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# 10th Anniversary of the Asset Recovery Network of the Financial Action Task Force of Latin America - RRAG

September 2020



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## **X años de la RRAG**

Hoy estamos celebrando  
El décimo aniversario  
De una red, que intercambiando  
Información sobre activos  
Va creciendo en el camino  
Que todos vamos forjando.

En los primeros momentos  
Surgió como alternativa  
De fuente de información  
Pero el tiempo y la razón  
La fueron robusteciendo  
Y hoy además va creciendo  
En sus puntos de contacto  
Que más que en el intercambio  
De información policial  
La red sirve de canal  
Para el contacto diario.

Varias son las experiencias  
Que avalan su utilidad  
Las investigaciones conjuntas  
De los países que integra  
Donde tejen la madeja  
Que conduce al criminal  
La ocupación del caudal  
De activos que por doquier  
Alguien los quiere tener  
Para poderlos lavar.

No está exenta de problemas  
La red que hoy celebramos  
La información que enviamos  
O las que nos solicitan  
También merecen ser vistas  
Como el punto de partida  
De lo que se ha de investigar

Por eso hay que lograr  
Que contenga los reclamos  
De quien nos hace el pedido  
De lo contrario les digo  
No parece funcionar.  
Es preciso contestar  
Todo lo que se nos pide  
Que nada se nos olvide  
Y en un tiempo prudencial.

Algo que es distintivo  
Y que merece respaldo  
Es reunir cada año  
A los puntos de contacto  
Para analizar aciertos  
Las experiencias, los retos  
Que se alcanzan en la red  
También para que después  
Al final de cada encuentro  
Lo que allí se debatió  
No termine en el recuerdo  
Y que el viento se llevó.

Para terminar, quisiera  
Felicitar a mis compañeros  
Que hoy están en esta red  
Y para los que después  
De haber pasado por ella  
Aportaron sus ideas  
Para mejor funcionar  
A los que van a luchar  
Siempre contra el delito  
Y también me felicito  
Por poderlos saludar.

**Por:**  
**José Rubén Escandón Carro.**  
**Punto de contacto de la RRAG**  
**7 de agosto de 2020**



## TABLE OF CONTENTS

ABBREVIATIONS AND ACRONYMS ..... 4

INTRODUCTION ..... 6

HISTORICAL OVERVIEW ..... 9

OUTCOMES OF THE RRAG IN 10 YEARS ..... 12

    Effectiveness ..... 12

*Outcomes of the RRAG Secure Platform* ..... 12

*Results of the exchange of information among RRAG members* ..... 13

*Statistics on information exchange between RRAG and other networks* ..... 14

*Examples of relevant cases reported by contact points* ..... 15

*Qualitative Results* ..... 17

    Impact ..... 21

*Impact on the work of the contact points* ..... 21

*Impact on the potential of RRAG to be transformative* ..... 22

*Impact on the implementation of international standards* ..... 22

    Relevance ..... 23

    Consistency ..... 25

    Sustainability ..... 26

CONTACT DETAILS ..... 29





## ABBREVIATIONS AND ACRONYMS

AML/CFT	Anti-Money Laundering and Counter-Terrorist Financing
ARIN-AP	Asset Recovery Interagency Network for Asia Pacific
ARIN-CARIB	Asset Recovery Interagency Network for the Caribbean
ARIN-EA	Asset Recovery Interagency Network for East Africa
ARIN-SA	Asset Recovery Interagency Network for South Africa
ARIN-WA	Asset Recovery Interagency Network for West Africa
ARIN-WCA	Asset Recovery Interagency Network for West and Central Asia
WB	World Bank
DAC	Development Assistance Committee
CARIN	Candem Asset Recovery Interagency Network
CICAD	Inter-American Drug Abuse Control Commission
CITCO	Intelligence Centre Against Terrorism and Organised Crime
DTOC	Department Against Transnational Organized Crime
TF	Terrorist Financing
GAFILAT	Financial Action Task Force of Latin America
ML	Money Laundering
OECD	Organisation for Economic Co-operation and Development
OAS	Organisation of American States





RRAG	Asset Recovery Network of GAFILAT
StAR	Stolen Asset Recovery Initiative
UNODC	United Nations Office on Drugs and Crime



## INTRODUCTION

The Asset Recovery Network of GAFILAT (RRAG) is a network of contacts from GAFILAT member countries that aims at facilitating the identification and tracing of assets, proceeds or instrumentalities of illicit activities for the purpose of their recovery.<sup>1</sup>

This network was created at the end of 2009 at the initiative of the United Nations Office on Drugs and Crime (UNODC), and with the support of the Inter-American Drug Abuse Control Commission, and now its Department against Transnational Organised Crime (DTOC) of the Organisation of American States (CICAD/OAS), INTERPOL and the Executive Secretariat of the Financial Action Task Force of Latin America (GAFILAT).

In 2010 the Financial Intelligence Unit (FIU) of the Costa Rican Drug Institute (ICD) offered to develop and manage the electronic platform for the secure exchange of information, which allowed the RRAG to become operational. Since then, the RRAG has been able to identify property and assets, its membership has expanded to more countries, and it has been able to exchange information with countries in other regions of the world.

It currently comprises the 17 GAFILAT member countries, in addition to Andorra, Spain, Italy, El Salvador, France, and EUROPOL, which serves as the Secretariat of the Candem Asset Recovery Interagency Network (CARIN). It is currently supported in its activities by the German Development Cooperation implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ).

On the 10th anniversary of the Network's existence, this document was produced to reflect the main outcomes during its years of existence using the evaluation criteria of the Development Assistance Committee (DAC) of the Organisation for Economic Co-operation and Development (OECD): Effectiveness, Impact, Relevance, Consistency, and Sustainability.

The results presented below were obtained from conducting a series of interviews, surveys of RRAG contact points and collaborators, as well as statistical information produced by the RRAG Secure Platform for the exchange of information and other information presented as a product of the activities that have been developed within the framework of the RRAG.

As will be discussed below, the outcomes show the following:

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<sup>1</sup> <https://www.gafilat.org/index.php/es/espanol/18-inicio/gafilat/49-red-de-recuperacion-de-activos-del-gafilat-rrag>



### **Relevance: The RRAG is very relevant and useful.**

Surveys and interviews show that the RRAG is quite relevant and extremely useful for its users, which in this context are the contact points of the countries that belong to the RRAG. It is also the only mechanism that allows for the secure exchange of information prior to mutual legal assistance with foreign counterparts. Operators, particularly criminal investigation operators, have found the RRAG to be very useful in identifying property and persons, and in strengthening their cases so that when they carry out international cooperation, it will be much more effective.

It is also clear that the RRAG is very relevant for implementing international standards in the region and very useful for the operational framework of observers and collaborators. The RRAG is a mechanism to raise awareness at the regional level on the importance of pursuing the proceeds of crime.

### **Consistency: The activities of the RRAG are very consistent with its purpose and with the global efforts against proceeds or instrumentalities of crime.**

The information analysed shows that the activities carried out within the framework of the RRAG are very consistent with its purpose, as well as with international efforts related to the pursuit of the proceeds of crime. The meetings held by the contact points foster the trust necessary to exchange sensitive information among members, strengthen their capacities to manage the secure information platform, and are an opportunity to develop technical issues or products related to financial investigation and the pursuit of instrumentalities or proceeds of crime.

### **Effectiveness: Although there are still challenges to overcome for its consolidation, the RRAG is effective in achieving its purpose.**

One of RRAG's great achievements is the electronic platform for the exchange of information. This has allowed the RRAG to exchange information securely, but also provides the opportunity to collect statistics on this exchange. The work of the FIU of the ICD of Costa Rica in updating and maintaining this technological tool should be highlighted.

As the network has been consolidated, there has also been an increase in the exchange of information through the RRAG secure platform. In addition, the number of properties identified has increased, as well as the exchange of information with other networks, showing better results. This demonstrates that the RRAG is effective in the work that it carries out.

However, the RRAG still has the possibility to strengthen some aspects that will allow it to show more results and be more effective in achieving its purpose. These challenges mainly cover issues related to information exchange, its structure, and the appropriate use of the electronic platform for information exchange and the capacity to conduct face-to-face events.





**Impact: The RRAG has a positive impact on the work carried out by the contact points, on international cooperation and on the implementation of international standards.**

The network's activities have had an impact that goes beyond the objective of identifying and tracing assets. As shown above, the RRAG's exchange of information allows for more effective international cooperation, which has even led to asset restraint measures such as freezing of bank accounts and seizure of assets. It has also led to bilateral asset-sharing agreements.

In addition, the RRAG serves as one of several mechanisms through which GAFILAT member countries apply international standards and demonstrate results in international cooperation on proceeds or instrumentalities of crime.

**Sustainability: The RRAG will continue to be relevant and has significant potential to continue to show sustained results over time.**

It is clear that the RRAG is a project that can continue to be developed, it is still very relevant and useful, and as long as it continues its work, it will continue to show important results. It is therefore an initiative that has a lot of potential for consolidation.

**It is undeniable that the RRAG presents important results for the identification of proceeds of crime, it is fulfilling its objective, and it has a significant potential to increase its impact in the region and in other parts of the world.**



## HISTORICAL OVERVIEW

In October 2009, at the initiative of the United Nations Office on Drugs and Crime (UNODC) in Bogota, Colombia, and with the support of the Organization of American States (OAS), in particular its Inter-American Drug Abuse Control Commission (CICAD), and now its Department against Transnational Organised Crime (DTCO), INTERPOL and the Financial Action Task Force of Latin America (GAFILAT), formerly known as the Financial Action Task Force of South America (GAFISUD), a proposal was made to use the platform generated in the region by GAFILAT to create and develop a network of contact points designated by each State, called the Asset Recovery Network of GAFILAT (RRAG) with the objective of facilitating the identification and tracing of persons and property, aimed at the recovery of assets, products or instruments of illicit activities.

In December 2009, the GAFILAT plenary approved the creation of the RRAG and in 2010 the first contact point meeting was held in Buenos Aires, Argentina. During that year, the Financial Intelligence Unit (FIU) of the Costa Rican Drug Institute (ICD) offered to develop and manage the electronic platform for the secure exchange of information, which allowed the RRAG to become operational.

At the beginning, the RRAG was made up of the GAFISUD member countries, which at the time were Argentina, Bolivia, Brazil, Chile, Colombia, Ecuador, Mexico, Paraguay, Peru, and Uruguay. Then in 2010, Costa Rica and Panama joined GAFISUD, thus becoming members of the RRAG.

As GAFISUD grew and consolidated itself as a Latin American group, so did the RRAG. In 2012 and 2013, Cuba, Guatemala, Honduras, and Nicaragua joined GAFISUD and therefore the RRAG. Then, in 2016, the Dominican Republic was accepted as a full member of GAFILAT<sup>2</sup> and the RRAG.

With the name change, the name of the RRAG underwent a slight change and along with its name also changed its logo.

**Logo of the RRAG 2010-2015**



**Logo from 2015**



Since 2013, the following countries and related networks have applied for, and been approved by GAFILAT, to become members or observers of the RRAG in order to be able to exchange information:

<sup>2</sup> In December 2014, the name was formally changed to GAFILAT.



### Countries

- Spain\* – 2013
- France\* – 2015
- Italy – 2015
- El Salvador – 2017
- Andorra – 2018

\* Observers of GAFILAT

### Networks

- CARIN – 2012 as a participant in the meetings, but its Secretariat accesses the secure RRAG platform since 2020.
- ARIN AP – 2014 observer status without access to platform
- ARIN EA – 2015 observer status without access to platform

In the early days of the RRAG the contact points were mainly from the police and prosecutors of the member countries, but with time and the activities that the different contact points have been carrying out, participation was extended to members of the financial intelligence units (FIU). In this regard, the RRAG currently has 48 contact points from twenty-two (22) countries with direct access to the RRAG secure platform from prosecutors' offices, police, FIU and other law enforcement agencies.

Access to the electronic platform by the CARIN Secretariat allows for the secure exchange of information between the RRAG countries and the 54 jurisdictions belonging to the CARIN Network. In addition, RRAG contact points can exchange information with other member jurisdictions of networks similar to RRAG with the support of the Secretariats of these networks and the use of encrypted emails.

From an organisational perspective, the RRAG Secretariat is exercised by the GAFILAT Executive Secretariat. The network is also under the purview of GAFILAT's Operational Support Working Group (GTAO), which presents its findings and recommendations to the GAFILAT plenary on a biannual basis.

### *RRAG Secure Platform*

As previously mentioned, in 2010 the FIU of Costa Rica, through the ICD, offered to develop, host, and manage the RRAG secure platform for the exchange of information between the contact points that make up this Network. This platform has been a determining instrument for the RRAG to develop its objective and ensure a timely and adequate exchange between contact points, which has allowed the identification of property and assets in the region.

### *Partners*

The RRAG has been able to develop its activities thanks to the support of different entities and countries. Since its creation, the UNODC, CICAD, and now the DTOC of the OAS have accompanied the RRAG, as well as the GAFILAT Executive Secretariat, which also serves as the RRAG's Secretariat. Likewise, the World Bank's StAR Initiative, INTERPOL, the Intelligence Centre against Terrorism and Organised Crime (CITCO)





and Spain's AECID, the German Development Cooperation implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) support the RRAG.





## OUTCOMES OF THE RRAG IN 10 YEARS

### Effectiveness

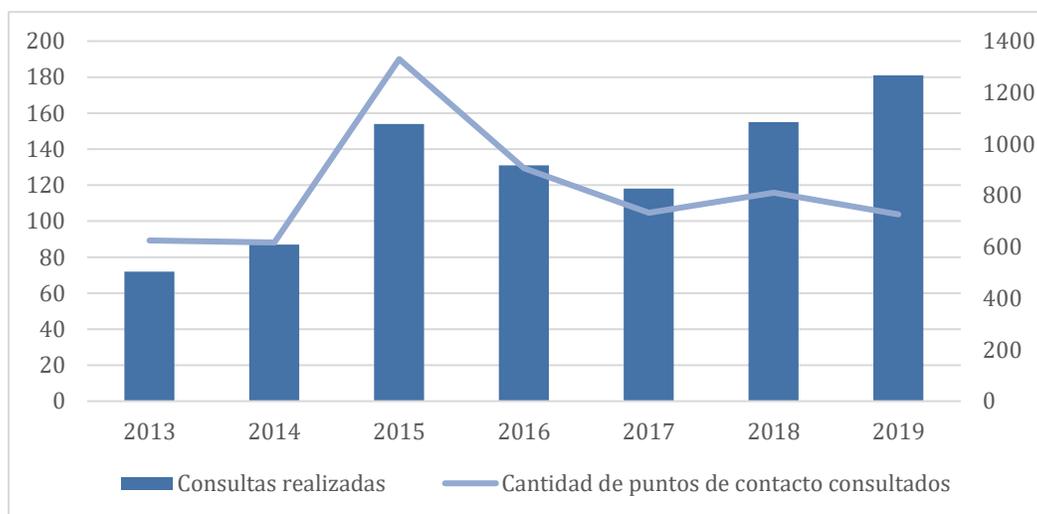
#### Outcomes of the RRAG Secure Platform<sup>3</sup>

One of RRAG’s great achievements and strengths is the electronic platform for the exchange of information. As mentioned before, this platform has been developed and maintained by the ICD. This tool allows to gather statistics on the information exchanged without individualising or disclosing sensitive data. The platform has been available to contact points since 2010, but statistical information has been available since 2013 when the platform was updated to generate this type of information.

Figure 1 shows how the use of the platform has evolved over the years. As can be seen, the consultations began in 2013 with 72 consultations and gradually the number of consultations increased to reach 181 consultations in 2019.

These consultations reflect the number of information requests forwarded by the contact points, but each consultation can be sent to several contact points, therefore, this same figure also shows the number of contact points consulted from 2015 to 2019.

Figure 1. Consultations made and contact points consulted on the RRAG Secure Platform



<sup>3</sup> It is important to mention that, for the purposes of this report, results from 2013 to the first half of 2020 were considered.



Furthermore, from the perspective of the crimes related to the consultations carried out, Table 1 shows that the crime that motivates most exchanges of information is money laundering, followed by drug trafficking and corruption. It is relevant to note that the exchange of information on terrorist offences and their financing has occurred to a lesser extent.

*Table 1. Offences related to the consultations*

Crime	2013–2019
Corruption	97
Drug Trafficking	134
Money Laundering	514
Terrorism	8
TF	6
Fraud	38
Other	117

### *Results of the exchange of information among RRAG members.*

As mentioned above, the objective of the RRAG is to identify property or assets that are the proceeds or instrumentalities of crime through the exchange of information between contact points. Since 2013, information has been collected on the results of these information exchanges and, as will be shown below, it is clear that the RRAG has been effective in tracing property.

Table 2 shows the type and quantity of assets and property that have been identified as a result of the information exchanged between RRAG contact points from 2013 to the first half of 2020.

*Table 2. Assets identified or located between RRAG contact points*

Property or assets	2013	2014–2015	2016–2019	2020–First half
Personal property (Vehicles, boats, motorbikes, others)	35	195	239	23
Real Estate		130	441	60
Companies	4	19	385	32
Bank accounts		Miscellaneous	84	106
Corporate Information (Shareholdings and beneficial ownership)		195	164	
Other property or assets			11	

As for the value of these assets, it is not possible to obtain information on their total value because in several cases their appraisal is not known, and the contact points do not have the capacity or power to



appraise the assets. However, contact points shared the following information on assets with a known value:

*Table 3. Approximate appraisal of some property or assets identified by the RRAG*

Approximate total value of assets <sup>4</sup>	
2013	Over USD 1 million
2014–2015	USD 33,715,751
2016–2019	USD 145,170,226.37
2020–First half	USD 4,997,013

### *Statistics on information exchange between RRAG and other networks*

With regard to the exchange of information between RRAG members and other networks, it is worth noting that the network with which there is the greatest exchange of information between contact points is the CARIN Network. In second place, there is the Caribbean Network (ARIN-CARIB); since its creation, RRAG contact points have been able to exchange information with these countries. To a lesser extent, information has been shared with member countries of other networks, as in the case of the Asia-Pacific Network and also with networks on the African continent.

The following tables show the results of information exchange between RRAG contact points and other networks.

*Table 4. Assets identified between the RRAG and other related networks*

Property or assets	2013– 2015	2016– 2019	2020–First half
Personal property (Vehicles, boats, motorbikes, others)	19	239	56
Real Estate		441	44
Companies		385	70
Bank accounts		84	
Corporate Information (Shareholdings and beneficial ownership)		164	145
Other property or assets		11	

Table 5 indicates the known value of property that has been exchanged between the Networks. It is noteworthy that the information on exchanges between networks demonstrates that there is an increasingly fluid communication and that outcomes are being obtained in the identification of property.

<sup>4</sup> This value only includes information on property that has a known value and, in order to consolidate the information, all values have been converted to US dollars at the August 2020 rate.



Table 5. Approximate appraisal of some property or assets identified in the exchange of information between the RRAG and other related networks

Estimated total of appraised assets <sup>5</sup>	
2013–2015	USD 705,000
2016–2019	USD 10,979,778.48
2020–First half	USD 45,325,164.3

### Examples of relevant cases reported by contact points

**Case 1:** In a case of money laundering from transnational drug trafficking with high institutional significance and multiple international ramifications, in June 2019, a request was made to country A for asset information through the RRAG. A few days later, country A provided quality information on assets and corporate shareholdings of the persons subject to the request. On the basis of the information collected, the requesting country sought and obtained a freezing order for one of the properties identified by country A, as a result of which in July this year a mutual legal assistance request was issued to that country for the purpose of freezing the identified asset, which is currently in the process of being executed.

**Case 2:** In December 2017, a request for exchange of information was sent to country A through the RRAG in relation to a criminal organisation against whom a criminal investigation with a high socio-economic impact is being conducted for offences such as fraudulent administration, coercion, usury, possible links with a drug trafficking cartel and money laundering. The heads of the organisation are a couple who had settled in country A, from where they carried out activities that allowed the laundering of assets of illicit origin. Country A responded quickly, identifying a total of 7 assets (5 real estate properties and 2 motor vehicles).

In January 2018, the couple was arrested in country A on the basis of an international arrest warrant for extradition purposes that was issued by the judge of the requesting country in the framework of the ongoing investigation in the requesting country. In country A, at the same time of the arrest, raids were carried out on the homes of the accused, where a large amount of other assets were detected, including, among others, real estate, cash deposits, exotic animals.

With regard to the properties that were identified thanks to the exchange of information through the RRAG, the judge of the requesting country ordered their restraint and, consequently, in June 2018 issued a letter rogatory addressed to country A with the purpose of requesting the annotation of the provisional

<sup>5</sup> This value only includes information on property that has a known value and, in order to consolidate the information, all values have been converted to US dollars at the August 2020 rate.





measures, by virtue of which the properties were effectively restrained by the authorities of country A in June 2019.

**Case 3:** In a case against the crime of money laundering in 2018, beneficial ownership data of accounts registered in foreign countries in the name of offshore companies was successfully obtained. Positive responses were obtained by CARIN Network contact points through the RRAG.

**Case 4:** In a request made via the RRAG, there was a positive response with the identification of foreign bank accounts, which resulted in a request for formal international legal assistance to freeze the amounts held in the accounts, but during the procedures necessary for the processing of the request, the account was closed in the other country.

**Case 5:** An investigation against a national of the requesting country linked to homicide and drug trafficking offences in the European continent and presumably money laundering. This person was considered to be one of the leaders of a criminal organisation dedicated to drug trafficking in a European country, who was presumably living in another European country. He had family support for the development of his illicit activities. Information was requested from the countries through the RRAG, and property and companies were successfully identified.

**Case 6:** The success thanks to the cooperation of country A in a judicial operation in the requesting country should be highlighted. Following the tracing of assets in country A upon a request made through the RRAG platform, the Court of the requesting country issued an international letter rogatory concerning the seizure of property, which was swiftly executed by the authorities of country A.

**Case 7:** The requesting country requested a wealth search in country A, for a tax fraud and money laundering investigation. The following were identified: 2 companies, 1 real estate property and migratory movements. This response from country A prompted the magistrate of the requesting country to issue an international letter rogatory. The procedure is ongoing.

**Case 8:** In 2017, a request for extradition cooperation was received from an Asian country. It resulted in a successful information exchange operation between the RRAG and this country in Asia.

**Case 9:** Based on information obtained by the investigative bodies of the requesting country, it became known that a citizen with a red notice issued by the Interpol Office of country A for involvement in acts of corruption was staying in that country. It was demonstrated that the aforementioned citizen, using other co-defendants as front men, with part of the cash obtained illicitly in country A, began to make investments in the requesting country through the acquisition of movable and immovable property of considerable value.





With these elements, information was requested from country A to verify the information in relation to this person’s ties with companies in that country and his/her involvement in acts of corruption. The response was received on August 11, 2015 and operational elements were provided on the person under investigation and his/her ties to companies in that country.

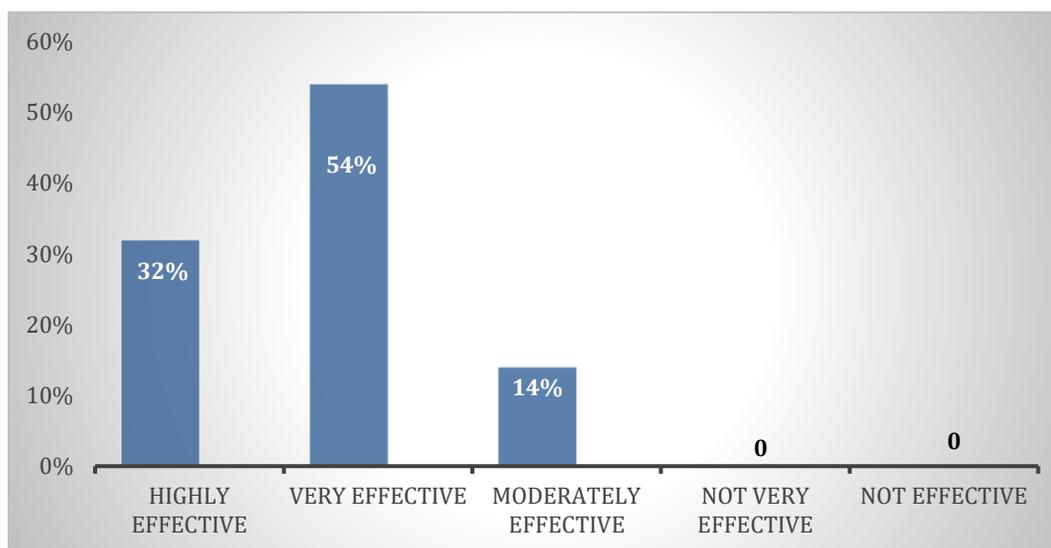
The criminal proceedings were presented to the court and the accused was found responsible for the crimes of money laundering and tax evasion and was sentenced to 15 years imprisonment, a sentence that is currently in force.

In parallel to the criminal proceedings, an administrative process of confiscation of assets was initiated against the accused, which helped to established that the assets illegally obtained amounted to more than 7 million dollars. Among the main assets confiscated were 5 comfortable houses, a KIA car and personal property valued at more than 1 million dollars.

### Qualitative Results

In a survey made to contact points, they were asked about their opinion on the effectiveness of the RRAG in achieving its purpose of exchanging information on natural and legal persons and property to facilitate the identification, tracing, and recovery of assets, proceeds or instrumentalities of illicit activities. 32% of the respondents answered that the RRAG is highly effective, 54% consider it to be very effective and only 14% consider it to be moderately effective.

Figure 2. The effectiveness of RRAG



Contact points commented on the reasons for considering RRAG to be highly effective:

- RRAG is a fundamental tool in asset or financial investigations for asset recovery purposes.
- It provides a tool to enable the exchange of information on natural and legal persons and property to facilitate the identification, tracing, and recovery of assets, proceeds or instrumentalities of illicit activities.
- It facilitates the requesting of letters rogatory requiring specific information on the natural or legal persons under investigation.
- Countries that are connected can easily provide information on whether or not there is something to pursue, essentially guiding the investigation and the results that can be obtained through it.
- Response times are increasingly shorter.
- The information obtained is increasingly complete as each country contributes to this collaborative effort necessary for the proper functioning and effectiveness of the network, giving investigators the prospect of achieving the ultimate goal of an investigation, which is the pronouncement of a judgment for the final disposition of seized assets.

Those who identified that the RRAG is very effective identified some limitations that countries themselves have on the exchange of information that have an impact on the RRAG and affect its effectiveness, such as the following:

- The RRAG is effective, but it is limited to countries' domestic laws, which often do not allow the sharing of certain types of information on persons and assets without a request for legal assistance or the authorisation of a judge.
- Although the RRAG has the advantage of allowing information to be gathered in real time, the data obtained can only be used for intelligence purposes and cannot be incorporated as evidence in the process until it is obtained through mutual legal assistance, which means that investigations inevitably end up facing the formalities and delays inherent to the processing of letters rogatory.
- There are difficulties in the countries to carry out quick and agile searches for information in order to provide a timely response to requests for information via the RRAG due to:
  - Lack of access to provincial, municipal, or national registry databases by some contact points.
  - Due to the bureaucratic characteristics of some registry systems, which in some cases require letters or official letters to request information.
  - The lack of systematisation or digitalisation of some databases.

The contact points that identify the RRAG as moderately effective state that:

- In some cases, there has been no response to the requests made, whether positive or negative, which has made it difficult to address the requirements in order to be able to prosecute the information.

- Some countries still do not have sufficient records, which means that the goal of seizing the proceeds of crime is only partially achieved.
- Although their use is an effective tool for this purpose, requests do not always contain the necessary elements to identify persons or property, in other cases requests are made but never answered, others are incomplete, and some requests are only answered after a very long period of time.

*Strengths or achievements of the RRAG information exchange:*

Both contact points and observers interviewed stated the following:

- Reciprocity in the immediacy of responses to information requests between contact points.
- It is evident that the use of the network by contact points has increased.
- It is an informal and friendly network that allows for the identification of people and property in the region and even beyond, which could not be achieved through traditional mechanisms.
- It has been possible to identify many proceeds of crime abroad thanks to the requests that have been made and in an expeditious manner.
- We have responded to requests from countries that are not members of the RRAG but belong to other asset recovery networks with the identification of mostly foreign persons.
- Domestic authorities have been made aware of the benefits of the RRAG platform through training sessions.
- Information has been effectively exchanged via RRAG.
- Requests via RRAG have increased and therefore international legal assistance has been produced and finally, proceeds of crime have been pursued.
- The Network has been strengthened and awareness has been raised about the importance of asset recovery in the region.
- The information provided through the RRAG has served as a fundamental input in judicial processes in other countries for the pursuit of criminal assets.
- Not only have assets been identified, but also formal requests for international cooperation in cases originating from the information shared by the Network have been made.
- The RRAG is the only secure informal mechanism in the region to identify assets abroad and thus began to be seen in the field of international cooperation.
- The effectiveness in the exchange of information and the strengthening of international cooperation not only at the regional level, but also at the international level due to the different alliances that the RRAG has been able to establish with other networks, such as CARIN and other similar networks.

*Strengths or achievements of the RRAG from the perspective of its structure:*

- The GAFILAT Secretariat’s work with regard to the contact points has been indispensable since the Network’s creation and for its subsequent consolidation.
- The trust between the contact points of the Latin American countries that is fostered in face-to-face meetings increases the effectiveness of the Network’s purposes.
- It includes the participation of law enforcement agencies such as the Police, the Public Prosecutor’s Office and other bodies with criminal investigation and prosecution functions.
- The participation of FIUs as contact points makes the processes more dynamic due to the variety of databases to which they have access.
- The fact that the RRAG is part of GAFILAT is one of its great strengths.
- The face-to-face meetings that are held every year allow contact points to further strengthen their relationships and to follow up more closely on the requests that have been made between them. These meetings helped the Network to consolidate since its creation.
- The relationship between GAFILAT and the RRAG is positive as it gives seriousness to the network for being backed up by a strong and recognised international organisation.
- Having CARIN as a member of RRAG increases the efforts of institutions to submit requests and provide quality responses.
- The fact that in some countries there are 3 contact points—one FIU, one police and one Public Prosecutor’s Office—allows for a wide coverage of information without restrictions on the powers of the contact points.
- During its 10 years of existence, the RRAG has kept the trust of GAFILAT representatives in its functioning.
- The continuity of the contact points from an institutional point of view has been maintained to a large extent.
- The RRAG adds value to GAFILAT and therefore continues to be interested in supporting the Network.

*Strengths or achievements of the RRAG from the perspective of the electronic platform:*

- The RRAG has had a secure platform for exchanging sensitive information since its creation.
- The tool has allowed for an efficient and timely exchange of information.
- The modernisation of the platform by Costa Rica has made it more user-friendly and new functions have been incorporated.
- The registration of historical information and statistics is an advantage of the RRAG.
- It is an accessible and user-friendly platform.
- It is a secure platform, which generates trust among official operators, as sensitive information is shared through it.



- The RRAG platform is the Network’s biggest input for the efficient exchange of information.

*Other relevant achievements:*

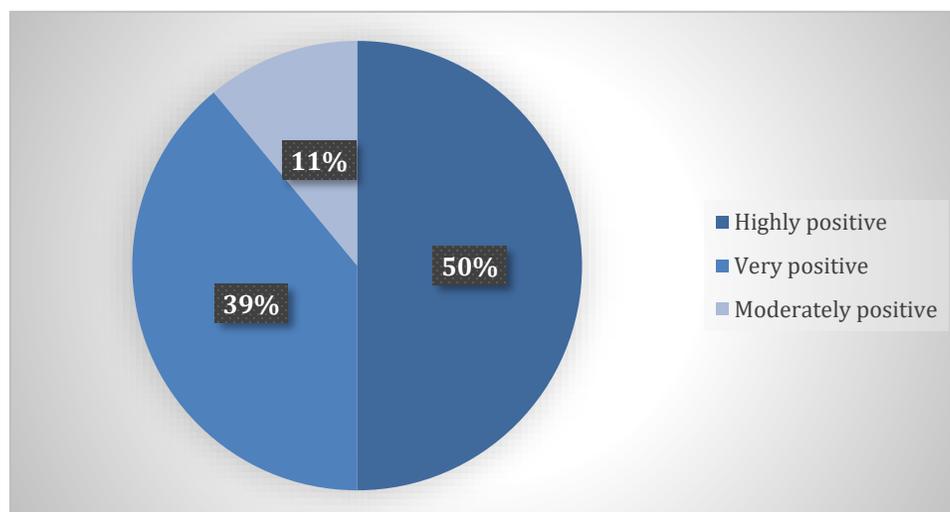
- In 2018, based on the exchange of information made through the RRAG, there was an agreement on the disposition of assets between two member countries.
- The RRAG has been strengthened as an operational network for the exchange of information, unlike others that are only for support or management.
- More agile responses by RRAG than by EGMONT due to its regional connotation.
- The RRAG has served as a reference for the region and for the creation of other similar networks such as the one in the Caribbean.
- The RRAG has positioned itself at a global level due to the agreements that have been entered with other similar networks such as CARIN.
- The strengthening of the Network can be seen in the fact that it has increased its membership to countries in other regions such as Spain, France, and organisations such as the CARIN Secretariat.

*Impact*

*Impact on the work of the contact points*

From the perspective of the impact on the work of the contact points, the survey found that 50% of the contact points consider that the RRAG has had a highly positive impact, 39% said it has had a very positive impact, and only 11% considered it to be moderately positive. None of the contact points considered the impact to be low or none at all.

*Figure 3. Has the RRAG had a positive impact on your work?*





### *Impact on the potential of RRAG to be transformative*

The impact of RRAG can also be identified from the activities triggered by the exchange of information. Although the objective of the RRAG is to identify proceeds of crime, it is of course expected that this information will trigger the next steps to implement formal international cooperation mechanisms so that these traced assets are integrated into a judicial process, become part of the investigations, and ultimately, precautionary, or definitive measures can be implemented against them. This is the highest or potentially transformative level of the RRAG.

Table 6 shows the number of judicial assistances that the contact points have reported resulted from the exchange of information between the RRAG and with other networks.

*Table 6. Mutual Legal Assistance issued as a result of RRAG information exchange.*

Mutual Legal Assistance	
2013–2015	10
2016–2019	17
2020–First half	9

From this perspective, the contact points have reported that, in several cases, letters rogatory and other legal assistance between countries have been generated as a result of the information exchanged. This more defined information allows such international cooperation to achieve more results and have a greater impact. There have even been cases in which security measures have been applied against individuals, precautionary measures against property (freezing of accounts, seizure of personal or real property, etc.) and even convictions have been obtained. In one particular case, the authorities of two countries developed a bilateral agreement for collaboration in the case and eventual sharing of assets arising from it.

### *Impact on the implementation of international standards*

From the perspective of the implementation of international standards, the activities carried out by the RRAG, and in particular the exchange of information between contact points, is ultimately a mechanism to implement and demonstrate results in international assets cooperation.

Examples of paragraphs on RRAG in mutual evaluation reports.	
Uruguay	The country also exchanges informal information within the framework of the Asset Recovery Network of GAFILAT (RRAG) in order to provide and request cooperation for the identification of property in other countries of the region in order to guide the asset recovery process in other jurisdictions (GAFILAT, 2020, paragraph 692).





<b>Peru</b>	Between 2015 and 2017, 11 information requests have been made through the RRAG (GAFILAT, 2019, paragraph 366).
<b>Mexico</b>	Mexico received and granted a total of 46 foreign requests for basic and BO information between 2010 and 2017 through the RRAG (GAFILAT platform for the facilitation and tracing of property, products, and instruments of illegal activities) (GAFILAT, 2017, paragraph 410).
<b>Colombia</b>	The FGN is part of the Asset Recovery Network of GAFILAT (RRAG) and as of 2016 it has made 17 active requests to eight countries using this platform. The requested countries were Panama (4), United States (3), Spain (3), Argentina (2), Chile (2), Switzerland (1) France (1) and Italy (1) (GAFILAT, 2018, paragraph 418).

It is clear that the impact of the activities carried out by the RRAG goes beyond its scope of competence and its results support the wider objective of achieving effective international cooperation on assets that allows for provisional or definitive measures to be applied on them. The RRAG also serves as one of several mechanisms through which GAFILAT member countries apply international standards and demonstrate results in international cooperation.

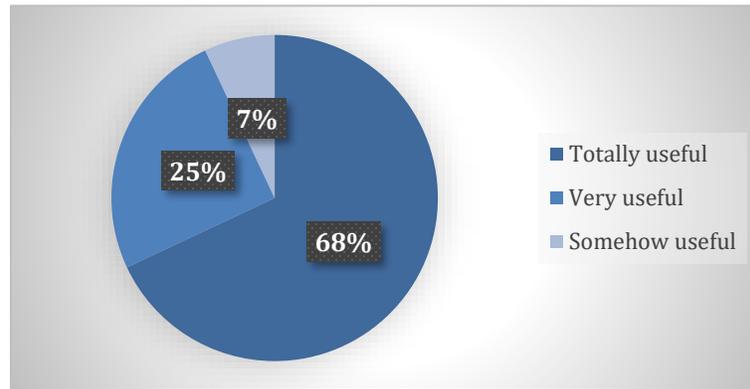
### *Relevance*

Observers and contributors were asked about the relevance of the RRAG for the region and in the light of international standards against money laundering and terrorist financing. When asked whether they considered the RRAG to be relevant for the region, 50% considered it to be totally relevant and the other 50% considered it to be very relevant, and there were no responses on little or no relevance.

Also, when asked about the relevance of the RRAG in light of international standards, the majority considered it to be totally relevant (75%) and 25% considered it to be very relevant. These results show that the RRAG is very relevant for its users, for the region and also for compliance with international AML/CFT standards.



Figure 4. Do you consider the RRAG to be a useful network for your work?



Contact points were also asked whether they consider RRAG useful for their work, and 68% of respondents considered RRAG to be fully useful, 25% considered it very useful and only 7% considered it to be somewhat useful. No contact points considered RRAG to be not little or no useful at all.

The reasons why the contact points stated that the RRAG is useful are:

- It is the only instrument of actual prejudicial efficiency available to them.
- In addition to being a mechanism for the identification of assets, it is possible to identify processes in other countries.
- Because it streamlines and guides the investigation.
- It saves time and effort when the crime is transnational.
- Its importance lies in the reduction of response times and the increase of trust between the States involved.
- Through the RRAG Platform, general, social, tax, patrimonial and financial information can be requested to assist in the preliminary investigation of money laundering offences.
- Data obtained from enquiries made to foreign contact points facilitates the preparation of international letters rogatory with accurate data and a better chance of success, which will increase the efficiency of criminal and financial investigations.
- The RRAG has also been beneficial for the efficiency of the work of our institutions even in cases where the consulted contact points reported the absence of assets in their jurisdictions, since, in such cases, knowing in advance the absence of information relevant to the case has saved time and resources in the issuance of meaningless letters rogatory and has even led to a strategic rethinking of investigative hypotheses.
- This form of cooperation makes it possible to move away from conventional communication through diplomatic channels, bringing government agencies in charge of investigation and prosecution closer together, building bridges not only between countries but also between investigative and law enforcement agencies, based on the trust of their members.

Those who consider the network to be somewhat useful said that it is not so useful for their institution, but it is useful for other national institutions, such as investigative and law enforcement agencies. This reflects the need for the contact point designated by the countries to be a relevant entity for asset investigations.

The information presented provides evidence that the RRAG is very relevant and useful for its users (contact points), for observers and for the implementation of international standards in the field.

### *Consistency*

From the perspective of the contact points, 75% of the respondents to the survey consider the activities carried out by the RRAG to be totally consistent with its objective, and 25% consider them to be very consistent. As can be seen in Figure 5, 75% of observers/collaborators also consider RRAG's activities to be very consistent with its objective. Neither the contact points nor the observers consider the RRAG's activities to be little or not at all consistent.

Contact points and observers were also asked why they considered RRAG's activities to be consistent with its objective, and in summary the responses received highlight that:

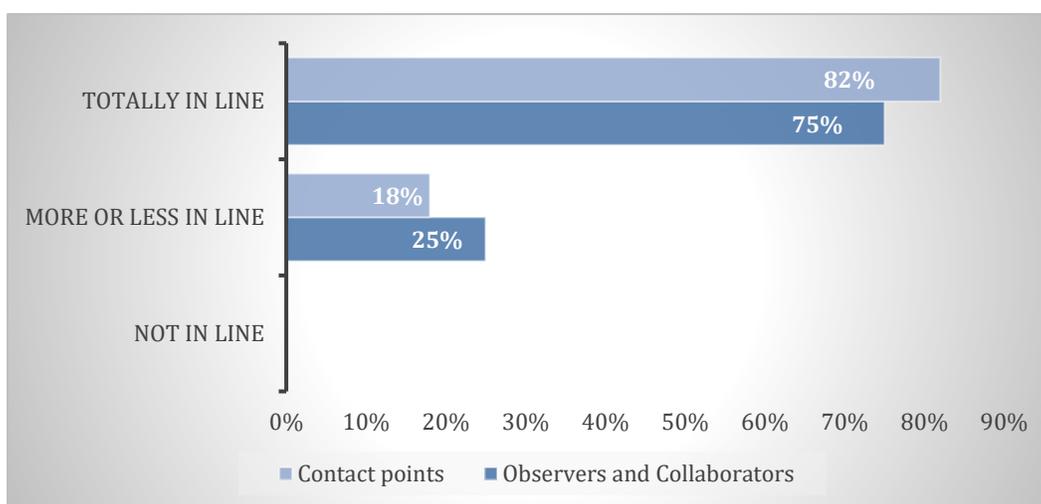
- The activities are consistent with the challenges sought to be overcome in the agile exchange of information.
- The RRAG makes it possible to identify the proceeds of criminal offences quickly and reliably, which saves time and allows for a timely and more agile asset recovery process.
- Annual meetings are essential to build trust between the contact points, which is essential for them to decide to cooperate with each other. In addition, questionnaires on the performance of the RRAG allow an analysis of how the RRAG is performing. These actions are consistent with the purpose of the network.
- It is a network that facilitates timely exchange, so that our countries can request international legal assistance, the outcome of which is guaranteed by the most positive response.
- It is consistent with the objective of the RRAG since the information that is commonly exchanged in the network is related to natural and legal persons who are used for the registration of assets of illicit origin.
- The exchanges both in the annual meetings of the contact points and in virtual exchanges have this objective, which seeks to achieve a better exchange of information for the identification and tracing of persons and assets. In several cases, it serves as a basis for the letters rogatory in criminal proceedings being investigated in the different countries.
- It allows for quick and efficient access to relevant information in order to report the requesting country whether it should proceed with a formal rogatory or request without the bureaucratic process that would be required to do so through diplomatic channels.
- It facilitates and strengthens international and interagency collaboration.



In addition, 82% of the contact points and 75% of the observers consider that the activities carried out within the framework of the RRAG are very much in line with international standards for the identification and prosecution of assets or instruments of illicit activities. Only 18% and 25%, respectively, considered the activities of the RRAG to be more or less in line. It is noteworthy that no contact point or observer considered the activities of the RRAG are not in line.

All of the above demonstrates that the RRAG's activities are very well targeted and really focused on developing its objective, as well as being very consistent and in line with global efforts to pursue the proceeds or instrumentalities of crime.

Figure 5. Are activities under the RRAG in line with global efforts to identify and pursue assets that are the proceeds or means of illicit activities?



### Sustainability

79% of the contact points responding to the survey consider that the RRAG will remain very relevant in the coming years and 21% consider that it will be of medium relevance. This indicates that RRAG has great potential for the years to come.

Contact points consider that the RRAG will continue to be relevant in the future because:

- Transnational crime is growing, and countries must work together to combat it.
- It is and will continue to be a relevant tool given that assets of illicit origin and destination are being investigated. In that sense, it is common to use foreign legal persons to lose track of assets, so the RRAG will continue to be useful for present and future asset recovery investigations.
- The world is changing, institutions are going digital and obtaining more complete information as a result of this modernisation is natural.

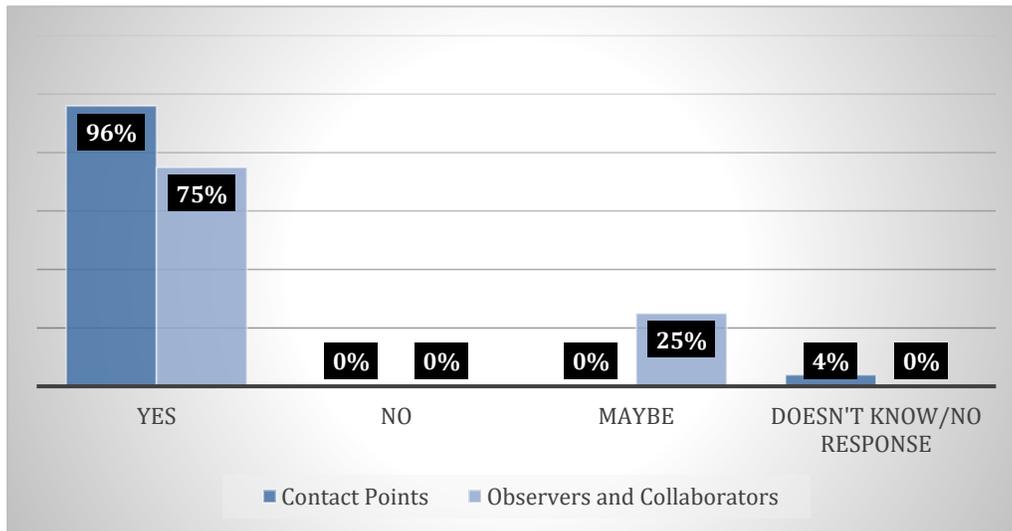


- The prosecution of organised crime and economic crime is increasingly being approached with the recovery of assets of illicit origin as one of its priority objectives in line with international standards and national legislations. Under these conditions, there is no doubt that, in the coming years, the Network will continue to be an indispensable tool for the pursuit of organised crime.
- Each State cannot act alone in this matter; it must open up to the world and adapt, as criminal organisations do. Crime has no borders, methods of operation are changing, and international cooperation is indispensable and bound to be strengthened.

Some of the contact points that indicated that the RRAG will be of medium relevance in the future commented that the reasons are because international assistance in asset recovery in the region needs to continue to be strengthened. Also, the use of the RRAG will be of medium relevance if some of the challenges raised above, which prevent RRAG from realising its full potential, are not overcome.

Furthermore, 75% of the observers consider that the RRAG will remain relevant in the coming years and 25% think that it might be relevant in the coming years. It is noteworthy that none of the contact points or observers considered that the RRAG will not be relevant in the future.

Figure 6. Do you think that the RRAG will be able to generate positive outcomes in the coming years?



From the perspective of future results, as shown in this Figure, 96% of the contact points and 75% of the observers consider that the RRAG will be able to generate positive outcomes in the next few years. Twenty-five percent of observers think that it might be able to generate positive outcomes.

In short, the RRAG will continue to produce positive outcomes as long as the efforts to disseminate the RRAG in each of the member countries continue or increase, which will increase the interest of the



national authorities in the benefits of the information sharing tool, thus enabling the generation of more requests.

Finally, as a consequence of the positive experience gained in the use of the Network, it is evident that national authorities do not hesitate to use the RRAG again. In this way, and as some contact points mentioned, sending information exchange requests through the network is becoming an essential part of the strategy in asset or financial investigations in the region and therefore its work and objective is sustainable in the future.

**Finally, as a reference for the contact points of the RRAG, other related networks and other international organisations, the entities represented with a contact point in the RRAG are presented below.**

Country	Institution
Andorra	Andorran Police
Argentina	Attorney General's Office
	Financial Information Unit
Bolivia	Financial Intelligence Unit
	Attorney General's Office
Brazil	Federal Public Prosecutor's Office
	Ministry of Justice and Public Security of Brazil
	Federal Police of Brazil
Chile	Investigative Police of Chile (PDI)
	Carabineros
	National Prosecutor's Office of the Attorney General's Office
Colombia	Attorney General's Office
	National Police
	Comptroller General of the Republic
Costa Rica	Attorney General's Office
	Financial Intelligence Unit
Cuba	Attorney General's Office of the Republic
	Technical Investigation Police
Ecuador	Attorney General's Office
	Financial and Economic Analysis Unit
El Salvador	National Police
	Attorney General's Office of the Republic
Spain	Ministry of Justice
	CITCO
France	Ministry of the Interior - Judicial Police Directorate
	Ministry of the Interior - Judicial Police Directorate
Guatemala	Attorney General's Office
	Ministry of Government (MIGOB)

Honduras	Financial Intelligence Unit
	National Police
Italy	Asset Recovery Office
Mexico	Ministry of Finance and Public Credit
	Attorney General's Office
Nicaragua	Attorney General's Office
	National Police
Panama	National - Criminal Investigation Directorate
	Attorney General's Office
Paraguay	Secretariat for the Prevention of Laundering of Money or Assets
	Attorney General's Office
	National Police
Peru	Financial Intelligence Unit
	National Police of Peru (PNP)
	Attorney General's Office
Dominican Republic	Attorney General's Office
	National Directorate for the Control of Drugs
CARIN Secretariat	EUROPOL
Uruguay	Presidency of the Republic of Uruguay
	Presidency of the Republic of Uruguay

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