal reforms and the President’s March 2025 directive to consider introducing liability for illicit enrichment. However, criminalization alone cannot address the systemic challenges of corruption and asset recovery.

The research demonstrates that effective anti-corruption regimes require a comprehensive three-pronged approach. First, Uzbekistan must adopt Criminal Code Article 271, incorporating comparative best practices

while establishing proportional thresholds that capture meaningful corruption without criminalizing minor discrepancies. The provision should create clear liability triggers based on gross disproportionality between declared income and accumulated wealth, following successful models from China and Armenia.

Second, the theoretical asset declaration requirements introduced by the 2022 Civil Service Law must be operationalized through robust verification and enforcement mechanisms. This necessitates establishing a specialized declaration monitoring body with adequate resources and authority, supported by comprehensive databases that link declared assets with actual wealth patterns. Without effective implementation infrastructure, declarations remain mere formalities that provide neither deterrence nor detection capabilities.

Third, Uzbekistan’s asset recovery toolkit requires fundamental expansion through the introduction of civil forfeiture and non-conviction-based confiscation mechanisms. These tools, successfully employed in jurisdictions such as Western Australia, enable authorities to target unexplained wealth without requiring criminal convictions, particularly crucial for cases involving deceased suspects, fugitives, or diplomatic immunity situations.

The integration of these reforms would position Uzbekistan to harmonize its national law with UNCAC and FATF standards, thereby enhancing cross-border asset recovery capabilities and strengthening international cooperation.

References

1. The United Nations Convention against Corruption (UNCAC), adopted by the United Nations General Assembly on 31 October 2003 in New York. <https://www.unodc.org/corruption/en/uncac/learn-about-uncac.html>
2. FATF (2012-2025), International Standards on Combating Money Laundering and the Financing of Terrorism & Proliferation, FATF, Paris, France, www.fatf-gafi.org/en/publications/Fatfrecommendations/Fatf-recommendations.html
3. See for corruption issues: Коленко Е.В. «Ответственность за получение взятки: перспективы совершенствования уголовного законодательства Республики Узбекистан с учетом международных стандартов». Дисс. на с.

- уч. степ. PhD. – Т., Ташкентский государственный юридический университет, 2023. – 186 с.
4. <https://www.fatf-gafi.org/en/topics/asset-recovery.html>.
 5. Some aspects of combating corruption are analyzed by Kolenko, Y. (2025). Legal Analysis Of The Objective Side Of Bribery. Oriental Journal of History, Politics and Law, 5(01), 231–247. <https://doi.org/10.37547/supsci-ojhpl-05-01-29>.
 6. On activities of law enforcement organs in this regard see Е.Коленко. Деятельность прокуратуры Республики Узбекистан в сфере противодействия коррупции. Ўзбекистон Республикаси Бош прокуратураси Академияси Ахборотномаси. №1 (49). – Т.: Ўзбекистон Республикаси Бош прокуратураси Академияси, 2022.- Б. 23-27.
 7. The United Nations Convention against Corruption (UNCAC), adopted by the United Nations General Assembly on 31 October 2003 in New York. <https://www.unodc.org/corruption/en/uncac/learn-about-uncac.html>
 8. Pieth, M. (2012). Recovering Stolen Assets. In M. Pieth (Ed.), Collective Action: Innovative Strategies to Prevent Corruption, Basel Institute on Governance (pp. 145–168).
 9. Law of the Republic of Uzbekistan “On the accession of the Republic of Uzbekistan to the United Nations Convention against Corruption (New York, October 31, 2003)”, 07.07.2008. № LRU-158. <https://lex.uz/docs/1369505>
 10. Шамсутдинов Б.С. Коррупциявий жиноятлар учун жавобгарлик. Монография // Масъул мухаррир: Д.Б.Базарова, ю.ф.н., профессор в.б. – Т.: Тошкент давлат юридик университети, 2020. – Б. 43. <https://regulation.gov.uz/uz/d/29646>
 11. Президент қонунчиликка ноқонуний бойлик орттириш хақида модда киритишни таклиф қилди. <https://www.xabar.uz/siyosat/prezident-qonunchilikka-noqonuniy-boylig-orttirish>
 12. Penal Code of France. Version effective July 2, 2025. https://www.legifrance.gouv.fr/codes/section_lc/LEGITEXT000006070719/LEGISCTA000006165339/#LEGISCTA000006165339
 13. Criminal Law of the People's Republic of China. Adopted at the Second Session of the Fifth National People's Congress on July 1, 1979; revised at the Fifth Session of the Eighth National People's Congress on March 14, 1997 and promulgated by Order No.83.
 14. Criminal Law of the People's Republic of China. Adopted at the Second Session of the Fifth National People's Congress on July 1, 1979; revised at the Fifth Session of the Eighth National People's Congress on March 14, 1997 and promulgated by Order No.83.
 15. Уголовный Кодекс Республики Армения от 18.04.2003 г., Армения. <https://www.arlis.am/hy/acts/63312>
 16. Уголовный кодекс Кыргызской Республики от 28 октября 2021 года № 127. (Введен в действие Законом Кыргызской Республики от 28 октября 2021 года № 126). <https://cbd.minjust.gov.kg/3-38/edition/2087/ru>
 17. Prevention of Corruption Act, 1988, (as amended by the Prevention of Corruption (Amendment) Act, 2018). https://www.indiacode.nic.in/show-data?actid=AC_CEN_26_36_00001_198849_1517807318890§ionId=43725§ionno=13&orderno=14
 18. Cap. 201, the Prevention of Bribery Ordinance (POBO), Hong Kong. L.N. 58 of 1971. <https://www.legislation.gov.hk/>
 19. The Anti-Corruption Act of Bhutan 2011. <https://www.acc.org.bt/wp-content/uploads/2022/11/ACC-Act-2011.pdf>
 20. Исмоилов О. Коррупцион йўналишдаги латент жиноятларни фош этиш усулларини такомиллаштириш. – Т.: Ўзбекистон Республикаси Бош прокуратураси Академияси, 2022.
 21. Б.П.Зокиров. Хорижга чиқарилган жиноий даромадларни Ўзбекистонга қайтаришнинг процессуал жиҳатлари.. юрид. фан. б. фал. док. диссертацияси. – Т., Ўзбекистон Республикаси Хукуқни муҳофаза қилиш академияси, 2022. – 155 б.
 22. Жалолов Ш. Коррупция билан боғлиқ жиноятларни тергов қилишнинг криминалистик жиҳатлари. Юрид. фан. б. фал. док. диссертацияси. – Т.: Ўзбекистон Республикаси Жамоат хавфизлиги университети, 2022. – 153 б.
 23. Шамсутдинов Б.С. Коррупциявий жиноятлар учун жавобгарлик. Монография // Масъул мухаррир: Д.Б.Базарова, ю.ф.н., профессор в.б. – Т.: Тошкент давлат юридик университети,

2020. – 120 б.
24. Доказывание по уголовным делам о возврате активов: учебное пособие / [Коллектив авторов]. Под общ. ред. Шушиковой Г.К. Академия правоохранительных органов при Генеральной прокуратуре Республики Казахстан. – Косшы, 2025. – 102 с.
25. Возврат похищенных активов: учебное пособие / [Коллектив авторов]. Под общ. ред. У.С. Байжанова – Косшы: Академия правоохранительных органов при Генеральной прокуратуре Республики Казахстан, 2023. – 86 с.
26. Щедрин Н. "Проблемы и перспективы криминализации незаконного обогащения публичных должностных лиц" Имущественные отношения в Российской Федерации, №. 12 (207), 2018, pp. 62-75. doi:10.24411/2072-4098-2018-10127
27. Крышевич, Ольга, Безгинский, Богдан. Уголовная ответственность за незаконное обогащение: сравнительный анализ законодательства Украины и Молдовы. In: *Pregătirea profesională a cadrelor pentru subdiviziunile Ministerului Afacerilor Interne și alte organe de drept*, 4 decembrie 2020, Chișinău. Chișinău: Departamentul Editorial-Poligrafic al Academiei „Ștefan cel Mare” al MAI, 2021, pp. 422-427. ISBN 978-9975-121-76-7.
28. Безгинский, Богдан. Уголовная ответственность за незаконное обогащение: международный опыт. In: *Anale științifice ale Academiei „Ștefan cel Mare” a MAI al RM: științe juridice*, 2021, nr. 13, pp. 201-209. ISSN 1857-0976. DOI: <https://doi.org/10.5281/zenodo.5069682>
29. Dornbierer, Andrew. Illicit Enrichment: A Guide to Laws Targeting Unexplained Wealth. Basel Institute on Governance, 2021. JSTOR, <https://doi.org/10.2307/j.ctv2c74pzx>.
30. Cornelia Körtl, Imad Chbib, Illicit enrichment in Germany: An evaluation of the reformed asset recovery regime's ability to confiscate proceeds of crime, *International Review of Law and Economics*, Volume 80, 2024, 106230, ISSN 0144-8188, <https://doi.org/10.1016/j.irle.2024.106230>.
31. Lohaus, Mathis/ Ellen Guterman (2021): "International efforts to combat corruption." In: Bo Rothstein/ Monika Bauhr/ Andreas Bågenholm/ Marcia Grimes (eds.), *The Oxford Handbook of Quality of Government*. Oxford: Oxford University Press.
32. Brun, Jean Pierre; Hauch, Jeanne; Rita Julien; Owens, Jeffrey Phillip; Yoonhee Hur. *Unexplained Wealth Orders - Toward a New Frontier in Asset Recovery* (English). Washington, D.C.: World Bank Group. 2023. <http://documents.worldbank.org/curated/en/099111523114038836>
33. Muzila, Lindy; Michelle Morales; Marianne Mathias; and Tammar Berger. *On the Take: Criminalizing Illicit Enrichment to Fight Corruption*. Washington, DC: World Bank, 2012. <https://doi.org/10.1596/978-0-8213-9454-0>
34. Stevanović, Aleksandar & Stanila, Laura. (2022). *Illicit Enrichment As A Criminal Offense: Possibility Of Implementation In The National Criminal Legislations*. Institucije I Prevencija Finansijskog Kriminaliteta.
35. Worku Yaze Wadago. (2014). *Criminalization of Possession of Unexplained Property and the Fight Against Public Corruption: Identifying the Elements of the Offence under the Criminal Code of Ethiopia*, *Mizan Law Review*, Vol. 8, No.1, p.56.
36. Dornbierer, Andrew. *Illicit Enrichment: A Guide to Laws Targeting Unexplained Wealth*. Basel Institute on Governance, 2021. JSTOR, <https://doi.org/10.2307/j.ctv2c74pzx>. – Б. 29.
37. Decree of the President of the Republic of Uzbekistan "On Approving the Strategy for the Development of the National System of the Republic of Uzbekistan for Combating the Legalization of Proceeds from Crime, the Financing of Terrorism and the Financing of the Proliferation of Weapons of Mass Destruction" No.6252 (dated June 28, 2021). <https://lex.uz/docs/5482727>
38. Kudratillaev K. (2023). Foreign and domestic experience in solving predicate crimes. *Society and Innovations*, 4(2/S), pp.293-296. <https://doi.org/10.47689/2181-1415-vol4-iss2/S>
39. Regulation on the procedure for implementing international cooperation in the field of combating the legalization of proceeds from criminal activities, the financing of terrorism and the financing of the proliferation of weapons of mass destruction. Appendix 2 to the Resolution of the Cabinet of Ministers of the Republic of Uzbekistan No. 402 (dated 29.06.2021). <https://lex.uz/docs/5482456>
40. OECD (2024), *Baseline Report of the Fifth Round of Monitoring of Anti-Corruption Reforms in*

- Uzbekistan: The Istanbul Anti-Corruption Action Plan, OECD Publishing, Paris, <https://doi.org/10.1787/363ba9d8-en>.
41. Keen, Florence. Unexplained Wealth Orders: Global Lessons for the UK Ahead of Implementation. Royal United Services Institute (RUSI), 2017. JSTOR, <http://www.jstor.org/stable/resrep37364>.
42. Proceeds of Crime Act 2002 (as amended by the Criminal Finances Act 2017). <https://www.legislation.gov.uk/ukpga/2002/29/contents>
43. Federal Act on the Freezing and the Restitution of Illicit Assets held by Foreign Politically Exposed Persons (Foreign Illicit Assets Act, FIAA) of 18 December 2015 (Status as of 1 July 2016). <https://www.fedlex.admin.ch/eli/cc/2016/322/en>
44. Law of the Republic of Uzbekistan dated 08.08.2022 No. 788 "On State Civil Service", <https://lex.uz/docs/6145972>
45. OECD (2024), Baseline Report of the Fifth Round of Monitoring Anti-Corruption Reforms in Uzbekistan: Istanbul Anti-Corruption Action Plan, OECD Publishing, Paris, <https://doi.org/10.1787/0c24d6de-ru>.
46. Pop, L.; Kotlyar, D.; Rossi, I. 2023. Asset and Interest Disclosure: A Technical Guide to an Effective Form. World Bank. <http://hdl.handle.net/10986/39943>
47. Ismailov B.I., Nasriev I.I. Issues of increasing the effectiveness of departmental measures to combat corruption//Teaching and methodological manual.- T.: Academy of the Prosecutor General's Office of the Republic of Uzbekistan, Higher School of Judges of the Supreme Judicial Council of the Republic of Uzbekistan. 2020.- pp. 266-268.
48. Ўзбекистон Республикаси Жиноят-процессуал кодекси. 22.09.1994 й.да қабул қилинган, 01.04.1995 й.да кучга кирган. <https://lex.uz/docs/111460>
49. Ўзбекистон Республикаси Жиноят-процессуал кодекси. 22.09.1994 й.да қабул қилинган, 01.04.1995 й.да кучга кирган. <https://lex.uz/docs/111460>
50. Ўзбекистон Республикаси Жиноят-процессуал кодекси. 22.09.1994 й.да қабул қилинган, 01.04.1995 й.да кучга кирган. <https://lex.uz/docs/111460>
51. Jinoyat-protsessual huquq: Darslik / Yuridik fanlar doktori, professor M. A. Rajabova tahriri ostida (To'ldirilgan va qayta ishlangan uchinchi nashri). – T.: O'zbekiston Respublikasi IIV Akademiyasi, 2019. – B. 318-319.
52. Ўзбекистон Республикаси Жиноят-процессуал кодекси. 22.09.1994 й.да қабул қилинган, 01.04.1995 й.да кучга кирган. <https://lex.uz/docs/111460>
53. Б.П.Зокиров. Хорижга чиқарилган жиноий даромадларни Ўзбекистонга қайтаришнинг процессуал жиҳатлари.. юрид. фан. б. фал. док. диссертацияси. –Т., Ўзбекистон Республикаси Хукуқни муҳофаза қилиш академияси. 2022. – Б.82.
54. Nelson, Caleb. "The Constitutionality of Civil Forfeiture." The Yale Law Journal, vol. 125, no. 8, 2016, pp. 2446–518. JSTOR, <http://www.jstor.org/stable/43894612>;
55. Van den Berg, Michael. "Proposing a Transactional Approach to Civil Forfeiture Reform." University of Pennsylvania Law Review, vol. 163, no. 3, 2015, pp. 867–926. JSTOR, <http://www.jstor.org/stable/24247887>.
56. Western Australia Criminal Property Confiscation Act 2000. As at 02 Nov 2013. <https://www.legislation.wa.gov.au/legislation/>
57. Anthony Davidson Gray; Forfeiture Provisions and the Criminal/Civil Divide. New Criminal Law Review 1 January 2012; 15 (1): 32–67. doi: <https://doi.org/10.1525/nclr.2012.15.1.32>
58. Marc B. Stahl, Asset Forfeiture, Burdens of Proof and the War on Drugs, 83 J. Crim. L. & Criminology 274 (1992). https://scholarlycommons.law.northwestern.edu/jcl_c/vol83/iss2/2
59. LaSalle, Frank (1995) "The Civil False Claims Act: The Need for a Heightened Burden of Proof as a Prerequisite for Forfeiture," Akron Law Review: Vol. 28: Iss. 3, Article 9. Available at: <https://ideaexchange.uakron.edu/akronlawreview/vol28/iss3/9>
60. Jean-Pierre Brun, Anastasia Sotiropoulou, Larissa Gray, Clive Scott, and Kevin M. Stephenson, Asset Recovery Handbook: A Guide for Practitioners, 2nd ed. (Washington, DC: World Bank, 2021).
61. France, Guilherme. Non-Conviction-Based Confiscation as an Alternative Tool to Asset Recovery.: Lessons and Concerns from the Developing World. Transparency International, 2022. JSTOR,

<http://www.jstor.org/stable/resrep39424>.

62. See also King, Colin, EU Developments in Non-Conviction-Based Confiscation (August 31, 2022). Criminal Law and Justice in the European Union (Clarus Press 2022), Available at SSRN: <https://ssrn.com/abstract=4361086> or <http://dx.doi.org/10.2139/ssrn.4361086>