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Organized Crime as a Transnational Threat in the Modern Period

The paper addresses one of the primary challenges of the modern era: both nationally and internationally organized crime and the threats it poses. Effectively combating crimes of this nature is the primary legal obligation of any democratic state, and at this juncture, it remains an unresolved issue, which undoubtedly highlights the significance of the research.

The article is based on an analysis of doctrine, legislation, and judicial practice. It reviews the main provisions of organized and transnational organized crime, as well as the existing challenges.

This study aims to identify effective measures for combating organized crime and transnational organized crime, as well as to address relevant issues.

Keywords: *Organized Crime, Transnational Organized Crime, Transnational Threat, Complicity in Crime.*

1. Introduction

“Organized crime is a complex criminal phenomenon that requires special empirical and analytical research. Creating the legal framework for this problem is related to many theoretical, social, and practical problems, especially since organized crime became transnational, it has threatened humanity with its devastating impact.”¹ “Although some international and domestic instruments”² are applied to fight against organized and transnational crime, it is becoming increasingly large-scale and global. According to the International Monetary Fund, the “income from drug trafficking and the legalization of illegal income equals six to eight percent of the world economy.”³ Thus, the fight against this phenomenon requires a constantly updated thought.

The rise of nation-states, the development of capitalism, industrialization, and, ultimately, modern advancements in science and technology have all contributed to the emergence of new forms of organized crime. This social phenomenon is marked by a complex and criminal nature, closely linked to widespread corruption and various economic crimes. In pursuit of maximum profit, organized crime groups not only exploit and oppress ordinary citizens – violating their legitimate

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¹ Mumladze D., Dzneladze L., *Fight Against Organized Crime (Mafia): Comparative Legal Analysis*, Jurn “Justice”, No. 2, 2008, 35.

² Tumanishvili G., Jishkariani B., Shram E., (Eds.), *Impact of European and International Law on Georgian Criminal Procedure*, T., 2019, 800-801.

³ Shelley, L., *Transnational Organized Crime and Seized Assets: Moral Dilemmas Concerning the Disposition of the Crime of Crime*, 7 Maastricht J. Eur. & Comp. (2000), 35 [24.08.2025].

rights – but also pose a serious challenge to the state itself, particularly to law enforcement agencies, and, in some cases, at a global level.

Beyond some international or local regulations, crimes are often disguised in such a way that legislative instruments and the activities of law enforcement agencies fail to yield tangible, practical results, which makes it difficult to find and deprive the criminal of assets accumulated as a result of committing such crimes.

It would be unreasonable to contend that this complex socio-economic problem can only be solved by legal measures and criminal punishments. The purpose of this paper is to analyze the relevant material related to the practice and theory of combating this problem worldwide, using a comparative-legal method.

Globalization creates favorable conditions for the rapid transnational expansion of organized crime. This study also seeks to examine the threats posed by transnational organized crime and to analyze recent practices adopted by national courts in addressing both transnational and domestic forms of organized crime.

2. General Provisions of Organized Crime

In the modern sense, organized crime emerges alongside the establishment of state sovereignty. Criminal networks form a systemic structure that spreads through society like a metastatic tumor, feeding off the resources of both the state and its citizens. These networks infiltrate institutions, undermine societal structures, instill fear, and, at a certain point, begin to directly compete with the state itself.

Since the 19th century, organized crime has become increasingly powerful and has taken dangerous forms.

“Organized crime, which (at least) has a history of two centuries, has been the subject of scientific research for several decades.”⁴

“Organized crime is the most dangerous type of group crime committed by organized groups with a reliably conspiratorial, solid, long-standing criminal activity, which is widely used for violence, population intimidation, bribery to obtain overprofit from illegal lucrative businesses. And it penetrates the field of business and politics through converting the legal business conducted through illegal means into a legal one.”⁵

“Organized crime is one of the complex and dangerous types of crime, which primarily encroaches on the economic, political, legal, and moral spheres of society.”⁶

“Organized crime is one of the most acute problems of today's world. It should be attributed to the delict of the global threat to society by the effect of its devastating impact.”⁷

⁴ M., Criminology, Tbilisi, 2011, 84 (in Georgian).

⁵ I., Criminology, Tbilisi, 1998, 179. (in Georgian)

⁶ Tsulaia Z., Criminology (General Part), Tbilisi, 2003, 224 (in Georgian).

⁷ Ugrekhelidze M., Charged in Hazard Delicts, Tbilisi, 1982, 60 (in Georgian).

The history of organized crime should probably be discussed with the history of the development of the state, because “Confronting society, the criminal phenomenon has undergone evolution and become resistant to the anti-crime impact of the state and society.”⁸

As already mentioned, “organized crime is not only a problem in most countries, but it has a transnational nature.”⁹ A typical example is the illegal movement of foreigners seeking “political asylum”, which is driven by organized criminal groups. Since the 1950s, the United States Senate has regularly charged appropriate commissions to analyze this crime and find ways to combat it. The conclusions of the committees were known by the names of the heads of the committees: Rico, Kefauer (1950-1951); Katzenbach (1966-1967); Byrne (1975-1976); and Kaufman (1983-1986).

The Kefauer Commission first mentioned the term “Organized Crime”, which went beyond the scope of ordinary gangster crime. The term has possibly expressed the essence of a very dangerous criminal phenomenon.

The 2021-2025 strategy of the European Union against Organized Crime states that “organized crime, which is hidden from public view due to its opaque nature, is a significant threat to European citizens, businesses, and state institutions, as well as the European economy as a whole.”¹⁰

According to the National Strategy to fight against organized crime, “based on its transnational nature, it is one of the important challenges not only for Georgia but for the whole world. Organized crime violates fundamental values of society, hinders economic, social, cultural, and political development, contradicts the principles of the rule of law, and threatens national and international security.”¹¹

“Following its transnational nature National Strategy considers the combat against organized crime as one of the main priorities of our country. After the collapse of the Soviet Union, the civil and separatist wars impelled human trafficking and the drug transition process in Georgia.”¹²

3. Georgian Legislation on Organized Crime

According to the Law of Georgia on the National Security Policy Planning and Coordination, fighting organized crime is one of the key tasks of our country.

“The scope of the law, among other important issues, includes the fight against transnational and organized crimes.”¹³

⁸ Avanesov G.A. (ed.), *Criminology*, T., 2007, 570 (in Georgian).

⁹ *Pieces c.* (ed.), *Problems of Criminalization and Law Enforcement of Modern Manifestations of Organized Crime in Georgian Criminal Law*, T., 2012, 22.

¹⁰ The EU Strategy to Tackle Organised Crime 2021-2025, <<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52021DC0170&qid=1632306192409>>, [03.08.2025].

¹¹ Fighting Organized Crime 2021-2024 National Strategy, 2, <<https://matsne.gov.ge/ka/document/view/5256554?publication=0>> [03.08.2025].

¹² *Ciklauri-Lammich Eliko*, Menschenraub, ein Blühendes Gewerbe in der Kaukasusregion, *Monatshefte für Osteuropäisches Recht*, Hrsg. Dr. Günter Tontsch, Hamburg 2000, 2-9.

¹³ Article 12 of the Law of Georgia on the Procedure for Planning and Coordination of National Security Policy, <<https://matsne.gov.ge/document/view/2764463?publication=14>> [24.11.2025].

According to Article 27(3) of the Criminal Code of Georgia, “a crime shall be considered to have been committed by an organized group if it was committed by structured group formed and acting structured jointly within a specific period and the member of which united in advance to commit one or several crimes the purpose of which is unlawfully obtain direct or indirect financial or other material benefits.” Based on part 3 of the article, a structured group shall be the group that has not been casually set up for immediate commission of a crime and that does not require formal distribution of roles among its members, or continuous membership, or a developed structure.

“It is clear that an organized group ready to commit one or more serious or particularly serious crimes is dangerous. Especially if the organized group has already committed a pre-planned crime.”¹⁴

“Numerous provisions within the General Part of the Criminal Code of Georgia recognize the commission of a crime by an organized group as a qualifying or aggravating circumstance. In addition, the Code establishes specific offenses directly associated with organized criminal activity, such as banditry. However, banditry (Article 224 of the Criminal Code) and the commission of a crime by an organized group (Article 27(3)) are not identical legal constructs.

Unlike a gang, an organized group may not be armed. For example, under Article 180, paragraph 4, subparagraph (a) of the Criminal Code, fraud committed by an organized group does not require the group to be armed. The stability and structure of such a group are sufficient for qualification. Similar to a gang, an organized group may be formed for committing one or multiple crimes.”¹⁵

“In the context of combating organized crime, one of the key strategic directions is the systemic intensification of efforts against so-called 'thieves in law' and members of the criminal underworld, including their supporters.”¹⁶ “The term 'thief in law' refers to a phenomenon rooted in the Soviet penal system, originating in the early 1930s.”¹⁷

“In the Soviet Union, “thieves in law” exercised control over the lives of inmates in prisons and labor camps (“lagers”). Beginning in the 1960s and 1970s, their influence extended beyond the penitentiary system to encompass oversight of “speculators” and “Tsekhaniks” (self-made hustlers) – figures operating within the shadow economy (Gurov, 1995; Varese, 1998; Volkov, 1998, 2002). 2002).”¹⁸

“A significant role in the resurgence of the 'thief in law' institution was played by the political and voluntaristic hypothesis that emerged in the 1960s-1980s, namely the belief in the 'possibility of the complete eradication of crime in the Soviet Union.' This ideological construct contributed to the illusion that professional and organized crime had been eliminated, thereby creating conditions conducive to the quiet revival and entrenchment of criminal subcultures.”¹⁹

¹⁴ Tkesheladze G. (ed.), General Part of Criminal Law, Tbilisi, 2004, 220.

¹⁵ Turava M., Criminal Law, General Part Review (Eighth Edition) , Tbilisi, 2010, 279 (in Georgian).

¹⁶ Combating Organized Crime 2021-2024 National Strategy, 4, <<https://matsne.gov.ge/document/view/5256554?publication=0>> [25.09.2025].

¹⁷ Lobzhanidze G., Ghlonti G., Thieves in Law: History and Reality (Monogr.), Tbilisi, 2004, 46.

¹⁸ Kekoshvili v., The Impact of the Subculture of Thieves on the Socialization of Adolescents in Post-Soviet Georgia (dissertation), Tbilisi, 2019, 29.

¹⁹ Lobzhanidze G., Ghlonti G., Thieves in Law: History and Reality (Monogr.), Tbilisi, 2004, 55 (in Georgian).

Over several decades, the criminal subculture and mentality have evolved in such a manner that the operations of the so-called “criminal underworld” have become increasingly structured and institutionalized, encompassing even transnational organized crime activities.

The intensified fight against organized crime in Georgia began in 2005 with the adoption of the Law of Georgia on Organized Crime and Racketeering, which underwent substantial amendments on April 18, 2018.²⁰

This law defines and regulates key concepts such as the “criminal underworld,” “criminal underworld activities”, “member of the criminal underworld,” “thief in law,” “criminal showdown,” and “underworld meeting”.

Article 223¹ of the Criminal Code of Georgia, which criminalizes membership in the criminal underworld and the status of ‘thief in law’, was introduced in 2005.

“Georgia became the first country in the post-Soviet space to adopt anti-theft legislation, which may be regarded as a progressive step in the fight against organized crime.”²¹

According to the amendments adopted on April 18, 2018, in addition to criminalizing “membership in the criminal underworld” and holding the status of a “thief in law,” the law also established criminal liability for participating in an “underworld meeting”, supporting the “criminal underworld activities,” appealing to a member of the criminal underworld or a thief in law, and receiving material benefit or advantage as a result of such an appeal.”²²

These legislative amendments largely solve the challenges in combating this complex phenomenon, which we will consider in detail by analyzing judicial practice.

4. Organized Crime in International Legal Instruments and Conventions

In the context of combating organized crime and confiscating proceeds derived from criminal activities, numerous international (UN) and regional (European) legal instruments have been adopted over the past few decades. These instruments have, at various stages, been incorporated into the national legislation of Georgia.

“Among the most significant and illustrative examples for transitional countries are the following: – the Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime (1990), – the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1997), – the Council of Europe Criminal Law Convention on Corruption (1999), – the United Nations Convention Against Transnational Organized Crime (UNTOC) (2000), – the Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (2005), – and the EU

²⁰ Law of Georgia on Organized Crime and Racketeering of 20 December 2005, <<https://matsne.gov.ge/document/view/27814?publication=1>> [25.09.2025].

²¹ *Pieces c.* (ed.), *Problems of Criminalization and Law Enforcement of Modern Manifestations of Organized Crime in Georgian Criminal Law*, Tbilisi, 2012, 528.

²² Articles 2231-2234 of the Criminal Code of Georgia, <<https://matsne.gov.ge/document/view/16426?publication=264>> [25.09.2025].

Directive 2014/42/EU on the Freezing and Confiscation of Instrumentalities and Proceeds of Crime in the European Union, (2014).²³

The United Nations Convention against Transnational Organized Crime, adopted on November 15, 2000, represents one of the cornerstone international instruments in the global fight against organized crime.²⁴ “It was the first international treaty of the century to be signed for countries at the Millennium High-Level Conference held in Palermo, Italy, from December 12 to December 15, 2000.”²⁵

“The Palermo Convention was established as a comprehensive legal instrument to combat cross-border criminal activity. Its key provisions address participation in an organized criminal group, money laundering, corruption, and obstruction of justice. (1) Additionally, the Convention establishes mechanisms for international cooperation, including extradition, mutual legal assistance, and cooperation among law enforcement agencies. (2) It also emphasizes the importance of enhancing the qualifications and technical capacity of public institutions at the national level (3).”²⁶

Article 2 of the Convention contains a set of important definitions that serve as the conceptual foundation for the Convention's application. These include:

- a) Organized criminal group – a structured group of three or more persons, existing over a period and committing one or more serious crimes to obtain direct or indirect financial or other material benefits.
- b) Serious crime – an offence punishable by a maximum deprivation of liberty of at least four years or a more severe sanction.
- c) Structured group – a group that is not randomly formed for the immediate commission of an offence and in which it is not necessary to formally define roles for its members, maintain continuity, or possess a fully developed hierarchical structure.
- d) Property – any type of asset, whether tangible or intangible, movable or immovable, including legal documents or instruments evidencing title to, or interest in, such assets.
- e) Proceeds of crime – any property derived or obtained, directly or indirectly, through the commission of a criminal offence.
- f) Freezing or seizure – the temporary prohibition of the transfer, conversion, disposition, or movement of property, or the temporary assumption of custody or control by a court or competent authority.
- g) Confiscation – the permanent deprivation of property by order of a court or other competent authority.

²³ Orlovska, N., & Stepanova, J., Confiscation of Proceeds and Property Related to Crimes: International Standards and the ECHR Practice, 10 Juridical Trib. 499-500 (2020) [24.08.2025].

²⁴ United Nations Convention on Transnational Organized Crime, <<https://matsne.gov.ge/document/view/1485286?publication=0>> [27.09.2025].

²⁵ Ciopec F., Compatibility of Romanian Legislation with the UN Convention Against Transnational Organized Crime, 39 Zbornik Radova (2005), 213 [24.08.2025].

²⁶ Borgstede G., Cultural Property, the Palermo Convention and Transnational Organized Crime, 21 IJCP (2014), 283 [24.08.2025].

The Convention also provides a definition of “transnational crime” for its application. “A crime is considered transnational if: a) It is committed in more than one state. b) it is committed in one state but a substantial part of its planning, preparation, direction, or control takes place in another state; c) it is committed in one state but involves an organized criminal group that engages in criminal activity in more than one state; or d) it is committed in one state but has substantial effects in another state.”²⁷

On 24 April 2024, upon the recommendation of the European Commission, a new directive on the recovery and confiscation of criminal assets was adopted, strengthening the legal framework for recovery across EU member states.²⁸

According to the Directive (2), the primary motive of transnational criminal organizations, including high-risk criminal networks, is the pursuit of financial gain. In order to mitigate the serious threat posed by organized crime, competent authorities must dedicate greater institutional focus and resources to the effective tracing, identification, freezing, confiscation, and management of assets related to criminal property and activities.

5. Organized Crime and Criminal Complicity

Given the intrinsic connection between organized crime and the phenomenon of complicity, as well as the evolving forms and methods of organized criminal activity in recent decades, particularly its increasing transnational character, it becomes essential to examine the concept of complicity in greater depth.

“Complicity in a crime refers to the intentional and joint participation of two or more individuals in the commission of a premeditated criminal crime.”²⁹

“In cases involving the joint commission of intentional unlawful acts by two or more individuals, Georgian criminal law applies the so-called dualistic system for distinguishing the roles of participants. Under this system, each participant is classified either as a principal (executor) or as an accomplice, based on the specific role they played in the commission of the crime.”³⁰

The executor is the individual who, as the *central figure* in the commission of a crime, exercises control over the act through planned direction or shared intent (co-awareness). This person holds the power to shape the course of the criminal act, with the ability to initiate, continue, or terminate it at will.

“In contrast, the accomplice is someone who, lacking such control, contributes to the criminal act as a *secondary figure* in the event, either by instigating, facilitating, or otherwise promoting its commission without personally dominating the execution of the act.”³¹

²⁷ Clark R. S., The United Nations Convention Against Transnational Organized Crime, 50 WAYNE L. REV. (2004), 167 [24.08.2025].

²⁸ Directive (EU) 2024/1260 of the European Parliament and of the Council on Asset Recovery and Confiscation, <<https://eur-lex.europa.eu/eli/dir/2024/1260/oj>> [05.08.2024].

²⁹ Article 23 of the Criminal Code of Georgia, <<https://matsne.gov.ge/document/view/16426?publication=267>> [18.01.2025].

³⁰ Turava M., Criminal Law, General Part Review (Eighth Edition), Tbilisi, 2010, 265 (in Georgian).

³¹ Wessels I., Boyle V., General Criminal Justice, Tbilisi, 2010, 290-291.

“Complicity in the commission of a crime may arise not only through direct action but also through omission, where the individual has a legal duty to act. Moreover, an accomplice does not necessarily have to agree with the principal's motives or objectives; However, the accomplice must intentionally contribute to the commission of the crime, as complicity requires a deliberate and actionable form of participation.”³²

“The term *accessorius* (from Latin) means 'additional' or 'one who is joined.'” In the context of complicity, it refers to the legal concept that an accomplice's responsibility is derivative of, or connected to, the principal offender's actions. In other words, the liability of the accomplice is tied to their contribution to the commission of the crime by the principal.”³³

“The concept of complicity emerged from the recognition that the criminal liability of co-participants possesses certain distinctive features. These features become particularly evident in the form of complicity known as complicity in the narrow sense. This type of complicity arises when the accomplice does not personally fulfill the elements of the offense as defined in the Special Part of the Criminal Code, yet still contributes to its commission through intentional assistance, incitement, or other supportive conduct.”³⁴

The author refers to complicity involving the distribution of roles among multiple perpetrators, specifically the organizer, the instigator, and the aider. The fact that the organizer, instigator, or aider does not personally perform the objective elements of the offense (the *actus reus*) may raise doubts about the basis for their punishment. However, the legality of holding such participants criminally liable is well established and beyond dispute. The actions of the organizer, instigator, and aider are intrinsically linked to those of the principal (executor). In many instances, without the involvement of these accomplices, the act might not have occurred at all, and the crime would have remained unrealized.

T. Tsereteli observed that the responsibility of participants must rest on a single legal foundation. “In the context of complicity, the offense remains one unified criminal act, committed by several individuals, and characterized by a single materially and socially dangerous conduct.”³⁵

This approach to the issue persisted until the German scholar E. Metzger ultimately addressed the problem of the subjective elements of unlawfulness. The core idea of the doctrine he developed was that, in certain categories of offenses, unlawfulness (*Unrecht*) is not solely defined by objective elements, but is also constituted by a subjective element – specifically, the offender's purpose. In such cases, the absence of this subjective element renders the act legally non-wrongful, regardless of its objective characteristics.

In Georgia, E. Metzger's theory was further developed by O. Gamkrelidze, who formulated the doctrine of unified unlawfulness (*einheitliches Unrecht*) as a unified foundation for holding co-perpetrators criminally liable. By analyzing the subjective elements of unlawfulness in connection with the punishability of complicity, Gamkrelidze concluded that co-perpetrators commit a single act

³² Turava M., Criminal Law, General Part Review (Eighth Edition), Tbilisi, 2010, 272 (in Georgian).

³³ Surguladze L., Criminal Law, Tbilisi, 1997, 354 (in Georgian).

³⁴ Tsereteli T., Complicity in Crime, Tbilisi, 1965, 7-8 (in Georgian).

³⁵ Tsereteli T., Complicity in Crime, T., 1965, 55 (in Georgian).

of unlawfulness, and this unity is formed through a shared purpose that links the perpetrators, regardless of the individual motives each may have.³⁶

“Therefore, both the principal (executor) and the accomplice commit the same act of unlawfulness. Furthermore, complicity necessarily implies awareness of the principal's criminal conduct. It is sufficient that the accomplices are aware of the executor's actions; However, for the accomplices to be held criminally liable, the executor doesn't need to be aware of their actions.”³⁷

Accordingly, both the principal (executor) and the accomplice engage in the same act of unlawfulness. Complicity inherently requires that the accomplice be aware of the principal's criminal conduct. It is sufficient that the accomplice knows the executor's actions; However, the principal's awareness of the accomplice's involvement is not a prerequisite for establishing the accomplice's criminal liability.”³⁸

In the fight against transnational organized crime, it is particularly important to establish the liability of accomplices, especially the leaders and coordinators of organized criminal groups. Analyzing the forms and types of complicity is essential for a deeper understanding of the structure and functioning of organized crime.

Complicity can be manifested in three general forms: complex complicity is a participation through the distribution of roles (e.g., organizer, instigator, aider); simple complicity – joint commission of a crime without differentiated roles; participation within an organized criminal group. However, since criminal complicity always requires a subjective connection between participants (i.e., shared intent or common purpose), complicity can further be categorized based on the existence of prior agreement: with prior agreement, and without prior agreement. Therefore, complicity in criminal law may be classified into five distinct forms based on the structure of participation and the subjective relationship between the parties.”³⁹

According to Article 24 of the Criminal Code of Georgia, “an organizer is a person who organizes the commission of a crime or supervises its execution, as well as a person who creates or leads an organized group. An instigator is someone who intentionally incites another person to commit a deliberate crime. Aiders are those who assist in the preparation or commission of a crime. The organizer is considered a central figure among the participants and co-offenders, playing a crucial role in planning and directing the criminal act.”⁴⁰ However, the instigator and helper in the activities of organized and communicated crime groups are of no less importance.

Organized crime groups are naturally characterized by a large number of individuals and a continuous need to recruit new members. Due to the nature of their activities, such groups frequently require various forms of support, both active and passive. Functionally, it is often the case that individual members must assume different roles at different times and in the commission of various

³⁶ *Gamkrelidze O.*, Problem of Criminal Unrighteousness and Grounds for Punishability of Participation, Tbilisi, 1989.

³⁷ *Turava M.*, Criminal Law, General Part Review (Eighth Edition), Tbilisi, 2010, 275-276 (in Georgian).

³⁸ Wessels I., Boyle v., General Criminal Justice, Tbilisi, 2010, 299.

³⁹ *Proceedings G.*, General Criminal Justice, Tbilisi, 2007, 203-204 (in Georgian).

⁴⁰ *Proceedings G.*, General Criminal Justice, Tbilisi, 2007, 211.

types of crimes. As a result, a clear and rigid separation between participants based on their roles is practically impossible.

M. Turava considers outdated the interpretation of the norm that defines the executor as solely the person who directly carries out the objective elements of the crime, while treating others involved in functionally essential parts of the crime as mere helpers.

According to Turava, “*A person who assists the principal offender during the actual execution of the crime and facilitates the completion of its objective elements is not merely an aider. Such a person is a functional co-executor, fully participating in the commission of the offense.*”

“A person who assists the principal offender during the actual commission of the crime and facilitates the realization of the elements of the offense is also considered to be involved in the crime. Such an individual cannot be classified as a mere aider; rather, they are a functional co-executor.”⁴¹

Organized crime is also qualitatively characterized by the commission of new crimes. Thus, in addition to complicity, it is associated with criminal institutions such as uniform crime and a plethora of crimes. It should also be noted that in a continuing crime, the moment of repetition of the crime does not create a plethora of crimes. “Viewing action as a continuing crime is usually a matter of fact, not a matter of legislative construction.”⁴²

It is also important to note that an organized crime group is not necessarily created for the commission of a single, specific crime. Both the 2000 Palermo Convention and the Criminal Code of Georgia (Article 27(3), as amended in 2006) recognize that such a group may be established to commit one or multiple criminal offenses.

What matters is the presence of the fundamental elements that define coordinated participation, as characteristic of organized criminal activity. In this regard, a noteworthy parallel can be drawn with the jurisprudence of international criminal law.

To introduce a unified standard of liability for joint perpetrators and to reinforce the objective elements of collective responsibility, the International Criminal Tribunal for the former Yugoslavia (ICTY), in the landmark case of *Prosecutor v. Tadić*, identified three essential objective elements of the doctrine of Joint Criminal Enterprise (JCE), applicable across all categories. These elements are: “A plurality of persons, the existence of a common plan, purpose, or design, and the accused's participation in the common plan.”⁴³ The strategic objective of organized crime is the continuous expansion of its criminal operations. In the modern era, it has evolved into a form of *criminal industry*, necessitating a deliberate, consistent, and rigorous criminal justice policy in response.

6. Georgia's Experience in Combating Organized Crime

“Although more than two decades have passed since the adoption of the United Nations Convention against Transnational Organized Crime, it remains evident that organized crime continues

⁴¹ Turava M., Criminal Law, General Part Review (Eighth Edition), Tbilisi, 2010, 272 (in Georgian).

⁴² Tkeshishvili G., Responsibility for the Unity of Crimes, Tbilisi, 1985, 32.

⁴³ Dgebuadze G., The Doctrine of Individual Crime, Crime and Precedent Law in International Criminal Law, Tbilisi, 2021, 115-116 (in Georgian).

to be a complex and evolving phenomenon, one that no single state can effectively address in isolation.”⁴⁴

The transnational threat posed by organized crime, along with the evolving nature of criminal methods (*modus operandi*) characterized by both covert and overt operational patterns, necessitates a strategic and continuously adaptive response.”⁴⁵

National agencies tasked with leading the fight against organized crime must ensure effective cooperation and information exchange at both the European Union and global levels. Achieving this goal requires integration into a unified criminal justice framework, along with access to adequate material and technical resources. “The main motivator of most serious and organized crime is financial benefits.”⁴⁶

The National Strategy to Combat Organized Crime focuses on three key areas: the criminal subculture of so-called “thieves-in-law,” cybercrime, and drug-related crime.⁴⁷

The strategy also emphasizes that combating crime and organized crime in particular is a continuous process, especially in the context of modern technological advancement, where “both law enforcement agencies and criminal networks are constantly developing new capabilities.”⁴⁸

In connection with organized crime and in order to examine the Georgian experience, this study analyzes the case law of the common courts related to “thieves-in-law” and the “criminal underworld.”

“According to the verdict of the Tbilisi City Court dated February 18, 2021, M.G. and others were convicted of acts of violence, illegal deprivation of liberty, membership in the criminal underworld, supporting the criminal underworld activities, and appealing to a member of the criminal underworld / ‘thief in law’. Additionally, G.G. was acquitted in absentia on the charge of holding the status of a “thief in law”. No confiscation of property was imposed as an additional penalty.”⁴⁹

“Following the judgment of the Zugdidi District Court dated March 5, 2021, T.G. (in absentia) and others were convicted of extortion, holding the status of a “thief in law”, membership in the criminal underworld, and sowing/importing narcotic drugs. No confiscation of property was imposed as an additional penalty.”⁵⁰

“Based on the verdict of the Tbilisi City Court dated March 17, 2021, I.C. and others were convicted of membership in the criminal underworld, holding the status of a “thief in law” (in absentia), supporting the criminal underworld activities, and appealing to a member of the criminal underworld / “thief in law”. No confiscation of property was imposed as an additional penalty.”⁵¹

⁴⁴ UNODC,-Organized Crime Strategy Toolkit for Developing High-Impact Strategies, 1, <https://sherloc.unodc.org/cld/uploads/pdf/Strategies/OC_Strategy_Toolkit_Ebook.pdf> [07.09.2025].

⁴⁵ The EU Strategy to Tackle Organised Crime 2021-2025 <<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52021DC0170&qid=1632306192409>> [03.08.2024].

⁴⁶ Prosecutor's Office of Georgia 2022-2027 Strategy, 37, <<https://pog.gov.ge/uploads/7f5da215-saqrTvelos-prokuraturis-2022-2027-wlebisstrategia.pdf>> [03.08.2024].

⁴⁷ Combating Organized Crime 2021-2024 National Strategy, 4, <<https://matsne.gov.ge/ka/document/view/5256554?publication=0>> [03.08.2024].

⁴⁸ Ibid, 7.

⁴⁹ Verdict No 1/3309-22 of February 18, 2021 of Tbilisi City Court.

⁵⁰ Verdict No 1/465-20 of March 05, 2021 of Zugdidi District Court.

⁵¹ Verdict No 1/3252-20 of 17 March 2021 of the Tbilisi City Court.

“According to the verdict of the Kutaisi City Court dated April 7, 2021, M. G. was found guilty of supporting the activities of the 'criminal underworld.' No deprivation of property has been used as an additional punishment.”⁵²

“Under the judgment of the Tbilisi City Court of September 23, 2021, K. K. and R.G. (in absentia) were convicted of membership of the “criminal underworld” and “theft of law”. No deprivation of property has been used as an additional punishment.”⁵³

“According to the judgment of the Rustavi City Court of December 10, 2021, Kh. P. and E. A. were convicted of extortion, membership of the “criminal underworld”, and support of the activities of the “criminal underworld”. No deprivation of property has been used as an additional punishment.”⁵⁴

“Following the judgment of the Tbilisi City Court of December 27, 2021, B. A. and others were convicted of supporting the activities of the “criminal underworld” and appealing to a member of the “criminal underworld” / “thief in law”. No deprivation of property has been used as an additional punishment.”⁵⁵

“By the judgment of the Tbilisi City Court of March 15, 2022, G. R. was judged for supporting the activities of the “criminal underworld”. No deprivation of property has been used as an additional punishment.”⁵⁶

“Based on the verdict of the Tbilisi City Court of March 17, 2022, D. K. and others were convicted of membership in the “criminal underworld” and supporting the activities of the “criminal underworld”. No deprivation of property has been used as an additional punishment.”⁵⁷

“According to the verdict of the Tbilisi City Court of April 01, 2022, A. A. and others were convicted of membership of the “criminal underworld” and supporting the activities of the “criminal underworld”. No deprivation of property has been used as an additional punishment.”⁵⁸

“By the verdict of the Bolnisi District Court of April 05, 2022, T. N. and others were convicted of violence, membership of the “criminal underworld”, and support for the activities of the “criminal underworld”. No deprivation of property has been used as an additional punishment.”⁵⁹

“Following the verdict of the Rustavi City Court of April 01, 2022, S. T. and others were convicted of supporting the activities of the “criminal underworld”. No deprivation of property has been used as an additional punishment.”⁶⁰

“Under the verdict of the Bolnisi District Court of April 06, 2022, A. J. and others were convicted for extortion, membership of the “criminal underworld”, support for the activities of the “criminal underworld”, and for seeding/importing narcotic drugs. No deprivation of property has been used as an additional punishment.”⁶¹

⁵² Verdict No 1/664-20 of the Kutaisi City Court of April 07, 2021.

⁵³ Verdict No 1/468-21 of September 23, 2021 of the Tbilisi City Court.

⁵⁴ Verdict No 1-334-21 of December 10, 2021 of the Rustavi City Court.

⁵⁵ Judgment No 1/5491-21 of December 27, 2021 of Tbilisi City Court.

⁵⁶ Verdict No 1/947-22 of 15 March 2022 of Tbilisi City Court.

⁵⁷ Judgment No 1/1349-21 of 17 March 2022 of the Tbilisi City Court.

⁵⁸ Verdict No 1/4408-21 of April 01, 2022 of Tbilisi City Court.

⁵⁹ Verdict No 1/226-21 of April 05, 2022 of Bolnisi District Court.

⁶⁰ Verdict No 1-514-21 of April 05, 2022 of Rustavi City Court.

⁶¹ Verdict No 1/237-21 of April 06, 2022 of the Bolnisi District Court.

“According to the verdict of the Tbilisi City Court of April 15, 2022, G. D. and others were convicted of supporting the activities of the “criminal underworld” and appealing to a member of the “criminal underworld” / “thief in law”. No deprivation of property has been used as an additional punishment.”⁶²

“Based on the judgment of the Tbilisi City Court of April 20, 2022, Sh. K. was convicted of appealing to a member of the “criminal underworld” / “thief in law”. No deprivation of property has been used as an additional punishment.”⁶³

“Following the judgment of the Tbilisi City Court of June 13, 2022, Sh. M. and others were convicted of membership of the “criminal underworld” and support for the activities of the “criminal underworld”. No deprivation of property has been used as an additional punishment.”⁶⁴

“Under the judgment of the Tbilisi City Court of December 27, 2021, N. C. and others were convicted of supporting the activities of the “criminal underworld” and appealing to a member of the “criminal underworld” / “thief in law”. No deprivation of property has been used as an additional punishment.”⁶⁵

“According to the judgment of the Tbilisi City Court of September 13, 2022, Z. M. and others were convicted of membership of the “criminal underworld”, support for the activities of the “criminal underworld”, and appeal to a member of the “criminal underworld” / “thief in law”. No deprivation of property has been used as an additional punishment.”⁶⁶

“Based on the judgment of the Tbilisi City Court dated June 13, 2022, G.L. and others were convicted of membership in the 'criminal underworld' and of supporting its activities. No property confiscation was imposed as additional punishment.”⁶⁷

“Following the judgment of the Tbilisi City Court of September 16, 2022, I. M. and others were convicted of membership of the “criminal underworld” and for appealing to a member of the “criminal underworld” / “thief in law”. No property confiscation was imposed as an additional punishment.”⁶⁸

“Under the judgment of the Akhaltsikhe District Court of September 20, 2022, L. J. and others were convicted of membership in the “criminal underworld”, support for the activities of the “criminal underworld”, and failure to comply with the judgment that entered into legal force. No property confiscation was imposed as an additional punishment.”⁶⁹

“Based on the judgment of the Tbilisi City Court of October 12, 2022, I. M. and others were convicted of appealing to a member of the “criminal underworld” / “thief in law”. No property confiscation was imposed as an additional punishment.”⁷⁰

“According to the judgment of the Tbilisi City Court of December 16, 2022, L. T. and V.T. were convicted of membership in the “criminal underworld” and for appealing to a member of the

⁶² Judgment No 1/3333-21 of 15 April 2022 of Tbilisi City Court.

⁶³ Verdict No 1/1947-22 of April 20, 2022 of Tbilisi City Court.

⁶⁴ Verdict No 1/4642-21 of 13 June 2022 of Tbilisi City Court.

⁶⁵ Verdict No 1/385-22 of 16 June 2022 of Tbilisi City Court.

⁶⁶ Verdict No 1/5937-19 of September 13, 2022 of Tbilisi City Court.

⁶⁷ Verdict No 1/968-22 of the Tbilisi City Court of September 13, 2022.

⁶⁸ Verdict No 1/374-22 of the Tbilisi City Court of September 16, 2022.

⁶⁹ Verdict No 1/107-22 of September 20, 2022 of Akhaltsikhe District Court.

⁷⁰ Verdict No 1/3450-22 of October 12, 2022 of the Tbilisi City Court.

“criminal underworld” / “thief in law”. No property confiscation was imposed as an additional punishment.”⁷¹

“Following the verdict of the Tbilisi City Court of December 26, 2022, Z. Kh. and others were convicted of membership in the “criminal underworld”, support for the activities of the “criminal underworld”, and appeal to a member of the “criminal underworld” / “thief in law”. No property confiscation was imposed as an additional punishment.”⁷²

“By the judgment of the Tbilisi City Court of January 06, 2023, A. Ts. and others were convicted of membership in the “criminal underworld”, support for the activities of the “criminal underworld” and appeal to a member of the “criminal underworld” / “thief in law”. No property confiscation was imposed as an additional punishment.”⁷³

“Under the verdict of the Tbilisi City Court of March 17, 2021, M. M. and others were convicted of membership in the “criminal underworld”, “theft in law” (in absentia), support for the activities of the “criminal underworld” and appeal to a member of the “criminal underworld” / “thief in law”. No property confiscation was imposed as an additional punishment.”⁷⁴

“Based on the judgment of the Tbilisi City Court of February 16, 2023, T. G. (in absentia) and others were convicted of coercion, inhuman treatment, “theft in law”, membership in the “criminal underworld”, support for the activities of the “underworld” and appeal to a member of the “criminal underworld” / “thief in law”. No property confiscation was imposed as an additional punishment.”⁷⁵

“Following the verdict of the Tbilisi City Court of March 14, 2023, R. G. and others were convicted of appealing to a member in the “criminal underworld” / “thief in law”. No property confiscation was imposed as an additional punishment.”⁷⁶

“According to the verdict of the Tbilisi City Court of March 14, 2023, L. D. and others were convicted of membership in the “criminal underworld”, support for the activities of the “criminal underworld”, appeal to a member of the “criminal underworld” / “thief in law”, for the purchase and possession of firearms and narcotic drugs. No property confiscation was imposed as an additional punishment.”⁷⁷

“Following the verdict of March 30, 2023, M. KH. and M. D. were convicted of appealing to a member in the “criminal underworld” / “thief in law”. No property confiscation was imposed as an additional punishment.”⁷⁸

“Under the verdict of the Tbilisi City Court of April 05, 2023, T. F. and others were convicted of membership in the “criminal underworld” and supporting the activities of the “criminal underworld”. No property confiscation was imposed as an additional punishment.”⁷⁹

⁷¹ Verdict No 1/6471-22 of December 16, 2022 of Tbilisi City Court.

⁷² Verdict No 1/2641-22 of December 26, 2022 of Tbilisi City Court.

⁷³ Verdict No 1/2742-22 of the Tbilisi City Court of January 06, 2023.

⁷⁴ Verdict No 1/2777-22 of the Tbilisi City Court of January 16, 2023.

⁷⁵ Verdict No 1/3444-22 of February 16, 2023 of Tbilisi City Court.

⁷⁶ Verdict No 1/4582-22 of 14 March 2023 of Tbilisi City Court.

⁷⁷ Verdict No 1/4212-22 of 14 March 2023 of Tbilisi City Court.

⁷⁸ Verdict No 1/7177-22 of 30 March 2023 of Tbilisi City Court.

⁷⁹ Verdict No 1/4583-22 of April 05, 2023 of Tbilisi City Court.

“Based on the judgment of the Tbilisi City Court on May 02, 2023, G.Z. and others were convicted of membership in the “criminal underworld”, support for the activities of the “criminal underworld”, and appeal to a member of the “criminal underworld” / “thief in law”. No property as an additional punishment.”⁸⁰

“By the judgment of the Tbilisi City Court of June 21, 2023, N. J. and others were convicted of violence, membership in the “criminal underworld”, and support for the activities of the “criminal underworld”. No property confiscation was imposed as an additional punishment.”⁸¹

“According to the judgment of the Tbilisi City Court of July 25, 2023, K. C. and others were convicted of membership in the “Thieves World”. No property confiscation was imposed as an additional punishment.”⁸²

“Following the judgment of the Tbilisi City Court of October 17, 2023, K. V. and others were convicted of supporting the activities in the “criminal underworld” and appealing to a member of the “criminal underworld” / “thief in law”. No property confiscation was imposed as an additional punishment.”⁸³

“Under the judgment of the Tbilisi City Court of October 19, 2023, K. S. and others were convicted of membership in the “criminal underworld”, support for the activities of the “criminal underworld”, and appeal to a member of the “criminal underworld” / “thief in law”. No property confiscation was imposed as an additional punishment.”⁸⁴

“Based on the verdict of the Tbilisi City Court of November 10, 2023, D. Ch. and others were convicted of supporting the activities of the “criminal underworld” and appealing to a member of the “criminal underworld” / “thief in law”. No property confiscation was imposed as an additional punishment.”⁸⁵

“By the verdict of the Telavi District Court of November 14, 2023, B. J. was convicted of supporting the activities in the “criminal underworld”, for the purchase and possession of firearms and narcotic substances. A firearm was deprived of additional punishment.”⁸⁶

“According to the verdict of the Tbilisi City Court of November 20, 2023, M. G. and others were convicted of membership in the “criminal underworld” and supporting the activities of the “criminal underworld”. No property confiscation was imposed as an additional punishment.”⁸⁷

“Following the February 16, 2023, verdict of the Tbilisi City Court, J. K. (in absentia) and others were convicted of “theft in law”, support for the activities of the “criminal underworld”, and appeal to a member of the “criminal underworld” / “thief in law”. No property confiscation was imposed as an additional punishment.”⁸⁸

⁸⁰ Verdict No 1/4977-22 of May 02, 2023 of Tbilisi City Court.

⁸¹ Verdict No 1/6282-22 of 21 June 2023 of Tbilisi City Court.

⁸² Verdict No 1/7178-22 of July 25, 2023 of Tbilisi City Court.

⁸³ Verdict No 1/4731-23 of 17 October 2023 of Tbilisi City Court.

⁸⁴ Verdict No 1/4242-23 of October 19, 2023 of Tbilisi City Court.

⁸⁵ Verdict No 1/5861-23 of November 10, 2023 of Tbilisi City Court.

⁸⁶ Verdict No 1/164-23 of November 14, 2023 of Telavi District Court.

⁸⁷ Verdict No 1/2540-23 of November 20, 2023 of Tbilisi City Court.

⁸⁸ Verdict No 1/2046-23 of November 22, 2023 of Tbilisi City Court.

“As a result, the proactive and effective actions of Georgia's law enforcement agencies, the vast majority of 'thieves-in-law' are currently outside the country.”⁸⁹

Court practice shows that “thieves in law” have a systematic connection with Georgia. In cases where the prosecution manages to present evidence meeting the relevant legal standards, the courts convict such individuals in absentia for being “thieves in law”. This has been facilitated by the 2018 amendments to the Criminal Code, which introduced that: “A citizen of Georgia or a stateless person with legal status in Georgia who commits an act abroad under Articles 223¹, 223², 223³, or 223⁴ of this Code shall be held criminally liable under Georgian law, even if the act is not considered a crime under the laws of the state in which it was committed.”⁹⁰

Under the Law of Georgia on Organized Crime and Racketeering, the “criminal underworld activities”, including those of a member of the “criminal underworld” or a “thief-in-law” are directed toward the commission or incitement of crimes, the exercise of criminal influence, or other unlawful actions to obtain benefits or privileges for themselves or others, and of acquiring power and/or influence.

An analysis of judicial practice indicates that the 2018 amendments to the Criminal Code have strengthened the courts' ability to impose individual criminal liability, especially given the inherent challenges associated with evidence collection in such cases. In several instances, during the substantive hearing of a case, courts have reclassified charges based on the facts to ensure that the individual is held appropriately accountable for the committed act.

Judicial practice also shows that the motivation of “thieves-in-law”, members of the criminal underworld, and their supporters lies in the pursuit and maintenance of influence over broader segments of society. This is primarily driven by the illicit economic power they wield, especially through the collection of the so-called “thieves' common fund” (*obshchak*).

Accordingly, it is necessary to strengthen international cooperation and to focus on identifying income or property obtained through criminal activities and ensuring its subsequent confiscation.

7. General Characterization of Transnational Organized Crime

“Each state determines the types of crimes and the means to combat them independently. However, certain crimes, by their very nature, transcend national borders and attract the attention of the international community.”⁹¹

“Numerous national and international instruments, particularly the United Nations Convention against Transnational Organized Crime (UNTOC), demonstrate that transnational organized crime has developed into a highly structured and sophisticated global phenomenon.”⁹²

⁸⁹ Combating Organized Crime 2021-2024 National Strategy, 17, <<https://matsne.gov.ge/ka/document/view/5256554?publication=0>> [14.09.2025].

⁹⁰ Article 5 of the Criminal Code of Georgia, <<https://matsne.gov.ge/document/view/16426?publication=264>> [14.09.2025].

⁹¹ *Aleksidze L.*, Modern International Law, Tbilisi, 2001, 228 (in Georgian).

⁹² *Hauck P.*, *Peterke S.*, Organized Crime and Gang Violence in National and International Law, 92 INT'L REV. RED. Cross (2010), 408 [24.08.2025].

The origin and development of organized crime, when disregarding its criminal content, can be compared to entrepreneurial activity, as it follows many of the same fundamental principles and characteristics:

1. A tendency to expand capital turnover and capture new markets;
2. The most profitable areas of organized crime activity often exceed the boundaries of a single nation-state, increasingly taking on a transnational character.

Almost anything can become an object of illicit trade, from human beings and human organs to nuclear and atomic materials, as well as toxic industrial waste.⁹³

“Modern technologies have also provided a significant boost to criminal enterprises. It has become much easier to access information about demand and opportunities across different parts of the world. The use of cyber technologies has dramatically expanded the scope of organized crime and enabled these networks to increase their revenues on a global scale. Moreover, large-scale construction projects financed through proceeds from drug trafficking, cybercrime, money laundering, and corruption are often carried out at the expense of public and state interests.”⁹⁴

It was this global threat that the renowned Italian judge Giovanni Falcone highlighted in the early 1990s in his work “*Organized Crime – A Global Problem: The Italian Mafia as a Model for International Organized Crime*” (Falcone, *Organisierte Kriminalität – ein Weltproblem. Die italienische Mafia als Vorbild für das international organisierte Verbrechen*, Bundeskriminalamt). In his book, Falcone appealed to the general public, particularly to law enforcement agencies, to recognize the seriousness of this threat and to engage in a united fight against it as a shared danger.

Falcone's warning proved prophetic. Over time, this threat spread across other European countries, including Switzerland, Germany, France, the Netherlands, and beyond. The fight against organized crime in Italy alone has cost the lives of hundreds of justice officials. For this reason, in September 1992 in Brussels, the Italian Minister of the Interior, along with his counterparts, formally appealed to European and global law enforcement agencies for assistance in combating organized crime.⁹⁵

As of 2017, “revenue from transnational organized crime ranged from USD 1.6 billion to USD 2.2 trillion annually.”⁹⁶

“Also, the quality and practical usefulness of the implementation of both international and local instruments should become the subject of a separate study. It is widely known that organized crime is a kind of crime industry.”⁹⁷ Meanwhile, organization as a method of management in any field of

⁹³ Ciklauri-Lammich Eliko, The Problem of Crime Between Late Migrants From ISC in Germany, Georgian Lawyers, Tiflis, 2001, 45-51.

⁹⁴ Ciklauri-Lammich Eliko, Kapitel 2 Abschnitt 2. Der Kampf gegen die Korruption in den europäischen Ländern in der Monographie: Die Korruption in Georgien: Kriminologische Analysen und Kommentare der gerichtlichen Praxis , Hrsg. TSU & Tsereteli Inst., Tiflis 2010, 50-76.

⁹⁵ Pressnachvit Interior Justice Ministers Meeting, Brussels, September 18, 1992.

⁹⁶ Global Financial Integrity About Transnational Organized Crime <<https://gfintegrity.org/issue/transnational-crime>> [03.08.2024].

⁹⁷ “Crime Industry”, Ciklauri-Lammich Eliko und Paoli Letizia, Bekämpfung des ungesetzlichen Umsatzes und Konsums von Drogen auf dem Gebiet der russischen Föderation, in Prawo i Politika, St. Petersburg 2002, 29-34. (Russisch).

production serves to intensify processes and maximize profits with lower expenditures, which constitutes a necessary condition for the progress and growth of any given phenomenon. In the history of every nation, alongside the official government, there have existed forces, in the form of groups, that sought to acquire large amounts of property through criminal means and to exert influence over the official authorities.

“Organized crime takes advantage of legal loopholes. In many cases, law enforcement agencies struggle to respond swiftly to criminal enterprises, as the criminal world continuously evolves its methods, making illicit activities and revenue streams increasingly difficult to detect. Moreover, organized crime effectively exploits the benefits of globalization and modern information technologies to expand and strengthen its operations.”⁹⁸

According to the European Union's Grave and Organised Crime Threat Assessment Report (2021 EU COCTA), grave and organized crime is a key problem for EU security. “Organized crime has a networking character, where cooperation between criminals is current, systemic, and focused on making profits.”⁹⁹

One of the main characteristics of transnational organized crime is its high profitability, which provides the criminal world with stable and substantial economic resources year after year. The amorphous nature of this phenomenon and the difficulty of categorizing it within a specific type of criminal offense do not constitute sufficient grounds for refraining from combating it through criminal and repressive measures. “On the contrary, each new report by international organizations underscores the growing threat of organized crime, particularly its increasing infiltration into the legal business sector and its gradual takeover of legitimate enterprises.”¹⁰⁰ This is how the essence of organized crime is interpreted.

“Enterprise Theory (Smith, 1975) posits that organized crime groups (hereinafter referred to as OCGs) primarily act as providers of goods and services that are either illegal or heavily regulated (e.g., drugs, firearms, tobacco products, gambling). Following the widespread adoption of this theory, numerous studies have explored the involvement of OCGs in illicit markets (Reuter, 1985; Paoli, 2002; Bouchard & Wilkins, 2010; Transcrime, 2013; Calderoni, 2014). In addition to their role as suppliers in illegal markets, some researchers have also highlighted the presence of OCGs in legal markets (Cressey, 1969; Catanzaro, 1988; Ianni & Reuss-Ianni, 1993; Arlacchi, 2007).”¹⁰¹

8. Key Sectors of Modern Transnational Organized Crime

“International organized crime poses a serious threat to the global order and, in this sense, can be compared to acts of aggression that traditionally fall under the jurisdiction of international bodies

⁹⁸ White Paper on Transnational Organized Crime (2015), 7, <<https://edoc.coe.int/en/organised-crime/6837-white-paper-on-transnational-organised-crime.html>> [24.08.2025].

⁹⁹ EU SOCTA 2021 – Serious and Organized Crime Assessment Report, <https://www.europol.europa.eu/cms/sites/default/files/documents/soccta2021_1.pdf> [03.08.2024].

¹⁰⁰ Internazionale Organisierte Kriminalitat (Hrsg. Prof. Dr. Ulrich Sieber. Carl Heymans Verlag KG), Koln. Berlin. Bonn. Munchen, 1996, 6-8.

¹⁰¹ Dugato M., Favarin S., & Giommoni L., Risks and Rewards of Organized Crime Investments in Real Estate, 55 BRIT. J.Criminology (2015), 944 [24.08.2025].

such as the United Nations. It undermines three fundamental pillars of a nation's sovereign independence: border control, the state's monopoly on the legitimate use of force, and the authority to regulate and tax cross-border economic activity. International criminal organizations establish alternatives to legitimate state governance, thereby destabilizing national institutions and threatening state sovereignty.”¹⁰²

According to the United Nations Office on Drugs and Crime (UNODC), “transnational organized crime is the hidden price paid by society.”

Transnational organized crime encompasses virtually all economically motivated criminal acts that involve more than one country and have an international dimension. These include drug trafficking, the smuggling of migrants, human trafficking, money laundering, illegal arms trafficking, trade in counterfeit goods, crimes related to wildlife and cultural heritage, as well as certain forms of cybercrime.

Transnational organized crime is not a static phenomenon; rather, it is a growing global industry that constantly adapts, expands into new markets, and evolves into increasingly complex forms. It is an illicit enterprise that transcends cultural, social, linguistic, and geographic boundaries, disregarding laws and norms.

“Drug-related crime remains one of the most profitable sectors of organized criminal activity, generating an estimated \$320 billion annually. Human trafficking – including the exploitation of children – is also highly lucrative, with annual revenues of approximately \$32 billion. The illicit arms trade, though smaller in scale, produces an estimated \$170 million to \$320 million per year. Meanwhile, cybercrime, particularly offenses involving the theft and misuse of personal data, is estimated to generate around \$1 billion annually.”¹⁰³

“The most severe forms of organized crime have a transnational dimension due to several circumstances, in particular, crime is committed in different countries, or criminals have international connections and support or legalization of income resulting from crime is carried out in different countries; by investing in foreign companies or real estate or fiscal oases.”¹⁰⁴

“Those involved in organized crime, driven by the pursuit of profit, engage in coordinated or violent criminal activities, as these methods are considered more effective for generating financial gain.”¹⁰⁵

“Organized crime was once a clear national issue, but today it represents one of the darker sides of globalization. It has transcended geographic boundaries, become continental in scope, and now exploits open border policies and modern technologies. Its illicit profits are on par with the scale of its global operations.”¹⁰⁶

¹⁰² *Guymon C.*, International Legal Mechanisms for Combating Transnational Organized Crime: The Need for a Multilateral Convention, 18 BERKELEY J. INT'L (2000), 61-62 [24.08.2025].

¹⁰³ UNODC About Transnational Organized Crime <<https://www.unodc.org/toc/en/crimes/organized-crime.html>> [03.09.2025].

¹⁰⁴ White Paper on Transnational Organized Crime (2015) 12, <<https://edoc.coe.int/en/organised-crime/6837-white-paper-on-transnational-organised-crime.html>> [30.09.2025].

¹⁰⁵ *Bassiouni M.*, Effective National and International Action Against Organized Crime and Terrorist Criminal Activities, 4 Emory Int'l L. Rev. 12 (1990) [24.08.2025].

¹⁰⁶ *Ciopec, F.*, compatibility of Romanian legislation with the UN Convention against Transnational Organized Crime, 39 Zbornik Radova 213 (2005) [24.08.2025].

“The diversified global illegal economy encompasses a wide range of illicit activities, including arms trafficking, human trafficking, the smuggling of stolen works of art across borders, the illegal trade in endangered species, money laundering, and the relatively new domain of cybercrime. These well-known activities are further supplemented by traditional forms of organized crime such as prostitution, extortion, and racketeering.”¹⁰⁷

According to the Director of Europol, the European Union is becoming increasingly vulnerable to organized crime, which poses a significant threat to the security of many member states. Criminals from around the world are choosing Europe as a base for carrying out illegal operations. “Organized crime groups are well aware of the advantages offered by the EU's free movement of goods, labor, and services, as enabled by EU treaties. Their criminal activities include money laundering, drug trafficking, economic crimes, and human trafficking. These groups are highly flexible, build networks both within and beyond the EU, and actively seek to influence law enforcement and judicial systems.”¹⁰⁸

Across the EU, criminal revenue from nine major crime markets reached USD 139 billion in 2019, accounting for 0.1% of the EU's gross domestic product.”¹⁰⁹

This includes drug-related crimes, the smuggling of migrants, human trafficking, fraud, environmental crimes, illegal arms trafficking, illicit tobacco trade, cybercrime, and organized property crimes.”¹¹⁰

“Modern transnational organized crime benefits significantly from globalization and free trade, and it actively leverages new technologies to facilitate the movement of various forms of crime, money, services, and people. Organized crime groups operate in a world without borders. The diversification of crimes, criminal markets, and networks by transnational organized crime groups is steadily increasing.”¹¹¹

According to the Global Organized Crime Index (2023), analysis indicates that organized criminal markets are expected to continue expanding in the future. Among the criminal markets such as human trafficking, migrant smuggling, extortion and racketeering, illegal arms trafficking, trade in counterfeit goods, trade in untaxed products, environmental crimes, trafficking in non-renewable resources, drug-related crimes, cybercrime, and financial crimes), one of the newest financial crime has emerged as the most widespread. Financial crime has been identified as the most prevalent form of criminal activity across all continents, except for the Americas, where it still ranks among the top five criminal markets.”¹¹²

¹⁰⁷ Shelley, L., Transnational Organized Crime and Seized Assets: Moral Dilemmas Concerning the Disposition of the Proceedings of Crime, 7 Maastricht J. EUR. & Comp. L.38 (2000) [24.08.2025].

¹⁰⁸ Brazier, M. L., The European Union's Hot Pursuit of Organized Crime Groups, 7 New Eng. Int'l & Comp. L. Ann. (2001), 262 [24.08.2025].

¹⁰⁹ The EU Strategy to Tackle Organised Crime 2021-2025 <<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52021DC0170&qid=1632306192409>> [03.08.2024].

¹¹⁰ Mapping the Risk of Serious and Organized Crime Infiltrating Legitimate Businesses, <<https://op.europa.eu/en/publication-detail/-/publication/ab3534a2-87a0-11eb-ac4c-01aa75ed71a1/language-en>> [24.08.2025].

¹¹¹ Zagaris, B., U.S. International Cooperation Against Transnational Organized Crime, 44 Wayne L. Rev. (1998), 1402 [24.08.2025].

¹¹² Global Organized Crime Index 2023, 51-52, <<https://globalinitiative.net/wp-content/uploads/2023/09/Global-organized-crime-index-2023-web-compressed-compressed.pdf>>[08.09.2025].

“Organized economic crime undermines one of the core powers of the state, its authority over taxation. When criminal groups retain illicit funds, they effectively bypass taxes, fueling the growth of the shadow economy and elevating the perceived influence of the criminal sector, which in some cases is seen as more powerful than the state itself. Money laundering allows organized criminals to channel proceeds from illegal activities into legitimate businesses, thereby amplifying the destructive impact of organized crime. Drug traffickers alone are estimated to launder around \$250 billion annually. In this area, the internationalization of finance and electronic access to global financial markets have enabled criminal groups to exploit the system, making money one of the easiest assets to convert. It can be moved instantly, its origin concealed, and detecting it often requires extensive effort.”¹¹³

This means that organized crime necessitates a comprehensive and inclusive response, addressing both the driving factors and the enabling conditions that underpin the global criminal economy. The transnational nature of organized crime and the need for strengthened international cooperation must be acknowledged, as emphasized in the Convention against Transnational Organized Crime.”¹¹⁴

9. Individual International and Regional Organizations Combating Transnational Organized Crime

For decades, numerous international and regional organizations have been engaged in the fight against transnational organized crime. After the end of World War II, the International Criminal Police Organization (Interpol) was established.

“Modern crime is increasingly international. Therefore, coordination among all actors responsible for maintaining global security is essential. As a global organization, Interpol facilitates cooperation even between countries that do not have diplomatic relations with one another.”¹¹⁵

“Interpol has significantly enhanced international law enforcement cooperation in three key areas:

1. By connecting national and local police forces through a reliable and rapid communication network.
2. By providing member countries with information on emerging law enforcement methods through its international professional association.
3. By increasing the level of harmonization among law enforcement agencies worldwide.”¹¹⁶

“Europeans have been discussing the creation of a unified police and prosecutorial system for years¹¹⁷ to enhance the effectiveness of combating transnational organized crime. In 1992, Europol was established, followed by the creation of Eurojust in 1999.

¹¹³ Guymon C., International Legal Mechanisms for Combating Transnational Organized Crime: The Need for a Multilateral Convention, 18 BERKELEY J. INT'L (2000), 65 [24.08.2025].

¹¹⁴ UNODC, Organized Crime Strategy Toolkit for Developing High-Impact Strategies, 1 <https://sherloc.unodc.org/cld/uploads/pdf/Strategies/OC_Strategy_Toolkit_Ebook.pdf> [07.09.2025].

¹¹⁵ Interpol <<https://www.interpol.int/en/Who-we-are/What-is-INTERPOL>> [08.09.2025].

¹¹⁶ Guymon C., International Legal Mechanisms for Combating Transnational Organized Crime: The Need for a Multilateral Convention, 18 Berkley J. Int L (2000), 73 [24.08.2025].

“Europol assists member states in various ways. It facilitates the exchange of information, within the bounds of national legislation, through Europol Liaison Officers (ELOs) who represent their respective national law enforcement agencies. Europol produces operational analyses and strategic reports based on intelligence and operational data provided by member states. Additionally, when needed, it offers technical and expert support during operational and investigative activities conducted by individual countries. Europol also plays a key role in raising awareness and promoting the harmonization of investigative techniques in the fight against organized crime across the EU.”¹¹⁸

“At its meeting in Tampere, Finland, in October 1999, the Council of Europe concluded that Eurojust should be established to combat serious, organized, and cross-border crime. Eurojust is composed of prosecutors, magistrates, or police officers seconded by the member states, depending on the relevant competencies of their national authorities. Each national government determines the type and scope of the mandate it grants to its representative. The purpose of the Eurojust Convention is to strengthen cooperation between competent national authorities by providing additional legal mechanisms. According to the Convention, Europol must establish close cooperation with the relevant divisions of Eurojust and may request legal support and advice. Europol is also required to provide Eurojust with information on all investigations and prosecutions involving more than one member state. Eurojust plays a leading role in coordinating investigations and prosecutions of crimes such as human trafficking, terrorism, counterfeiting of currency, offenses affecting the EU's economic and financial interests, money laundering, and cybercrime.”¹¹⁹

Since 2019, a cooperation agreement between Georgia and EUROJUST has entered into force. Although Georgia has actively utilized EUROJUST's international facilitation capabilities, it has yet to take advantage of services such as cooperation within joint investigation teams and participation in expert forums.¹²⁰

10. Georgian Experience in Combating Transnational Organized Crime

The success of combating transnational organized crime depends on the ability of law enforcement agencies to effectively operate using investigative, procedural, and other legal tools provided by legislation. The primary objective of organized criminal activity is to generate profit and to maximize and legitimize the illicitly obtained wealth.

“Transnational and organized crimes pose a particular threat to public order and security, both at the national and global levels,” the Prosecutor’s Office of Georgia emphasized in its 2022-2027 strategy.¹²¹

¹¹⁷ Ibid.

¹¹⁸ *Brazier, M. L.*, The European Union's Hot Pursuit of Organized Crime Groups, 7 New Eng. Int 'I & Comp. L. Ann. (2001), 263 [24.08.2025].

¹¹⁹ *Brazier, M. L.*, The European Union's hot pursuit of organized crime groups, 7 NEW ENG. INT 'I & COMP. L. Ann. (2001), 264-265 [24.08.2025].

¹²⁰ Prosecution Service of Georgia Strategy 2022–2027, 38, <<https://pog.gov.ge/uploads/7f5da215-saqrTvelos-prokuraturis-2022-2027-wlebis-strategia.pdf>> [05.08.2024].

¹²¹ Prosecutor's Office of Georgia 2022-2027 Strategy, 38, <<https://pog.gov.ge/uploads/7f5da215-saqrTvelos-prokuraturis-2022-2027-wlebis-strategia.pdf>> [05.08.2024].

“It is impossible to provide an exhaustive list of the types of transnational organized crime, as it can manifest in virtually every sector where high profits are possible, often followed by the illegal legalization of such income through money laundering.”¹²²

To assess the scale of Georgia's experience and the damage inflicted, the existing practice regarding transnational organized crimes (including money laundering), as reflected in 46 conviction judgments delivered by the common courts, was analyzed.¹²³ From these, we will focus on cases that to a greater or lesser extent exhibit a transnational character.

“According to the verdict of the Tbilisi City Court dated April 23, 2021, N.K. was convicted of fraud and the legalization of illicit income amounting to €17,900. No confiscation of property was applied as an additional penalty.”¹²⁴

“By the judgment of the Tbilisi City Court dated May 11, 2021, F.O.K. and others were convicted of fraud and the legalization of illicit income for \$134,208. Although property confiscation was not imposed as an additional punishment, the court ordered procedural confiscation of an apartment in Tbilisi, 49.19% of which had been purchased for \$10,200 using criminal proceeds.”¹²⁵

“Following the judgment of the Tbilisi City Court dated July 27, 2021, F.O.K. and others were convicted of laundering illicit income amounting to GEL 619,839. As an additional penalty aimed at concealing the origin of the illegal proceeds, seven luxury vehicles purchased for \$168,000 were confiscated.”¹²⁶

“Based on the judgment of the Tbilisi City Court dated October 11, 2021, G.M. and others were convicted of fraud and the legalization of illicit income amounting to €700,300 and \$40,802. As an additional penalty, various real estate properties acquired through criminal means were confiscated.”¹²⁷

“According to the judgment of the Tbilisi City Court dated October 29, 2021, T. and others were convicted of fraud and the legalization of illicit income amounting to €48,900. As an additional penalty, a car acquired through criminal means was confiscated.”¹²⁸

“By the judgment of the Tbilisi City Court dated February 14, 2022, M.K. and others were convicted of fraud and the legalization of illicit income amounting to €73,995 and \$13,100. No property confiscation was imposed as an additional penalty.”¹²⁹

“Following the judgment of the Tbilisi City Court dated March 16, 2022, N.G. was convicted of theft and the legalization of illicit income amounting to GEL 41,212. Although no additional penalty was imposed, the court ordered plea-based confiscation of GEL 2,118.72 and USD 277.90 from bank accounts.”¹³⁰

¹²² *Dzneladze L.*, confiscation as a necessary criminal mechanism for combating transnational organized crime, *Journ. Journal of Law*, No. 2, 2024, 236-237 (in Georgian).

¹²³ *Ibid.*, 242.

¹²⁴ Verdict No 1/996-21 of April 23, 2021 of Tbilisi City Court.

¹²⁵ Verdict No 1/4697-20 of 11 May 2021 of the Tbilisi City Court.

¹²⁶ Verdict No 1/3434-21 of July 27, 2021 of the Tbilisi City Court.

¹²⁷ Verdict No 1/4280-21 of October 11, 2021 of the Tbilisi City Court.

¹²⁸ Verdict No 1/3934-21 of October 29, 2021 of the Tbilisi City Court.

¹²⁹ Verdict No 1/3270-21 of February 14, 2022 of Tbilisi City Court.

¹³⁰ Verdict No 1/4855-19 of 16 March 2022 of Tbilisi City Court.

“Under the judgment of the Tbilisi City Court dated March 25, 2022, F.N. and others were convicted of legalizing false proprietorship and illicit income totaling GEL 1,268,036.60; USD 15,385,489.60; EUR 20,786,875; CHF 3,030; and GBP 57,645. F.N. was deprived of various high-value real estate properties acquired through criminal means.”¹³¹

“According to the judgment of the Tbilisi City Court dated April 12, 2022, J.H. was convicted of fraud and the legalization of illicit income amounting to GEL 119,941.54, EUR 467,341.31, and USD 1,528. “As an additional penalty, J.H. was deprived of various high-value vehicles acquired through criminal means.”¹³²

“Following the judgment of the Tbilisi City Court dated May 4, 2022, M.S. and R.O. were convicted of fraud and the legalization of illicit income amounting to GEL 29,767.49. M.S. was deprived of GEL 7,700 obtained through criminal means.”¹³³

“By the judgment of the Tbilisi City Court dated May 23, 2022, J.A. was convicted of the legalization of illicit income totaling GEL 5,201.20, EUR 63,065,825.49, and EUR 88,132,376.82. As an additional penalty, funds obtained through criminal means were confiscated for GEL 37,685.52, EUR 153,467.48, and USD 7,831,116.04.”¹³⁴

“Based on the judgment of the Tbilisi City Court dated May 31, 2022, N.A. and others were convicted of fraud and the legalization of illicit income amounting to \$256,174. No property confiscation was imposed as an additional penalty. However, recovered funds totaling \$60,000 and €29,450 were returned to the victims.”¹³⁵

“According to the judgment of the Tbilisi City Court dated July 20, 2022, M.G. was convicted of the legalization of illicit income amounting to GEL 135,822.36. As an additional penalty, M.G. was deprived of various high-value vehicles acquired through criminal means.”¹³⁶

“Following the judgment of the Tbilisi City Court dated September 8, 2022, V.L. was convicted of fraud and the legalization of illicit income amounting to USD 206,782.20. As an additional penalty, various real estate properties acquired through criminal means were confiscated.”¹³⁷

“Under the judgment of the Tbilisi City Court dated February 13, 2023, N.A. was convicted of fraud and the legalization of illicit income amounting to EUR 4,041.14 (USD 5,460). No property confiscation was imposed as an additional penalty.”¹³⁸

“By the judgment of the Tbilisi Court of Appeals of March 16, 2023, M. R. was convicted of fraud and legalization of illegal income of \$4,005. No property confiscation was imposed as an additional punishment.”¹³⁹

¹³¹ Verdict No 1/3845-21 of 25 March 2022 of the Tbilisi City Court.

¹³² Verdict No 1/2181-21 of 12 April 2022 of Tbilisi City Court.

¹³³ Verdict No 1/292-22 of May 04, 2022 of Tbilisi City Court.

¹³⁴ Verdict No 1/2638-22 of May 23, 2022 of the Tbilisi City Court.

¹³⁵ Verdict No 1/1434-22 of 31 May 2022 of the Tbilisi City Court.

¹³⁶ Judgment No 1/1832-22 of July 20, 2022 of the Tbilisi City Court.

¹³⁷ Verdict No 1/3065-20 of September 08, 2022 of Tbilisi City Court.

¹³⁸ Verdict No 1/3423-22 of February 13, 2023 of Tbilisi City Court.

¹³⁹ Verdict No 1b/2124-22 of March 16, 2023 of the Tbilisi Court of Appeals.

“Following the judgment of the Tbilisi City Court of June 12, 2023, A. K. and others were convicted of fraud and legalization of illicit income of GEL 314,173.45. Various expensive cars purchased by criminal means were also confiscated of their sentences.”¹⁴⁰

“According to the judgment of the Tbilisi City Court of June 26, 2023, Sh. H. was convicted of the legalization of illicit income of USD 3,610,434. As an additional penalty, various real estate properties acquired through criminal means were confiscated.”¹⁴¹

“Based on the judgment of the Tbilisi City Court of July 11, 2023, M. G. was convicted of fraud for legalizing illicit income of \$12,500. No property confiscation has been imposed as an additional punishment.”¹⁴²

“By the judgment of the Tbilisi City Court of September 14, 2023, L. F. was convicted of fraud and legalization of illicit income of \$24,180. No property confiscation has been imposed as an additional punishment.”¹⁴³

“Under the judgment of the Tbilisi City Court of September 27, 2023, A. Kh. and F. S. were convicted of fraud and legalization of illicit income of GEL 306,314. €5,080 and USD 68,195 were deprived of additional sentences.”¹⁴⁴

“By the judgment of the Tbilisi City Court of October 6, 2023, E. J. and E. J. were convicted of fraud and legalization of illicit income of GEL 1,898,880, EUR 39,550, and \$9,000. As an additional penalty, monetary funds and various movable and immovable assets were confiscated.”¹⁴⁵

“In the judgment of the Tbilisi City Court of December 04, 2023, Al. b. was convicted of legalizing illegal income of \$102,000. Three real estate properties of different values purchased through criminal means were deprived of additional punishment.”¹⁴⁶

Court practice shows that by taking into account the global scale of this type of crime, the activities of law enforcement agencies are to be activated concerning transnational organized crime.

11. Conclusion

The study reveals that organized crime in modern times is a transnational challenge and a global threat.

Transnational organized crime has evolved into a form of criminal industry.

Each year, organized crime groups gain access to increasing financial resources, which undermines the effectiveness of efforts to combat transnational organized crime.

Modern technological tools, the digitalization of businesses, and the growing use of virtual assets have transformed illegal proceeds, not only in their form and appearance but also in their geographic distribution. These changes are further enabled by new methods of money laundering.

¹⁴⁰ Verdict No 1/1579-23 of 12 June 2023 of Tbilisi City Court.

¹⁴¹ Verdict No 1/3114-23 of 26 June 2023 of the Tbilisi City Court.

¹⁴² Verdict No 1/2476-22 of July 11, 2023 of Tbilisi City Court.

¹⁴³ Judgment No 1/3555-22 of September 14, 2023 of Tbilisi City Court.

¹⁴⁴ Judgment No 1/2860-23 of September 27, 2023 of Tbilisi City Court.

¹⁴⁵ Verdict No 1/3091-22 of October 06, 2023 of Tbilisi City Court.

¹⁴⁶ Verdict No 1/2716-23 of December 04, 2023 of Tbilisi City Court.

Invasion of illegal incomes in the legal economy can be devastating, even for the economy of a successful state.

Research reveals that organized crime, due to its transnational nature, the constantly evolving forms of modern crime, and the increasing use of advanced technologies, is becoming progressively more concealed from society.

Billions in illegal income are accumulated annually, infiltrating the legal economy to such an extent that, over time, it becomes nearly impossible to distinguish between lawful and unlawful revenues.

This suggests that law enforcement has traditionally focused more on convicting offenders than on identifying, recovering, and confiscating the proceeds and property derived from criminal activities.¹⁴⁷

The study also indicates that there are sufficient and effective legal tools available at both international and national levels.

“Of course, we cannot eliminate crime, as it is part of the human condition. However, we can reduce its prevalence and mitigate its negative consequences.”¹⁴⁸

Therefore, it is necessary for law enforcement agencies – including foreign partner institutions and international organizations – to take coordinated and purposeful action, and to activate all available legal mechanisms for the confiscation of criminal assets accumulated through transnational organized activity.

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¹⁴⁷ *Dzneladze L.*, *Confiscation as an Essential Criminal Law Mechanism in the Fight Against Transnational Organized Crime*, *Journal of Law*, No. 2, 2024, 237 (in Georgian).

¹⁴⁸ *Bjorgo T.*, *Crime Prevention*, Tbilisi, 2016, 24 (in Georgian).

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117. Verdict No 1/3434-21 of July 27, 2021 of the Tbilisi City Court.
118. Verdict No 1/4697-20 of 11 May 2021 of the Tbilisi City Court.
119. Verdict No 1/996-21 of April 23, 2021 of Tbilisi City Court.
120. Verdict No 1/664-20 of the Kutaisi City Court of April 07, 2021.
121. Verdict No 1/3252-20 of 17 March 2021 of the Tbilisi City Court.
122. Verdict No 1/465-20 of March 05, 2021 of Zugdidi District Court.
123. Verdict No 1/3309-22 of February 18, 2021 of Tbilisi City Court.