

UNEVEN RECOVERY

What global data reveal and conceal
about stolen asset returns

A civil society analysis of the StAR Asset Recovery Watch database



Table of Contents

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What global data reveal and conceal about stolen asset returns
A civil society analysis of the StAR Asset Recovery Watch database

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The author and researcher of the report extend their sincere thanks to Charlotte Palmieri, Betina Pasteknik, Corinna Gilfillan, Jackson Oldfield, Solvej Kretchun, and Elsa Gopala Krishnan for their thoughtful and constructive review.

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	Glossary	4
	List of abbreviations	5
	Introduction	6
	Recommendations	8
	Presentation of the database	10
01	Data sources and reporting quality	12
	Half of UNCAC States respond, while certain key actors remain silent	14
	Limits and biases in the data reported	15
02	International cooperation	18
	Geographical flows	18
	Action initiating asset recovery	18
03	Legal basis for asset recovery	20
	Procedural pathways for asset recovery	20
	Offences underlying asset recovery cases	21
04	Asset recovery patterns and drivers	22
	Geography	22
	Duration	24
	Volume of assets	25
	Modalities of restitution	26
	Civil society involvement	26
	External factors	27
	Conclusions	28
	Annexes	30

Glossary

Confiscation of assets

is the permanent deprivation of property rights from the owner of an asset, in accordance with the applicable legal rules.

Freezing/Seizing of assets

means, according to Article 2.f of the UN Convention against Corruption, the temporarily prohibition of the transfer, conversion, disposition or movement of property or temporarily assuming custody or control of property on the basis of an order issued by a court or other competent authority. This definition does not include asset freezes imposed as part of political or diplomatic sanctions, which fall outside the scope of this analysis.

Restitution of assets

is the process whereby the proceeds of corruption are confiscated by the country of asset location and returned to the country of origin.

Proceeds of corruption

are any property derived from or obtained, directly or indirectly, through the commission of an offence established in accordance with the UN Convention against Corruption.

Country of asset location

is the country where the proceeds of corruption are located. It is also sometimes referred to as the “destination country” or “holding country”.

Country of origin

is the country of origin of the public official involved. It is typically the country where the original corruption offence took place.

Transit country

is the country (other than the country of origin and the country of asset location) through which proceeds of corruption have passed.

Third country

is any country other than the country of origin or the country of asset location.

The term country may describe jurisdictions, States or countries regardless of their political status.

List of abbreviations

ARW

Asset Recovery Watch Database

FATF

Financial Action Taskforce

FIU

Financial Intelligence Units

IMF

International Monetary Fund

IRM

Implementation Review Mechanism

MLA

Mutual Legal Assistance

MoU

Memorandum of Understanding

NCB

Non-conviction based

StAR

Stolen Asset Recovery Initiative

UNCAC

United Nations Convention Against Corruption

UNODC

United Nations Office on Drugs and Crime

Introduction

Stolen assets are often swiftly moved across borders and routed through multiple jurisdictions, making recovery efforts highly complex and reliant on prolonged international cooperation.

Too many countries fail to recover stolen assets and proceeds of corruption located abroad. In the EU, for instance, despite robust legislative frameworks, the seizure of criminal proceeds remains at an alarmingly modest level of approximately 2%.¹ A figure that hasn't changed in the last decade.² At the global scale, the picture is slightly better. While in 2014 only a handful of countries were actively recovering proceeds of crime and stolen assets³, the rates have slightly improved since then. In 2023, 47 countries reported involvement in at least one cross-border asset return involving corruption proceeds between 2010 and 2023.⁴

« the seizure of criminal proceeds remains at an alarmingly modest level of approximately 2% »

Despite this slight improvement, reliable and comparable data on asset recovery remains extremely scarce. Official reporting is patchy, fragmented across jurisdictions, and lacks the transparency needed for meaningful analysis.

This scarcity makes it difficult to evaluate performance over time and leaves external observers with limited basis to assess the transparency, integrity, and inclusiveness of processes or to provide targeted recommendations.

The lack of systematic data also conceals another major challenge: the wide disparity in practices. Even in countries that have returned assets, the way they do so can vary drastically from one case to the next. Where transparency and accountability guided one restitution, they may be entirely absent in another—sometimes within the very same jurisdiction, separated only by a few years or different tranches of the same recovery. Without consistent reporting, these contrasts remain hidden, making it nearly impossible to compare cases, draw lessons, or identify best and worst practices with sufficient detail.

This uneven landscape opens the door to opacity, selective disclosure, and manipulation of restitution processes. For civil society, it means that advocacy often takes place in the dark: watchdogs may celebrate one example of good practice while struggling to denounce abuses in another, simply because the information needed to establish patterns is absent.

In this context, the Stolen Asset Recovery Initiative (StAR)'s [Asset Recovery Watch database](#), created in 2011 and relaunched in 2023, provides a valuable resource: it combines information from public sources (media, civil society, etc.) with data collected through questionnaires regularly sent to States Parties to the United Nations Convention against Corruption (UNCAC), opening new possibilities for a more structured and global overview of recovery practices.

This paper presents the first civil society-led global analysis of cases recorded in the StAR As-

set Recovery Watch database. While the dataset offers valuable insight into global asset recovery efforts, its limitations are significant: reporting is uneven, some key jurisdictions are missing, and crucial details are often absent. These gaps prevent robust cross-analysis and make it difficult to draw general patterns. The trends identified here should therefore be read as indicative rather than exhaustive, reflecting both the availability of data and the willingness of States to disclose information. Within these constraints, the analysis nonetheless highlights emerging dynamics in geography, duration and volume of asset recovery cases.

KEY FINDINGS

- **Participation remains shallow and uneven.** Only about half of UNCAC States Parties have responded to at least one questionnaire, and several major financial centres have consistently abstained.
- **Quality of submissions could be improved.** On average only 37% of fields are filled, and national authorities' own entries are no more complete than StAR's desk research.
- **StAR's open-source research underpins much of the database.** Around 60% of cases were disclosed by States and 40% identified directly by StAR through open-source research. Most State-reported cases are combined with StAR's own research.
- **Structural bias persists.** Because key destination countries with large financial sectors underreport, the dataset likely overrepresents asset recovery success stories from responding countries.

¹ EUROPOL, *Does crime still pay? Criminal Asset Recovery in the EU Survey*, 2016

² EUROPOL, *EU Serious and Organised Crime Threat Assessment*, 2025

³ StAR, *Few and far: The hard fact on stolen assets recovery*, 2014

⁴ United Nations Office on Drugs and Crime Secretariat, United Nations Office on Drugs and Crime Secretariat, *Collection of Information on International Asset Returns, Including Challenges, Good Practices and Lessons Learned* (Atlanta: Conference of the States Parties to the United Nations Convention against Corruption, Tenth Session, 11–15 December 2023), Doc. [CAC/COSP/2023/15](#), 16 October 2023, §16

RECOMMENDATIONS

→ **States Parties should improve their data collection by:**

1. **Establishing a formal inter-agency mechanism for collecting and consolidating asset-recovery data**, involving all competent authorities (e.g., asset-recovery offices, anti-corruption agencies, financial intelligence units (FIUs), central authorities, prosecutors, anti-corruption bodies, etc.).
2. **Designating a single national focal point responsible for all major asset-recovery reporting exercises** (e.g., StAR questionnaire, UNCAC implementation review mechanism (IRM), Financial Action Taskforce (FATF) mutual evaluation reports (MER), etc.) to ensure consistency and continuity, and regularly updating this designation with up-to-date contact information.
3. **Aligning their internal data-collection processes** with the highest reporting standards and best practices in the asset-recovery field, reducing duplication and ensuring that case information is captured coherently and consistently across all reporting systems.
4. **Adopting a continuous reporting process**, systematically updating StAR when previously reported cases progress, stall, or conclude — including when they do not result in a return.
5. **Periodically reviewing all cases in the StAR database in which they appear as country of origin or destination**, verifying accuracy, closing outdated entries, and correcting inconsistencies.

→ **States Parties and donors should ensure predictable, adequate financial support for StAR**, enabling regular maintenance, updates, and methodological improvements to the Asset Recovery Watch database.

→ **States Parties should support a more effective, transparent, and inclusive UNCAC Implementation Review Mechanism (IRM)**, so that asset-recovery reporting captures real-world outcomes, ensures greater transparency, and allows for meaningful civil-society participation.

→ **StAR should publish clear guidance and standardised definitions for the questionnaire**, including explanations of key terms and illustrative examples to support more consistent reporting across jurisdictions.

Presentation of the database

The Asset Recovery Watch (ARW) database is a public database managed by the Stolen Asset Recovery Initiative (StAR) that tracks efforts by prosecution authorities worldwide to go after assets that stem from corruption. Its purpose is to aggregate, standardize, and make publicly accessible structured data about ongoing and completed international recovery efforts involving proceeds of corruption.

StAR is a partnership between the World Bank Group and the United Nations Office on Drugs and Crime (UNODC) that supports international efforts to end safe havens for corrupt funds. The ARW database was launched in 2011 and underwent a major refresh in 2023. The database was originally launched at the 2011 World Bank / International Monetary Fund (IMF) Annual Meetings. At its launch, it contained 75 cases involving 52 countries of origin of corrupt public officials and 34 jurisdictions from which stolen assets have been recovered or located since 1980. It was based entirely on public source information collected by StAR and was updated annually.

The relaunch⁵ included both new design features and updated case entries drawn from years of active research and State-surveying efforts. As part of that work, StAR's team has reviewed and manually entered over 550 cases into the refreshed database, documenting more than USD 10 billion in internationally returned assets (for the period 1997–2023) as of launch.

The database's information has been gathered through three rounds of questionnaires circulated by StAR and the UNODC Secretariat to all UNCAC States Parties in 2020, 2022, and 2023. A fourth questionnaire was circulated in 2025, with responses still under review by StAR at the time of this analysis. These questionnaires are transmitted every two years by the UNODC Secretariat via *notes verbales*, acting on mandates from the UNCAC Conference of the States Parties, including resolutions 6/3, 8/9, and 9/2. Notes verbales are dispatched through diplomatic channels to countries' permanent missions in Vienna, which then forward the request to the competent national authorities (typically attorneys general or prosecutorial bodies, ministries of justice, anti-corruption agencies, or designated central authorities). Presented by the UNODC as "the largest systematic effort to date to collect information on international asset recovery efforts related to corruption offences directly from national authorities"⁶, each survey covered a defined period (2010–2020; 2020–2021; 2022–2023) and allowed countries to report new cases or update earlier ones. Reported cases have then been entered into the database as new records or used to amend existing entries.

In parallel, StAR has conducted desk research using official public documents such as court judgments, government press releases, and where relevant, reliable media and civil society reports. Source documents were appended to cases whenever possible, and survey inputs were sometimes used to complement or update entries already identified through open-sources.

Structure and Scope of the Database

The ARW database is organized around a cross-border, multi-jurisdictional focus, recording only cases that involve more than one jurisdiction (i.e., where assets originate in one country and are located or recovered in another).

It captures a wide range of quantitative and qualitative variables related to case characteristics, legal and procedural steps, financial

and restitution data, and measures of freezing and confiscation. A comprehensive list of all variables recorded in the database is provided in the annexes of this report.

These variables are complemented by a number of structural and functional features that determine how the database can be used and where its main limitations lie.

KEY FEATURES AND LIMITATIONS

- **Cross-border focus:** Only multi-jurisdictional cases are included.
- **Quantitative measures:** Each case includes figures for assets frozen, seized, confiscated, or returned (in USD), along with relevant dates and jurisdictions.
- **Legal and procedural metadata:** Includes legal bases for recovery, recovery stages (freeze, seizure, confiscation, return), and source documentation (e.g., MoUs, press releases, asset return agreements).
- **Search and filtering tools:** Users can query by jurisdiction, year of recovery, asset amount, UNCAC offences implicated, the existence of an agreement, the type of data source, and other procedural attributes.
- **Case clustering:** Related cases are grouped under shared clusters (e.g., Abacha, 1MDB), allowing users to trace complex, multi-phase recoveries. There is 59 case clusters, with an average of 3.9 cases per cluster. Many cases are not linked to any clusters.
- **Updating and validation:** The database is described as "dynamic," with regular updates as new information becomes available.

As of its relaunch, the ARW database encompassed over 140 jurisdictions, whether as countries of origin or asset locations, and a total of 556 cases after data cleaning.

⁵ The relaunched platform was unveiled at StAR Day during the 10th session of the Conference of States Parties (CoSP) to the UN Convention against Corruption (UNCAC) on December 12, 2023.

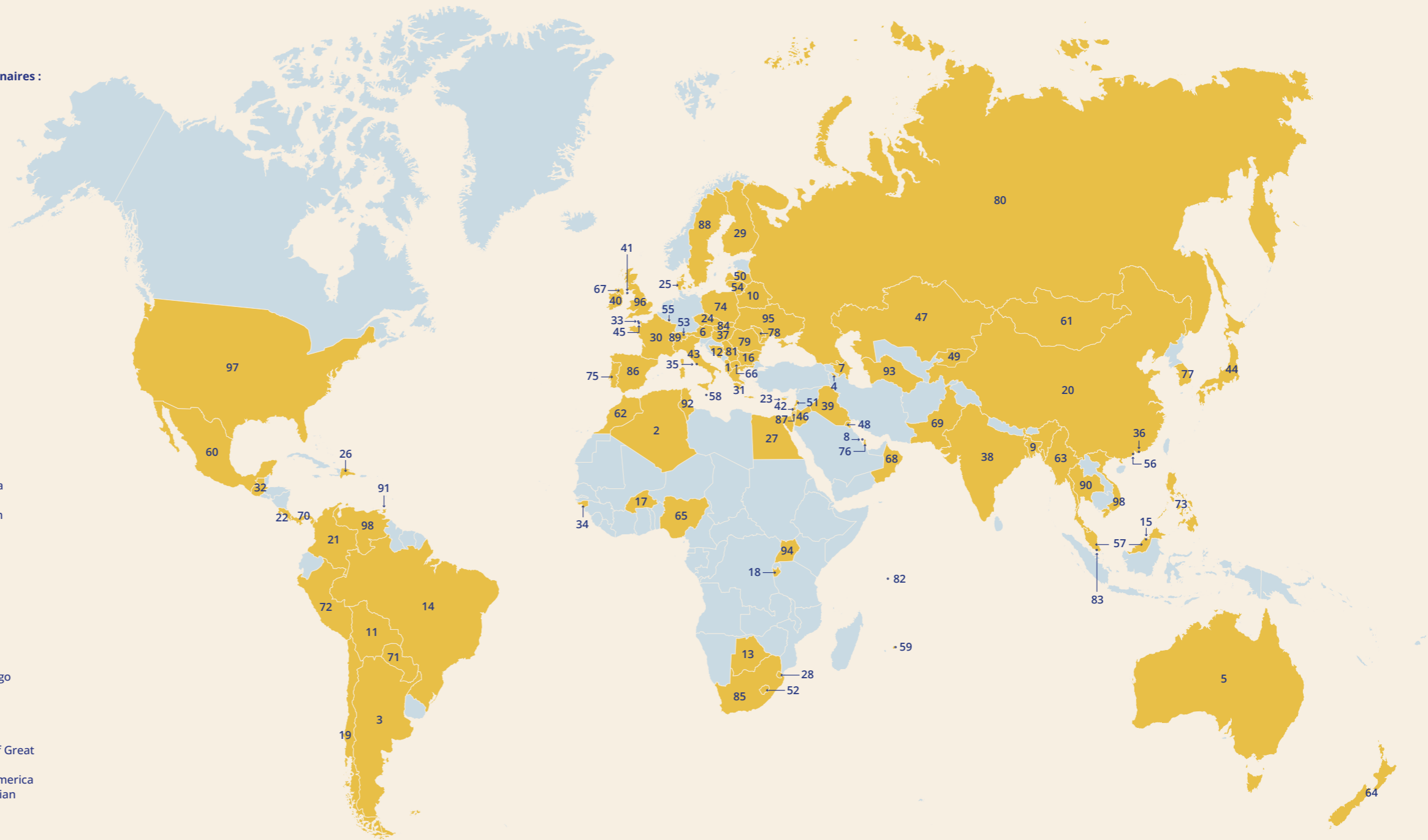
⁶ "The three questionnaires represent the largest systematic effort to date to collect information on international asset recovery efforts related to corruption offences directly from national authorities. While the information collected does not represent, and should not be interpreted as, comprehensive accounting of all relevant asset recovery cases that fall within the time frame and scope of the present document, it nonetheless constitutes a large sample of cases that offer valuable insights into the practice of cross-border efforts to restrain, confiscate and return proceeds of corruption." United Nations Office on Drugs and Crime Secretariat, Collection of Information on International Asset Returns, Including Challenges, Good Practices and Lessons Learned (Atlanta: Conference of the States Parties to the United Nations Convention against Corruption, Tenth Session, 11–15 December 2023), Doc. CAC/COSP/2023/15, 16 October 2023, §53

01. Data sources and reporting quality

Country responses to the StAR Questionnaire

● Countries that have responded to the StAR's questionnaires :

- | | |
|----------------------------|--|
| 1. Albania | 52. Lesotho |
| 2. Algeria | 53. Liechtenstein |
| 3. Argentina | 54. Lithuania |
| 4. Armenia | 55. Luxembourg |
| 5. Australia | 56. Macao (China) |
| 6. Austria | 57. Malaysia |
| 7. Azerbaijan | 58. Malta |
| 8. Bahrain | 59. Mauritius |
| 9. Bangladesh | 60. Mexico |
| 10. Belarus | 61. Mongolia |
| 11. Bolivia | 62. Morocco |
| 12. Bosnia and Herzegovina | 63. Myanmar |
| 13. Botswana | 64. New Zealand |
| 14. Brazil | 65. Nigeria |
| 15. Brunei Darussalam | 66. North Macedonia |
| 16. Bulgaria | 67. Northern Ireland |
| 17. Burkina Faso | 68. Oman |
| 18. Burundi | 69. Pakistan |
| 19. Chile | 70. Panama |
| 20. China | 71. Paraguay |
| 21. Colombia | 72. Peru |
| 22. Costa Rica | 73. Philippines |
| 23. Cyprus | 74. Poland |
| 24. Czechia | 75. Portugal |
| 25. Denmark | 76. Qatar |
| 26. Dominican Republic | 77. Republic of Korea |
| 27. Egypt | 78. Republic of Moldova |
| 28. Eswatini | 79. Romania |
| 29. Finland | 80. Russian Federation |
| 30. France | 81. Serbia |
| 31. Greece | 82. Seychelles |
| 32. Guatemala | 83. Singapore |
| 33. Guernsey (UK) | 84. Slovakia |
| 34. Guinea-Bissau | 85. South Africa |
| 35. Holy See | 86. Spain |
| 36. Hong Kong (China) | 87. State of Palestine |
| 37. Hungary | 88. Sweden |
| 38. India | 89. Switzerland |
| 39. Iraq | 90. Thailand |
| 40. Ireland | 91. Trinidad and Tobago |
| 41. Isle of Man (UK) | 92. Tunisia |
| 42. Israel | 93. Turkmenistan |
| 43. Italy | 94. Uganda |
| 44. Japan | 95. Ukraine |
| 45. Jersey (UK) | 96. United Kingdom of Great Britain |
| 46. Jordan | 97. United States of America |
| 47. Kazakhstan | 98. Venezuela (Bolivarian Republic of) |
| 48. Kuwait | 99. Viet Nam |
| 49. Kyrgyzstan | |
| 50. Latvia | |
| 51. Lebanon | |



Half of UNCAC States respond, while certain key actors remain silent

Despite repeated calls from the UN General Assembly, the Conference of the States Parties to the United Nations Convention against Corruption and the Open-Ended Intergovernmental Working Group on Asset Recovery for more comprehensive information⁷, responses remain scarce, with many countries choosing not to reply at all.

The first and second questionnaires, covering the period 2020–2021, drew replies from 87 States (that is, 45% of the States Parties to the UNCAC).⁸ The third questionnaire, covering 2022–2023, brought in a slightly wider set of respondents. Nine additional countries took part in the third round that had not contributed previously (that is, 50% of the States Parties to the UNCAC): Bolivia, Colombia, Cyprus, Denmark, Malta, Poland, Republic of Moldova, Slovakia, and Sweden.⁹ Their inclusion indicates a modest broadening of participation. Yet this progress remains limited.¹⁰

Equally striking are the absences. Several EU Member States did not respond to either questionnaire, including Belgium, Croatia, Estonia, Germany, the Netherlands, and Slovenia. The absence of Germany, one of Europe's largest economies and a G7 and G20 member, is particularly significant. It is also deeply troubling:

German banks have long been identified as havens for dirty money, including assets linked to former Arab dictators and other authoritarian rulers.¹¹ The Netherlands' silence is particularly striking given past controversies over its handling of stolen asset cases. In 2016, for instance, the USD 397.5 million VimpelCom settlement — arising from bribes paid to Uzbek officials — remained in the Dutch treasury rather than being returned to Uzbekistan, simply because no legal framework existed to enable restitution.¹² That EU jurisdictions repeatedly associated with hosting stolen wealth chooses not to report on their asset recovery practices signals a deliberate gap in accountability.

Beyond the EU, data also expose gaps among the world's major economies: Canada, Indonesia, Saudi Arabia, and Turkey are absent from both reporting rounds, meaning that one-fifth of G20 members have remained silent. This absence is all the more striking given that, as early as 2010, the G20 adopted asset recovery principles urging its members to collect and publish data on cross-border recovery efforts.¹³

Taken together, these omissions underline the uneven willingness and capacity of States to embrace transparency in the field of asset recovery.

⁷ This concern has been explicitly recognized in various UN resolutions, including paragraph 20 of General Assembly resolution 77/154 on promoting international cooperation against illicit financial flows and advancing good practices in asset return for sustainable development, as well as in Conference of the States Parties resolutions 6/3, 8/9, and 9/2. It has also been a recurring theme in expert discussions and civil society advocacy, such as during the Second International Expert Meeting on the Return of Stolen Assets, held in Addis Ababa from 7 to 9 May 2019.

⁸ United Nations Office on Drugs and Crime Secretariat, *Collection of Information on International Asset Returns, Including Challenges, Good Practices and Lessons Learned* (Vienna: Open-ended Intergovernmental Working Group on Asset Recovery, 7–11 November 2022), Doc. CAC/COSP/WG.2/2022/3, §17

⁹ United Nations Office on Drugs and Crime Secretariat, *Collection of Information on International Asset Returns, Including Challenges, Good Practices and Lessons Learned* (Atlanta: Conference of the States Parties to the United Nations Convention against Corruption, Tenth Session, 11–15 December 2023), Doc. CAC/COSP/2023/15, 16 October 2023, §16

¹⁰ According to StAR, across all four questionnaires (plus a few ad hoc submissions sent directly to the initiative), 108 countries and jurisdictions have responded in total. This figure includes contributions to the 2025 questionnaire, which had not yet been incorporated into the database at the time of this analysis.

¹¹ Markus Meinzer, *Steuerhase Deutschland* (Tax Haven Germany), 2015

¹² Several cases linked to the VimpelCom settlement appear in the ARW database; all rely exclusively on publicly available sources. For further background on the VimpelCom case, see Miranda Patrucic and Stella Roque, *VimpelCom Fined US\$ 795 Million Over Uzbekistan Telecoms Bribes*, OCCRP, 19 February 2016 (available at: <https://www.occrp.org/en/investigation/vimpelcom-fined-us-795-million-over-uzbekistan-telecoms-bribes>).

¹³ G20 key principles for asset recovery (2011): "Principle 9: Collect data on cases and share information on impact and results. To ensure the momentum for action is maintained, it is very important to step up the tracking of measures and operational actions being taken. It is also very important to track actual asset recovery cases, to show that "it works." Existing forums, such as the UNCAC Asset Recovery Working Group, the OECD anti-bribery working group or CARIN and 4 similar networks, should be used for discussions of asset recovery cases (even if only sanitized or when completed) and exchanges on lessons learned. Where information on cases is public, countries should ensure that this information is shared more broadly, via channels that minimize duplication of information-gathering exercises (for example the StAR Asset Recovery Database)."

STRENGTHENING THE UNCAC IRM FOR MORE EFFECTIVE ASSET-RECOVERY MONITORING

An effective, transparent, and inclusive UNCAC Implementation Review Mechanism (IRM) is essential for assessing how States implement asset-recovery provisions in practice. A strengthened IRM can provide a clearer picture not only of legal frameworks but also of the concrete results achieved in the tracing, freezing, confiscation, and return of stolen assets.

Enhancing the IRM's capacity to capture outcomes and impacts, rather than only focusing on procedural or legislative alignment, would make the mechanism more relevant to practitioners, policymakers, and affected communities. Greater transparency in documentation and improved access to underlying case information would also facilitate meaningful comparison with other reporting tools, including the StAR Asset Recovery Watch database.

Ensuring meaningful engagement of civil society and independent experts is equally important. Creating opportunities for them to contribute information and comment on review findings can strengthen accountability and broaden the evidence base on States Parties' progress. Collectively, these improvements would help the IRM function as a more reliable and impactful instrument for monitoring real-world asset-recovery performance.

Limits and biases in the data reported

Beyond the low overall participation rate, the quality and completeness of the data reported through the questionnaires raises further concerns. Although just over half of the recorded cases (around 60%) originated from States' submissions, StAR's own research through public source was indispensable in broadening the scope of the database (nearly 40% of cases). In practice, however, most cases ultimately result from a merging process, combining State-reported information with StAR's collected open-source material.

Despite this dual approach, the overall reporting rate remains strikingly low, with only about 37% of variables filled in across the 556 cases recorded. Perhaps more surprisingly, cases relying solely on information provided by States have a completion rate of just 39%, barely above the overall average.

However, attention should not only focus on the overall reporting rate itself, as many fields of the

questionnaire do not apply to every case. What is more concerning is that crucial information is frequently missing from State submissions, including dates of seizure or confiscation (respectively 29% and 22% completion rate) and the jurisdictions involved (41% completion rate). A closer look by variable makes this imbalance even more apparent. Information that is central to understanding restitution processes (such as country of origin, UNCAC offences implicated, public officials involved, sectors concerned, intermediaries, dates of initiation, or dates of return) is often underreported by States, while StAR's desk research fills many of these gaps.

These gaps severely limit the possibility of understanding how a particular recovery unfolded. This may be explained by the fact that governments often struggle to retrieve the required data to complete the questionnaire, which may be dispersed across several agencies.¹⁴

¹⁴ According to StAR, this challenge is compounded by the fact that the latest questionnaires (post-2023) are considerably more detailed than the earlier ones, making inconsistencies more visible and increasing the likelihood that key fields remain unfilled.

OTHER INTERNATIONAL REPORTING PROCESSES ON ASSET RECOVERY

In addition to their efforts to collect and disclose asset recovery cases information through the StAR Asset Recovery Watch questionnaire, States may also be required to report asset recovery information in several other multilateral processes:

- **UNCAC Implementation Review Mechanism (IRM), Chapter V¹⁵**

Under the IRM, States Parties must complete a detailed self-assessment on the implementation of UNCAC Chapter V on asset recovery.¹⁶ Although the IRM is not a case-tracking tool, many States choose to illustrate implementation with concrete examples of freezes, confiscations or returns. As a result, the IRM may draw on the same internal datasets that authorities use when responding to the StAR questionnaire.

- **FATF Mutual Evaluations — Immediate Outcome 8**

FATF mutual evaluations assess both the technical compliance of a jurisdiction's AML/CFT framework and its effectiveness in practice. For the effectiveness assessment, States must submit extensive quantitative and qualitative information to the evaluation team before the onsite visit.

Immediate Outcome 8 focuses specifically on confiscation and asset recovery. To demonstrate effectiveness, jurisdictions must disclose: annual figures on assets traced, frozen/restrained, confiscated, and returned, broken down by criminal offence where possible; information on the use of key tools (e.g. NCB confiscation, value-based confiscation, management of frozen assets); case examples illustrating how confiscation powers are applied in practice; data on international cooperation, including incoming and outgoing requests and the value of assets frozen or confiscated upon foreign request; institutional and operational arrangements, including resourcing, coordination, and capacity of asset recovery bodies.

FATF assessors analyse this information, triangulate it with documentation provided during the onsite visit, and rate the jurisdiction's overall level of effectiveness.

A need for internal coherence: because these mechanisms operate independently, States often assemble and transmit similar information multiple times, in different formats, for different audiences. This can lead to discrepancies between submissions and contributes to the wider fragmentation of global asset recovery data. Strengthening internal coordination and harmonizing data management practices would help reduce duplication, enhance accuracy, and improve the consistency of reporting across fora.

¹⁵ The United Nations Convention against Corruption (UNCAC) is the most universally ratified anti-corruption treaty, with 192 States Parties as of 2024. Its near-universal adherence underscores the global relevance of the Implementation Review Mechanism (IRM). (Source: UNODC ratification status: <https://www.unodc.org/corruption/en/uncac/ratification-status.html>)

¹⁶ The UNCAC Secretariat provides detailed guidance on the type of information States Parties should supply when reporting on the implementation of asset-recovery provisions. This includes examples of measures applied in practice, related court cases, and relevant statistics. See: UNODC, "Guidance on Asset Recovery Articles," p. 81 (<https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReview-Group/20-24June2016/V1603598e.pdf>).



02. International cooperation

Geographical flows

Most cases involve South–North (i.e., assets originating from South countries ending in North countries) asset flows, which account for 64% of the total, far ahead of South–South and North–North flows, which appear in almost equal measure.

In terms of volumes, South–North flows also dominate: they involve the highest average restitution amounts. Asset flows differ sharply

depending on the direction of transfer. Returns from Global North countries to Global South countries are by far the largest, amounting to roughly five times the volume of South-to-South returns and nearly twenty-four times the volume of South-to-North returns. Likewise, the average volume of frozen or confiscated assets is greater for South–North flows than for either South–South or North–North cases.

Action initiating asset recovery

It should be noted that in 42% of cases, the action initiating asset recovery is not disclosed.

Mutual Legal Assistance (MLA)–based recoveries constitute the most common mechanism, representing 35% of reported cases. 33% are based on MLAs submitted by countries of origin, and less than 2% are triggered by MLA requests from third countries. 27% rely exclusively on MLA requests.

Domestic investigations initiated by law enforcement authorities in the destination country

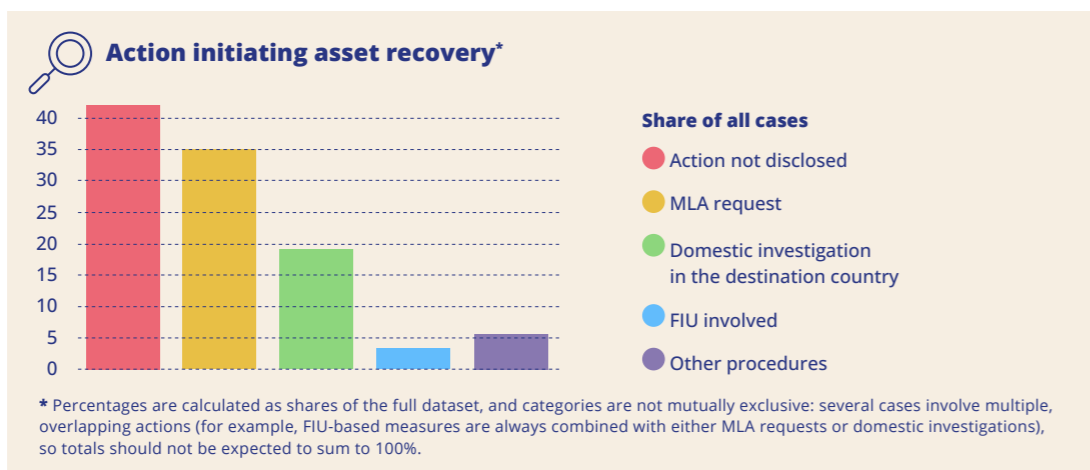
account for 19% of reported cases. Of these, 11% were launched independently of any MLA request, reflecting situations where destination countries acted on their own initiative rather than in response to a foreign request.

The use of Financial Intelligence Unit (FIU) action to suspend a suspicious transactions is reported in 3% of cases. Crucially, every FIU action is systematically combined with another procedure, either alongside an MLA request or in support of a domestic investigation.

These figures differ slightly from those collected by StAR through questionnaires sent to States Parties. According to that data, roughly 48% of asset restraints were initiated through an MLA request from the country of origin of the public official involved, while around 35% resulted from domestic investigations launched independently of any foreign request.¹⁷

Despite these discrepancies, partly explained by the use of open-sources that complement the questionnaire data collected by StAR, the figures remain encouraging. For many years, MLA requests have been not only the “traditional cross-border asset recovery action”¹⁸ but often the sole channel relied upon. This overreliance made destination countries heavily dependent on the outcomes of legal proceedings in countries of origin, which could be hampered by weaknesses in judicial or law enforcement systems or by political interference. As StAR notes, “that could be an indication that proactive actions by financial centres to close safe havens for corrupt funds and to protect their financial systems against abuse have been effective and that those actions play a critical role in meeting the goals of the Convention.”¹⁹

More recent research may, however, temper this view, revealing that certain financial centres have demonstrated greater willingness to prosecute exiled former politically exposed persons than incumbent elites.²⁰ Further caution comes from the European Union: a 2022 Eurojust report observed that several Member States still require high standards for the characterization of the predicate offense, discouraging prosecuting authorities from initiating anti-money laundering investigations.²¹



¹⁷ Ibid. 9, §28 and 29

¹⁸ Ibid.

¹⁹ Ibid. idem.

²⁰ Heathershaw, J., Mayne, T., Prelec, T., & Tokubayev, S. (2025). The Incumbency Advantage and the Enabler Effect: How Londongrad Beat the UK Anti-Money Laundering Regime. *Europe-Asia Studies*, 1–36. <https://doi.org/10.1080/09668136.2025.2549806>

²¹ Eurojust Report on Money Laundering (October 2022)

03. Legal basis for asset recovery

Procedural pathways for asset recovery

The ARW database records the types of proceedings used by both asset-origin and asset-location jurisdictions to recover assets. These include administrative confiscation, criminal-based confiscation, civil confiscation,²² court-ordered compensation, enforcement of foreign criminal courts' decisions, out-of-court settlement agreements. It is worth noting that the legal basis for asset recovery in the country of asset location is disclosed in just 46% of cases, and the legal basis in the country of origin appears in only 22% of cases.

Among the reported cases, 96 are marked as relying on a single type of legal basis, most of them on conviction-based criminal prosecution and confiscation (69 cases), followed by non-conviction based (NCB) confiscation (10 cases), out-of-court settlement agreements (5 cases), administrative confiscation (4 cases), private civil action (1 case), court-ordered compensation, restitution, or damages awarded to a foreign jurisdiction (1 case), and a small number either classified as other or N/A (6 cases). In addition, 26 cases are recorded as combining several legal bases.²³

Decisions ordered by foreign jurisdictions are present in a small number of cases. Enforcement of foreign confiscation orders, whether related to conviction-based confiscation or NCB confiscation, appears only within multi-basis cases, including combinations that pair these enforcement actions with conviction-based prosecution, NCB measures, or out-of-court settlements. Court-ordered compensation, restitution, or damages awarded to a foreign jurisdiction appears once as a single legal basis and also appears in a small number of multi-basis configurations (2 cases). This last category refers to cases of direct recovery of property — that is, situations where States initiate legal proceedings in foreign courts to claim ownership of assets acquired through offences established under the UNCAC. This mechanism, enshrined in Article 53 of the Convention, was reaffirmed in the 2021 UNGASS Political Declaration as a key tool for strengthening asset recovery.²⁴

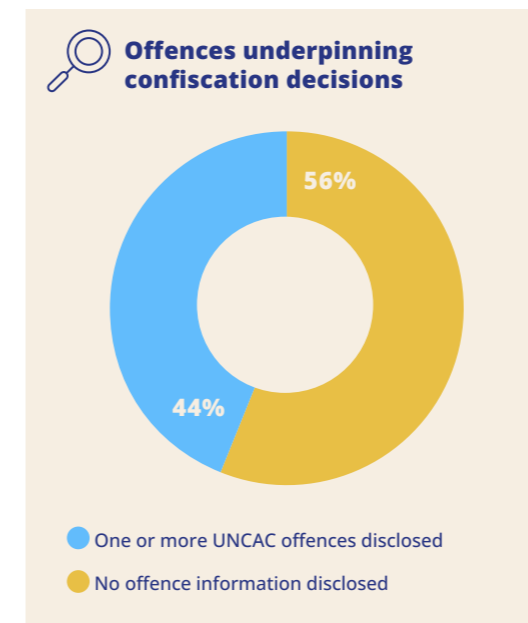
²² In the latest survey disseminated in 2025, StAR added a new field on civil cases allowing longer text responses on civil actions.

²³ The most frequent combination pairs conviction-based criminal prosecution and confiscation with NCB (8 cases), while smaller clusters layer additional instruments, such as combinations of conviction-based prosecution, NCB and out-of-court settlement agreements (3 cases), conviction-based prosecution and NCB together with enforcement of foreign criminal and/or NCB confiscation orders (two groups of 2 cases each), or conviction-based prosecution combined with court-ordered compensation, enforcement of foreign confiscation orders, out-of-court settlements, private civil actions or "Other" (several combinations appearing once each). There are also multi-basis configurations centred on NCB without conviction-based proceedings, including NCB combined with enforcement of foreign orders, administrative confiscation, private civil action and/or out-of-court settlements (a handful of cases, each specific combination appearing 1–2 times).

²⁴ United Nations General Assembly's political declaration adopted at its special session on challenges and measures to prevent and combat corruption and strengthen international cooperation, held from 2 to 4 June 2021 at the United Nations Headquarters: "We recognize the importance of measures for the direct recovery of property without prejudice to international cooperation. In this regard, we will ensure that domestic legal frameworks allow States parties to initiate legal proceedings in our courts to claim title to or ownership of property acquired through the commission of an offence established by the Convention, we will allow the recognition of other States parties harmed by an offence through judicial orders for compensation or damages, and we will take measures to enable our courts, in confiscation proceedings, to recognize the claim of another State party as a legitimate owner. We will work collectively to share information and good practices and develop further guidance in that regard, to facilitate litigation of such cases in foreign courts." (§46)

Offences underlying asset recovery cases

The StAR database documents the UNCAC offences underpinning confiscation decisions.²⁵ This information is available for only 44% of the cases in the database.



Where offences are recorded, single-offence and dual-offence cases each account for 13.6% of all cases, while multi-offence cases (three to seven offences) together represent 17.7% of the total; a very small number of cases list six or seven offences simultaneously.

Across all cases, the dataset contains 641 offence citations, the most frequent being Article 23 – laundering of proceeds of crime (29.4% of all cases), followed by Article 16 – bribery of foreign public officials and officials of public international organizations, Article 17 – embezzlement, misappropriation or other diversion of property by a public official, Article 20 – illicit enrichment, and Article 19 – abuse of functions (each appearing in roughly 10–21% of cases). Article 15 – bribery of national public officials and Article 18 – trading in influence appear less often (8–9%), while Article 21 – bribery in the public sector and Article 25 – obstruction of justice are only rarely cited, each occurring in fewer than 1% of cases. Because many cases cite multiple offences, these shares overlap and do not add up to 100%.

²⁵ Importantly, the "legal basis" fields refer to the legal grounds relied upon by the jurisdiction executing the asset recovery action, not to the predicate offense in the country of origin

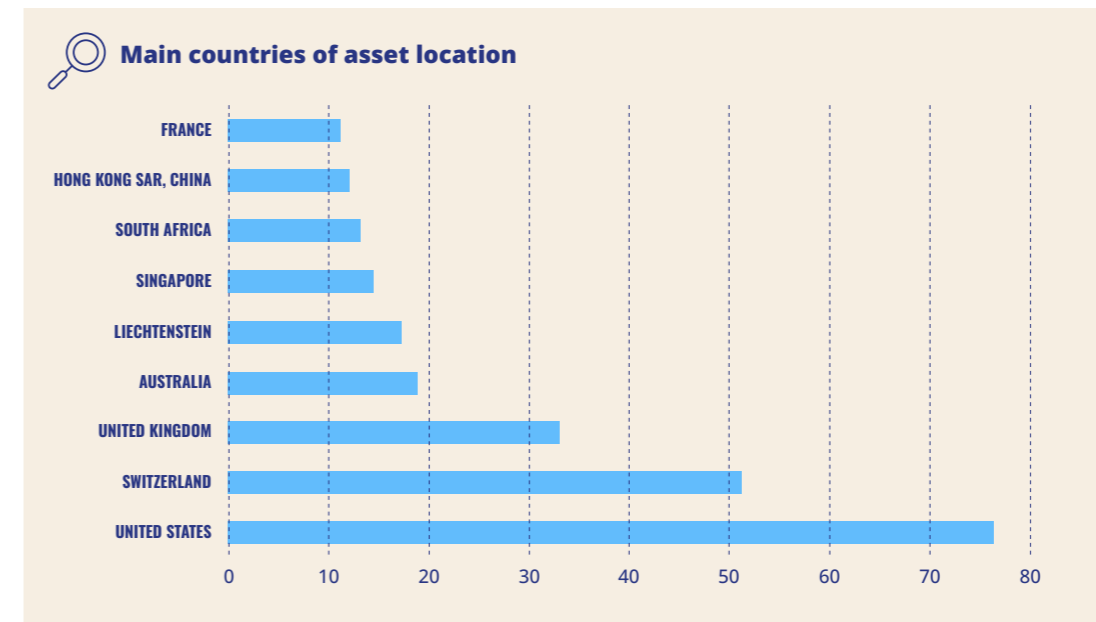
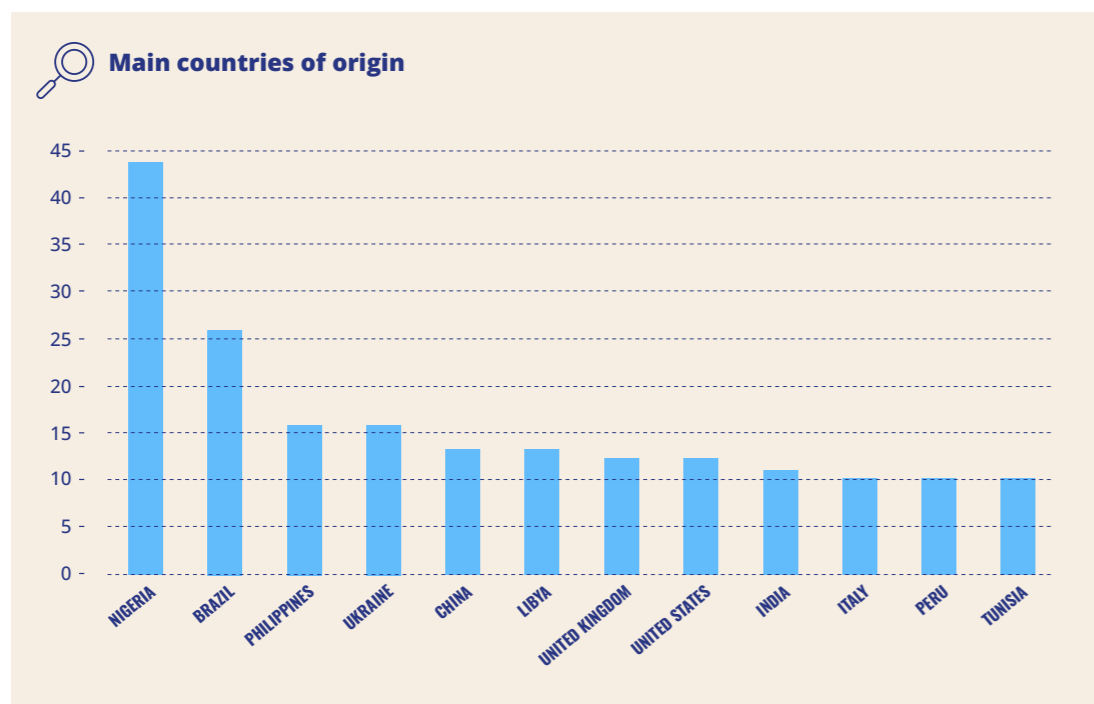
04. Asset recovery patterns and drivers

The following analysis draws on incomplete and unevenly reported information. Many cases lack essential details, and several major jurisdictions remain absent from reporting altogether. The patterns identified here should therefore be read as indicative rather than exhaustive. Within these constraints, certain consistent trends nevertheless emerge across geography, duration, and volume.

Geography

Because the available information is far from exhaustive, the geographical distribution of cases in the database reflects above all the willingness of States to report, rather than a complete global picture. This introduces a significant bias that must be borne in mind to avoid drawing overly general conclusions from the results.

The main countries of origin represented are Nigeria, Brazil, the Philippines, Ukraine, China, and Libya. On the receiving end, the United States, Switzerland, the United Kingdom, Australia, and Liechtenstein stand out as the principal destinations.²⁶



The most common recovery “corridors” identified are those linking the United States to the Philippines, the United Kingdom to Nigeria, the United States to Nigeria, and Switzerland to Brazil. These routes correspond to well-known

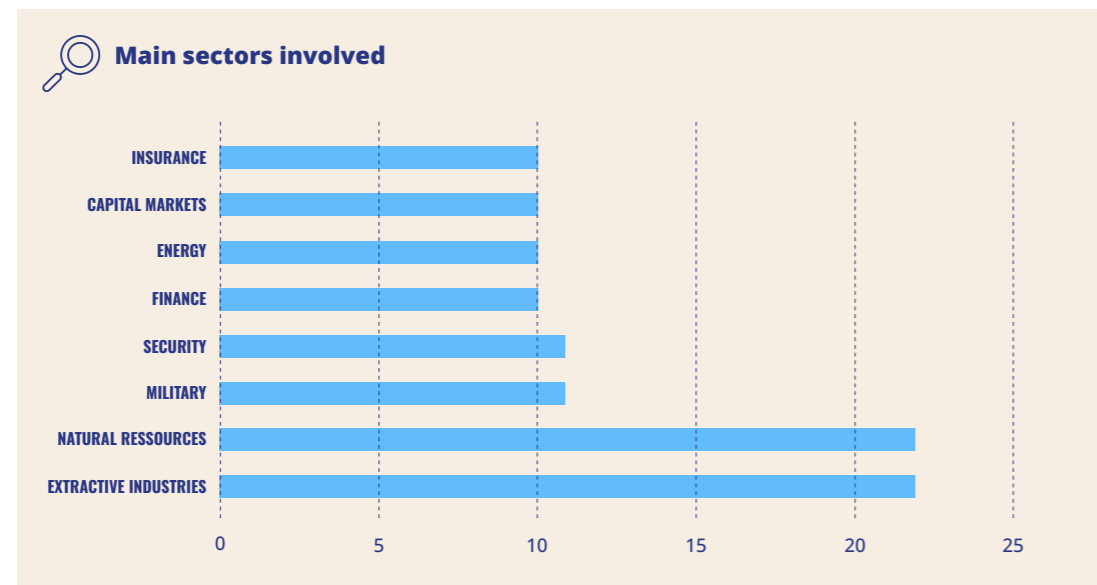
cases, including the recovery of assets linked to former Philippine dictator Ferdinand Marcos, Nigeria’s former ruler Sani Abacha, and the restitution of funds connected to the Odebrecht corruption case in Brazil.

COUNTRY OF ORIGIN	COUNTRY OF ASSET LOCATION	NUMBER OF CASES
PHILIPPINES	U.S.	13
NIGERIA	U.K.	10
BRAZIL	SWITZERLAND	7
NIGERIA	U.S.	5

²⁶ See also Transparency International, *Dirty Money Hiding Spots: How Corruption Funds Disappear Overseas* (2024), which similarly highlights the prominent role of financial centres such as the United States, the United Kingdom, Switzerland and Liechtenstein as recurrent destinations for stolen assets.

Most cases involve no more than the two jurisdictions of origin and destination, with about 60% of cases falling into this category. Around 30% involve an additional jurisdiction, while 7% extend to two additional ones. In one exceptional case, as many as nine jurisdictions were mobilised.

Looking at the sectors implicated, four stand out: extractive industries and natural resources, finance and capital markets, the security and military sector, and energy. Together, these account for more than half of the cases recorded in the database.



Duration

Asset recovery processes generally unfold in several steps. Authorities must first identify and trace assets suspected of stemming from corruption, before moving to freeze or seize them to prevent their dissipation. This is followed by

confiscation, either through criminal, civil, or administrative proceedings, after which assets may ultimately be returned to the country of origin through a negotiated or legally mandated restitution process.



The data available on case durations is extremely limited, with start and end dates recorded in only about 15% of cases. Because the averages rest on such a small base, and some entries even show durations of zero (likely errors in the submission or misreading of the questionnaire), the figures must be interpreted with great caution.

With this in mind, the average overall duration of asset recovery cases is 5.52 years. The high standard deviation reflects a wide dispersion, with both very short and very long cases. When cases reporting zero durations are excluded, the mean rises to 7.1 years.

Between the freezing of assets and their confiscation, the average interval is 3.46 years, or 4.5

years when zero values are excluded. From confiscation to restitution, the mean gap is 1.4 years, increasing to 2.8 years once the likely incorrect zeros are removed. Adding these averages together does not match the overall duration, since the subsets of cases differ depending on where information is available. Even with these caveats, one trend is clear: the path from freezing to confiscation typically lasts longer than the period from confiscation to restitution.

Durations also vary considerably by the countries involved. Restitution takes the longest for assets originating from Chile, Equatorial Guinea, Indonesia, the Philippines, and Mexico, while the lengthiest returns are recorded when assets were returned by Australia, Luxembourg, Hong Kong/China, France, and Switzerland.

Volume of assets

The data on asset volumes and rates is fragmentary, with very few entries per country. As a result, averages and rankings should be treated with caution, and only broad tendencies can be drawn.

With that in mind, certain patterns stand out. The largest asset recovery cases involve assets originating from Nigeria, Malaysia, Taiwan/China, Kuwait, and the Philippines, with Switzerland, the United States, France, the United Kingdom, and Liechtenstein as the main destinations. In cases of freezing or seizure, the biggest volumes come from Nigeria, India, Ukraine, Brazil, Portugal, and the Philippines, and are directed mainly toward the United States, France, Switzerland, the United Kingdom, Guernsey, and Singapore. Confiscated assets are most heavily sourced from Nigeria, Italy, China, Peru, and Indonesia, with the largest flows headed to the United States, Liechtenstein, New Zealand, Switzerland, and Egypt. Across all stages – freezing, confiscation, and restitution – Nigeria consistently appears as the principal country of

origin, while destination countries are often jurisdictions known for financial stability.

Turning to rates, the scarcity of data makes it not reliable to calculate averages at the country level. The most reliable figure is the overall restitution rate, since case outcomes are explicitly recorded: 38% of reported cases ended in restitution. For freezing and confiscation, the averages are computed only for cases where a date is available, which produces a mean freezing rate of 47% and a confiscation rate of 21%.

Looking specifically at the freezing-to-confiscation stage, the slowest processes concern assets from Thailand, Switzerland, Bangladesh, and Canada, as well as assets confiscated in Jersey, Italy, Luxembourg, India, and Liechtenstein. The confiscation-to-restitution stage, in contrast, is particularly protracted for assets from Equatorial Guinea, Turkmenistan, Indonesia, Taiwan, and Peru, and for assets ultimately returned by Luxembourg, Australia, Jersey, Chile, and Singapore.

Modalities of Restitution

Restitution rates by country are not meaningful, given the very small number of entries. There is no clear linear relationship between restitution outcomes and the type of UNCAC offences prosecuted. Out of the 556 cases recorded in the database, assets were returned in 212 of them (about 38%). Among these restitution cases, 88 (roughly 42%) reported the existence of an asset restitution agreement or plans to conclude one.

Civil Society Involvement

Cases that result in restitution tend to be associated with higher average scores on the civil society participation index²⁷, suggesting that a more vibrant civic space in the country of origin correlates with positive restitution outcomes. Beyond outcomes, restitution duration itself also shows a negative correlation with civil society scores: the stronger the civic space, the shorter the restitution process. Still, the effect is weak and cannot be generalized as a systematic relationship.

The political regime type also seems to matter²⁸: restitution rates are lower when the country of origin is an autocracy than when it is a democracy, semi-democracy, or hybrid regime. The more democratic the state, the higher the likelihood of an effective restitution.

Yet for South–North flows, the pattern is different: cases are evenly split between those with an agreement and those without, unlike North–North, North–South, or South–South flows. Both the total and average volumes of assets returned appear higher in cases where an agreement exists.

However, no significant link appears between corruption perception levels, according to the Corruption Perception Index, and restitution outcomes overall. However, for North–North flows, restitution cases correspond to higher average Corruption Perceptions Index scores.

External Factors

Interpretation of data on public officials is complicated by the fragmented classification, with some categories represented by only one case. Still, restitution rates seem higher and durations shorter when senior administrators are implicated, compared with heads of government. Amounts returned are less often reported when the official involved is a head of State, though in such cases both total and average volumes of assets returned are the largest, followed by those linked to senior administrators.

Other contextual factors play mixed roles. Higher income countries of origin tend to see shorter restitution processes. By contrast, destination countries belonging to the G7 do not perform better than others in terms of restitution rates or durations. No strong correlation emerges between the level of development aid

received by a country of origin and the volume of assets returned. However, more open economies, in terms of capital flows, tend to recover larger volumes of assets; successful restitution cases on average involve countries more open to capital than unsuccessful ones. Finally, former colonial ties do not appear to have a significant impact on restitution outcomes.



²⁷ Civil society data rely on the 2024 Civil Society Participation Index (CSPI). For each case, the reference year corresponds to the date of asset return or—where restitution has not yet occurred—the most recent available year.

²⁸ Regime type is based on the 2024 Electoral Democracy Index. For each case, the reference year corresponds to the date of asset return or—where restitution has not yet occurred—the most recent available year. Countries were grouped into four categories following a methodology similar to Transparency International's: autocracy (0–0.29), hybrid regime (0.29–0.49), semi-democracy (0.49–0.79), and full democracy (0.79–1). This classification underpins the observed pattern that restitution is less frequent for autocracies than for more democratic regimes.

CONCLUSION

The analysis of the StAR Asset Recovery Watch database underscores a simple but essential message: transparency in asset recovery is not a technical detail. It is a cornerstone of effective implementation of the United Nations Convention against Corruption. More than two decades after the Convention's adoption, the ability of States Parties to understand global restitution dynamics, strengthen cooperation, and improve outcomes depends fundamentally on the availability, quality, and consistency of information disclosed.

First, comprehensive disclosure is indispensable for States Parties themselves. Without reliable data on cases, legal bases, actors involved, or outcomes achieved, governments cannot meaningfully integrate asset recovery into their broader anti-corruption strategies. Tracking efforts, identifying recurring obstacles, and learning from past experiences all require clear, accessible, and structured information. In countries where asset recovery is still emerging as a policy priority, such disclosure is also a practical tool for developing institutional capacity and ensuring coherence between preventive, investigative, judicial, and restitution-related efforts.

Second, transparent reporting enables international fora to fulfil their mandate. Good practices in areas such as non-conviction-based confiscation, proactive use of international cooperation channels, management of returned assets, or victim-centred approaches can only be identified when cases are documented in sufficient detail. Regular, comparable information allows practitioners to understand what works, under which conditions, and why. It also strengthens peer learning and supports evidence-based recommendations across regions.

Third, disclosure is vital for the general public, civil society organisations, and affected communities. Access to information enables independent monitoring of States' efforts, comparison of practices across jurisdictions, and contextual analysis of trends over time. Civil society can play a constructive role in highlighting progress, identifying gaps, and proposing improvements, provided that the underlying data are available. Transparent reporting also enhances public trust in restitution processes — an essential element when dealing with cases involving significant harm and high political sensitivity.

In light of these objectives, the disparities observed in the StAR database are concerning. Significant differences persist in how countries collect, manage, and publish information on asset recovery cases. While some States may simply lack the institutional capacity to compile such data and could be supported by international partners to do so, others appear not to prioritise, or

not to be willing to disclose information that is crucial for meaningful oversight. For major financial centres in particular, continued opacity is increasingly difficult to justify. Jurisdictions that attract illicit financial flows also carry a heightened responsibility to demonstrate transparency, accountability, and cooperation.

Moving forward, strengthening disclosure should be seen as a shared priority. It will enable better policies, more effective cooperation, and restitution processes. In doing so, the global asset recovery community can turn case-by-case experiences into collective progress and bring the Convention closer to its full potential.

ANNEXES

01. Methodology

The methodology relies primarily on descriptive statistics and cross-tabulations. A first step consists in providing an overall picture of global asset recovery flows: distribution of assets seized, confiscated, and returned over time; average time-lapses between seizure, confiscation, and restitution; the number of jurisdictions involved per case; sectors linked to underlying offenses; and the main “corridors” of illicit financial flows between countries of origin and destination.

Second, the study assesses countries’ proactiveness and performance in asset recovery, focusing on jurisdictions that responded to the StAR questionnaire. It examines, for both origin and destination countries, the volume of assets seized, confiscated, and returned, as well as the speed of proceedings. It also analyses the legal bases used to initiate asset recovery in destination countries (e.g. mutual legal assistance, money laundering charges, non-conviction-based confiscation) and compares them in terms of average duration and proportion of assets effectively recovered.

Third, the analysis explores asset-type patterns (e.g. real estate, bank deposits, cash, corporate assets, luxury goods) across the phases of seizure, confiscation, and restitution, and links these to preferred jurisdictions for particular asset classes. It also examines international cooperation modalities, distinguishing South–South, South–North and North–North cooperation, and cross-referencing the legal tools used for cooperation with both the duration of procedures and the volume of assets recovered, in order to understand the practical impact of different cooperation frameworks.

A further component focuses on the modalities and governance of restitution. It identifies cases in which assets are returned, links them to the underlying UNCAC offenses, and examines the existence of return agreements and available information on the intended and actual use of funds, monitoring and disbursement arrangements, and the involvement of civil society in oversight.

The methodology also includes a dedicated section on civil society participation, identifying documented instances of CSO involvement in consultation, monitoring, or oversight roles during the restitution phase. Where possible, it explores correlations between civic space indicators and the degree of participatory governance in asset recovery, with a view to informing advocacy for more inclusive and transparent return practices.

Finally, the analysis integrates a set of external political, economic, and governance indicators to situate asset recovery processes in their broader context. These include regime type, income level, membership in the G7 or EU, inclusion on FATF or EU grey/black lists, and rankings on governance and anti-corruption indices such as Transparency International’s Corruption Perceptions Index and the Worldwide Governance Indicators. Additional cross-tabulations examine the relationship between restitution flows, development aid corridors, and former colonial relationships, as well as the prevalence of cases involving “common goods” sectors (such as natural resources and environmental assets).

02. StAR’s Asset Recovery Watch Database’s fields

This table was copied from the official website of the StAR Asset Recovery Watch database.

TAB: CASE IDENTIFIER	
CASE TITLE	The case title can be the name of an entity or individual involved (or allegedly involved) or a different case identifier may be used. If a country reported a case via the surveys, then, in most cases, the title provided by the country was used, with minor edits to improve clarity and avoid duplications. Unnamed cases were given a title by identifying the countries involved, type of asset or offence, year of freeze/confiscation/return, or other elements.
CASE CLUSTER	The “case cluster” category is used to identify related cases, for example, asset recovery actions in different jurisdictions to go after assets belonging to the same individual. A cluster comprises a minimum of two case entries. Clusters can be viewed using the filter search options.
TAB: GEOGRAPHIC REACH	
COUNTRY OF ORIGIN	The jurisdiction of origin of the public official involved, or allegedly involved. Also sometimes referred to as the “Source Country” or “Victim State”. It is typically the country where the original corruption offence took place.
COUNTRY OF ASSET LOCATION	The country of asset location is defined as the jurisdiction or state where the proceeds of corruption are located. It is also sometimes referred to as the “Destination Country” or “Holding State”.
TRANSIT COUNTRY	A country (other than the country of origin and the country of asset location) through which corrupt funds passed.
COUNTRY OF BRIBE PAYER	For bribery cases, the jurisdiction of the bribe-payer, or alleged bribe-payer (e.g., jurisdiction of involved company’s headquarters)

TAB: CASE SUMMARY

UNCAC OFFENCES IMPLICATED	The Database is comprised of asset recovery cases involving “proceeds of corruption”, which is defined as proceeds of crime (“any property derived from or obtained, directly or indirectly, through the commission of an offence”, Art. 2(e) UNCAC) derived from corruption offences in accordance with UNCAC Art.15-25, including money laundering cases with a corruption offense as a predicate offence.
PUBLIC OFFICIALS INVOLVED OR ALLEGEDLY INVOLVED	Name and position held by public official while underlying offences were committed, or allegedly committed.
SECTORS INVOLVED	Sector/Industry involved in the corruption offense
PROFESSIONAL INTERMEDIARIES INVOLVED OR ALLEGEDLY INVOLVED	Professional intermediaries involved, or allegedly involved, in the corruption offense, e.g. bankers, lawyers, real estate professionals, accountants, real estate agents, art advisers, company service providers, etc.

TAB: ASSET RECOVERY PROCESS (1/2)

ASSET RECOVERY START	Year when asset recovery effort was initiated. This could be the year when the investigation was initiated, or the year when a Mutual Legal Assistance (MLA) request was sent to country of asset location, for example.
ACTION INITIATING ASSET RECOVERY	This field describes how the asset recovery action was initiated. Options include: By an MLA request from the country of origin; by an MLA request from a third country; by an investigation in the country of origin; by an investigation in the country of asset location; by an FIU action to suspend a suspicious transaction; by an independent action from a financial institution; other procedure. If included in the database, this information was usually provided by the country authority in their survey response.
STAGE OF ASSET RECOVERY	Cases are labelled according to the most recent / most advanced stage of asset recovery on which information is available. For example, a case related to which there was an asset freeze/seizure, followed by a confiscation, followed by an asset return is labelled only as “assets returned”. The stage of asset recovery may be marked as “unknown” if there was not enough information provided to identify the stage. Options for this field are: Investigation; Assets frozen/seized; Assets unfrozen/released; Assets confiscated; On appeal; Assets returned (in part); Assets returned; Unknown.

TAB: ASSET RECOVERY PROCESS (2/2)

LEGAL BASIS FOR ASSET RECOVERY IN THE COUNTRY OF ASSET LOCATION	Asset recovery efforts can encompass a range of criminal and civil legal avenues. This field indicates the legal avenue(s) used in the country of asset location. If included in the database, this information was usually provided by the country authority in their survey response.
LEGAL BASIS FOR ASSET RECOVERY IN THE COUNTRY OF ORIGIN	Asset recovery efforts can encompass a range of criminal and civil legal avenues. This field indicates the indicate the legal avenue(s) used in the country of origin. If included in the database, this information was usually provided by the country authority in their survey response.
LEGAL BASIS FOR ASSET RECOVERY IN THE COUNTRY THAT INITIATED LEGAL ACTION TO RECOVER PROCEEDS OF CORRUPTION	This field indicates the indicate the legal avenue(s) used in the country that initiated legal action to recover proceeds of corruption. If included in the database, this information was usually provided by the country authority in their survey response.
LEGAL BASIS FOR INTERNATIONAL COOPERATION	Options include: UNCAC; Bilateral Mutual Legal Assistance Treaty; other multilateral treaties; Reciprocity.
MANNER OF ASSET TRANSFER	For completed asset returns, this field describes how the funds were transferred, e.g. via direct wire transfer to a centralized government account (e.g. general budget); via direct wire transfer to a beneficiary government agency; to a separate, designated government account for the asset return; via an escrow or trust account; via physical transfer of a movable asset (e.g. car, yacht, artwork, aircraft); via wire transfer to a designated account held by a third party , e.g. CSO, international organization.
CONTRIBUTING FACTORS IN ASSET RECOVERY	Field for noting any specific factors that helped make asset recovery possible, where this information is available, e.g. a joint international investigation team; use of an unexplained wealth order or illicit enrichment law, use of FIU’s power to suspend suspicious transactions.

TAB: ASSETS	
ASSETS RETURNED	Asset amount of proceeds of corruption related to this case that were returned to another state, prior legitimate owner, or victims harmed by corruption in another state, based on available information. Multiple amounts are marked by #1, #2, #3, etc.
ASSETS CONFISCATED	Asset amount of proceeds of corruption related to this case that were confiscated (see article 2(f) UNCAC), based on available information. Multiple amounts are marked by #1, #2, #3, etc.
ASSETS FROZEN OR SEIZED	Asset amount of proceeds of corruption related to this case that were frozen or seized (see article 2(g) UNCAC), based on available information. Multiple amounts are marked by #1, #2, #3, etc.
DATE OF ASSET RETURN/ CONFISCATION/ FREEZE	Month/year or time span. For some cases, the date for the asset freeze/ seizure, confiscation or return is not provided – this is because this information was not always included in the country's survey response.
ASSET TYPE AT TIME OF RETURN/ CONFISCATION/ FREEZE	Options include: Cash/bank deposit, Gold, Securities, Legal entity or arrangement, Real estate, Motor vehicle, Yacht/boat, Aircraft, Artwork jewellery.
AGREEMENT FOR RETURNED ASSETS	Field to indicate whether an agreement for the transfer, disposal or management of the assets exists or is planned, e.g. an agreement under UNCAC Art.57(5), an asset-sharing agreement, or another type of agreement. If the agreement was provided, it is included in the case entry under "Sources".
MONITORING AND DISBURSEMENT ARRANGEMENTS	Any available details on the arrangement for monitoring and disbursement of assets, including for example any involvement of a third party such as a CSO or an international organization.
USD CONVERSION DATE	Date that was used to calculate the USD asset amount if original asset amount was provided in a different currency.

TAB: SOURCES	
DATA SOURCE	<p>Field to indicate the type of data source for the case entry.</p> <p>Official information provided by country authorities = information was collected from authorities through questionnaires that were circulated by StAR or by the UNODC Secretariat</p> <p>Public source information/desk research = case entries were compiled through desk research using mostly official documents, such as court judgments and orders and government press releases, which are publicly available. In some cases, official documents were complemented with other public sources such as reliable media articles and reports by civil society organizations or international organizations.</p> <p>Official information provided by country authorities supplemented by StAR desk research/public source information = information provided by country authorities through questionnaires was used to update or supplement a case entry based on public source information to avoid duplicate database entries.</p> <p>Visually, cases based on survey information are marked by a dark blue header, while cases based on public source information are marked by a light blue header.</p>
CASE INFORMATION SUBMITTED BY	Country/countries that reported case information (for survey-based cases)
LIST OF SOURCES	Where available, the most relevant source documents have been appended to each case entry.

03. StAR's Asset Recovery Watch Database Case Reporting Forms:

Since its creation, the StAR Asset Recovery Watch database has gone through several rounds of revision. Four main versions of the questionnaire have been circulated to States, each reflecting improvements in structure, scope, and data needs. The latest version is available on the StAR website and is the one reproduced in this Annex.

The database was first launched at the 2011 World Bank / International Monetary Fund Annual Meetings, based exclusively on public-source information compiled by StAR and the dataset was updated annually.

- 2020 questionnaire**
 This was the first standardized StAR questionnaire formally sent to all UNCAC States Parties via UNODC, and the first time national authorities were directly asked to report information on freezes, confiscations, and returns under UNCAC. It was issued in five UN languages. Results informed the 2021 Conference Room Paper CAC/COSP/2021/CRP.12. This version introduced the comprehensive data model that underpins all later questionnaires.
- 2022 questionnaire**
 A simplified update of the 2020 version, this edition focused exclusively on completed asset returns. It did not collect data on freezes or confiscations.
- 2023 questionnaire**
 This iteration reinstated a more standardized reporting format but again limited its scope to completed returns. It preceded the launch of the upgraded ARW 2.0 platform in December 2023 at the UNCAC CoSP in Atlanta.
- 2025 questionnaire**
 The most recent version expanded again the scope to include freezes, confiscations, and returns. It also introduced two new elements: a question on related civil proceedings and a closing section inviting States to share challenges and good practices in asset recovery.

StAR Asset Recovery Watch Database

Case Reporting Form (April 2025 version)

Please use this form to report an – ongoing or completed – international effort to recover and return proceeds of corruption to the StAR Asset Recovery Watch database. We invite country authorities, as well as other partners, to submit information to help us build a more comprehensive dataset of cases and a better evidence base of international asset recovery efforts.

In the StAR Asset Recovery database, we collect information on **completed asset returns**, as well as **asset confiscations** (where a final confiscation order exists) and **asset freezes involving proceeds of corruption** (defined as proceeds derived from corruption offences in accordance with UNCAC Art. 15-25) **that involve a foreign jurisdiction**.

- All reported cases must involve **a foreign jurisdiction**, e.g. as the country of asset location, where proceeds of corruption were transferred to, or as the country of origin where the public official involved served or where the underlying corruption offense took place. Purely domestic asset recovery cases - without any international element - are not included in the scope of the StAR database.
- Please do **not** include any sensitive case information in your submission, e.g. internal case numbers, bank account numbers, or names of individuals that have not been included in the public record.
- Leave empty any fields that do not apply or where no information is available.

CONTACT INFORMATION

Contact details will be treated confidentially and will only be used for the purpose of follow-up questions related to this submission.

CONTACT NAME:	
POSITION:	
GOVERNMENT AGENCY:	
DEPARTMENT:	
COUNTRY:	
EMAIL:	
PHONE NUMBER:	
DATE OF SUBMISSION:	

By submitting this form to the Stolen Asset Recovery Initiative, I grant permission for the enclosed information to be included in the StAR Asset Recovery Watch database on StAR's website.

CASE TITLE ¹		
STAGE OF ASSET RECOVERY	<input type="checkbox"/> Assets frozen/seized ² <input type="checkbox"/> Assets unfrozen/released <input type="checkbox"/> Assets confiscated ³ <input type="checkbox"/> On appeal	<input type="checkbox"/> Assets returned (in part) <input type="checkbox"/> Assets returned <input type="checkbox"/> Unknown <input type="checkbox"/> Other:
IS THIS A NEW CASE OR AN UPDATE TO AN EXISTING CASE IN THE STAR DATABASE?	<input type="checkbox"/> New case <input type="checkbox"/> Update to an existing case in the StAR database: ARW- (provide case ID)	
GEOGRAPHIC REACH		
COUNTRY OF ORIGIN ⁴		
COUNTRY OF ASSET LOCATION ⁵		
COUNTRY OF BRIBE PAYER (if applicable) ⁶		
COUNTRY THAT INITIATED LEGAL ACTION TO RECOVER PROCEEDS OF CORRUPTION		
TRANSIT COUNTRY ⁷		
OTHER JURISDICTIONS INVOLVED (if different from above)		
WHICH COUNTRY WERE THE ASSETS RETURNED TO? (if applicable)		

¹ The case title can be the name of an entity or individual involved (or allegedly involved) or a different case identifier appropriate for the public record may be used. Please do not include internal case numbers or other sensitive information.

² See article 2(f) UNCAC: "temporarily prohibiting the transfer, conversion, disposition or movement of property or temporarily assuming custody or control of the property on the basis of an order issued by a court or other competent authority".

³ See article 2 (g) UNCAC: "includes forfeiture where applicable, shall mean the permanent deprivation of property by order of a court or other competent authority".

⁴ Usually the country of origin of the public official involved. Also sometimes referred to as the "Source Country" or "Victim State". It is typically the country where the original corruption offence took place.

⁵ The country of asset location is defined as the country or state where the proceeds of corruption are located. Also sometimes referred to as the "Destination Country" or "Holding State".

⁶ Jurisdiction of the (alleged) bribe-payer (e.g., jurisdiction of involved company's headquarters)

⁷ A country (other than the country of origin and the country of asset location) through which corrupt funds passed.

CASE SUMMARY		
<p>CASE SUMMARY Please provide a brief summary of the case. Include key information about elements relevant to the asset recovery efforts, such as where the investigation took place, where the legal action took place, and any outcome, if available.</p>		
<p>UNCAC OFFENCES IMPLICATED</p>	<input type="checkbox"/> Article 15. Bribery of national public officials <input type="checkbox"/> Article 16. Bribery of foreign public officials and officials of public international organizations <input type="checkbox"/> Article 17. Embezzlement, misappropriation or other diversion of property by a public official <input type="checkbox"/> Article 18. Trading in influence <input type="checkbox"/> Article 19. Abuse of functions <input type="checkbox"/> Article 20. Illicit enrichment	<input type="checkbox"/> Article 21. Bribery in the private sector <input type="checkbox"/> Article 22. Embezzlement of property in the private sector <input type="checkbox"/> Article 23. Laundering of proceeds of crime <input type="checkbox"/> Article 24. Concealment <input type="checkbox"/> Article 25. Obstruction of justice
<p>DISPOSITION OF CRIMINAL CASE(S) Please list criminal cases related to this asset recovery action, including the jurisdiction where they took place and any outcome (if concluded). This information can also be included in the 'Case Summary' field above.</p>		
<p>DISPOSITION OF CIVIL CASE(S) Please list civil cases related to this asset recovery action, including the courts that heard the case, plaintiff(s) and defendant(s) and any outcome (if concluded). This information can also be included in the 'Case Summary' field above.</p>		
<p>Civil causes of action:</p> <input type="checkbox"/> Tort <ul style="list-style-type: none"> <input type="checkbox"/> Breach of fiduciary duty <input type="checkbox"/> Unlawful means conspiracy <input type="checkbox"/> Tortious interference <input type="checkbox"/> Civil Fraud <input type="checkbox"/> Other: <input type="checkbox"/> Breach of contract <input type="checkbox"/> Unjust enrichment <input type="checkbox"/> Revindication <input type="checkbox"/> Other:		
<p>SECTORS/INDUSTRY INVOLVED</p>	<input type="checkbox"/> Agriculture/Forestry/Fisheries <input type="checkbox"/> Arts, Entertainment, Recreation <input type="checkbox"/> Education <input type="checkbox"/> Energy <input type="checkbox"/> Extractive Industries/Natural Resources <input type="checkbox"/> Finance/Capital Markets/Insurance <input type="checkbox"/> Health <input type="checkbox"/> Infrastructure/Transport/Urban Development <input type="checkbox"/> International development <input type="checkbox"/> Local government <input type="checkbox"/> Manufacturing <input type="checkbox"/> Military/Security <input type="checkbox"/> Motor Sport	<input type="checkbox"/> National government <input type="checkbox"/> Public Procurement <input type="checkbox"/> Retail <input type="checkbox"/> Science <input type="checkbox"/> Services/Consulting <input type="checkbox"/> Social Protection <input type="checkbox"/> Technology/Media <input type="checkbox"/> Telecommunications <input type="checkbox"/> Tourism <input type="checkbox"/> Trade/Customs <input type="checkbox"/> Water <input type="checkbox"/> Other:

<p>NAME & POSITION OF PUBLIC OFFICIAL INVOLVED OR ALLEGEDLY INVOLVED⁸</p>		
<p>TYPE OF PUBLIC OFFICIAL INVOLVED OR ALLEGEDLY INVOLVED</p>	<input type="checkbox"/> President/Prime Minister/head of state <input type="checkbox"/> Vice President/Vice Prime-Minister <input type="checkbox"/> Advisor/other high-level government official <input type="checkbox"/> Ministerial level <input type="checkbox"/> Legislative branch <input type="checkbox"/> Judiciary branch <input type="checkbox"/> Military Branch <input type="checkbox"/> Public official family member	<input type="checkbox"/> Tax administration <input type="checkbox"/> Customs <input type="checkbox"/> Law enforcement officials <input type="checkbox"/> State-owned enterprise <input type="checkbox"/> Political party officials <input type="checkbox"/> International organization official <input type="checkbox"/> Other:
<p>NAME(S) OF PROFESSIONAL INTERMEDIARIES INVOLVED OR ALLEGEDLY INVOLVED⁹</p>		
<p>TYPE OF PROFESSIONAL INTERMEDIARIES INVOLVED OR ALLEGEDLY INVOLVED</p>	<input type="checkbox"/> Bank or financial institution <input type="checkbox"/> Real estate agent <input type="checkbox"/> Lawyer, notary, other legal professional <input type="checkbox"/> Trust and company service provider <input type="checkbox"/> Accountant	<input type="checkbox"/> Consulting firm <input type="checkbox"/> Investment fund <input type="checkbox"/> Casino <input type="checkbox"/> Art dealers/art advisers <input type="checkbox"/> Other:
ASSET RECOVERY PROCESS		
<p>ACTION INITIATING ASSET RECOVERY</p>	<input type="checkbox"/> Investigation in the country of origin <input type="checkbox"/> Investigation in the country of asset location <input type="checkbox"/> Provision of intelligence by a foreign country <input type="checkbox"/> MLA request from the country of origin <input type="checkbox"/> MLA request from a third country ¹⁰ <input type="checkbox"/> Enforcement of a foreign criminal confiscation order <input type="checkbox"/> FIU action to suspend a suspicious transaction ¹¹ <input type="checkbox"/> Independent action from a financial institution <input type="checkbox"/> In a different way. ¹² Please explain:	<p>Year when this action was started e.g. 2021</p>
<p>WHICH AUTHORITIES OR AGENCIES WERE INVOLVED IN THE ASSET RECOVERY/RETURN PROCESS?</p>		

⁸ Do not include names of individuals that have not been cited in the public record.

⁹ Do not include names of individuals that have not been cited in the public record.

¹⁰ A third country is defined as a country other than the country of origin or the country of asset location.

¹¹ It is a temporary measure ordered by the FIU to block, suspend, or postpone transactions on an account, available many but not all jurisdictions. An FIU order to postpone a suspicious transaction is also sometimes referred to as an "FIU freeze", "FIU postponement power", or "suspending transactions".

¹² This refers to situations where a financial institution freezes assets and notifies authorities of their action (absent a freezing/seizure order from a court).

LEGAL BASIS FOR ASSET RECOVERY (specify in which country):	<input type="checkbox"/> Conviction-based criminal prosecution and forfeiture <input type="checkbox"/> Court-ordered compensation, restitution, or damages awarded to a foreign jurisdiction <input type="checkbox"/> Non-conviction based confiscation (NCB) <input type="checkbox"/> Enforcement of foreign criminal confiscation order <input type="checkbox"/> Enforcement of foreign NCB confiscation order	<input type="checkbox"/> Administrative confiscation <input type="checkbox"/> Value judgment (equivalent-value based confiscation) <input type="checkbox"/> Private civil actions (incl. insolvency process) <input type="checkbox"/> Administrative freeze <input type="checkbox"/> Out-of-court Settlement Agreement <input type="checkbox"/> N/A (no legal process in my jurisdiction) <input type="checkbox"/> Other - please specify:
WHAT WAS THE LEGAL BASIS FOR INTERNATIONAL COOPERATION? (select all that apply)	<input type="checkbox"/> CUNCAC <input type="checkbox"/> Other multilateral treaties: <input type="checkbox"/> Bilateral Mutual Legal Assistance Treaty <input type="checkbox"/> Reciprocity	<input type="checkbox"/> Deferred Prosecution Agreement <input type="checkbox"/> N/A <input type="checkbox"/> Other:
MANNER OF ASSET TRANSFER	<input type="checkbox"/> Direct wire transfer to a centralized government account (e.g. general budget) <input type="checkbox"/> Direct wire transfer to a beneficiary government agency <input type="checkbox"/> Direct wire transfer to a separate, designated government account for the asset return <input type="checkbox"/> Escrow account	<input type="checkbox"/> Trust account <input type="checkbox"/> Physical transfer of a movable asset (e.g. car, yacht, artwork, aircraft) <input type="checkbox"/> Transfer of legal title <input type="checkbox"/> Share transfer <input type="checkbox"/> Wire transfer to a designated account held by a third party ¹³ , e.g. CSO, international organization <input type="checkbox"/> Other:
WHICH AUTHORITY/AGENCY WERE THE ASSETS RETURNED TO?		
WERE THERE ANY SPECIFIC FACTORS THAT HELPED MAKE THE ASSET RETURN/CONFISCATION POSSIBLE?	<input type="checkbox"/> International investigation team <input type="checkbox"/> Unexplained Wealth Order <input type="checkbox"/> Illicit Enrichment Law <input type="checkbox"/> FIU's power to suspend suspicious transactions <input type="checkbox"/> Other:	<input type="checkbox"/> Plea bargain <input type="checkbox"/> Use of private civil action <input type="checkbox"/> Leaks <input type="checkbox"/> Abrogation of a corporate entity's limited liability protections by a judge
WERE ANY ASSET RECOVERY NETWORKS OR PARTNERSHIPS USED TO HELP FACILITATE THIS RETURN?	<input type="checkbox"/> ARIN-AP <input type="checkbox"/> ARIN-CARIB <input type="checkbox"/> ARIN-EA <input type="checkbox"/> ARINSA <input type="checkbox"/> ARIN-WA <input type="checkbox"/> ARIN-WCA <input type="checkbox"/> CARIN <input type="checkbox"/> RRAG	<input type="checkbox"/> Egmont Group <input type="checkbox"/> IACCC <input type="checkbox"/> EU's AROs <input type="checkbox"/> StAR <input type="checkbox"/> ICAR <input type="checkbox"/> GFAR Action Series (StAR/ICAR/IACCC) <input type="checkbox"/> Other:

¹³ A third party is defined as a party other than the country of origin, the country of asset location, and their legal/financial representatives.

ASSETS			
ASSET AMOUNT	ASSETS AMOUNT	CURRENCY	
(for asset returns, asset confiscations, or asset freezes related to corruption offenses. You can enter multiple amounts related to the same case, e.g. if some assets were confiscated and some were returned.)	<input type="checkbox"/> Assets were returned <input type="checkbox"/> Assets were returned (in part) <input type="checkbox"/> Assets were confiscated <input type="checkbox"/> Assets were frozen/seized <input type="checkbox"/> Assets were unfrozen/released <input type="checkbox"/> Other:		
DATE OF ASSET RETURN	(month/year or time span)	RECEIVING JURISDICTION	
DATE OF CONFISCATION ORDER	(month/year or time span)	JURISDICTION	
ENFORCEMENT OF CONFISCATION ORDER(S) (if different)	(month/year or time span)	JURISDICTION	
DATE OF FREEZING/SEIZURE ORDER	(month/year or time span)	JURISDICTION	
ENFORCEMENT OF ASSET FREEZING/SEIZURE ORDER (if different)	(month/year or time span)	JURISDICTION	
ASSET TYPE AT TIME OF RETURN (select all that apply)	<input type="checkbox"/> Cash/bank deposit <input type="checkbox"/> Gold <input type="checkbox"/> Securities <input type="checkbox"/> Legal entity or arrangement	<input type="checkbox"/> Real estate <input type="checkbox"/> Motor vehicle <input type="checkbox"/> Yacht/boat <input type="checkbox"/> Aircraft	<input type="checkbox"/> Artwork <input type="checkbox"/> Jewellery <input type="checkbox"/> Other:
ASSET TYPE AT TIME OF CONFISCATION/FREEZE/SEIZURE (select all that apply)	<input type="checkbox"/> Cash/bank deposit <input type="checkbox"/> Gold <input type="checkbox"/> Securities <input type="checkbox"/> Legal entity or arrangement	<input type="checkbox"/> Real estate <input type="checkbox"/> Motor vehicle <input type="checkbox"/> Yacht/boat <input type="checkbox"/> Aircraft	<input type="checkbox"/> Artwork <input type="checkbox"/> Jewellery <input type="checkbox"/> Other:
WAS THERE ANY AGREEMENT FOR THE DISBURSEMENT OF RETURNED ASSETS?	<input type="checkbox"/> Yes, an agreement under UNCAC Art.57(5) exists <input type="checkbox"/> Agreement under UNCAC Art.57(5) is planned <input type="checkbox"/> No agreement	<input type="checkbox"/> Yes, an asset-sharing agreement <input type="checkbox"/> Yes, another agreement. Please explain:	
IF YES, IS THE TEXT OF THE AGREEMENT PUBLICLY AVAILABLE, OR AVAILABLE UPON REQUEST?	<input type="checkbox"/> Yes. Please provide a link: <input type="checkbox"/> No <input type="checkbox"/> N/A (no agreement)		
ARE THERE ANY SPECIAL PROVISIONS IN THE AGREEMENT REGARDING THE MONITORING AND/OR THE USE OF RETURNED ASSETS?	<i>If yes, please provide details on the agreed-on provisions for monitoring and use of assets, e.g. funds to be used for specific development projects linked to SDGs, or other uses. Please note any involvement of a third party, e.g. a CSO or an international organization.</i>		
SOURCES			
SOURCES (please add links or attach documents, e.g. court documents, press releases, government reports)			

