The Crime of Money Laundering and the Use of Artificial Intelligence Technology in Confrontation

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■ Abstract:

The remarkable advancement across all aspects of life—particularly in technological and digital spheres—has led to the emergence of new forms of crime previously unknown. Among these modern crimes is the offense of money laundering, which typically stems from criminal activities such as drug trafficking, terrorism, and public fund embezzlement. Consequently, it has become imperative for all nations to confront this crime by implementing both legislative and preventive measures to limit its spread.

As technological progress has produced increasingly sophisticated tools, perpetrators have begun to exploit these innovations—most notably, artificial intelligence (AI), which represents a transformative development across various sectors. This has prompted law enforcement and judicial authorities to leverage AI in procedures related to detection, investigation, and prosecution. However, the application of such advanced technologies necessitates legal regulation and adherence to ethical standards to ensure responsible use.

Artificial intelligence relies primarily on the collection and analysis of data to produce outputs that facilitate the detection and confrontation of such emerging crimes. The study concludes with a set of recommendations aimed at achieving a balance between optimal AI utilization and the need to observe legal and ethical frameworks.

Keywords

Money laundering crime, Artificial intelligence, Penal Code, 1988 Vienna Convention, Investigation and enforcement procedures.

Introduction

The remarkable advancement in all areas of life, particularly in technological and technical development, has led to the emergence of new forms of crime that were previously unknown. Among these newly emerging crimes is money laundering, which results from illegal activities. This crime has become a significant concern for countries worldwide, as it often intertwines with various other crimes that threaten the security and safety of societies, such as terrorism, arms trafficking, drug trade, and other highly dangerous offenses. Consequently, it has become imperative for all countries to address this crime by implementing legislative and preventive measures to reduce its occurrence. The fight against such crimes typically begins with legislation, as it is the primary tool for regulating societal life and protecting its interests from harm.

The technological advancements that have accompanied modern life have also led to the development of new techniques that assist criminals in committing their offenses. Law enforcement and regulatory bodies must not overlook these technologies when crafting strategies to confront crime. One of the most important of these technologies is artificial intelligence, which has become a new field of knowledge that relies on the collection of large amounts of specialized data and information, which is then extracted and analyzed when needed. Therefore, those responsible for enforcement and investigation must leverage this modern technology to aid in their efforts, especially after the advent of virtual currencies, which have made it easier for criminals to move money without direct interaction with financial institutions.

Artificial intelligence is a sophisticated, automated system capable of achieving digital transformation, which is considered one of the key drivers of modern economic growth. This prompts us to explore how artificial intelligence technology can be utilized to combat money laundering crimes, particularly in an era where reliance on information technology tools and communication networks—by both individuals and governments—is ever-increasing.

The legitimate use of artificial intelligence technology holds significant importance in enhancing investment opportunities with transparency and integrity, as corruption often encourages investors to violate the law to gain illicit profits(1).

While the Penal Code has been enacted to protect various interests of individuals in every country and to impose appropriate penalties on those who attempt to harm the interests of society, it does not fully close all doors or windows to criminal professionals. Therefore, some complementary laws to the Penal Code were introduced to further tighten the grip on criminal professionals in order to achieve

(1) Dr. Gamal Ali Dahshan, The Need for an Ethical Charter for Artificial Intelligence Applications, article published in Educational Innovations Journal, Issue No. 10, Cairo, 2019.

the legislative goal of protecting the society's interests that are not covered by the general Penal Code, particularly regarding the protection of financial assets and preventing illegal gains(1). This prompted the legislator to issue various laws to complement the legislative framework concerning the protection of public funds and the economic system within society.

For instance, Law No. 34 of 1971, amended by Law No. 95 of 1980, was enacted to secure the welfare of the people by placing guardianship on the assets of those who illegally seize public wealth, provided there is serious evidence that their actions could harm the security of the country, both internally and externally, as well as the economic interests of society. This law was repealed in 2008(2).

Additionally, Law No. 62 of 1975 concerning the fight against illicit enrichment for public officials aimed to achieve the same purpose. However, the proliferation of criminal activities that generate illegal gains and their expansion, along with the continuous attempts of those involved to shield and legitimize those funds, has made the situation more challenging and has had a significant impact on the economies of most countries.

As a result, the international community has increasingly converged in its efforts to combat money laundering arising from illegal activities, due to the damage it inflicts on the interests of countries and individuals. This international response began with the inclusion of money laundering related to drug trafficking in the 1988 Vienna Convention, which criminalized the laundering of money derived from drug crimes. Over time, countries began to incorporate provisions in their legislation criminalizing money laundering activities resulting from any form of criminal activity(3).

Less than two years after the Vienna Convention, the French legislator issued Law No. 614 of 1990, dated July 12, 1990, concerning the contribution of financial institutions to combating money laundering resulting from drug trafficking. In its twentieth extraordinary session, held from June 8 to June 10, 1998, the United Nations General Assembly issued a Political Declaration stating that "we, the member states of the United Nations, pledge to make special efforts to combat money laundering derived from drug trafficking, emphasizing the importance of strengthening international cooperation. We recommend that countries that have not adopted national laws and programs to combat money laundering do so by 2003, in accordance with the relevant provisions of the United Nations Convention Against Illicit Traffic in Narcotic Drugs and Psychotropic Substances, 1988…"

As evident from these documents, the initial focus of criminalizing this phenomenon

(1) Prof. Dr. Hasanein Ibrahim Saleh Obeid, Lessons in Criminal Law, General Section, Dar Al-Nahda Al-Arabiya, Cairo, 2005, p. 5.
(2) This law was repealed in 2008 on the grounds of its negative impact on investment.
(3) Documentary Book – Drugs in 75 Years, published by the General Administration for Combating Drugs on the occasion of the Golden Jubilee of the Administration, 2004, p. 8.

was limited to money obtained from the illegal trafficking of drugs and psychotropic substances. However, the scope of this crime began to expand to include other offenses. It became unacceptable and unsustainable to restrict the criminal model of money laundering solely to proceeds from drug trafficking(1).

Law No. 80 of 2002, concerning the fight against money laundering crimes in Egypt, was a culmination of this trend. It was enacted with the goal of protecting Egypt's financial system and freezing and confiscating funds derived from criminal acts. As we mentioned earlier, money laundering is one of the most dangerous crimes to the economy, as it presents a real challenge that significantly contributes to the instability of both political and economic life. Moreover, money laundering is often considered a form of white-collar crime, which has been increasingly discussed in recent times. This phenomenon is closely linked globally to organized crime, even though the latter is more extensive and comprehensive(2), encompassing drug trafficking, terrorism, arms smuggling, and human trafficking. Furthermore, money laundering can lead to corruption in financial institutions, particularly banks and financial institutions(3) that knowingly "clean" dirty or suspicious money, often through bribes paid to employees of these institutions. It is a crime that represents a blatant assault on the financial systems of the countries in which it is committed.

Therefore, money laundering has become a global problem that requires collective efforts to combat it, as it has become one of the forms of organized crime, with its activities increasing over the past two decades, particularly due to the technological advancements in computers, the internet, communications, and the entry into the era of globalization without any economic barriers between nations. The International Monetary Fund estimates that the volume of dirty money laundered annually reaches five trillion US dollars(4), which is twice the global value of oil production. The United States has become one of the largest countries for money laundering operations, while the volume of dirty money laundered in the United Kingdom is estimated to be two and a half billion British pounds(5). The issue is similarly significant in many other countries, regardless of their economic policies or political ideologies. Criminals involved in money laundering have exploited all the technological advancements of the modern age, which has required law enforcement to keep pace with these criminals, and in some cases, surpass them in their efforts.

The importance of studying how to confront money laundering using modern technology arises from the need to address and combat the phenomenon, given its

(1) Dr. Ahmed Abdel Zaher, Criminal Confrontation of Money Laundering in Arab Legislations, 1st edition, 2015, p. 1.
(2) Dr. Ibrahim Hamid Tantawi, Legislative Confrontation of Money Laundering in Egypt (Comparative Study), Dar Al-Nahda Al-Arabiya, Cairo, 2003, p. 6.
(3) Michael Levi new frontiers of criminal liability for money laundering and proceeds of volume 3 no 3 journal of money laundering control p 223-232 (winter 2000).
(4) Dr. Ahmed Abdel Zaher, Op. Cit., pp. 9-10.
(5) R.E Bell prosecuting the money laundering who act for organized crime volume 3 no 2 journal of money laundering control p. 104-112 . 2003.

multiple negative effects on the economies of nations and the unequal distribution of wealth in a way that does not align with the principles of justice. It is important to note that tackling money laundering is essentially a fight against the other criminal phenomena that generate the illicit funds being laundered, such as the spread of drugs, corruption, theft, fraud, and the financing of terrorism.

We have decided to structure this study, titled "Money Laundering and the Use of Artificial Intelligence Technology in Confrontation," as follows:

Section 1: The Legal Concept of Money Laundering

- **Requirement 1**: The Elements of Money Laundering in Light of National Legislation.
- **Requirement 2**: Money Laundering in Light of International Legislation.
- **Requirement 3**: Obstacles to the Implementation of Money Laundering Legislation.

Section 2: The Use of Modern Technologies in Addressing the Phenomenon of Money Laundering

- **(Special Application of Artificial Intelligence Technology)**
- **Requirement 1**: The Concept of Artificial Intelligence Technology.
- **Requirement 2**: The Use of Artificial Intelligence Technology in Enforcement and Investigation of Money Laundering Crimes.

Recommendations.

Section One: The Legal Concept of Money Laundering

Introduction: In the Egyptian Money Laundering Law No. 80 of 2002, Article 1, prior to its amendment by the Presidential Decree Law No. 36 of 2014, defines money laundering as "any conduct involving the acquisition, possession, disposal, management, safekeeping, exchange, deposit, collateralizing, investment, transfer, conversion, or manipulation of the value of money, if such money is derived from a crime listed in Article 2 of this law, with the knowledge that the purpose of such conduct is to conceal, disguise, or alter the nature, source, location, or ownership of the money, or to prevent the discovery of its origin or the identification of the perpetrator of the crime from which the money was derived." Article 2 outlines certain felonies and misdemeanors as predicate crimes from which the proceeds are laundered, and the law specifies the criminal actions associated with the laundering

process[1].

This approach was initially common in many legislations, including European laws. The French legislator adopted a restrictive approach in identifying the primary crimes that lead to money laundering, before later adopting a more comprehensive approach to include a broader range of criminal activities.

The French legislator, under Law No. 392 of 1996, defined money laundering as "facilitating the false justification of any method for the origin of funds or the involvement of a person who committed a felony or misdemeanor and obtained direct or indirect benefit from it." The law also criminalizes the assistance in operations such as depositing, concealing, or transferring the proceeds of a crime, with penalties of up to five years in prison, and up to ten years for repeat offenders[2].

In the following sections, we will examine the elements of money laundering under both national and international legislation, as well as the obstacles to effective enforcement, which we will refer to in this research as "money laundering crime" or "laundering" as follows:

Requirement 1: The Elements of Money Laundering Crime Under National Legislation

Introduction: The elements of a crime refer to the legal structure on which the crime is built. For money laundering to occur, the general elements of a crime must be present, specifically the material and moral elements, as well as the prerequisite or assumed element for its commission, which is the existence of a primary crime that generates illicit funds subject to laundering activities. The elements of money laundering include:

1. **The Assumed Element (The Primary Crime or Source Crime)**
2. **The Material Element (The Laundering Conduct)**
3. **The Moral Element (Knowledge, Intent, and Specific Intent to Conceal or Disguise the Source of the Funds)**

Money laundering is considered a transnational crime, often with an international nature, as it may be committed across multiple jurisdictions by offenders from different countries. The Egyptian legislator criminalized money laundering with the issuance of Law No. 80 of 2002, and several amendments have been made, including Law No. 78 of 2003, Law No. 181 of 2008, and Presidential Decree Law No. 36 of 2014. Additionally, the executive regulations of this law were issued under Prime Ministerial Decree No. 951 of 2003. We will now discuss these elements in detail under three sub-sections as follows:

(1) Dr. Mohamed Ali Sweilem, Commentary on the Anti-Money Laundering Law in Light of Jurisprudence, Judiciary, and International Agreements, Dar Al-Nahda Al-Arabiya, Cairo, 2008, p. 12 and following pages.
(2) Dr. Ahmed Fathy Sorour, Money Laundering and Terrorism Financing, Dar Al-Nahda Al-Arabiya, Cairo, 2019, p. 8.

Branch 1: The Assumed Element - The Primary Crime

The assumed element in money laundering is when the offender commits a prior crime (the primary or source crime), which generates illicit funds, such as crimes related to drug trafficking, bribery, embezzlement, and other crimes. These crimes provide the illicit funds that are then subject to the laundering process(1). Without the commission of the primary crime, the laundering offense does not exist, as money laundering is a secondary crime dependent on the primary crime.

As previously discussed, the Egyptian legislator initially adopted a restrictive approach to defining the primary crime, limiting it to specific types of crimes. However, this approach was criticized by some legal scholars as it excluded many crimes that generate significant illicit funds, such as customs and tax evasion, food fraud, and the illegal currency trade. This led the legislator to shift to a broader approach, now encompassing any felony or misdemeanor from which illicit funds are derived and subject to laundering activities(2).

For a primary crime to serve as the source of illicit funds, it must result in proceeds or gains obtained through illegal means, which are then laundered. The Egyptian Court of Cassation has repeatedly emphasized the need for a primary crime to establish the crime of money laundering. In multiple rulings, the Court stated that "if the acquittal judgment is based on the non-existence of the primary crime, then no one can be prosecuted for money laundering derived from that crime due to the absence of the primary crime, thus failing to meet the assumed element necessary for money laundering(3)." In another ruling, the Court confirmed that "the money laundering crime cannot exist without the occurrence of the primary crime from which the proceeds are derived," and that the source crime must be identified and proven to sustain the charge of money laundering(4). Additionally, in another ruling, the Court stressed the necessity of clarifying whether the primary crime has been adjudicated or not, as this impacts the validity of the judgment concerning the elements of the case(5).

The Court ruled that "the court hearing a money laundering case must await the final judgment in the primary crime, as the rule is that a ruling on a preliminary issue has binding authority before the criminal court, even if the parties involved are not identical. According to Article 232 of the Criminal Procedure Code, the money laundering case must be suspended until a final ruling is issued in the source crime, because using the criterion of sufficient evidence for the commission of the source crime merely by the availability of the legal model is an unregulated

(1) Dr. Ahmed Fathy Sorour, Op. Cit., p. 1027.
(2) Dr. Ashraf Tawfiq Shams El-Din, A Critical Study of the New Anti-Money Laundering Law, Dar Al-Nahda Al-Arabiya, Cairo, 2003, p. 24.
(3) Appeal No. 8948 of Year 79, dated 13/03/2011.
(4) Appeal No. 6425 of Year 81, dated 17/03/2013.
(5) Appeal No. 12808 of Year 82, dated 12/05/2013.

standard that contradicts the principle of criminal legality and leads to unacceptable and contradictory outcomes. Therefore, the court must await a final judgment in the source crime, otherwise failing to do so would be an error in the application of the law(1)."

From a review of the abstract provisions, without considering practical application and rulings of the Court of Cassation, it is not necessary for a conviction to be issued against the perpetrator of the primary crime in order for the money laundering crime to be established. The crime of money laundering can be established even if no criminal case has been filed against the person who committed the primary crime, or if the case was filed but the perpetrator of the primary crime was acquitted due to a criminal liability defense or an exemption from punishment. Furthermore, the issuance of an amnesty for the criminal penalty of the primary crime does not prevent the establishment of the money laundering crime. However, in practical reality and application, this is not the case.

Money laundering is characterized by several features that differentiate it from other crimes. On the one hand, it is considered a secondary crime, relying on the commission of a primary crime that generates illicit funds or proceeds. On the other hand, money laundering is a crime that affects the public interest, negatively impacting the financial system in countries, and is categorized under organized crime. It is a subsequent crime that assumes the prior commission of a primary crime that generates illicit funds. The laundering process follows in a subsequent stage, aiming to "cleanse" the illicit funds, emphasizing that money laundering is distinct from the primary crime in terms of both responsibility and punishment(2).

Thus, it can be stated that money laundering is a crime that occurs after the commission of an unlawful activity and gains its criminal nature based on its purpose, which is to cleanse and conceal the illicit source of the funds obtained from the prior criminal activity(3). Here, a distinction must be made between the case in which a criminal case is filed for the primary crime, where no issue arises, and the case where no such case is filed. In the latter case, the court hearing the money laundering case must prove the source crime that has not been prosecuted, establishing it beyond any doubt as a necessary condition for the money laundering crime. In the first scenario, where the criminal case is filed for the primary crime, the court must wait for a final judgment on the unlawful acquisition of funds(4), even though the Court of Cassation initially ruled that the law does not require the court hearing the case to await a final judgment on the source crime, but rather may investigate the illegality of the funds. However, the Court of Cassation later

(1) Appeal No. 5191 of Year 87, dated 14/04/2018.
(2) Dr. Ibrahim Hamid Tantawi, Op. Cit., p. 57.
(3) Dr. Mohamed Zekri Idris, The Crime of Importing and Exporting Drugs and Its Relation to the Crime of Money Laundering, PhD thesis, Faculty of Law, Mansoura University, 2015, p. 440 and following pages.
(4) Appeal No. 11248 of Year 79, dated 17/02/2011.

reaffirmed in several rulings that if the judgment in the money laundering case does not indicate that the judgment in the source crime has become final, the judgment should be overturned, and it emphasized the need to await a final judgment in the source crime(1).

It is not required for the primary crime from which the illicit funds are obtained to have occurred in Egypt for the money laundering crime to be established. The crime can be committed even if the primary crime occurred outside the country, and it is not necessary for the perpetrator of the primary crime to also be the one who commits the money laundering offense(2).

The Court ruled that "if the primary crime occurred abroad, it is required that it be punishable under both Egyptian and foreign law. However, the issue arises when the primary crime was committed before the enactment of the Money Laundering Law. Some legal scholars argue that the primary crime should not be considered an element of the money laundering offense because the funds obtained from it are merely a prior condition that must exist before the commission of the laundering offense, which is not part of the elements of the crime. However, Egyptian case law has established that the primary crime must have occurred after the implementation of the Money Laundering Law No. 80 of 2002, meaning that the funds and proceeds resulting from the primary crime must have been obtained after the law came into effect, and laundering actions must take place within the framework of the law, in accordance with the principle of non-retroactivity of laws."

Branch 2: The Material Element of Money Laundering

The material element refers to the criminal act or tangible criminal activity focused on the funds obtained from the primary crime.

The material element consists of a set of physical actions that take on an external appearance perceived by the senses. There must be physical activity that violates the legally protected interests. There is no crime without a material element, and this principle has no exceptions(3).

The Egyptian legislator, in Article 1 of the Anti-Money Laundering Law, as amended by Law No. 36 of 2014, defines money laundering as: "Anyone who knows that the funds are derived from a primary crime and intentionally engages in any of the following actions:

1- Transferring or moving the proceeds, with the intent to conceal the money, disguise its nature, source, location, owner, or the rightful claimant, or to change its identity or hinder the discovery of its origin or obstruct the identification of the perpetrator of the source crime.

(1) Appeal No. 8254 of Year 78, dated 02/05/2011.
(2) Appeal No. 12808 of Year 82, dated 12/05/2013.
(3) Dr. Mahmoud Naguib Hosni, Causality in Criminal Law, Dar Al-Nahda Al-Arabiya, Cairo, 1984, p. 1.

2- Acquiring, possessing, using, managing, safekeeping, exchanging, depositing, collateralizing, investing, manipulating its value, or concealing or disguising its true nature, source, location, or method of handling, movement, ownership, or related rights."

Some scholars have argued that money laundering is closer to a "pure conduct crime," meaning the criminal behavior itself is criminalized regardless of whether a specific harmful outcome is achieved. This is in contrast to crimes that require a specific criminal result to complete the material element. Money laundering is therefore classified as a formal crime where it is sufficient that the intent is to achieve the result, even if no specific harm occurs, such as transferring or hiding illicit funds(1).

The material element in money laundering consists of various criminal acts. It is not limited to the behaviors outlined in Article 1 of the Anti-Money Laundering Law. The material element involves any conduct aimed at giving legitimacy to the proceeds obtained from the primary crime.

Due to the formal nature of money laundering, and the lack of a requirement for a specific harmful result, causality is not a necessary element of the material element in this crime. The criminal activity that constitutes the material element can vary, including actions related to banks such as withdrawals and deposits, as well as actions related to investments—whether fictitious or real—that aim to legitimize the proceeds of the primary crime.

The crime is not multiplied by the number of criminal acts as long as the conditions of a continuing crime are met. A continuing crime can occur with successive actions if they are part of a single criminal project aimed at an illicit goal, and all the actions focus on funds obtained from a felony or misdemeanor(2). Therefore, according to the rulings of the Court of Cassation, the judgment must specify the actions taken to launder the money, the date of each action, the amount of money laundered in each action, the timeframe during which the laundering occurred, and the amount of each part of the money subjected to complex banking operations, among other laundering actions. The judgment must not be vague, as ambiguity would make it difficult for the Court of Cassation to determine the accuracy of the judgment or its validity in applying the law to the case, and it would be considered flawed if the grounds provided for the facts were unclear or imprecise(3).

It is also required that the material acts constituting the source crime and the money laundering crime occur after the enactment of Law No. 80 of 2002. Therefore, the provisions of the money laundering law do not apply to events that occurred before

(1) Dr. Huda Hamed Qashqoush, The Crime of Money Laundering (Within the Framework of International Cooperation), Dar Al-Nahda Al-Arabiya, Cairo, 2003, p. 116.
(2) Dr. Ahmed Fathy Sorour, Op. Cit., p. 109.
(3) Appeal No. 12808 of Year 82, dated 12/05/2013.

the law's implementation. The law only applies retroactively if it is in favor of the accused(1). It is notable that the criminal behavior in the money laundering crime is generally lawful in itself; however, it acquires a criminal nature due to its connection with the preceding criminal activity. In this regard, money laundering is similar to secondary criminal participation. The acts of a secondary participant are not usually criminalized by themselves; they become criminal due to their connection to the criminal activity committed by the primary offender(2).

The money laundering crime is thus similar to some traditional crimes specified in the Penal Code, such as the crime of concealing stolen property or property obtained from a felony or misdemeanor. Both crimes involve the perpetrator's connection to the stolen property or proceeds derived from a felony or misdemeanor, and the criminal activity in both cases relates to the proceeds. However, money laundering requires an active criminal act, and it is not limited to the passive concealment that is found in the crime of concealing stolen or criminally obtained property. Moreover, the crime of concealing property can only legally be committed by someone other than the perpetrator of the original crime (the theft, felony, or misdemeanor from which the property was obtained). In contrast, money laundering can be committed by the person who committed the original crime or by someone else not involved in the original crime.

The material acts constituting the crime must relate to national funds, foreign currencies, financial instruments, and all valuables such as property, both real and personal, tangible or intangible, as well as any related rights and documented certificates of ownership for the aforementioned items. The scope of "money" was extended by the amendment in Law No. 17 of 2020 to include digital or electronic forms. The legislator amended "money" to "assets," meaning all tangible and virtual assets. This includes virtual assets that have a digital value and can be traded, transferred, or converted digitally, and can be used as a means of payment or investment (Article 1 of Law No. 17 of 2020).

Branch 3: The Moral Element of Money Laundering

For the crime of money laundering to occur, the moral element must be present, which takes the form of criminal intent (mens rea). This is confirmed by Article 1 of the Egyptian Anti-Money Laundering Law, as is the case with all intentional crimes.

According to this provision, money laundering is an intentional crime that requires the presence of general criminal intent, consisting of two components: knowledge and will. The perpetrator must know that the money subject to laundering originates from a felony or misdemeanor, and the perpetrator's will must be directed toward committing the act or behavior that constitutes the material element of the crime.

(1) Appeal No. 42630 of Year 74, dated 07/06/2005.
(2) Dr. Ahmed Abdel Zaher, Op. Cit., p. 17.

Here, knowledge must pertain to two crimes: the first or original crime, which relates to the source of the funds, and the second, the crime of money laundering. The perpetrator must be aware of the source of the funds, so the law does not apply to someone who is unaware of the origin of the money. However, if the perpetrator's knowledge is only probable and they engage in laundering activities, this is sufficient to establish potential criminal intent (probable mens rea)(1). The Court of Cassation has ruled, "Since criminal intent in the crime the defendant was convicted of requires the defendant's certain knowledge of the elements of the crime, including criminal intent, if the defendant disputes the presence of such intent, it is the court's duty to adequately establish it(2)."

As money laundering is a continuing crime, the moral element is present whenever the individual becomes aware of the unlawful origin of the funds, even after acquiring them. If the defendant was initially unaware of the unlawful origin of the funds but later learns of their criminal source, the moral element is still fulfilled(3). However, the 1988 Vienna Convention adopted a different stance, asserting that knowledge must be present at the time the funds are delivered, and thus, the crime of money laundering would not apply if the person was unaware of the funds' illicit origin at the time of possession, even if they later learned of it. Nonetheless, most national legislations did not adopt this approach to avoid the non-criminalization of situations where knowledge arises after the transfer(4).

The Egyptian legislator, in criminalizing money laundering, specifically requires the presence of a special intent, as outlined in Article 1 of the Anti-Money Laundering Law, which is the intention to conceal or disguise the nature, source, or ownership of the money, or to obstruct the discovery of its origin, among other actions.

The special intent in the crime of money laundering is realized when it is evident that the perpetrator's will is directed towards concealing or disguising the unlawful source of the funds, whether tangible or intangible, following the establishment of general criminal intent. The Court of Cassation has emphasized that the judgment must specify the material acts committed by the defendant, and it should not rely on vague, generalized phrases that do not clearly indicate the intended purpose of the judgment with respect to the facts of the case, as these would render the ruling legally flawed(5).

Therefore, the specific criminal intent is absent in the case of a property seller who knows at the time of the sale that the money paid by the buyer comes from a drug trafficking offense, but is in need of money and facing financial hardship, without intending to conceal or disguise the money's nature. Some legal scholars

(1) Dr. Mohamed Ali Sweilem, Op. Cit., p. 109.
(2) Appeal No. 12808 of Year 82, dated 12/05/2013.
(3) Dr. Fawzi Adham, Combating Money Laundering Crimes through Lebanese Legislation, no publisher, 2007, p. 11
(4) Article 2 of the 1988 Vienna Convention.
(5) Appeal No. 12808 of Year 82, dated 12/05/2013.

have argued that the Egyptian legislator's approach in specifying the criminal intent in the money laundering crime is problematic, as it leads to practical difficulties, particularly in proving the existence of this intent(1).

The Egyptian Court of Cassation has followed a strict approach that aligns perfectly with the law's text without any interpretation. In one of its rulings, the Court stated, "Since the criminal intent in the crime the defendant was convicted of requires the defendant's certain knowledge at the time of committing the crime regarding the existence of its elements—if the defendant contests the presence of this intent, it is obligatory for the court to sufficiently establish it. Additionally, it is established that the crime of money laundering requires, apart from general criminal intent, special intent, which is the intention to conceal the money or disguise its nature, source, location, or rightful owner, or to change its identity... etc., as previously stated. Therefore, the judgment must explicitly establish this intent and provide evidence of its presence if contested by the defendant(2)."

The special intent is realized through concealment, which means preventing the truth in the original crime that generated the funds from being revealed. For example, the perpetrator may physically transfer the money abroad, thus completely severing the link between the drug trade and the depositing of the illicit funds into a foreign banking system, only to later bring part of this money back into the original country(3). On the other hand, the term "disguise" refers to the efforts of the perpetrator to obscure the illicit nature of the funds by using a series of complex and sequential financial operations to create a false legitimate source for the funds(4). This can involve entering into legitimate or fictitious business ventures, not for the purpose of generating profit but rather to launder the money, making it appear legitimate instead of tainted proceeds from a crime.

Punishment: The legislator has established a principal punishment for the crime, which includes imprisonment for a period not exceeding seven years and a fine equal to twice the amount of the money involved in the crime. Additionally, there is a complementary penalty, which is the confiscation of the seized funds or a fine equal to their value if they are not seized (Article 14).

Requirement 2: Money Laundering in Light of International Legislation

Introduction: Money laundering is considered a transnational crime, often involving perpetrators from multiple countries. The acts that constitute its material element may occur across several jurisdictions. Recently, money laundering has become closely associated with organized crime, such as drug trafficking, arms trade, and

(1) Dr. Ashraf Tawfiq Shams El-Din, Op. Cit., p. 49.
(2) Appeal No. 78103 of Year 76, dated 07/04/2008.
(3) Appeal No. 15202 of Year 88, dated 26/09/2019.
(4) Appeal No. 12808 of Year 82, dated 12/05/2013.

increasingly, terrorism financing. These activities have become core to the original crimes of money laundering in most legal systems. In this section, we will address the international nature of the crime of money laundering in the first subsection, then discuss the extension of jurisdiction beyond national borders in the second subsection, and conclude by highlighting the Security Council's resolutions on combating the phenomenon and their importance in effective confrontation in the third subsection.

Branch 1: Money Laundering as a Transnational Crime

It was necessary for our national legislation to consider the international nature of this crime. Articles 18 to 20 of the Egyptian Anti-Money Laundering Law address international judicial cooperation in the fight against money laundering crimes. Article 18 stipulates that judicial cooperation can be exchanged with foreign judicial authorities for judicial inquiries and the extradition of suspects, based on bilateral or multilateral treaties to which Egypt is a party, and according to the principle of reciprocity(1).

Article 19 allows these authorities to request legal actions to track, freeze, or seize the funds subject to laundering, or their proceeds, while respecting the rights of third parties in good faith(2).

Article 20 states that these judicial authorities may order the enforcement of final judgments issued by foreign authorities regarding the confiscation of money laundering proceeds, in accordance with the procedures set forth in bilateral or multilateral agreements. These authorities may also enter into agreements regarding the distribution of crime proceeds among the parties to the agreement(3).

Through these provisions, the Egyptian legislator sought to establish a form of cooperation between Egypt and all countries worldwide to combat money laundering crimes, given the international nature of these crimes. This cooperation is to be achieved by utilizing all available means, taking appropriate actions, and entering into agreements to regulate international anti-money laundering efforts, in line with the Financial Action Task Force (FATF) recommendations on international cooperation in the fight against money laundering(4).

International and Regional Agreements on Money Laundering

Given that one of the main goals the international community seeks to achieve by criminalizing money laundering is to preserve the global financial system, deprive

(1) The phrase "and terrorism financing crimes" was added to Article (18) by Law No. 181 of 2008.
(2) The phrase «and terrorism financing crimes» was added to Article (19) by Law No. 181 of 2008.
(3) The phrase «and terrorism financing crimes» was added to Article (20) after the phrase «money laundering crimes» in the first and second paragraphs of the article, by Law No. 181 of 2008.
(4) Judge Mohamed Ali Skiker, Combating Money Laundering Crime at the Egyptian and Global Levels, New University House, Alexandria, 2007, p. 37.

criminals of benefiting from the proceeds of crime, and confront large criminal organizations operating on a wide geographical scale, several international agreements have been signed emphasizing the importance of combating money laundering, especially in the context of organized crime. The most significant of these agreements include, as previously mentioned, the United Nations Convention Against Illicit Traffic in Narcotic Drugs and Psychotropic Substances (Vienna Convention) of 1988, the European Council Convention signed in Strasbourg on November 8, 1990, regarding the laundering, confiscation, and seizure of proceeds from crime, the United Nations Convention Against Transnational Organized Crime signed in Palermo (Italy) in December 2000, and the United Nations Convention Against Corruption signed on December 9, 2003. Egypt has signed and ratified these agreements, making their provisions applicable as national law(1).

The Vienna Convention of 1988 is considered the first agreement to explicitly address the issue of money laundering, particularly in relation to drug trafficking as the original crime for laundering proceeds. Other related agreements have also contributed to the development of Egypt's national Anti-Money Laundering Law and its subsequent amendments.

United Nations Convention Against the Illicit Traffic in Narcotic Drugs and Psychotropic Substances, 1988 (Vienna Convention)

This convention is the cornerstone of international efforts in the area of money laundering, although efforts in this field began years before this convention was drafted. However, until then, these efforts remained in the realm of academic research, planning, and strategy building, without reaching an international framework to unify anti-money laundering efforts.

The Vienna Convention of 1988 marked the first significant step that embodied the international community's conviction regarding the necessity of combating money laundering. As of November 1995, 119 countries had joined this convention.

The convention includes provisions on money laundering in the context of drug trafficking, such as criminalizing the transfer or movement of money, knowing it was derived from a crime related to drug trafficking, or concealing or falsely representing the nature, location, or movement of the money. The convention also criminalizes acquiring, possessing, or using money, knowing that it is derived from any of the crimes mentioned in the convention or any act arising from involvement in them. Additionally, the convention contains procedural provisions for international cooperation in the extradition of criminals.

(1) Prof. Dr. Mahmoud Sherif Basyuni: Money Laundering – Regional and International Responses and Anti-Money Laundering Efforts, Dar Al-Sharq, Cairo, 2004, p. 188 and following.

The convention also establishes a clear criminal policy regarding the fight against money laundering, imposing an obligation on member states to criminalize actions related to money laundering resulting from drug trafficking. Article 3 of the convention mandates that states adopt necessary measures to penalize certain actions if carried out intentionally, including the exchange or transfer of money knowing its source is a crime as outlined in the Vienna Convention, such as the illicit trafficking of narcotics(1).

The Forty Recommendations of the Financial Action Task Force (FATF):

In 1990, the Forty Recommendations were issued by the Financial Action Task Force (FATF) on Money Laundering, a body created by the Group of Major Industrialized Countries. These recommendations outline methods for combating money laundering(2). A total of 26 countries and two international organizations, the European Union and the Gulf Cooperation Council, initially joined these recommendations, making it a collective international effort. Today, more than 180 countries have joined, and the FATF has become the primary framework for establishing rules to combat money laundering. It forms the basis for most national anti-money laundering laws. FATF's recommendations became legally binding under UN Security Council Resolution 1617 in 2005, issued under Chapter VII of the UN Charter. The FATF's scope has since expanded to include efforts to combat terrorism financing and the financing of weapons of mass destruction. After the September 11, 2001 attacks, stricter standards were introduced regarding the source crime and financial institutions were required to implement due diligence procedures. In 2012, the FATF adopted 40 revised recommendations and 9 additional recommendations regarding terrorism financing that had been introduced in 2001 and 2004. These recommendations included new, comprehensive measures that addressed both money laundering and terrorism financing, discussed in the FATF meeting in 2013. The binding force of the FATF's decisions, reinforced by UN Security Council Resolution 1617 in 2005, was further confirmed by subsequent resolutions, including Resolutions 2253 and 2255 in 2015, and Resolution 1989 in 2011 regarding the Taliban. Under these standards, countries are required to adopt various measures for criminalization, prevention, and international cooperation(3).

In 1995, the United Nations issued a model law for combating money laundering. This law includes a set of rules that countries can follow in their national legislation

(1) Dr. Omar bin Younis Mohammed: Money Laundering via the Internet, The Position of Criminal Policy, No Publisher, Beirut, 2004, p. 103.
(2) The Financial Action Task Force (FATF) is an intergovernmental body representing major industrialized nations. It was established in 1989 to address the growing issue of money laundering. The Forty Recommendations serve as standardized international criteria and a guiding framework for combating money laundering. Several amendments have been made to these recommendations, with the most recent update in 2012, which included additional recommendations related to combating the financing of terrorism.
(3) Dr. Ahmed Fathi Sorour: Op. cit., pp. 54, 55.

to combat illegal money laundering activities, facilitating the process for countries wishing to draft their own laws on money laundering(1).

The United Nations Convention Against Transnational Organized Crime:

In 2000, the United Nations signed the Convention Against Transnational Organized Crime, emphasizing the need to criminalize money laundering as one of the forms of organized crime. On July 24, 2001, the United Nations Economic and Social Council issued Resolution (13) of 2001, entitled "Enhancing International Cooperation to Prevent and Combat the Transfer of Proceeds from Corruption, Including Money Laundering and the Return of Such Funds".

The United Nations Convention Against Corruption:

On September 29, 2003, the United Nations Convention Against Corruption came into force. The convention required state parties to take measures to prevent money laundering and mandated that they adopt legislative and other measures in line with the basic principles of their domestic law to criminalize acts of money laundering. In 2005, Security Council Resolution 1617 was issued, urging all member states to implement the comprehensive international standards embodied in the FATF's 40 Recommendations related to money laundering and its 9 recommendations concerning terrorism financing.

Finally, on May 3, 2005, the Council of Europe adopted the Convention on Money Laundering, Confiscation, and Seizure of the Proceeds of Crime and the Financing of Terrorism(2).

Arab Agreements on Combating Money Laundering:

At the Arab level, attention to the phenomenon of money laundering emerged later, in 1994, when the Arab Convention Against the Illicit Traffic in Narcotic Drugs and Psychotropic Substances was signed in Tunisia. This agreement committed each party to take necessary measures to criminalize acts of money laundering. In 2003, the Arab Interior Ministers' Council approved the Arab Model Law on Combating Money Laundering. On December 22, 2010, the Arab Ministers of Justice and Interior adopted five Arab agreements, four of which are related to the combat and criminalization of money laundering and combating corruption.

Article 1 of Clause 8 of the Arab Convention for Combating Money Laundering and the Financing of Terrorism defines money laundering as "committing or attempting to commit any act with the intent to conceal or disguise the true origin of illegally

(1) Judge Mohamed Ali Skiker: Op. cit., p. 39.
(2) Dr. Ahmed Abdel Zaher: Op. cit., pp. 15-21.

obtained money, contrary to the laws and internal regulations of each state party, and making it appear as though it originates from a legitimate source." From this text, it is clear that the Arab Convention for Combating Money Laundering and the Financing of Terrorism focuses on the intent behind the criminal act, which is to conceal or disguise the origin of illegally obtained money, making it appear as if it is of legitimate origin. Therefore, the type of behavior does not matter, as long as the objective is to conceal or disguise the illicit origin of the obtained money(1).

The Arab Model Law for Combating Money Laundering also provides a definition of money laundering, describing it as "any act committed directly or through an intermediary with the intent of acquiring money, rights, or property of any kind, or dealing with it, managing it, storing it in a safe, exchanging it, depositing it, securing it, investing it, transporting it, possessing it, transferring it, knowing that such money, rights, or property are derived from a crime or represent the proceeds of a crime, or for the purpose of concealing or disguising its illicit origin or preventing its detection, or for the purpose of assisting any person involved in committing the original crime to evade the legal consequences of their actions." This definition outlines various forms of criminal behavior in the crime of money laundering, without overlooking the purpose or objective behind such behavior.

Some scholars argue that, due to the transnational nature of the crime, it is possible to adopt the principle of the universality of criminal law when applying money laundering laws to perpetrators of this crime, regardless of their nationality or where the crime was committed. The principle of universality refers to the application of national criminal law to crimes committed by individuals within the jurisdiction of a state, regardless of the location of the crime or the nationality of the perpetrator or the victim, and regardless of whether foreign law recognizes it as a crime. Some Arab criminal legislations refer to this as "universal jurisdiction(2)."

The call for adopting this principle was raised at the Third Congress of the International Association of Penal Law, held in Palermo in 1933. Some scholars also argue that the basis of the principle lies in the idea of solidarity among countries in combating transnational crimes, as there are common interests among all societies that require protection and an agreement to unify jurisdiction in punishing any aggression that occurs against these interests(3).

It is accepted that the principle of universality does not apply to all crimes. To argue otherwise would lead to a serious conflict between the criminal laws of different countries. Therefore, its application is limited to a set of crimes that concern the international community as a whole, where the perpetrator is seen as attacking a shared interest of all states, including the state in which the perpetrator is apprehended(4).

(1) Dr. Hamdy Abdel Azim: Money Laundering in Egypt and the World, No Publisher, Cairo, 2000, p. 38.
(2) Dr. Mustafa Taher: Legislative Response to the Crime of Money Laundering, Cairo University, 2006, p. 42.
(3) HTTP://ecommerce technology.org
(4) Dr. Ahmed Abdel Zaher: Op. cit., pp. 701-703.

Branch Two
Extension of Jurisdiction Over Crimes Outside the State

The crime of money laundering is considered a transnational crime that may be committed in more than one country. The acts constituting the laundering behavior can occur in different locations, or the act may be committed in one country, but its result occurs in another. This complicates the determination of the applicable criminal jurisdiction. As a result, extending jurisdiction over money laundering crimes beyond the state has become a critical issue.

Article 42 of the United Nations Convention Against Corruption states that "each State Party shall adopt the measures necessary to establish its jurisdiction over the offenses it has criminalized in accordance with this Convention in the following cases:

- (a) When the offense is committed in the territory of a State Party.
- (b) When the offense is committed on board a ship or aircraft registered in a State Party at the time the offense is committed."

Additionally, Article 4 of the same Convention provides that a State Party may subject any offense related to money laundering to its jurisdiction if it involves proceeds derived from criminal activity.

Under Egyptian law, specifically the Anti-Money Laundering Law, although the general Penal Code does not contain a provision on the universality of criminal jurisdiction, the Anti-Money Laundering Law, even before its amendment, criminalized acts of money laundering arising from specific crimes. Whether the money laundering crime or the predicate offense occurred within Egypt or abroad, it was punishable as long as the act was punishable in Egypt and the other states involved. The amendment introduced by Law No. 36 of 2014 reaffirmed the prosecution of individuals committing money laundering crimes or predicate offenses inside or outside Egypt.Top of Form

According to Article 18 of the Anti-Money Laundering Law, Egyptian and foreign judicial authorities exchange judicial cooperation in the field of money laundering crimes. This includes requests for judicial assistance, mutual legal assistance, and the extradition of defendants and convicted persons, in accordance with the rules set out in international agreements to which Egypt is a party, or based on the principle of reciprocity.

In accordance with Article 19 of the same law, the authorities mentioned in Article 18 may request the necessary legal measures to trace, freeze, or seize assets related to money laundering crimes and their proceeds, or to place them under seizure, without prejudice to the rights of bona fide third parties. In order to take

such measures, there must be a legal basis, whether it is an international treaty or reciprocity, with dual criminality in both countries, and without violating the rights of bona fide third parties.

Furthermore, the recognition of foreign judgments regarding the confiscation of assets is what distinguishes money laundering crimes from other crimes, with the confiscated assets being transferred according to the international treaties of each party. The disposal of proceeds or assets that are confiscated is governed by the provisions of the domestic laws of the state, in accordance with its internal systems and procedures (Article 5 of the Vienna Convention).

Branch Three
UN Security Council Resolutions on Combating Money Laundering

Given the global importance of combating money laundering, particularly after the phenomenon has become intertwined with other criminal activities, especially international terrorism and the disruptions it causes to the international system, the United Nations Security Council has issued numerous resolutions that are binding on UN member states under Chapter VII of the Charter. These resolutions establish an international financial system that supports the objectives of the international organization, which seeks to stabilize security among all member states. Among the most important of these resolutions are:

- Resolution No. 1267 of 1999, which was issued to freeze the assets of extremist entities in Afghanistan.
- Resolution No. 1373 of 2001, prompted by the terrorist attacks against the United States in September 2001, which aimed to prevent, criminalize, and punish the collection and receipt of funds used to finance or support terrorism.
- Resolution No. 1988 of 2011 and Resolution No. 1989, which imposed sanctions on certain terrorist entities.

Similarly, Resolutions No. 2253 and 2255 of 2015 imposed sanctions on terrorist entities in Iraq.

In addition to these, the Council has called on states to implement the recommendations of the Financial Action Task Force (FATF), urging them to develop plans and measures within their financial systems, all of which are based on a legal framework established by the United Nations and the Security Council. These measures include economic strategies to combat terrorism.

The Security Council's resolutions have granted FATF the authority to enforce these measures, with one of the most recent important resolutions being Resolution No. 1617 of 2005, which called on UN member states to implement FATF's comprehensive international standards. This and other Security Council resolutions were issued based on Chapter VII of the Charter, which obligates member states to comply with them in order to maintain international peace and security. This has been further emphasized by both the International Monetary Fund (IMF) and the World Bank.

According to these international standards, states are obligated to criminalize money laundering and the financing of terrorism, considering the financing of terrorism as a predicate offense for money laundering. This aims to provide greater protection concerning the security and stability of the international community(1).

Requirement Three:
Barriers to the Implementation of Anti-Money Laundering Laws

Introduction: The obstacles to combating money laundering are numerous, largely due to the secretive nature of the acts constituting the criminal behavior of this crime. Additionally, the interconnection of these acts, their occurrence across multiple countries, and their involvement by multiple individuals complicate efforts to combat and address the issue. Therefore, it is essential for countries to exchange knowledge, use best practices, implement innovative strategies, and leverage advanced modern technologies to address this phenomenon. Some of the primary barriers to implementation include:

1. **The Dilemma of Banking Secrecy:** Banking secrecy is one of the most significant issues tied to modern economic systems. It is considered a fundamental principle closely associated with the operations of banks and financial institutions, given their crucial role in the economic life and national development. Banks are central to financing various commercial and service projects, which benefit society as a whole. Today, no commercial transaction is completed without the involvement of banks or financial institutions, whether for opening accounts, issuing letters of credit, or handling remittances(2), among other functions. As a result, banking secrecy falls under professional confidentiality, meaning that a bank is obligated not to disclose the financial secrets entrusted to it by its clients(3). However, recent rulings have indicated that notifications of suspicious activities by anti-money laundering units to regulatory authorities do not constitute a breach of confidentiality(4).

(1) Dr. Ahmed Fathi Sorour: Op. cit., p. 54.
(2) Mr. Mohamed Abdel Wadoud Abu Omar: Criminal Responsibility for Disclosing Banking Secrecy (A Comparative Study), No Publisher, 1999, p. 9.
(3) Dr. Naeem Maghbagh: Banking Secrecy (A Study in Comparative Law), No Publisher, 1996, p. 45.
(4) Court of Cassation, Session of 17/2/2011, Appeal No. 1248 of 80 Q.

Modern legislations have organized banking secrecy, placing it among professional secrets. While the purpose of these secrets is to protect individuals' privacy, banking secrecy also aims to facilitate the banking profession by fostering public trust in financial institutions, providing guarantees for confidentiality, and protecting society's economic interests(1). However, this secrecy ultimately complicates the detection of money laundering activities related to banks(2).

2. Weak Oversight on Global Trade Operations: Money laundering typically involves passing through multiple countries, each of which has its own national sovereignty. Each country also differs in the procedures it adopts for combating money laundering, as internal conditions vary from one country to another. This makes it exceedingly difficult to standardize anti-money laundering legislation globally. Moreover, the lack of strong international cooperation in addressing money laundering or organized crime in general leads to a proliferation of legal systems governing this issue, which, in turn, makes it easier for perpetrators to circumvent legal measures. The numerous constraints on international trade can also directly harm countries(3), further complicating efforts to combat money laundering.

3. . Weak Oversight Mechanisms for Banks and Financial Institutions Locally and Globally:

The operations of banks and financial institutions are considered one of the most critical means for detecting money laundering activities. This was emphasized by the U.S. Bank Secrecy Act, which mandates that banks report any cash transaction exceeding $10,000 to the tax authorities. However, despite these regulations, several banks have failed to comply, resulting in financial penalties and the subsequent uncovering of numerous money laundering operations. In Egypt, the Anti-Money Laundering Law established a unit within the Central Bank dedicated to combating money laundering, with additional units in bank branches to achieve the same objective(4).

According to a recent ruling by the Court of Cassation, "Since the judgment rejected the plea of invalidating the order to inspect the accounts, it was justified in that the summary of suspicion prior to the issuance of the inspection order did not result from a violation of the confidentiality of the appellant's accounts, but rather was an enforceable procedure requiring financial institutions to report financial transactions that are suspected to involve money laundering, in accordance with Article 8 of the law. Therefore,

(1) Dr. Ihab Mohamed Hassan: The Theory of Criminal Protection of Banking Operations, Dar Al-Ma›arif, Alexandria, p. 96.
(2) Banking secrecy in Egypt is governed by Law No. 205 of 1990, as amended by Law No. 67 of 1992.
(3) Abdel Fattah Suleiman: Combating Money Laundering, Manshiyat Al-Ma›arif, Alexandria, 2008, p. 23.
(4) Dr. Suleiman Abdel Moneim: Op. cit., p. 101.

the ruling on this matter justifies the dismissal of the plea, and thus the appeal against the ruling in this regard is unfounded(1)."

4. Lack of Advanced Information Systems Suitable for Modern Technology

It is essential to have an advanced and modern information system that can monitor financial transactions, determine their legitimacy, track their movement, and identify how and where they are invested. This is particularly critical as money laundering perpetrators now have access to modern technologies, including artificial intelligence, to commit their crimes. As such, it is necessary to establish a centralized information center that maintains close and secure communication with various financial institutions. These institutions should provide the center with the required information through confidential electronic reports. The central information center then analyzes this data, verifies its accuracy, identifies its source, and tracks how it is utilized. The primary goal of this system is to combat money laundering using advanced scientific methods, with the central information center coordinating with all institutions, banks, and financial entities(2).

This highlights the need to utilize modern technologies in the operation of such information systems, particularly the use of artificial intelligence, which will be further discussed in the second section of this study.

Section Two

The Use of Modern Technologies in Combating Money Laundering Crimes

Introduction:

The recent global technological advancements have triggered a revolution in information technology and communication systems. This revolution has profoundly impacted various sectors, including the global economy, leading to the emergence of the so-called "digital economy." The rise of the digital economy introduced new tools and systems for financing and financial transactions, creating novel methods for capital movement that often operate beyond the legal jurisdiction of traditional banking systems.

Among the most prominent phenomena in this rapidly evolving world is the emergence of virtual, digital, or encrypted currencies. However, the advent of these currencies has not been without significant drawbacks, notably their use in committing crimes such as money laundering. This reality necessitates the evolution of anti-money laundering strategies to align with these technological developments.

(1) Court of Cassation, Session of 17/2/2011, Appeal No. 1248 of 80 Q.
(2) Dr. Saleh Al-Saad: Money Laundering in Banking and Law, No Publisher, 2003, p. 109.

In this chapter, we address the use of modern technologies in combating money laundering, focusing in particular on the application of artificial intelligence (AI) as one of the most critical contemporary technologies. The discussion proceeds as follows:

- First, we examine the concept of artificial intelligence;
- Second, we explore the potential for law enforcement and investigative agencies to utilize AI;
- Finally, we conclude with legislative and administrative recommendations to enhance anti-money laundering efforts.

Requirement One

The Concept of Artificial Intelligence Technology

Introduction:

Here, we define artificial intelligence as one of the latest technological innovations, discuss its benefits and drawbacks, and explain methods of utilizing AI technology.

Definition of Artificial Intelligence Technology:

Several definitions help to illuminate the concept of artificial intelligence (AI). Broadly, AI is the capability of machines to mimic human traits and behavior.

Alternatively, it is defined as the science concerned with the engineering and programming of intelligent machines to emulate human intelligence and observable biological behaviors. Another perspective describes AI as the process of enabling machines to perform activities typically requiring human cognition, thereby allowing computers to "think" intelligently(1).

Thus, in general terms, artificial intelligence can be understood as a collection of programs built on a knowledge base composed of symbolic representations that computers use to perform assigned tasks and deliver results to users.

AI draws heavily from various scientific disciplines, including computer science, psychology, linguistics, and mathematics.

At its core, AI is based on the premise that human intelligence can be simulated within technological systems. It involves designing systems or devices that perceive their surrounding environment and act in ways that mimic human behavior.

AI derives its value from the vast volumes of data generated daily through automated systems and the internet. The more data that AI systems process through methods such as machine learning, the more intelligent and responsive they become. For instance, websites and search engines now utilize AI to determine user interests,

(1) Dr. Mahmoud Tarek Haroun: Introduction to the Science of Artificial Intelligence, Academic House for Sciences, Cairo, 2009.

preferences, and behaviors based on input data. Through these processes, systems uncover hidden relationships within data, extract conclusions, and enhance knowledge, thereby striving to reach levels of capability comparable to human intelligence.

Importantly, many perpetrators of corruption and money laundering crimes have developed significant expertise in utilizing such technologies.

AI applications can be categorized into:

- **Strong or General AI Applications**, which are capable of gathering information, analyzing it, learning from accumulated experiences, and making decisions independently (examples include self-driving cars and virtual assistants).

- **Super AI Applications**, which can socially interact with humans by simulating their thoughts, emotions, reactions, and even predicting behaviors.

Nevertheless, despite these advancements, AI cannot surpass the human intellect that created and continually refines it(1). Human intelligence remains irreplaceable in controlling and guiding technological tools.

To achieve high-level intelligence, AI systems require three essential elements:

1- A robust data system capable of representing information and knowledge to facilitate learning.

2- Algorithms that determine how information is used for gathering, analyzing, classifying, and identifying relationships among data sets.

3- Programming languages that model both information and algorithms to produce results and support decision-making.

However, one major drawback of AI technology is its potential threat to certain professions, such as law and architecture, where automation may lead to the eventual displacement of traditional roles.

Despite such risks, AI offers immense benefits: it can significantly enhance the economic and financial efficiency of corporations and governments, improve the analysis of massive datasets, predict risks, and support the growth of e-commerce. Governments and companies employing AI technology in economic fields will likely enhance their manufacturing, marketing, service delivery, and investment capacities, thereby improving overall living standards.

(1) Dr. Wathiq Ali Al-Mousawi: Artificial Intelligence Between Philosophy and Concept, Vol. 1, 1st ed., Dar Al-Ayam, Amman, Jordan, 2019.

Moreover, AI technology can contribute to broader security objectives:

- It can analyze audio and visual data from criminal suspects;
- Monitor and track individuals;
- Detect illicit activities;
- Uncover cases of corruption, fraud, and organized crime, which often occur under conditions of strict secrecy.

By doing so, AI facilitates early detection, prevention, and efficient enforcement actions.

Thus, AI systems possess the ability to perceive their environment and take actions that maximize the probability of achieving defined objectives, playing a crucial role in skill development and goal attainment.

It is worth noting that the most advanced and successful nations have prioritized modern technology and scientific research, investing significant portions of their budgets into these fields. Their emphasis on systematic, research-driven innovation has propelled industrial and technological revolutions that placed them among the world's leading powers.

Today, no sector can evolve without contemporary knowledge and purposeful scientific research. Content, implementation, and evaluation must be entrusted to specialized experts, executed practically, monitored consistently, and reassessed periodically to ensure real-world relevance and effectiveness.

Ultimately, the paramount goal is to deepen learning processes and skill acquisition so that newly acquired competencies are effectively applied, building comprehensive systems that safeguard nations against violations that could escalate into crimes of corruption.

Digital Transformation and the Use of Modern Technologies for the Prevention of Corruption Crimes

In this context, the concept of e-government is founded upon the principles of transparency and integrity in the provision of public services. It seeks to simplify administrative processes by accelerating service delivery and reducing costs, primarily by minimizing direct interactions between citizens and government employees. This reduction in personal contact inherently limits opportunities for bribery, favoritism, illicit gains, and money laundering, thereby narrowing the scope for corruption.

To achieve the objectives of e-government, several measures must be taken:

- Training individuals nominated for public office in the use of modern technologies.
- Developing training programs that enable employees to meet the requirements of their positions by educating and training them in technological competencies.
- Establishing legislative and administrative measures characterized by transparency and integrity to nominate technologically qualified leaders.
- Implementing governance and internal control systems within administrative bodies that rely on technological tools.

Recognizing the importance of awareness and knowledge development, the **United Nations Convention Against Corruption**, in Article 6(b), emphasized the obligation of each State Party to promote and disseminate knowledge aimed at preventing corruption. Awareness initiatives play a crucial role in promoting values of transparency and integrity. Accordingly, most member states have introduced systematic training programs to educate large numbers of public-sector employees across ministries, agencies, and institutions.

These training efforts, particularly in the use of modern technologies, are expected to significantly enhance the transparency and integrity of employee performance and serve as a practical application of effective training in the real world(1).

Methods of Using Artificial Intelligence to Combat Corruption

Several methods illustrate how artificial intelligence (AI) can be utilized in the fight against corruption:

A. Machine Learning Approach

This approach equips machines with the ability to learn and evolve through experience. Machine learning focuses on developing software that enables systems to access data and learn autonomously. The learning process begins with the collection of previous data and observations in the form of text files, Excel sheets, images, or audio recordings containing examples or experiences classified in databases.

The higher the quality of the input materials, the more efficient the learning process becomes. Machine learning aims to identify data patterns and make optimal decisions based on past information. Thus, AI can be relied upon in decision-making processes related to combating corruption crimes.

(1) Dr. Mohamed Sadeq Ismail: Administrative Corruption in the Arab World - Its Concept and Various Dimensions, Arab Group for Training and Publishing, Cairo, 2014.

B. Big Data Approach

Big data refers to extremely large and complex data sets that cannot be processed through traditional methods. These data are aggregated and stored for the purpose of analysis, encompassing information from internet sources, social media platforms, and sensor networks. Analyzing such data reveals hidden relationships among disparate data sets, providing insights that can predict business trends, detect criminal activities, and enhance information security. In an increasingly interconnected digital world, information security has become a vital challenge. It requires adopting the best practices and modern techniques to protect systems and sensitive information from evolving cyber threats.

Information security encompasses protecting the confidentiality of users' data on social media platforms and electronic sites, establishing systems that prevent hacking and cyber espionage. It covers system operations, software applications, and access management—areas frequently targeted by cybercrimes.

Cybercrime is broadly defined as any criminal activity wherein computer technology is used either as a tool or as a direct target to execute criminal acts. Consequently, the perpetration of corruption crimes or the material elements of such crimes through digital means is no longer remote(1).

C. Deep Learning Approach

Deep learning involves training machines and computers to perform multiple tasks in a manner closely resembling human behavior. It represents a more sophisticated form of machine learning, allowing systems to undertake complex tasks naturally and independently(2).

D. Algorithmic Approach

This method involves conducting a sequence of operations designed to create a roadmap for machine learning to solve specific problems or achieve defined goals. There are two main types of algorithms:

- **Supervised Learning Algorithms**, where human oversight is necessary. The machine is trained using known input-output pairs, much like a teacher guiding students.
- **Unsupervised Learning Algorithms**, representing deep learning methodologies. Here, the system independently identifies processes and patterns without constant human intervention, enabling it to discover data relationships and predict future outcomes autonomously.

(1) Dr. Mohamed Ahmed Labib – Judge Haitham Mohamed El-Qadi: The Role of Egyptian Criminal Law in Combating Information Corruption, a paper presented to the Governance and Anti-Corruption Program at the Anti-Corruption Academy of the Administrative Control Authority.
(2) Dr. Haitham El-Sayed Ahmed Eissa: Digital Diagnosis of the Human Condition in the Age of Data Mining Through Artificial Intelligence Techniques According to the European Regulation, Dar Al-Nahda Al-Arabiya, Cairo, 2019.

However, the use of AI technologies must strictly adhere to ethical standards. AI systems must remain legal, operating within legislative frameworks, and respect privacy rights while ensuring that no harm is inflicted upon users. Their use must align with principles of justice, equality, and transparency.

Moreover, all procedures should be explainable and interpretable, maintaining the user's safety and security, while ensuring that human oversight and control are preserved throughout the application of such technologies(1).

Requirement Two

Utilization of Artificial Intelligence Technology in the Stages of Inquiry and Investigation

Introduction:

The inquiry stage involves the collection of information and data related to a crime through investigation and the search for the perpetrator by all lawful means. It also includes preparing the necessary elements to initiate a preliminary investigation. This task is performed by judicial officers within the limits of their jurisdiction, provided that they do not infringe upon individual freedoms. Inquiry precedes the initiation of criminal proceedings and is not considered part of the litigation process itself(2). An investigating authority may only issue an order for arrest or search based on serious inquiries conducted by a judicial officer(3). This general principle also applies to money laundering crimes, although, for such offenses, a specialized unit was established within the Central Bank of Egypt, comprising representatives from multiple bodies and vested with judicial powers related specifically to money laundering.

In this section, we will examine the responsibilities of this unit concerning inquiries and the application of modern technologies in its operations, before addressing the use of such technologies during investigative procedures, and concluding with recommendations for enhancing the response to money laundering crimes.

First Branch

The Use of Modern Technologies in Inquiry Procedures

Article (3) of the Anti-Money Laundering Law stipulates the establishment of an independent, specialized unit within the Central Bank of Egypt tasked with combating money laundering and terrorism financing. This unit is to include representatives from the relevant authorities and must be adequately staffed with experts, judicial members, and specialists in areas relevant to the implementation of the law(4).

(1) Dr. Jamal Ali Al-Dahshan: Op. cit.
(2) Court of Cassation, 4 May 1981, Appeal No. 1438 of 48 Q.
(3) Dr. Mahmoud Nagib Hosni: Explanation of the Criminal Procedures Law, Dar Al-Nahda Al-Arabiya, Cairo, 2001, p.15.
(4) Dr. Mohamed Ali Sweilem: Op. cit., p. 18.

Chapter Two of the Executive Regulations of the Anti-Money Laundering Law, titled "The Anti-Money Laundering Unit," specifies in Article Three that the Unit shall exercise the powers provided for by the law and Presidential Decrees Nos. 164 of 2002 and 28 of 2003. Its responsibilities include:

1. Receiving notifications from financial institutions regarding transactions suspected of involving money laundering, recording them in the Unit's database, utilizing the **Big Data approach** previously mentioned—which involves compiling large, complex datasets for subsequent analysis and results extraction.

2. Receiving additional information about such transactions and recording it within the database.

3. Conducting investigations and examinations either through the Unit's own investigative departments or by cooperating with general regulatory authorities and other legally competent bodies.

4. Reporting to the Public Prosecution any evidence emerging from inquiries and examinations that suggest the commission of a money laundering offense, utilizing **artificial intelligence** technologies for data analysis and decision-making.

5. Submitting requests to the Public Prosecution for the implementation of precautionary measures as outlined in Articles 208 bis (A), 208 bis (B), and 208 bis (C) of the Code of Criminal Procedure(1).

Article (6) further grants certain Unit employees, designated by the Minister of Justice upon the request of the Governor of the Central Bank of Egypt, the status of **judicial officers** regarding money laundering offenses related to their job functions.

Granting these employees judicial police powers enables them to conduct all inquiry activities outlined in the Code of Criminal Procedure, thus facilitating investigation and control procedures.

The Unit's responsibilities encompass:

- Investigation and examination.
- Reporting to the Public Prosecution.
- Requesting the application of precautionary measures.
- Managing notifications.
- Providing judicial authorities with information regarding suspected cases.

Moreover, Article (7) mandates that authorities responsible for supervising financial institutions must establish effective mechanisms to ensure compliance with

(1) This jurisdiction was added to the unit under the amendment introduced by Law No. 36 of 2014 in its fifth article.

anti-money laundering regulations, including the obligation to report suspicious activities. These mechanisms should leverage **deep learning techniques**, enabling machines and computers to perform multiple tasks with minimal human error or deviation.

According to the Executive Regulations, supervisory authorities include:

1- The Ministry of Communications and Information Technology.
2- The Postal Savings Fund Supervisory Authority.
3- The Central Bank of Egypt.

These supervisory bodies have modernized their operational systems using the latest technologies, including the application of artificial intelligence to achieve their objectives.

Article (8) obliges financial institutions to notify the Unit of any financial transactions suspected of involving money laundering, as described in Article 4 of the law. Institutions must also implement systems to verify the identities and legal statuses of clients and ultimate beneficiaries, whether natural or legal persons, through official or customary means and maintain records of such verifications.

The acceptance of anonymous deposits, fictitious accounts, or pseudonymous clients is strictly prohibited.

Artificial intelligence technologies are distinguished by their ability to mine and analyze data, extract critical insights, independently support decision-making processes(1), and predict trends through advanced analytics.

They enhance data management and optimal utilization by improving the arrangement, classification, retrieval, and presentation of information with greater precision than manual efforts—primarily achieved through the use of robots and automated systems.

The Unit also develops standardized models to facilitate these purposes.

The concept of judicial police authority pertains to intervening when a factual situation can be legally classified as a crime. Judicial police activities are distinct from investigative activities: they precede the formal investigation, aim to document the apparent elements of the criminal act, and gather initial, surface-level information without delving into deeper analyses, which is the responsibility of the investigative authorities.

Article 21 of the Code of Criminal Procedure provides that “Judicial officers shall seek out crimes and their perpetrators and collect the necessary information for the investigation of the case(2).”

(1) Dr. Haitham El-Sayed Ahmed Eissa: Op. cit.
(2) Dr. Mohamed Ali Sweilem: Op. cit., p. 169.

Moreover, Article 24 (paragraph two) mandates that "All procedures undertaken by judicial officers must be recorded in reports signed by them, indicating the time and place of the procedures, and must include signatures from witnesses and experts heard. These reports must be forwarded to the Public Prosecution along with any seized materials."

Properly defining the activities of judicial officers regarding money laundering crimes thus requires specifying the ordinary and extraordinary powers of judicial officers as provided under the Code of Criminal Procedure(1).

Ordinary and Exceptional Jurisdiction of Judicial Officers

The ordinary powers of judicial officers consist of inquiry procedures that they are authorized to perform under normal circumstances. These include:

Receiving reports and complaints from citizens regarding criminal activities.

Obtaining clarifications and conducting inspections relevant to the reported incidents.

Conducting investigations:

Investigation refers to the activities undertaken by judicial officers or their subordinates concerning a specific crime and a suspected perpetrator. Its purpose is to establish whether the crime occurred and to identify the offender. Investigations are typically conducted discreetly and without the knowledge of the person being investigated.

Regarding money laundering offenses, investigations must adhere to the following conditions:

1- There must be an actual money laundering crime, meaning that the investigation must concern a crime that has already occurred.
2- The investigation must specifically relate to the crime of money laundering itself and not any other associated crimes, even if the crimes are related. Thus, investigations into predicate offenses alone (i.e., the offenses that generated the illicit funds) are insufficient, as money laundering is treated as an independent crime.
3- The investigation must be serious and substantial, in line with the standards required for all crimes.
4- Investigations must respect the appropriate subject-matter and territorial jurisdiction.
5- Investigations must be conducted lawfully, based on legal acts or evidence(2).

(1) Dr. Ibrahim Eid Nayeel: The Criminal Response to the Phenomenon of Money Laundering in National and International Criminal Law, Dar Al-Nahda Al-Arabiya, Cairo, 1999, p. 88.
(2) Dr. Mohamed Ali Sweilem: Op. cit., p. 171 and beyond.

Investigation Reports:

After gathering information and clarifications through lawful methods, the judicial officer must draft an official report documenting the procedures undertaken. This report assists the investigative authority or the trial court in assessing the integrity and adequacy of the investigation.

The judicial officer may also request authorization from the investigative authority to carry out certain measures, such as arrest or search operations, aimed at apprehending the perpetrator or seizing documents or materials proving the crime.

The exceptional powers of judicial officers arise in cases of flagrante delicto (cases of being caught in the act).

Article 30 of the Code of Criminal Procedure defines a situation of flagrante delicto as when the crime is discovered during its commission or immediately thereafter.

Other instances include:

The victim chasing the perpetrator immediately after the crime;

The perpetrator being found shortly after the crime with items indicating their involvement;

Physical traces or signs indicating recent participation in a crime.

While it may seem unlikely to catch money laundering offenses "in the act," practical experience shows that such circumstances can occasionally occur.

Judicial officers can lawfully use modern technologies to support their efforts, such as:

Surveillance camera systems: These are digital cameras transmitting signals over network cables, available in various types (fixed, movable, large, small, medium-sized).

Smart card systems: Used, for example, to electronically deduct tolls from drivers automatically when passing certain checkpoints.

The application of artificial intelligence (AI) significantly enhances the ability to mine and analyze large datasets efficiently and accurately.

Second Branch
The Use of Artificial Intelligence Technology in Investigative Procedures

The commission of a crime gives rise to a criminal case, aiming to punish the offender, distinct from a civil claim for damages.

The Public Prosecution holds the exclusive authority to initiate and pursue criminal proceedings until a final judgment is issued. The preliminary investigation phase is critical because it prepares the case for trial[1]. The work of the Public Prosecution, whether supervising the collection of evidence or conducting the investigation or

(1) Dr. Abdel Raouf Mahdy: Explanation of the General Rules of Criminal Procedure, Dar Al-Nahda Al-Arabiya, Cairo, 2007, p. 317.

indictment, is considered a judicial function. Preliminary investigation comprises a series of procedures aimed at uncovering and collecting evidence regarding a crime and evaluating whether the evidence suffices to bring the accused to trial(1). Preliminary investigations are mandatory for felonies and optional for misdemeanors and minor offenses, though they are often conducted for serious misdemeanors. Certain guiding principles govern preliminary investigations:

All procedures must be documented.

Their contents and results must be treated as confidential.

When investigators employ AI technologies to analyze data or uncover evidence, such technologies must be legal, ethical, effective, and non-harmful.

Respect for privacy, adherence to justice, transparency, accountability, and maintaining human oversight are crucial.

Some of the primary investigative procedures where AI technologies can be utilized include:

1. Collection and Mining of Evidence
Key activities include:
On-Site Inspections:
Inspections involve the investigator visiting crime scenes, examining locations, objects, or persons related to the crime, and documenting their condition. For instance, inspecting the crime scene, the weapon used, or the body of the victim. Quick response is crucial to preserve evidence before it is tampered with. The Public Prosecution currently employs modern monitoring and imaging devices, including smart cameras, to capture real-time events at crime scenes.

The use of AI enhances the capability to analyze environments, search for evidence, and understand patterns, thereby increasing the success rates of criminal investigations.

2. Appointment of Experts

Investigations often require technical expertise to elucidate specific aspects, such as: Determining the cause or time of death.

Collecting and comparing fingerprints from crime scenes.

Expert opinions involve specialized individuals providing their professional assessments regarding critical facts in a criminal case(2).

If experts employ modern technologies—such as advanced forensic methods, fingerprint matching systems, or AI-based data analysis tools—results become

(1) Dr. Mahmoud Nagib Hosni: Preliminary Investigation in the Criminal Procedure Law, Cairo, 1994, p. 1.
(2) Court of Cassation, 16 June 1958, Collection of Cassation Rulings, Vol. 9, No. 171, p. 4676.

more reliable and accurate.

These technologies process authentic and vast datasets, applying scientific analyses and predictive modeling to improve the quality of investigative findings.

Witness Testimonies

The process of hearing witnesses by an investigator does not significantly differ in principle. A witness's testimony is a verbal account of what they have seen, heard, or otherwise perceived through their senses, and it constitutes an **oral form of evidence**.

The use of **artificial intelligence** to record and analyze witness testimonies, conduct comparisons, and identify inconsistencies can significantly enhance investigative outcomes compared to traditional methods.

Deploying smart cameras and incorporating AI-based technologies within interrogation rooms undeniably adds value to the investigation and the verification of witness statements.

Search, Seizure, Interrogation, and Confrontation

Search is among the most critical procedures of preliminary investigation. Its primary objective is to locate and seize items related to the crime, such as the tools used, the subject matter, or the proceeds. Given that searches infringe upon the sanctity of individuals and private premises, they are afforded **constitutional and legal protection**[1].

This necessitates the lawful use of AI applications to assist in searches without violating personal privacy. It must be emphasized that, despite the sophistication of AI, **human intelligence remains superior**, as it directs and controls the technology. Responsibility for any misuse therefore remains with the human operator.

Investigators must be properly informed and trained in the lawful and ethical use of AI during interrogation and confrontation procedures. They should harness internet data, sensor inputs, and sophisticated data analytics to uncover broader aspects of the crime under investigation, including predictive insights to prevent future offenses.

For instance, **algorithmic methods** involve carrying out a sequence of computational operations that map out machine learning strategies to solve specific problems or achieve defined objectives. However, this must always occur under the full control and informed awareness of the investigator.

(1) Dr. Abdel Raouf Mahdy: Op. cit., p. 307.

These practices must adhere to strict ethical standards:

- Respect for personal privacy,
- Prevention of harm to any individual,
- Compliance with legal frameworks ensuring transparency, justice, and non-discrimination,
- Preservation of human oversight and decision-making.

Recommendations

Given the complexities surrounding the proof of money laundering offenses—particularly in establishing the actus reus (physical element), the mens rea (mental element), and linking them to the underlying predicate offense—the following recommendations are proposed:

1- **Simplification of Evidence Requirements:**

2- It should be sufficient to prove the illicit nature of the assets involved in the laundering activities and their derivation from a felony or misdemeanor, without requiring a prior conviction for the predicate crime.

3- This approach would allow the trial court adjudicating the money laundering offense to independently and confidently establish the occurrence of the predicate offense, thereby facilitating more effective prosecution, similar to the approach adopted in illicit enrichment cases.

4- Money laundering severely contradicts religious, ethical, and societal values and poses serious threats to national economies by exacerbating income inequality and undermining fair wealth distribution.

5- **Enhancing International and Regional Cooperation:**

6- There is an urgent need to intensify cooperation at both the international and regional levels to combat money laundering effectively. Central banks should be empowered to suspend relations with local banks repeatedly implicated in deliberate money laundering operations.

7- Advanced training programs should be offered for individuals involved in law enforcement, investigation, and prosecution of money laundering cases. Inspiration can be drawn from the **United Nations Model Law** on money laundering, which allows prosecution without requiring conviction for the predicate offense (Article 5/2/1). Similar provisions exist in **Bahraini Law No. 4 of 2001**, **Qatari Law No. 4 of 2010 (Article 2/4)**, and in **British law**, where it suffices that circumstances strongly suggest that the assets are derived from criminal activity(1).

8- **Alignment with International Conventions:**

9- National laws must be adapted to comply with international agreements, such as the **1988 Vienna Convention**, to address money laundering and related crimes(2) without causing legal conflicts. Additionally, the legal framework should establish incentives for individuals (other than perpetrators or accomplices) who report money laundering crimes and reveal the whereabouts of illicitly obtained assets.

10- **Establishing Governance and Internal Oversight Systems:**

11- National institutions must implement robust governance frameworks and transparent administrative measures to ensure the appointment of qualified, integrity-driven leadership.

12- **Advanced Training in AI Technologies for Enforcement Authorities:**

13- Specialized training programs must be proposed to empower law enforcement, investigative, and prosecutorial personnel to

(1) William Blair, Richard Brent and tom Grant: banks and financial crime, Oxford University, 2017, p. 197
(2) Prof. Dr. Said Ahmed Ali Qasim: The Criminal Response to the Crime of Money Laundering and Terrorism Financing, Dar Al-Nahda Al-Arabiya, Cairo, 2015, p. 152.

effectively utilize AI technologies. Effective training fosters the development of reliable systems and practices among public employees, thereby promoting transparency and integrity. Improved administrative practices could gradually eliminate complex bureaucratic processes that encourage individuals to seek intermediaries or offer bribes, ultimately leading toward the full realization of **e-government systems** that prioritize transparency in the provision of public services.

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