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A STUDY OF FATF'S APPROACH TO BLACKLISTED COUNTRIES

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ABSTRACT

Today, due to the expansion of financial exchanges between the countries of the world, this issue is recognized as a necessity, and there is no country in the world that claims that it can meet all its needs without contact with other countries. On the other hand, the large volume of monetary and banking transactions at the international level has caused criminals to launder money and turn the money from crimes into safe money through operations. Therefore, one of the institutions that has been established in recent years worldwide to monitor and prevent money laundering crimes is the Financial Action Task Force (FATF). However, in its laws, this institution states definitions and examples that do not comply with the policies of some countries, including the concept of terrorism. Therefore, this financial institution has put some countries in the list of non-cooperating countries and has asked the member countries to take countermeasures against these countries. The financial institution demands from its members the implementation of notification instructions in order to create an integrated system in monetary and financial transactions in order to block any infiltration and infiltration and to prevent money laundering and terrorist financing.

KEYWORDS: Money Laundering, Terrorist Financing, Financial Action Task Force (FATF).

1. INTRODUCTION

Today, the stability of multilateral political and social relations of countries depends on trade and economic activities. It can be said that economic relations play an important role in collective activities. With the global expansion of the economy and the prosperity of financial markets, the transfer of capital through various means, especially governments, is becoming commonplace. The globalization of the economy, especially in high-profit capital markets, has created harmful phenomena in economic systems, the most important of which is the phenomenon of money laundering. Money laundering is the conversion of profits from misappropriation and corruption of

seemingly legitimate assets. In money laundering, the proceeds of illicit activities are converted into money or wealth, apparently obtained through legal means, in which "laundered money" enters the economy. This is generally done in such a way that the true source of the money remains unclear. In fact, it is a new offense to lose track of the proceeds of crime. This type of offense is largely dependent on the original offense. This group includes those who seek to "launder" money by smuggling drugs and weapons, embezzlement, bribery and other illegal means. Accordingly, in order to prevent this ominous phenomenon and monitor the financial system at the international level, a special financial action group was established (Aalipour, 2016: 163).

2: International Trade; Underlying financial crimes

Most economists believe that trade is the engine of development in today's societies. Today, the need to be present in global markets due to the expansion of trade around the world has become so widespread that in all areas, especially the economy, it is not possible to stay out.

In today's world, having a static and closed economy lacks economic logic. Apart from this, international trade has several sources that directly and indirectly affect the rate of economic growth. The dynamism or, in other words, the openness of the economy as an effective indicator of productivity and increase the efficiency of allocated resources can ensure and promote development patterns in a country. The field of foreign trade and the conquest of international markets, whether in the field of technology and resources, can prevent severe shocks in the economy. In developing countries, which sometimes suffer from defective and inflexible structures in the field of trade, so the adoption of strategic policies in this area seems necessary (Farhadi: 50).

The phenomenon that is referred to today as globalization is one of the factors of the new world order and determines future developments. Another important issue for effective global interaction is regionalism. To this end, the countries of the world tend to join the economic blocs of the regions in order to increase economic prosperity, improve economic growth and also expand trade between members, and this issue is increasing day by day. Therefore, it is necessary to obtain a suitable share of the international market, cooperation and interaction with regional and international organizations and unions (Zirak, 2008: 57).

The phenomenon of globalization in the international system is one of the fundamental changes that has taken place in the last century, has attracted the attention of thinkers. In such a way that attention to the requirements of its fulfillment in the cultural, economic and political spheres seems inevitable. The development goals and requirements set by the Islamic Republic of Iran in achieving a leading position in the field of economy, science and technology in the Asian region in the horizon of 1404 will follow the platform of effective interaction in international trade.

One of the characteristics of globalization; The growth of global trade, the growth of foreign direct investment, the growth of money and capital trade, the rapid transfer of technology and the increase of communications and media and information exchange processes are expressed in different parts of the world.

The high growth rate of exports, the growth rate of foreign direct investment, as well as the growth of capital trade due to the increase of banks and multinational corporations in developed countries show the importance of globalization. At present, a country that can use the above tools well and knows how to use them properly in relation to other countries will be very successful in this regard (Ibid: 61-58).

Therefore, in this regard, we refer to the two types of crimes that play a greater role in the international economy today.

1-2: Money laundering

In the current era, trade and economic activities play a decisive role in the political position of governments, and consequently the relations between countries, whether bilateral or multilateral, are in accordance with their economic power. One of the crimes that has increased significantly in proportion to the economic growth of countries in the world is money laundering. The scale of this crime has been so great that it has become one of the main problems of the world economy. Therefore, both at the international level and at the domestic level of countries, a serious determination and will has been formed to confront this crime (Gholami, 2011: 93).

Money laundering means turning profits from corruption and misconduct into seemingly legitimate assets. In this process, the money obtained from illegal actions is transformed into money or wealth, which in its appearance, is obtained through correct and legal means, and thus "laundered money" enters the cycle of the country's economy.

In general, the reason for money laundering is that the main and real source of money remains unknown. This crime is a sub-crime in order to deviate and prevent the identification of the income obtained from the main crime. For this reason, the perpetrators are mostly those who earn money through drugs such as drugs, embezzlement, arms smuggling, bribery and other illegal methods, and in fact seek to "launder" money.

Money earned illegally and in violation of the official laws and regulations of a country can be divided into three general categories:

a. Gray money: Includes revenues from the production and sale of goods that are usually hidden from government control for tax evasion.

B. Black money: includes proceeds from the smuggling of goods.

J. Dirty or red money: includes revenues from drugs, terrorist operations and human trafficking (Motaharikhah, 2016: 91).

1-1-2: Fight against money laundering in international documents

One of the actions of governments in the fight against money laundering is cooperation with other countries in the form of international organizations, multilateral treaties or committees, which in this section, some of the most important cases are stated:

1-1-1-2: Money laundering in the Convention against Narcotic Drugs and Psychotropic Drugs (Vienna Convention)

In December 1988, the United Nations Convention adopted the first international document requiring signatory states to criminalize the laundering of illicit proceeds in their domestic law, known as the Vienna Convention. The scope of the convention was limited to the trafficking of narcotics and psychotropic substances. This convention was approved by the Islamic Consultative Assembly on the 3rd of Azar 1370 according to a single article (Bagherzadeh, 2004: 189-188).

2-1-1-2: Statute of Basel Committee

In 1988, banking authorities in 12 countries signed a charter in Basel, Switzerland, which required member banks to fully comply with principles such as identifying customers, preventing

suspicious transactions, and cooperating with anti-money laundering organizations. Employees in order to identify methods of tracking suspicious transactions, support law enforcement forces to prevent illegal actions and activities (Tahzibi, 2002: 56).

3-1-1-2: Charter of the European Union (1990)

According to the charter, the European Union in Europe and even abroad adopted the same anti-money laundering policy, according to which the issue of money laundering went beyond drug revenues and other organized crime was included. The agreement emphasizes money laundering, investigation and inspection, as well as the confiscation of the proceeds.

4-1-1-2: Resolution of the International Organization of Securities Commissions

In 1992, the organization issued a resolution encouraging members to take action to combat money laundering in the securities market.

5-1-1-2: United Nations Convention against Transnational Organized Crime (Palermo)

The convention was established in 2000 in Palermo, Italy. The convention calls on governments to take legislative action to criminalize the misappropriation of proceeds of crime. According to this point, each member state is required to take criminal action in accordance with the basic principles of its domestic law. Article 6 refers to general issues that need to be criminalized, and in all of them, there is a spiritual element, which is the same knowledge that this property is the proceeds of crime (Gholami, 2011: 107).

Article 7 of the Convention states that each State Party is required to establish a comprehensive internal regulatory and administrative system for financial institutions and other entities in order to prevent and identify forms of money laundering. In accordance with Articles 18 and 27 of the Convention, States also guarantee that the various executive, law enforcement and domestic bodies will be able to cooperate and exchange information at the national and international levels, in order to develop and strengthen global, regional and bilateral cooperation. They will make the necessary efforts to deal with the crime of money laundering (Bagherzadeh, 2004: 29-35).

6-1-1-2: The Financial Action Task Force (FATF)

It is recognized as the most important and active international organization for the continuous and comprehensive fight against money laundering. In 1990, the organization issued forty proposals for anti-money laundering planning, and in 2001, eight other proposals were submitted by the organization to combat the financing of terrorism, supplementing the forty proposals.

2-2: Terrorist Financing

There is no single definition of terrorism that is accepted by all countries. However, the characteristics of terrorism include violent acts with financial and human losses, as well as the secrecy of acts prior to terrorist operations. One of the important requirements of any terrorist operation is the issue of its financing. So that the administration, management and execution of any terrorist operation without anticipation of its financing is difficult and impossible.

The first step in identifying the revenues used by terrorists is to understand the needs and expectations of financing terrorist groups. It should be noted that not all proceeds are spent on terrorist operations. This is because these groups have other costs, such as maintaining, expanding, and promoting their goals. In addition, expenses such as travel expenses, forging papers and

documents, taking bribes and providing weapons and ammunition are also included (GhaemMaghami, 2019: 36).

Terrorist financing is mainly obtained through the proceeds of illegal activities such as drug trafficking, human trafficking, arms trafficking, and so on. In fact, the three most important elements of arms supply, financing and ideology are the important elements of terrorism. Among these three elements, financing is very important. Because access to this subject also provides other elements.

For this reason, preventing financing and also blocking the ways for them to reach the mentioned resources, has a decisive role in creating and continuing the activities of terrorist groups (Haidar al-Sheikh, 2010: 100).

On the other hand, today the activities of terrorist groups are organized and mainly in several countries. Therefore, it is necessary to establish cooperation between countries at the international level in order to fight and especially to finance it.

1-2-2: International rules on terrorist financing

Regarding the fight against terrorism as well as the fight against the financing of terrorism, various rules have been recently established, most of which are aimed at restricting countries in cultivating terrorism and their activities. The most important of these rules are international treaties and Security Council resolutions. The difference between the two is that treaties are binding on governments. While Security Council resolutions are binding on all UN member states, international treaties are binding only on treaty members.

2-2-2: The role of the United Nations in the fight against terrorist financing

The decisive role of the United Nations in the fight against the financing of terrorism can be seen in various conventions, including the 1999 Convention for the Suppression of the Financing of Terrorism.

One of the important goals of the UN Charter is to maintain international peace and security. Therefore, the member states of this convention created this convention with the increase of terrorist acts in the world. The purpose of the signatory states of the Convention is to address issues such as the increase in terrorist operations around the world, as well as its close connection with the financial assistance received by terrorists.

The text of the convention was finally adopted by the UN General Assembly in 1999 and has so far been ratified by more than 186 countries. For this reason, this convention is known as one of the most important and best international conventions (Haidar al-Sheikh, 2010: 105).

The International Convention for the Suppression of the Financing of Terrorism recognizes three obligations for member states:

- 1- The criminalization of financing terrorist operations in the criminal law of countries.
- 2- Extensive coordination and cooperation with other member states of the Convention in all aspects.
- 3- Preparing and codifying the necessary laws for the position of financial institutions in detecting and reporting cases of suspected terrorist financing.

It should be noted that countries are required to accede to the Convention, and if they do not, an executive guarantee is provided for in the UN Charter. This can be deduced from the binding nature of Security Council Resolution 1373 regarding the immediate obligation of countries to accede to international conventions and protocols relating to terrorism (Tayebifard, 2005: 305-301).

3-2-2: Security Council resolutions

The UN Security Council, in accordance with its inherent duties, has issued various resolutions in accordance with Chapter VII of the UN Charter following the establishment of terrorist operations in several countries, the most important of which are as follows:

- Resolution 1267 of 1999 on the freezing of Taliban funding;
- Resolution 1333, 2000, on the freezing of the financial resources of Osama bin Laden and al-Qaeda;
- Resolution 1373 of 2001 regarding the establishment of the Committee against Terrorism;
- Resolution 1377 of 2001 regarding the request of countries for the full implementation of Resolution 1373.

Several important issues can be understood from the review of the resolutions issued by the Security Council:

1. All member states are required to refrain from financing terrorist acts.
2. Condemn those who intentionally provide property directly or indirectly to terrorist acts.
3. Persons who commit terrorist acts or intend to commit them, as well as their partners, immediately block their bank accounts and their property and assets.
- 4- Prevent any material or moral support from individuals or groups involved in terrorist operations.
5. States are required to take the necessary measures to prevent the commission of terrorist operations before any terrorist operation, such as alerting other countries and exchanging necessary information.
- 6- Member countries are required to cooperate with each other in conducting investigations as well as criminal measures related to the financing of terrorism (Haidar al-Sheikh, 2010: 107-106).

In general, tackling the issue of terrorist financing is one of the major goals in the world. . Those countries that have previously enacted and enforced money laundering laws have less difficulty enacting anti-terrorist financing regulations and only need to take new and necessary measures in matters such as tracking down and prosecuting criminals. However, countries that have not yet adopted laws on combating money laundering and combating the financing of terrorism, face difficulties in achieving the desired result (Mirzavand, 2016: 58).

4-2-2: Classification of countries in the Financial Action Task Force

The Financial Action Task Force classifies countries into four categories based on their compliance with their 49's standards:

- A) Countries that fully comply with the standards (which mostly include developed countries).

B) Developing countries to bring their laws in line with standards.

C) Non-cooperating countries, which do not cooperate with the group and therefore financial and trade exchange with them is dangerous.

D) Countries against which strict measures should be taken (reciprocal measures).

Currently, only two countries, the Islamic Republic of Iran and North Korea, are in the fourth category. It should be noted, however, that in Panama, according to international documents, there is far more widespread money laundering than in other countries, indicating that the FATF also pays attention to political behavior. In fact, the Financial Action Task Force in 2008 announced that the Islamic Republic of Iran is at risk of money laundering and terrorist financing, and since 2010 our country has been blacklisted by that institution. This means that there is a high risk of money laundering and terrorist financing in the country's banking system (Strategic Research Institute of the Basij Lawyers Organization, 2016: 9-4).

This is important because, according to the recommendations and warnings of the Financial Action Task Force, international banks and financial institutions refrain from conducting financial and monetary exchanges with banks, institutions, and individuals, although they exercise extreme caution. Consider the most risky conditions to minimize the risk of investing.

For the first time in 2009, the Financial Action Task Force introduced the final benchmarks for countries around the world as well as evaluators. But since 2000, the FATF has included in its annual reports a list of countries in the world called (blacklisted), which includes the most risky countries in terms of investment.

On the other hand, the list is published by the Organization for Economic Co-operation and Development (OECD) under the title (countries and powers unsuitable for cooperation). The list includes countries that, according to FATF assessors, do not cooperate in the global fight against money laundering as well as the financing of terrorism. Of course, after the meeting (G20) in 2008, the Financial Action Task Force, after criticizing the list, decided to review its studies in more detail (Fooladi, 2018: 88).

For the first time in 2009, the name of the Islamic Republic of Iran was blacklisted by the Financial Action Task Force along with the names of Uzbekistan, Pakistan and Turkmenistan. This measure was repeated in the following years, while the Financial Action Task Force reserves the right to add the names of some countries and remove the names of some countries in its routine reviews. But the Islamic Republic of Iran, along with North Korea, in addition to being at the top of the black list, was on the list of countries that were recommended by the Financial Action Task Force based on the assessments and expertise of that organization (ibid: 89).

In 2005, UN Security Council Resolution 1617 strongly advised member states to implement the 49-year-old FATF standards. Security Council Resolution 1929 in 2010 also encouraged the Financial Action Task Force to set guidelines for the imposition of sanctions on the Islamic Republic of Iran.

3: Recommendations of the Financial Action Task Force on Combating Money Laundering

The first comprehensive FATF report was published in 1990 and consisted of three sections. The first part was about the extent and strategy of money laundering, in which it emphasized the involvement of financial institutions and banks in the fight against money laundering, which shows their important role in this phenomenon. The second part is about the measures taken to combat

money laundering, and the third part contains forty recommendations, which are known as (forty recommendations). In fact, these recommendations include a comprehensive international plan to prevent as well as combat money laundering. It has amended and supplemented the forty recommendations of the provisions of the 1998 Vienna Convention, as well as the principles adopted by the Basel Committee on regulatory and banking procedures in 1988 regarding international cooperation (Abbasi, 2007: 153).

These recommendations have been the product of the efforts of many of the world's best experts in various professions. It has been widely welcomed by countries around the world and also endorsed by many international institutions and organizations and is recognized as an international rule in the field of anti-money laundering measures.

For example, in addition to the ratification of many international bodies, the UN General Assembly, at its extraordinary session in 1998, proposed that it approve the forty recommendations of the Financial Action Task Force. The UN Security Council, in Resolution 1617 of 2005, also explicitly called on UN member states to implement the FATF's 40 recommendations. The European Union has made a similar request to its member states. Therefore, although these recommendations are not binding in nature, it should be borne in mind that all member states of this institution have accepted and implemented the recommendations politically and even acted in accordance with the recommendations to combat anti-money laundering laws.

Another point about the recommendations of the Financial Action Task Force is that considering that the financial system of the member states of this institution is different and therefore not all of them can follow the same criteria, so the recommendations were formulated in such a way that in addition to being applicable by countries. However, financial exchanges should not limit them and should not be an obstacle to the economic development of these countries. To this end, the FATF Recommendations provide a minimum of practical standards for member states so that they can select recommendations according to their own circumstances and in accordance with the regulations of that country (ibid: 155-154).

Experts of the Financial Action Task Force, according to the reports of countries, especially on issues of financial transparency, tax regulations, monetary and banking system laws, etc., provide advisory opinions on the level of investment risk in these countries, which is considered by international investors. Attention and citation.

4: CONCLUSION

It seems that the membership of countries in the Financial Action Task Force is inherently desirable, so that the benefits can be counted in several parts. The first fruit of joining this financial institution is economic transparency, which can enhance a country's position in the international arena. The rules and regulations of this financial institution promise the growth of monetary and banking standards as a front line in the fight against corruption. On the other hand, attracting foreign investment is one of the components of development in countries in strategic areas of the economy. Today, investors are assessing countries' ability to invest with the expected profits, along with the economic security of the destination country. The FATF ensures the security of investors while facilitating the inflow of capital to member countries.

The FATF has blacklisted countries, including Russia and Cuba, since its inception. But with a two-pronged strategy, Russia was removed from the list in 2003. Subsequently, Cuba was removed from the black list of non-cooperating countries by engaging in constructive cooperation. At

present, Iran and North Korea still have not been able to comply with the protocols and standards of this institution and are removed from the black list.

The cooperation of countries in the framework of the FATF will be effective if the background and context of this interaction is defensible in a legal logic. The legal advice of this institution has a neutral look at the cases that can be seen as hostile. For example, the Financial Action Task Force does not consider the obligation to follow its recommendations to be negligible under any circumstances. Examples include maintaining the confidentiality of customer information, the openness of legal proceedings in the country, and the cost and financial burden of some recommendations.

1. Apart from the issues raised, the hostile and intentional actions of the United States and the influence of the United States in the FATF to confront Iran are further due.

For example, following Iran's blacklisting, the United States imposed twelve secondary sanctions on countries with ties to the Central Bank and the Revolutionary Guards. Secondary sanctions are expected to be lifted as Iran is removed from the blacklist. Unfortunately, US restrictions remain in place, and Iran's concerns remain twofold.

As mentioned earlier, the nature of some of the principles of the Task Force is challenging, including the risk of espionage and leaks. Because the country's financial information is collected in a unified manner and in a complete classification, but the uncertainty of the dimensions of the agreement, the possibility of espionage and disclosure of information. Forcing countries to impose more sanctions on individuals and entities under UN Security Council Resolution 2231 is also a challenge.

2- Therefore, we can mention two strategic points in the international arena, according to which the strategy of countries is defined in accordance with it:

The long-term goal of the United States of America, as directly and indirectly stated, is to change the regime of the Islamic Republic of Iran, which can be achieved by redefining a medium-term plan. The strategy used by the US medium-term plan comes with two tools: sanctions and negotiation. Simultaneous use of these two tools (negotiation, sanctions) is the same clever trick that can lead the authorities to a dilemma. Which individuals and institutions remain on the sanctions list and which groups are removed from the list is in line with the carrot-and-stick policy that calls for the vigilance of officials and stakeholders. Accepting commitments that create an atmosphere of self-sanction in Iran, that is, playing in enemy territory, which is a dangerous event and can have irreparable consequences.

3. There are several principles emphasized in macroeconomics, without which economics cannot be called efficient and effective. One of these basic principles is transparency.

Transparency as a driver of corruption can block any loophole for corrupters and economic disruptors. Achieving transparency in the economy has such blessings that it can be called a golden key. For example, the rate of tax evasion in Iran is so high that it has effectively removed taxes from the scope of profit. This and similar problems are due to the lack of transparency in the Iranian financial system. Therefore, there is no doubt that fundamental reforms should be made in this direction. The problem, however, is that if the FATF principles and regulations serve the sovereignty and national interests, Iran will welcome them, but if transparency is achieved for foreign banks and financial institutions, we need to be more sensitive.

5- Offers

It seems that the membership of countries in the Financial Action Task Force is inherently desirable, so that the benefits can be counted in several parts:

The first fruit of joining this financial institution is economic transparency, which can enhance a country's position in the international arena. The rules and regulations of this financial institution promise the growth of monetary and banking standards as a front line in the fight against corruption. Membership in the Islamic Republic of Iran can remove barriers to financial exchange and bring the economy out of recession. On the other hand, attracting foreign investment is one of the components of development in countries in strategic areas of the economy. Today, investors are assessing countries' ability to invest with the expected profits, along with the economic security of the destination country. The FATF ensures the security of investors while facilitating the inflow of capital to member countries.

1- Iran's membership can be considered in terms of domestic conditions and the nature of its relations, especially in the field of foreign relations.

Among them, we can mention the rules and regulations of the special working group, which in the absence of appropriate infrastructure inside, can be considered as the Achilles heel of this relationship. The influence of the powerful countries of this financial institution, which ironically have a long-standing enmity with Iran, is another reason.

2- Therefore, it can be stated that the membership of the Islamic Republic of Iran in the Financial Action Task Force can be considered desirable if, first, the benefits of this relationship outweigh its potential disadvantages. Second: In case the legitimate demands of Iran are not met, it should have the appropriate tools to claim its rights and violated rights. Third, to discuss differences in order to reach a common understanding of differences, especially in the field of terrorism.

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