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Publication Officer:

Orifjon Choriev

Editor:

Elyor Mustafaev

Graphic designer:

Umid Sapaev

Editorial office address:

Tashkent, st. Sayilgoh, 35. Index 100047.
Principal Contact

Tel.: (+998 71) 233-66-36

Fax: (+99871) 233-37-48

Website: legalreport.tsul.uz

E-mail: info@legalreport.tsul.uz

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CRYPTO-ACTIVES AS A NEW MEANS OF CORRUPTION CRIME: INTERNATIONAL AND NATIONAL CRIMINAL RESPONSIBILITY MECHANISMS

Egamberdiev Dilshodjon Alisherovich,

Head of the Department of Law and Technology,

Tashkent State University of Law

ORCID: 0000-0002-1645-044X

e-mail: degamberdieyv1990@gmail.com

Dubey Deepa,

Assistant Professor of the National Forensic Sciences University

ORCID- <https://orcid.org/0000-0003-1355-0143>

e-mail: deepa.dubey@nfsu.ac.in

Abstract. *This article examines the use of digital financial assets, particularly cryptocurrencies, as new instruments for committing corruption-related crimes. The research aims to analyze the legal characterization of corruption offenses involving cryptocurrencies, evidentiary challenges, and the effectiveness of national and international criminal liability mechanisms. The relevance of the study stems from the fact that pseudonymous features of blockchain technology, decentralized finance (DeFi) platforms, and privacy coins significantly complicate the identification of parties to corrupt transactions. The study employs comparative-legal, systemic-structural, formal-juridical, and statistical analysis methods. A comparative analysis of the legislation of the Republic of Uzbekistan and foreign countries was carried out. The results demonstrate that in many countries, the criminal-legal status of cryptocurrencies has not yet been fully defined, which complicates the qualification of corruption offenses. The research findings substantiate the need to improve national criminal legislation, expand blockchain forensics capabilities, and strengthen international cooperation mechanisms.*

Keywords: *cryptocurrency, corruption, blockchain, criminal liability, digital financial assets, money laundering, KYC/AML, FATF*

Introduction

As a social affliction present throughout human history, corruption has consistently exerted a detrimental impact on various spheres of society and state governance.

Today, corruption remains a severe threat not merely to individual nations but also to the international community as a whole. According to Transparency International's 2025 Corruption Perceptions Index, a substantial portion of the global population resides in countries characterized by high levels of corruption. Notably, while 31 countries have significantly reduced their corruption levels since 2012, the rest are failing to tackle the problem—they have remained stagnant or worsened during the same period. The global average has fallen to a new low of 42, while more than two-thirds of countries score below 50. Ultimately, the public pays the price, as corruption leads to under-funded hospitals, unbuilt flood defenses, and blights the hopes and dreams of young people (Corruption Perceptions Index, 2025).

However, by the third decade of the 21st century, traditional forms of corruption—such as cash bribery and illicit transfers through bank accounts—are giving way to new, technologically sophisticated methods.

The rapid advancement of digital technologies, particularly the advent of blockchain technology and crypto-assets, has fundamentally transformed the financial system. Since the execution of the first Bitcoin transactions by Satoshi Nakamoto in 2009, the crypto-asset market has experienced unprecedented growth (Lykhova et al., 2023, p. 137). Concurrently, the specific technical characteristics of crypto-assets—namely, the pseudonymity of transactions, decentralized governance systems, and near-instantaneous, low-cost cross-border payments—have rendered them an attractive instrument for corrupt purposes. In 2024, the illicit turnover of crypto-assets totaled \$40.9 billion, a substantial decline from the \$46.1 billion recorded in 2023. Overall, the proportion of all cryptocurrency transactions associated with illicit activity decreased from 0.61% in 2023 to 0.14% in 2024 (Crypto Crime Report. 2025).

The relevance of this topic is determined by several key factors. Firstly, in numerous countries, including the Republic of Uzbekistan, the status of crypto-assets within criminal law remains insufficiently defined, leading to significant challenges in the legal qualification of corruption-related offenses. Secondly, traditional methods of gathering evidence—such as bank records, witness testimonies, and audit reports—are proving ineffective in cases of digital corruption. Thirdly, corrupt transactions executed via crypto-assets are inherently cross-border in nature and may span multiple jurisdictions, thereby necessitating the enhancement of international cooperation mechanisms.

The specific objective of this article is as follows: to scientifically and theoretically substantiate the mechanisms by which crypto-assets are utilized as instruments in corruption offenses; to conduct a comparative analysis of criminal liability mechanisms in the Republic of Uzbekistan and foreign jurisdictions; and to formulate scientifically grounded proposals for the enhancement of national legislation.

A review of the academic literature on the subject indicates that the nexus between crypto-assets and corruption has been extensively explored by numerous international scholars in recent years. Specifically, Lykhova et al., in their analysis of emerging forms of cyber-corruption, investigated the problem of crypto-assets becoming the object of corruption offenses within the Ukrainian context (Lykhova et al., 2023.). Smirnov et al. investigated the role of legal regulation in preventing corruption within the digital financial assets market, drawing upon the example of Russian legislation (Smirnov, et al., 2023). A. Ibrahimi and B. Arifi, in turn, analyzed the relationship between crypto-assets and corruption within the context of blockchain technology (Ibrahimi, A., & Arifi, B. 2022). P. Wawrosz and J. Lánský investigated the interrelationship between crypto-assets and corruption from an economic perspective (Wawrosz, P., & Lánský, J. 2021). D. Saputra and F. Kusumah explored the issues surrounding blockchain forensics and evidence

gathering in crypto-enabled corruption within developing nation (Saputra, D. H., & Kusumah, F. 2025). Furthermore, reports published by international organizations such as the FATF, the Basel Institute on Governance, and Europol have provided an in-depth analysis of the relationship between virtual assets and criminal activity.

However, existing research has not specifically examined the relationship between crypto-assets and corruption offenses within the context of the national legislation of the Republic of Uzbekistan. Furthermore, the development of practical recommendations for Uzbekistan, based on a comparative analysis of the experiences of the CIS countries and the European Union, remains insufficiently explored in the academic literature.

Methods

The comparative legal method constitutes the methodological foundation of this research. Through this method, a comparative analysis was conducted on the legislative norms pertaining to crypto-assets and corruption offenses within the Republic of Uzbekistan, the Russian Federation, the member states of the European Union, and the United States of America. The systemic-structural method facilitated the examination of the mechanism of utilizing crypto-assets in corruption offenses as a cohesive system. Within the framework of this method, the technical, legal, and institutional aspects of crypto-based corrupt transactions were analyzed in their interrelation. The formal-legal method was employed for the grammatical, logical, and systemic interpretation of the content of normative legal acts. Using this method, an analysis was performed on the concepts and categories utilized within the norms of the Criminal Code of the Republic of Uzbekistan, the Law “On Anti-Corruption,” and the Law “On Combating the Legalization of Proceeds from Criminal Activity,” as well as the relevant legislative acts of several foreign jurisdictions in this domain.

Corruption offenses committed utilizing crypto-assets have been selected as the object of this research. The subject of the research, in turn, encompasses the mechanisms of criminal liability for these offenses, the specific features of their legal regulation, and the avenues for their enhancement.

Results

An analysis of the mechanisms and trends concerning the use of crypto-assets in corruption offenses indicates that digital financial assets are being utilized for corrupt purposes through several primary methods. The first and most prevalent method is the payment of bribes and kickbacks in crypto-assets. As articulated by P. Wawrosz and J. Lánský, the traditional bribery process entails the risk of transferring cash in person, the potential use of marked banknotes, and the ease of identifying both the sender and the recipient of bank transfers (Wawrosz, P., & Lánský, J. 2021, p. 635). Conversely, crypto-assets developed through modern technologies enable participants in corrupt transactions to transfer bribe funds under conditions of high anonymity, where neither personal interaction is necessary nor is there a high risk of identification and exposure.

The second method entails the conversion of corruption proceeds into crypto-assets and the subsequent execution of money laundering processes. According to a study conducted by Europol, the European Union Agency for Law Enforcement Cooperation, money laundering operations facilitated by crypto-assets have been identified as the most prevalent form of illicit activity (Europol, 2022). Specifically, the process of money laundering via crypto-assets adheres to the traditional scheme—placement, layering, and integration—yet it exhibits distinct characteristics. Given that crypto-assets are inherently anonymous from their inception, the placement stage is frequently rendered redundant, as the creation of a new wallet is a simple, rapid, and cost-free procedure. Furthermore, the use of crypto-mixers—services that obfuscate the origin of funds by blending crypto-assets

from multiple sources and distributing them into new, “clean” wallets—makes tracing the illicit funds virtually impossible.

The third method involves concealing corrupt transactions through decentralized finance (DeFi) platforms and privacy coins. In contrast to traditional centralized cryptocurrency exchanges, DeFi platforms do not mandate KYC (Know Your Customer) protocols, thereby enabling users to exchange assets, accrue interest, and transfer funds without disclosing their legal identity. These platforms are governed not by corporate entities but by smart contracts, rendering the exertion of legal influence or the enforcement of compliance virtually impossible. Furthermore, according to the United Nations Office on Drugs and Crime (UNODC), privacy coins such as Monero, Zcash, and Dash—unlike traditional crypto-assets—facilitate the complete concealment of user addresses, account balances, and the provenance of the coins from third parties (UNCTAD and UNODC, Conceptual Framework for the Statistical Measurement of Illicit Financial Flows, 2020).

The fourth method entails the conversion of corrupt funds into non-fungible tokens (NFTs), stablecoins, or wrapped tokens. Increasingly, illicit proceeds are not merely retained in the form of conventional crypto-assets, but are being converted into NFTs, stablecoins, or wrapped tokens that circulate across multiple blockchains (Kaferanis, D., et al., 2023). For instance, a corrupt official may transfer Ethereum-based tokens to the Binance Smart Chain, convert them into privacy tokens, and subsequently migrate them into a gaming platform or a virtual real estate environment. Each subsequent step further isolates the transaction from traceable evidence.

The practical application of these mechanisms can be observed in several instances. In 2022, two Chinese intelligence officers were charged with obstructing a federal investigation in the United States. They offered a bribe to a witness in the form of crypto-assets, with the objective of mitigating the risk of detection (U4 Anti-Corruption Helpdesk, 2023). In West Africa, as part of an energy infrastructure project, high-ranking officials laundered bribes from foreign entities using Bitcoin, using the relative anonymity of blockchain wallets to bypass cross-border financial controls (Verma, 2024). In an investigation into political financing in Brazil, funds through illegal charity companies were converted into crypto-assets and misappropriated only through shell corporations operating online (Tziakouris, 2018).

The four principal mechanisms identified above — the commission of corruption offences through crypto-assets, the channelling of corrupt proceeds into money laundering schemes, the concealment of transactions through DeFi platforms and privacy coins, and the transformation of funds into NFTs, stablecoins, or wrapped tokens — clearly demonstrate the extent to which corruption offences have become deeply integrated with the digital financial infrastructure today.

At the same time, practice relating to the commission of bribery offences through crypto-assets demonstrates that this mechanism is employed not only in individual cases, such as the Chinese intelligence officers’ case cited above, but also at a systemic level — particularly in the energy, construction, and public procurement sectors. In this regard, the dual nature of blockchain technology becomes apparent: on the one hand, crypto-assets, by virtue of their pseudonymity, afford corrupt actors a lower risk of detection compared to the traditional banking system; on the other hand, the transparent and immutable nature of blockchain enables law enforcement authorities to trace transaction trails and gather evidence. It is precisely this latter characteristic that brings us to the question of the use of crypto-assets as evidence in corruption offences.

The findings obtained regarding the problems of using crypto-assets as evidence in corruption offences demonstrate that traditional means of evidence gathering — witness

testimony, financial documents, and audit reports — are insufficient for the effective investigation and prosecution of digital corruption cases. Blockchain technology creates a distinctive paradox in the evidence-gathering process: on the one hand, every transaction is publicly recorded and cannot be altered (immutability), while on the other hand, the identities of wallet holders are not directly linked to legal subjects. This characteristic of “pseudonymity” considerably complicates the identification of corrupt officials.

The widespread proliferation of DeFi platforms and privacy coins has further deepened the challenges inherent in the evidence-gathering process. From a scholarly and technical standpoint, representatives of the academic community explain this problem as follows: while centralized crypto-exchanges are required to verify the true identity of their users in accordance with KYC protocols, no such requirement exists on DeFi platforms (Zetzsche et al., 2020). Furthermore, owing to the development of tokenization and digital asset processes, illicit proceeds can be transferred across multiple blockchains, which complicates forensic reconstruction and necessitates multi-chain investigative capabilities.

The absence of international standards for the identification of blockchain-based evidence also constitutes a serious problem. Although the FATF has published recommendations concerning virtual assets, unified international legal norms governing the admissibility and reliability of blockchain evidence do not yet exist (Saputra & Kusumah, 2025). This situation assumes particular significance when corruption offences are of a transboundary nature — that is, when funds are channeled through exchanges and wallets located across different jurisdictions.

The analysis of the legislation of the Republic of Uzbekistan demonstrates that significant steps have been taken in the country towards regulating the relationship between crypto-assets and corruption offences; however, a number of gaps remain in this area. In presidential decrees and resolutions, as well as in the regulations of relevant bodies, crypto-assets — referred to in the Republic of Uzbekistan as “crypto-assets,” since decentralized currency units have not been accorded the status of currency — are recognized as property. In particular, pursuant to paragraph “a” of Part 3 of Resolution No. PD-3832 of the President of the Republic of Uzbekistan, dated 3 July 2018, “On Measures for the Development of the Digital Economy and the Sphere of Crypto-Asset Circulation in the Republic of Uzbekistan,” a crypto-asset is defined as “a proprietary right constituting an aggregate of digital records in a distributed data registry, possessing value and an owner” (Resolution of the President of the Republic of Uzbekistan, 2018). Furthermore, Order No. 32 of the Director of the National Agency for Prospective Projects of the Republic of Uzbekistan, dated 15 August 2022, “On the Approval of the Regulation on the Procedure for Licensing the Activities of Service Providers in the Sphere of Crypto-Asset Circulation” (registered by the Ministry of Justice of the Republic of Uzbekistan on 15 August 2022, registration number 3380) in accordance with Part 1 of Chapter 1 (General Provisions) of the Regulation approved thereby, a crypto-asset is defined as “a proprietary right constituting an aggregate of digital records in a distributed data registry, possessing value and an owner” (National Agency of Perspective Projects, 2022).

The Law “On Introducing Amendments and Additions to the Criminal Code, the Code of Criminal Procedure, and the Code of Administrative Liability of the Republic of Uzbekistan,” adopted on 19 January 2024, introduced significant amendments and additions to the Criminal Code and the Code of Administrative Liability of the Republic of Uzbekistan. Specifically, Articles 278⁸ and 278⁹, entitled “Violation of Legislation in the Sphere of Crypto-Asset Circulation” and “Unlawful Conduct of Mining Activities,” were incorporated into the Criminal Code. According to the amendments introduced to the Criminal Code, the disposition of Article 278⁸ directly provides for “the unlawful

acquisition, transfer, or exchange of crypto-assets, the conduct of activities as a service provider in the sphere of crypto-asset circulation without obtaining a license in the prescribed manner, or the conduct of operations with anonymous crypto-assets by service providers in the sphere of crypto-asset circulation.” Upon closer examination of this article, three distinct objects can be identified. The first pertains to the unlawful acquisition, transfer, or exchange of crypto-assets, whereby the essence of the offence lies in the subject exercising the right of disposal over crypto-assets without lawful grounds. The second concerns the conduct of activities as a service provider in the sphere of crypto-asset circulation without obtaining a license in the prescribed manner, which refers to an individual or organization providing services relating to the exchange, storage, or transfer of crypto-assets without possessing a license issued by the competent authority. The third relates to the conduct of operations with anonymous crypto-assets by service providers in the sphere of crypto-asset circulation, which denotes a formally licensed provider itself carrying out operations through privacy coins or wallets that have not undergone identification procedures. On the basis of the foregoing analysis, it should be noted that the given article, by virtue of its constituent elements of a criminal offence — namely, the object, the subject, and the objective and subjective aspects — does not constitute a corruption offence but rather forms an independent economic offence directed at the violation of the financial-economic order in the sphere of crypto-asset circulation. This is because it lacks the fundamental characteristic of corruption — that is, the element of an official’s abuse of their service authority for personal gain.

Additionally, an amendment was made to Article 5 of the Law of the Republic of Uzbekistan “On Amendments and Additions to Certain Legislative Acts of the Republic of Uzbekistan” dated April 17, 2025, stating that the thirteenth paragraph of Article 12 of the Law of the Republic of Uzbekistan dated August 26, 2004, No. 660-II “On Countering the Legalization of Proceeds from Crime, the Financing of Terrorism, and the Financing of the Proliferation of Weapons of Mass Destruction” is set forth in the wording “providers of services in the field of crypto-asset turnover.”

As amended by Article 12 of the Law of the Republic of Uzbekistan of August 26, 2004, “On Countering the Legalization of Proceeds from Crime, the Financing of Terrorism, and the Financing of the Proliferation of Weapons of Mass Destruction,” the list of reporting entities covers all major sectors engaged in financial intermediation, including the traditional banking and credit system, the securities market, the insurance sector, leasing services, money transfer services, pawnshops, gambling and lottery operators, dealers in precious metals and precious stones, the real estate market, and professional service providers, such as notary offices, law firms, and auditing organizations.

The term “persons carrying out activities in the field of crypto-asset circulation” mentioned in paragraph 13 of Article 12 means that the legislator puts subjects operating in the field of crypto-assets on the same level as traditional financial institutions and imposes on them the same level of financial monitoring obligations. This indicates that the legislator recognized the risks of using the crypto-asset market for money laundering and recognized the need to regulate this area. From a practical perspective, this means that crypto exchanges, crypto wallet providers, and other crypto-asset service providers now have legal obligations to identify clients, monitor transactions, and report suspicious transactions to the competent authorities.

However, this article has no direct connection to corruption crimes, as it defines not the abuse of official powers by officials, but the scope of preventive and control obligations of entities engaged in financial transactions within the system for combating money laundering.

As a member of the international community, the Republic of Uzbekistan joined the UN Convention against Corruption in 2008. Within the framework of the Convention, a number of bodies for combating corruption crimes have been established in the country. In particular, the Anti-Corruption Agency of Uzbekistan, the Prosecutor General's Office, the Ministry of Internal Affairs, the State Security Service, and the Ministry of Justice have been designated as the authorized bodies for preventing corruption. However, the mechanisms necessary for the practical implementation of the convention in the context of crypto-assets—specifically the confiscation of digital assets, the procedure for accepting blockchain evidence, and the provision of mutual legal assistance on crypto-assets in international cooperation—have not yet been fully developed.

An analysis of the experience of the Russian Federation shows that even in this country, the legal status of crypto-assets is not fully defined. Federal Law No. 259-FL dated July 31, 2020, introduced the concepts of digital financial assets and digital currency, but prohibited their use as a means of payment. The law does not define the concepts of crypto-asset, token or coin separately. In law enforcement practice, a crypto-asset is classified as a “digital currency,” resulting in a paradox – the legal regulation of practical market relations based on significant capitalization is left behind. Courts are making contradictory decisions: some recognize crypto-assets as property, while others deny it. The Prosecutor General's Office of the Russian Federation and the Federal Financial Monitoring Service have expressed the opinion that virtual assets or digital currencies should be equated to property, which will allow them to be recognized as objects of crimes, including money laundering and financing of terrorism. Cases of giving and receiving bribes using crypto-assets have been recorded in Russia, but the qualification of such crimes within the framework of current legislation creates complexities (Cheshko, 2019).

The most significant regulatory framework in the European Union regarding crypto-assets is the Markets in Crypto-Assets Regulation (MiCA), which entered into force in 2024. MiCA defines crypto-assets as “a digital representation of a value or right that can be transmitted and stored electronically using distributed ledger technology or similar technology.” (Hrebeniuk & Lukianchuk, 2017). The MiCA covers transparency, data disclosure, and transaction controls. The regulation applies to individuals and legal entities in the European Union engaged in the issuance, public offering and offering for trading of crypto-assets or the provision of crypto-related services. In addition to MiCA, Directive 2018/843 of the European Parliament and of the Council of Europe (EU) of 2018 was adopted to prevent the use of the financial system for money laundering or terrorist financing, expanding the fight against crime in the crypto-asset market (Directive 2018/843, 2018).

In the United States, efforts to combat corruption involving crypto-assets are managed through various federal laws and agencies. In the US, FinCEN (Financial Crimes Enforcement Network) is responsible for investigating financial crimes and overseeing the requirements of the Bank Secrecy Act (BSA). Under the BSA, banks, financial institutions, and even crypto-asset wallets must create effective anti-money laundering programs. (Kohn, 2023). The U.S. Department of Justice has successfully investigated a number of major criminal cases involving crypto-assets. In January 2023, Anatoly Legkodimov, the owner of the Hong Kong-based Bitzlato crypto exchange, was arrested on charges of laundering hundreds of millions of dollars for criminals (U4 Anti-Corruption Helpdesk, 2023). In 2013, Liberty Reserve, a Costa Rica-based company, and seven of its employees were charged with operating a money laundering and unlicensed money transfer business — the company transferred over \$6 billion US dollars through more than

55 million illegal transactions in an anonymous and untraceable manner (US Department of Justice, 2016).

The AML Whistleblower Improvement Act, passed in the United States in 2021-2022, expanded the system of rewards to individuals who expose corruption and money laundering crimes to the crypto-asset sector. According to this law, in cases where the Ministry of Finance or the Ministry of Justice imposes a sanction exceeding 1 million US dollars, the person who provides information is paid a mandatory reward in the amount of 10 to 30 percent of the sanction amount (Kohn, 2023). This mechanism applies to crypto-asset wallets and exchanges, as well as to all entities operating without noticing large and suspicious depositors.

According to the updated FATF report for 2025, while jurisdictions have made some progress in implementing the standards for virtual assets and virtual asset service providers (VASP) (Recommendation 15), significant shortcomings remain (FATF, 2025). Risk assessment and the effective application of a risk-based approach are still challenging for many jurisdictions. Although more and more countries are defining ways to regulate the VASP (Virtual Asset Service Providers) sector, there are significant gaps. Practical progress in licensing and registration is significant, but mitigating the risks of offshore VASPs remains a challenging task for jurisdictions.

Discussion

Analysis of the criminal-legal qualification of crypto-assets in corruption crimes shows that the main problem lies in determining the legal nature of crypto-assets. In different jurisdictions, crypto-assets are named and classified differently: “digital currency” in Argentina, “virtual goods” in Canada and China, “crypto-token” in Germany, “payment token” in Switzerland, “cybercurrency” in Italy and Lebanon, “virtual asset” in Mexico, and “electronic currency” in Colombia (Ibrahimi & Arifi, 2022). This terminological diversity poses not only a theoretical but also a practical problem, as a precise definition of the subject is a necessary condition for qualification in criminal law.

Although the designation of crypto-assets as “crypto-assets” in the context of Uzbekistan has created certain legal clarity, their status in criminal law—particularly in the context of corruption crimes—has not yet been fully established. The articles of the current Criminal Code on corruption (Articles 205-214) mainly provide for traditional forms of bribery, abuse of power and embezzlement. No special qualifying features have been established for cases of receiving or giving bribes in the form of crypto-assets, or converting funds obtained as a result of a corruption crime into crypto-assets.

In the practice of the Russian Federation, crypto-assets are categorized as “digital currencies,” but their status as property is not clearly defined. As a result, conflicting decisions appeared in judicial practice (Smirnov et al., 2023). This situation also leads to problems in the qualification of corruption crimes, as to establish liability for bribery, it is necessary to clearly define the subject of the bribe—something of property value. If a crypto-asset is not recognized as property, it cannot be the subject of bribery, which may serve as grounds for concluding that the crime has no elements.

The U.S. experience demonstrates a different approach. In the United States, crypto-assets are classified differently by several federal agencies—as property by the IRS and as currency by FinCEN—but in the investigation of corruption crimes; this problem has been practically resolved. The U.S. Department of Justice can link pseudonymous wallet activities to real-world individuals or entities using tools, risk assessment software, and wallet attribution services from blockchain analytics companies such as Chainalysis, TRM Labs, and Merkle Science (Saputra & Kusumah, 2025). Once verified with KYC documents, blockchain evidence will be included in indictments and accepted in federal

courts. The US also has the authority to issue summonses for centralized crypto exchanges and data storage providers, which significantly simplifies the investigation process.

The experience of Estonia deserves special attention. Estonia has implemented blockchain technology as a key component of its e-governance model. The use of blockchain in key areas such as healthcare, land management, court records, and government audits has created technical capabilities and institutional trust (Semenzin et al., 2022). This systematic approach has normalized the use of blockchain evidence in judicial proceedings and reduced resistance in legal and procedural contexts.

It is appropriate to discuss the possibilities and limits of forensic examination through blockchain technologies. Modern blockchain analytics tools – Chainalysis, Elliptic, CipherTrace – allow for tracking transaction flows, identifying suspicious wallets, and tracing funds that have passed through crypto-mixers. However, these tools have several limitations. First, the analytics of privacy coins (Monero, Zcash) are significantly more complex. Secondly, multi-chain transactions carried out through DeFi platforms and bridge protocols complicate forensic reconstruction. Third, for the results of blockchain analytics to be accepted as evidence, the participation and explanation of forensic experts are necessary (Saputra & Kusumah, 2025). These problems are especially relevant for developing countries, including Uzbekistan, as it is a matter of personnel and technical infrastructure specializing in blockchain forensics in these countries.

Several important aspects stand out regarding crypto-assets and international anti-corruption cooperation mechanisms. First, the exchange of blockchain evidence is not regulated within the framework of agreements on mutual legal assistance (MLAT). Bilateral and multilateral agreements between many countries provide for the traditional exchange of evidence, but specific protocols for exchanging information on crypto-asset transactions, wallet data, and blockchain analytics results have not been developed. Although Article 46 of the UNCAC Convention establishes mechanisms for providing mutual legal assistance, the practical implementation of these mechanisms in the context of digital assets faces difficulties.

Secondly, the principle of “dual criminality” is a serious obstacle to international cooperation. Some countries have not recognized crypto-assets as objects of a crime, so requests for legal assistance from countries such as Indonesia may be rejected (Raden Ferdiandra & Defry Yusdaniel, 2025). Thirdly, AML/KYC standards in different countries differ significantly, which complicates the cross-border exchange of financial data. Although FATF standards are accepted as a global norm, their practical implementation differs significantly depending on the jurisdiction.

Lykhova et al. highlighted the problem of the criminal-legal qualification of crypto-assets as objects of corruption crimes and justified the need to recognize them as the subject of a crime (Lykhova et al., 2023) — the results of our study also confirm this conclusion.

Smirnov et al. (Smirnov et al., 2023) pointed out the importance of KYC and AML mechanisms in the digital financial asset market – our analysis confirms the need to strengthen these mechanisms in the context of Uzbekistan as well. Yemelianov et al. investigated the potential of blockchain technology to reduce corruption risks in the public procurement system - our research confirms that blockchain can be viewed not only as a problem but also as a solution Yemelianov et al., (2023).

Several problems were identified during the study. The first is a methodological problem: there is no clear statistics on corruption crimes committed through crypto-assets, as such crimes are not accounted for separately in many countries. The second is a legal problem: there is no international consensus on determining the legal nature of crypto-

assets, which limits the accuracy of the comparative analysis. The third is a practical problem: access to and use of blockchain forensics tools varies significantly by country, further widening the gap between developing and developed nations.

At the same time, the situation identified during the study shows that blockchain technology itself can also serve as a tool for combating corruption. Several studies have shown that the use of blockchain technology in public procurement, voting systems, land cadastre, and financial auditing can significantly reduce corruption risks (Sarker al., 2021; Yemelianov et al., 2023; Parenti et al., 2022). The e-governance experience of Estonia, the land cadastre system of Georgia, and the public procurement platform of Brazil are clear examples of this (Benitez-Martínez et al., 2023).

Conclusion

Based on the results of the conducted research, the following conclusions and proposals can be formulated.

First, crypto-assets have become a new, technologically sophisticated tool for corruption crimes. The pseudonymous nature of blockchain technology, decentralized financial platforms, crypto-mixers, and privacy coins significantly complicate the identification of participants in corrupt transactions and the collection of evidence against them.

Secondly, in many countries, the status of crypto-assets in criminal law is not fully defined. The inclusion of special articles on the turnover of crypto-assets in the Criminal Code of the Republic of Uzbekistan is a positive step. However, the current legislation does not provide for the use of crypto-assets as a means in corruption crimes as a separate qualifying feature. Therefore, it is advisable to improve the articles of the Criminal Code of the Republic of Uzbekistan on corruption and define corruption crimes committed using crypto-assets or other digital assets as a separate qualifying feature. In particular, in the disposition of Article 210 of the Criminal Code of the Republic of Uzbekistan, the subject of a bribe is expressed through the concepts of “material values” and “property interest.” However, the legal nature of crypto-assets does not fully correspond to the traditional concept of tangible assets - they do not have a physical form, in some cases, their qualification as property is debatable, and their value is variable in nature. Therefore, in practice, when a bribe is transferred to an official in the form of Bitcoin, Ethereum, USDT, or another crypto-asset, a qualification problem may arise – it is possible that the defense will claim that the subject of the bribe is not a “material asset.” Therefore, it is advisable to add the phrase “including crypto-assets and other digital assets” to the disposition of Articles 210 and 211.

Thirdly, it is necessary to include mechanisms for preventing corruption operations involving crypto-assets and digital financial assets in the Law of the Republic of Uzbekistan “On Combating Corruption.”

Fourth, it is necessary to ensure the full implementation of FATF recommendations, in particular, to strengthen the system of licensing and registration of VASPs, to take measures to reduce the risks associated with offshore VASPs. It is also necessary to improve the mechanisms for data exchange between the National Agency for Perspective Projects and law enforcement agencies. It is necessary to introduce professional development programs in blockchain technology, crypto-assets, and digital forensics for judicial and law enforcement officers. The FATF (2025), Basel Institute on Governance (2022), and Europol (2022) reports also emphasize the need for training in this field.

In conclusion, crypto-assets are a new tool for corruption in the digital age, and a comprehensive application of legal, institutional, and technological approaches is

necessary to combat crimes committed using them. The Republic of Uzbekistan has taken important initial steps in this field – special articles on crypto-assets have been included in the Criminal Code, and a licensing system has been introduced. However, a broader and deeper reform is needed to address the problem of using crypto-assets as a tool in corruption crimes. This reform should include not only improving national legislation but also strengthening international cooperation, expanding blockchain forensics capabilities, and enhancing human resource capacity.

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