

BEATING THE CORRUPTORS AT THEIR OWN GAME

**A LOOK BACK AT A DECADE OF
IMPLEMENTATION OF THE
PRESUMPTION OF MONEY LAUNDERING
IN FRANCE**

Transparency International is a global movement with one vision: a world in which government, business, civil society and the daily lives of people are free of corruption. With more than 100 chapters worldwide and an international secretariat in Berlin, we are leading the fight against corruption to turn this vision into reality.

www.transparency.org

Working paper

Beating the corruptors at their own game

A look back at a decade of implementation of the presumption of money laundering in France

Authors: Sara Brimbeuf and Esther Bornstein

Reviewers: Kush Amin, Gillian Dell, Adam Foldes, Steve Goodrich, Matthew Jenkins, Sophie Lemaître

Every effort has been made to verify the accuracy of the information contained in this report. All information was believed to be correct as of the 1st of July 2023. Nevertheless, Transparency International cannot accept responsibility for the consequences of its use for other purposes or in other contexts.

2023 Transparency International. Except where otherwise noted, this work is licensed under CC BY-ND 4.0 DE. Quotation permitted. Please contact Transparency International – copyright@transparency.org – regarding derivatives requests.



INTRODUCTION

Over one year since the start of Russia's brutal invasion of Ukraine, estimates for the cost of Ukraine's reconstruction are swelling as Russian bombs and missiles continue to fall on the country. The bill currently stands at between €350 and €750 billion.¹ Meanwhile, calls are growing louder to use Russian oligarchs' frozen assets by confiscating them permanently and allocating these funds to the reconstruction of Ukraine.

One potential challenge is that asset confiscation in most jurisdictions is a judicial decision that requires law enforcement authorities to provide evidence of the illicit origin of any oligarch's assets that have been identified and frozen. Being included on a sanctions list – an administrative decision taken by the executive branch – does not prove the commission of criminal offences.

An additional difficulty is that in contrast to traditional asset recovery cases that target the ill-gotten gains of current or former public officials, most of today's attention is on Russian oligarchs as private individuals. This fact precludes the use of traditional toolkits in transnational corruption cases involving kleptocrats where disparities between the official income of a public official and the lavish nature of his or her lifestyle may sometimes be sufficient to justify an investigation. These conventional tools, such as illicit enrichment legislations², generally target both public and private individuals. In practice, however, the discrepancies between a person's wealth and his or her lawful incomes are easier to characterize with public officials than with private individuals who can, like Russian oligarchs, justify their extravagant lifestyles by the success of their legitimate business.

Some jurisdictions have partly overcome this challenge by acting on the legal grounds of sanctions evasion: the US secured its first

confiscation of a Russian oligarch's asset on this basis,³ and the EU Commission has recently tabled a legislative proposal to harmonise the offence of sanctions evasion among Member States.⁴ However, this legal basis operates only in the event of an attempt to circumvent the sanctions by the person or persons concerned and applies only to the asset subject to evasion. More questionably, other jurisdictions have embraced sanctions-based confiscation regimes at the risk of violating the rule of law⁵.

In addition to these initiatives, several jurisdictions have implemented innovative tools, such as non-conviction-based confiscation mechanisms – which allow confiscation in situations where it is not possible to obtain a criminal conviction⁶. Other jurisdictions whose regimes do not provide for non-conviction-based confiscation mechanisms have developed innovative legal instruments, such as France, with the presumption of money laundering, a recent and powerful tool for prosecuting the offence of money laundering independently of the predicate crime.

This paper aims to present the main features of the French presumption of money laundering, and the challenges and the lessons learnt from a decade of implementation by French law enforcement authorities.

MAIN FEATURES OF THE PRESUMPTION OF MONEY LAUNDERING

Except for customs or drug trafficking offences, which are subject to dedicated provisions, the French Criminal Code provides for a general money laundering offence that applies to proceeds of any felony or misdemeanour, including proceeds of corruption and other related infractions.⁷ Under French law, following international standards,⁸ money laundering is a stand-alone offence, meaning that French courts can characterize money laundering without having to rely on a prior conviction for the predicate offense.⁹

With the presumption mechanism, the stand-alone nature of money laundering is especially pronounced. The illicit origin of the funds is presumed, deduced from the opaque, complex and intricately modalities of a given operation, without the need to characterise the predicate offence's elements.¹⁰

The idea of a law provision creating a presumption of money laundering within the French Criminal Code derives from a scandal that brutally shook French politics in the early 2010s. Following revelations by investigative journalists, the ruling minister delegate in charge of the budget resigned before being indicted and convicted a few years later for money laundering in connection with the offence of tax fraud. The scandal led to the adoption in 2013 of a landmark law in the fight against tax fraud and serious financial crime.¹¹

The 2013 law introduced a presumption of money laundering, providing that "property or income is presumed to be the direct or indirect proceeds of a crime or offence if the material, legal or financial conditions of the investment, concealment or conversion operation have no other justification than to conceal the origin or beneficial owner of

such property or income".¹² The legislator wished to target unnecessarily complex financial vehicles lacking economic rationality that could not be explained otherwise than by the desire to conceal the illicit origin of the goods or income used or the identity of the beneficial owners.¹³

Implementation of the presumption is twofold and can be applied at all stages of proceedings, including at trial, where judges may ask a defendant to explain a financial structure in which he or she has participated. As a first step, French law enforcement authorities must demonstrate the existence of an investment, concealment, or conversion operation. As a second step, deducing the purpose of concealing the origin of the funds or the beneficiary of the transaction from the operation's conditions and modalities, they may trigger the presumption of money laundering.

Following this rebuttable presumption, the burden of proof no longer lies on the prosecution but on the defendant, who must demonstrate that the operation fulfils a lawful purpose.¹⁴

According to French practitioners, the presumption of money laundering is more than a simple rule of evidence. It is "a remarkable and revolutionary tool in the fight against the laundering of the proceeds of crime, particularly in that it does not require the prosecution to prove a prior offence". Indeed, it encourages law enforcement authorities to "concentrate efforts on the repression of money laundering rather than on predicate crimes".¹⁵ The presumption mechanism targets the inner workings of money laundering by beating the launderers at their own game: "The more sophisticated the techniques used to conceal the proceeds of crime, the easier it is to implement the presumption and the more difficult it is to reverse it."¹⁶

“ The more sophisticated the techniques used to conceal the proceeds of crime, the easier it is to implement the presumption and the more difficult it is to reverse it.

FEEDBACK FROM A DECADE OF IMPLEMENTATION

COMPLIANCE WITH THE DUE PROCESS RIGHT

During the examination of the law, the draft legislation raised lively parliamentary debates on the need for balance between the challenges of overcoming the evidentiary difficulties of money laundering on the one hand and not being prejudicial to the presumption of innocence and the rights of the defence on the other hand.¹⁷

In line with the European Court of Human Rights' long-standing position,¹⁸ the French Constitutional Court has regularly recalled the principle according to which "the legislator cannot establish a presumption of guilt in criminal matters",¹⁹ specifying that, exceptionally, presumptions of guilt may be established, provided "that they are not irrebuttable, that respect for the rights of the defence is ensured and that the facts reasonably suggest that the offence is attributable".²⁰

Two years after the law's enactment, the Court of Cassation, the French judiciary's highest court, swept aside attempts to argue for the unconstitutionality of the mechanism, stressing that the presumption of money laundering is not an irrebuttable one and recalling that its enforcement requires the demonstration of an operation that aims to conceal the origin of the funds or the beneficiary of the transaction under scrutiny.²¹

As noted by academics, the presumption in question is not really a presumption of money laundering, but rather "a presumption of illicit origin". The substantive element of money laundering is indeed not entirely presumed, since the judges must still demonstrate the existence of an investment, concealment, or conversion operation. They can presume the illicit origin of the funds afterwards but only by relying on objective elements to characterise the abnormality of the operation. This delimitation makes it perfectly compatible with the presumption

of innocence, "since it is indisputable that the abnormality objectively established makes it likely that the origin of the goods or income is illicit, a likelihood that the defendant will be allowed to fight, in compliance with the rights of the defence".²²

As of today, it should be noted that the presumption of money laundering has never been challenged before the European Court of Human Rights.

RETROACTIVE IMPLEMENTATION CHALLENGE

A potential limit to this powerful tool may be its absence of retroactive implementation. The presumption of money laundering came into force in December 2013. The question of whether the rule can be applied retroactively, that is, to facts that occurred before 2013, has not yet been answered. According to the *nullum crimen, nulla poena sine lege* principle, the answer depends on whether the presumption is interpreted by the courts as a substantive rule (in which case it will not be retroactive) or a procedural rule (in which case it can be applied retroactively). To date, French law enforcement authorities have avoided applying the presumption of money laundering to concealment operations that took place before 2013.²³

The challenged of its retroactive implementation may explain why French law enforcement authorities have rarely used the presumption of money laundering, as the Financial Action Task Force (FATF) pointed out in its mutual evaluation of France.²⁴

GROWING USE OF THE PRESUMPTION OF MONEY LAUNDERING IN SOPHISTICATED CORRUPTION SCHEMES

While the presumption of money laundering was confined in its early years to the discovery of hidden cash at border crossings, the aim now seems to be to tackle the most sophisticated operations, such as digital assets²⁵ or proceeds of embezzled public funds and foreign bribery.

French law enforcement authorities notably used the presumption of money laundering to bring to trial Rifaat Al-Assad, uncle of Syrian dictator Bashar Al-Assad and former vice-president of Syria. Accused of having built up a real estate empire in France with embezzled public funds, Rifaat Al-Assad was

sentenced in 2022 to four years' imprisonment and the confiscation of his properties valued at €90 million for money laundering in connection with aggravated tax fraud offences.²⁶

The presumption of money laundering is also at the heart of France's strategy to track down Russian oligarchs' assets²⁷, following official instructions of the French Ministry of Justice.²⁸

In March 2023, French authorities announced the launch of at least 19 investigations into Russian businesspeople and politically exposed persons (PEPs) suspected of money laundering in the real estate sector.²⁹ Out of the 19 judicial proceedings, 15 build on the presumption of money laundering.³⁰ In the wake of opening the investigations, French law enforcement authorities have also announced their first criminal seizure of a sanctioned Russian oligarch's real estate assets, building on the presumption of money laundering.

TOWARDS A REPLICATION OF THE FRENCH PRESUMPTION OF MONEY LAUNDERING ABROAD?

Some jurisdictions already provide mechanisms that look like the French presumption of money laundering. In a similar vein to the French presumption of money laundering, the theory of "irresistible inference", established by the English Court of Appeal in a 2008 decision,³¹ provides that the criminal provenance of property can be proved by showing that the modalities of the property purchase give rise to the irresistible inference that it can only derive from crime. Like the French presumption of money laundering, the "irresistible inference" mechanism focuses on the structure of financial vehicles and the management of fund to characterise money laundering. Some uncertainty, however, remains. British practitioners observe that there is still "a fondness for the concept of predicate offence as the exclusive route in legal circles"³² and bemoan more generally how the concept of predicate offence continues to have a restricting influence on an efficient prosecution of money laundering not only in the UK but also more broadly, particularly in the US.³³ Recent judicial decisions have even been interpreted in such a way as to restrict implementation of the irresistible inference theory.³⁴

Other jurisdictions provide for illicit enrichment laws, which allow a court to impose criminal or civil sanctions if illicit enrichment is found, without requiring the establishment of a separate or underlying criminal activity to impose the sanction³⁵. Illicit enrichment laws are slightly different from the presumption of money laundering mechanism. Both

aims at targeting unexplained wealth by moving away from an approach focusing on the predicate offence to concentrate on its results. However, the question of how the money is handled, which is at the heart of the presumption of money laundering, never comes into play in illicit enrichment laws.

International standards already promote stand-alone money laundering, that is, allowing law enforcement authorities to characterise money laundering without having to rely on a prior conviction for the predicate offence. An interpretative note to Article 23 of the United Nations Convention Against Corruption (UNCAC) expressly specifies that “a prior conviction for the predicate offence is not necessary to establish the illicit nature or origin of the assets laundered. The illicit nature or origin of the assets and [...] any knowledge, intent or purpose may be established during the course of the money-laundering prosecution and may be inferred from objective factual circumstances.”³⁶ Likewise, the FATF provides that when proving that property is the proceeds of a crime, it should not be necessary for a person to be convicted of a predicate offence.³⁷

In the European Union, a 2018 Directive on combating money laundering by criminal law provides that Member States should prosecute and sanction money laundering without it being necessary to ensure a prior or simultaneous conviction for the predicate offence³⁸ or to establish all the factual elements or circumstances relating to the predicate offence, including the identity of the perpetrator.³⁹

The 2018 Directive was a step forward, enabling better prosecution and sanction of international money laundering in the EU – a major priority made more pressing in light of Europol’s concerning estimate that 98.9 per cent of all criminal profits in the EU escape seizure and confiscation and remain at the disposal of criminals.⁴⁰ According to a 2022 Eurojust report on money laundering, however, tangible progress has remained limited. Ranking the identification of the predicate offence for the conviction for money laundering at the top of the ten most relevant legal and practical challenges, the 2022 report laments that “although theoretically the precise identification of the predicate offence to prosecute money laundering is not required, and the fact that the money derives from criminal activities should suffice, supreme courts have nevertheless set high standards for prosecutors to demonstrate the criminal origin of the money. In practice, prosecutors have to be able to identify the predicate offence as well. They also face a lack of

clarity as to the standard of proof that is required to demonstrate that the money is of criminal origin. This has an impact on international cooperation, as prosecutors from these countries are more reluctant to start money laundering investigations.”⁴¹

Jurisdictions wishing to tackle illicit financial flows while upholding the rule of law have a wide range of tools: from stand-alone money laundering to the presumption of money laundering through illicit enrichment laws. The situation shows, nevertheless, that many, if not most, countries have a great deal of room for improvement in bringing themselves into line with international standards for prosecuting money laundering. In this context, jurisdictions wishing to equip themselves as effectively as possible to combat increasingly sophisticated practices relying on intricate networks of intermediaries and shell companies could draw on France’s 10-year experience in using the presumption of money laundering and its gradual application to complex cases such as the tracking down of oligarchs and kleptocrats assets.

ENDNOTES

¹ See for example: World Bank; Government of Ukraine; European Union; United Nations. *Ukraine – Rapid Damage and Needs Assessment: February 2022–2023*. Washington, D.C.: World Bank Group (<http://documents.worldbank.org/curated/en/099184503212328877/P1801740d1177f03c0ab180057556615497>). This report estimates that the cost of reconstruction and recovery in Ukraine has grown to US\$411 billion in the one-year period from Russia's invasion of Ukraine on 24 February 2022 to the first anniversary of the war on 24 February 2023.

² See Dornbierer, A., 2021. *Illicit Enrichment: A Guide to Laws Targeting Unexplained Wealth*. Basel Institute on Governance. Available at: illicitenrichment.baselgovernance.org

³ *Russian Oligarch Charged With Violating United States Sanctions*, Department of Justice, U.S. Attorney's Office, Southern District of New York, 6 April 2022 (<https://www.justice.gov/usao-sdny/pr/russian-oligarch-charged-violating-united-states-sanctions>)

⁴ Proposal for a Directive of the European Parliament and of the Council on asset recovery and confiscation, European Commission, 25 May 2022 (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52022PC0245>)

⁵ See Dornbierer, A., 2023. *From sanctions to confiscation while upholding the rule of law*, Working Paper 42, Basel Institute on Governance. Available at: <https://baselgovernance.org/publications/wp-42>

⁶ See France G., 2022. *Non-conviction-based confiscation as an alternative tool to asset recovery*, Transparency International Helpdesk

⁷ French Criminal Code Article 324-1

⁸ See for instance the legislative guide for the implementation of the United Nations Convention against Corruption, para. 248; Interpretative notes for the official records (travaux préparatoires) of the negotiation of the United Nations Convention against Corruption (A/58/422/Add.1), para. 32; and the FATF Recommendations No. 3, *International standards on combating money laundering and the*

financing of terrorism & proliferation; updated February 2023 p. 38.

⁹ Enforcement of money laundering does not require that the predicate offence occurred in France, nor that it falls within the French courts' jurisdiction, as long as its main elements are characterized (see Cass. Crim.; 20 February 2008; n° 07-82.977 – Cass. Crim.; 24 February 2010; n° 09-82.857). According to established case law, the French courts may even prosecute money laundering without having determined the circumstances of the commission of the predicate offences (see Cass. Crim.; 4 December 2019; n° 19-82.469). The intent and knowledge required to prove the money laundering offence can be inferred from objective factual circumstances (see Cass. Crim.; 17 February 2016, n° 15-80.050; Cass. Crim.; 17 March 2015, n° 14-80805; Cass. Crim.; 25 October 2017, n° 16-80.238).

¹⁰ This has recently been confirmed by the Court of Cassation (see Cass. Crim.; 18 December 2019; n° 19-82.496)

¹¹ Law n° 2013-1117 *relative à la lutte contre la fraude fiscale et la grande délinquance économique et financière*; 6 December 2013

¹² French Criminal Code Article 324-1-1

¹³ Minutes of Parliamentary debates, available at: <https://www.assemblee-nationale.fr/14/rapports/r1348.asp>

¹⁴ Circulaire of the Ministry of Justice *relative à la présentation de la loi n° 2013-1117 en date du 6 décembre 2013 relative à la lutte contre la fraude fiscale et la grande délinquance économique et financière*; 23 January 2014; p. 6. See for an application, Cass. Crim.; 18 December 2019; n° 19-82.496. In this case, a driver was caught by customs agents while crossing the border between France and Spain. The driver declared that he was not carrying more than €10,000, but the customs agents found €19,000 in a plastic bag in place of the airbag, €9,500 in a bag in the ceiling of the vehicle, and two

hidden compartments in the vehicle's side rails, as well as tools in the glove box allowing access to the hiding places. He was charged with money laundering through the use of the presumption. The Court considered that the existence of an investment, concealment or conversion operation was characterised by the transportation of such a sum of money in cash from Spain to France. The purpose of concealing the origin of the funds or the beneficiary of the transaction was deduced from the fact that the funds were hidden in different caches of the vehicle. Put in the position to demonstrate the lawful origin of the funds and the purpose of the operation, the defendant provided documents to justify the cash inflows. However, the Court observed that the defendant's statements had been globally evolving, that the provided documents were too old in comparison with the date of the offence, and that if he claimed that he was in Spain to develop a commercial activity, he was never able to provide either any justification for the activity or the identity of the persons he was to meet there.

¹⁵ Goldszagier J., 2019, *It's the economy, Stupid. - De l'interprétation judiciaire de la présomption d'illicéité en matière de blanchiment*, AJ pénal 2019. 323

¹⁶ Ibid.

¹⁷ See in particular the Senate's Report Nos 738 (p.59) and 789 (p.4) and the National Assembly's Reports Nos 1296, 1297 and 1348 (p.23-24)

¹⁸ To be compatible with Article 6§2 of the Convention providing for the presumption of innocence, presumptions must "not exceed a certain threshold" and States must "keep them within reasonable limits, taking into account the seriousness of the matter at stake and preserving the rights of the defence" (ECHR; October, 7, 1988; *Salabiaku v. France*, req. n° 10519/83, cons. 28). The Court also ensures that criminal courts avoid "any automatic recourse to presumptions" (ECHR; 25 September 1992; *Pham Hoang v. France*, req. n° 13191/87, cons. 33 et 36). See also, for example: ECHR; 30 March 2004; *Radio France and others v. France* – ECHR; June, 30 2011; *Klouvi v. France* – ECHR; 26 June 2016; *lasir v. Belgium*.

¹⁹ Cons. const.; 21 July 2017; n° 2017-645; QPC – Cons. const.; 2 March 2016; n° 2015-524 QPC – Cons. const.; 22 September 2015; n° 2015-484 QPC – Cons. const., 25 February 2010; n° 2010-604 DC

²⁰ Cons. const.; 10 June 2009; n° 2009-580 DC – Cons. const., 16 June 1999; n° 99-411 DC

²¹ Cass. Crim.; 9 December 2015; n° 15-90.019

²² Segonds M., *Blanchiment*, Répertoire droit pénal et procédure pénale, Dalloz, October 2017, updated in June 2022, §97-98 (free translation)

²³ It is established that money laundering is an immediate offence. As soon as a concealment, investment or conversion operation has taken place after 2013, even if it is linked to earlier operations, it can be prosecuted via the presumption of money laundering.

²⁴ FATF Evaluation of France, May 2022, §240: "The number of convictions for stand-alone money laundering represents only a small proportion of money laundering convictions, also in view of the legal opportunity for the authorities to prosecute stand-alone money laundering more easily due to the introduction of the presumption of money laundering in 2013. Not all authorities have introduced a specific investigation strategy for the presumption of money laundering."

²⁵ Cass. Crim.; 15 February 2023; n° 22-81.326

²⁶ Court of Appeal; Paris; 9 September 2021; n° 20/04290. The Court studied each company set up to hold and manage the defendant's real estate assets and demonstrated that the defendant repeatedly and systematically chose to interpose members of his family and chains of French and foreign companies with accounts located in tax havens, even though he was the sole decision-maker. The Court considered that there was a total interlingling of the assets of the different companies owned by Rifaat AL-ASSAD and that the targeted flows had no economic justification other than to maintain the real estate assets of Rifaat AL-ASSAD within the framework of operations aimed to conceal the identity of the real beneficiary. This made it possible to characterise the abnormality of the investment, concealment or conversion. Al Assad was not able to demonstrate that, on the contrary, the targeted flows were licit and the operations had an economic justification.

²⁷ El Idrissi A., *La "présomption de blanchiment", arme redoutable contre les montages financiers occultes*, published on 29 April 2023, *Le Monde* (<https://www.lemonde.fr/les->

[decodeurs/article/2023/04/29/la-presomption-de-blanchiment-arme-redoutable-contre-les-montages-financiers-occultes_6171473_4355770.html](https://www.lemonde.fr/decodeurs/article/2023/04/29/la-presomption-de-blanchiment-arme-redoutable-contre-les-montages-financiers-occultes_6171473_4355770.html))

²⁸ Circulaire of the Ministry of Justice *relative au traitement des procédures mettant en cause des intérêts russes dans le contexte des sanctions internationales visant la Fédération de Russie*, CRIM-2022-07/G1; 3 March 2022, in which the Ministry of Justice called for the use of the presumption of money laundering in cases involving Russian-sanctioned assets.

²⁹ El Idrissi A., *Une Villa saisie et dix-neuf enquêtes ouvertes: les sanctions contre les oligarques russes commencent à porter leurs fruits en France*, published on 1 March 2023, updated on 23 March 2023, *Le Monde* (https://www.lemonde.fr/en/les-decodeurs/article/2023/03/01/one-villa-seized-and-17-investigations-opened-french-sanctions-against-russian-oligarchs-begin-to-bear-fruit_6017803_8.html)

³⁰ El Idrissi A., *La "présomption de blanchiment", arme redoutable contre les montages financiers occultes*, published on 29 April 2023, *Le Monde* (https://www.lemonde.fr/decodeurs/article/2023/04/29/la-presomption-de-blanchiment-arme-redoutable-contre-les-montages-financiers-occultes_6171473_4355770.html)

³¹ R v. ANWOIR & Others (2008), EWCA Crim 1354

³² Murray K., 2011, *The uses of irresistible inference*, *Journal of Money Laundering Control*, Vol. 14 No. 1

³³ Murray K., 2012, *A suitable case for treatment: money laundering and knowledge*, *Journal of Money Laundering Control*, Vol. 15 No. 2 pp. 188-197

³⁴ R v. GEARY [2010] EWCA Crim 1925; Appeal by Athif Sarwar against HMA [2011] HCJAC 13

³⁵ Ibid 2

³⁶ Legislative guide for the implementation of the United Nations Convention against Corruption, para. 248; Interpretative notes for the official records (travaux préparatoires) of the negotiation of the United Nations Convention against Corruption (A/58/422/Add.1), para. 32

³⁷ The FATF Recommendations, *International standards on combating money laundering and the financing of terrorism & proliferation; updated February 2023*, Recommendations No. 3 "Money laundering offence" and its interpretative note, p. 38

³⁸ Directive (EU) 2018/1673 of the European Parliament and of the Council of 23 October 2018 on combating money laundering by criminal law, Article 3.3 a)

³⁹ Ibid., Article 3.3. b)

⁴⁰ Europol Police Office, *Does crime still pay? Criminal asset recovery in the EU – Survey of statistical information 2010-2014*, 2016. (https://www.europol.europa.eu/cms/sites/default/files/documents/criminal_asset_recovery_in_the_eu_web_version_0.pdf)

⁴¹ *Eurojust Report on Money Laundering*, October 2022, p. 8

Transparency International
International Secretariat
Alt-Moabit 96
10559 Berlin
Germany

Phone: +49 - 30 - 34 38 200

Fax: +49 - 30 - 34 70 39 12

ti@transparency.org

www.transparency.org

blog.transparency.org

facebook.com/transparencyinternational

twitter.com/anticorruption