USE OF FINANCIAL INTELLIGENCE DATA IN CORRUPTION RISK ASSESSMENT: LEGAL PROSPECTS FOR UZBEKISTAN

Mirkomilova Mohinur Muzaffar qizi
mirkomilovamohinur@gmail.com

Abstract. *The article examines the legal prospects of using financial intelligence data generated through the AML suspicious transaction reporting system in Uzbekistan's new corruption risk assessment mechanism, introduced by Presidential Decree No. PF-270 (2025). The Decree does not specify its data sources; the article argues that financial intelligence is an underused but viable input, and proposes legislative amendments bridging the AML and anti-corruption regimes.*

Keywords: *financial intelligence, corruption risk assessment, AML, Uzbekistan, PEP, FATF, financial monitoring.*

Аннотация. *В статье рассматриваются правовые перспективы использования данных финансовой разведки формируемых в рамках системы сообщений о подозрительных операциях (ПОД) в новом механизме оценки коррупционных рисков Узбекистана, введённом Указом Президента №ПФ-270 (2025). Указ не определяет источники данных; автор обосновывает целесообразность использования финансовой разведки и предлагает поправки, связывающие режимы ПОД и противодействия коррупции.*

Ключевые слова: *финансовая разведка, оценка коррупционных рисков, ПОД/ФТ, Узбекистан, ПЗЛ, ФАТФ, финансовый мониторинг.*

Annotatsiya. *Maqolada JFOFL tizimidagi shubhali operatsiyalar to'g'risida xabar berish mexanizmi orqali shakllanadigan moliyaviy razvedka ma'lumotlaridan O'zbekistonning yangi korrupsiya xavfini baholash mexanizmida (PF-270-son Farmon, 2025) foydalanishning huquqiy istiqbollari tahlil qilinadi. Farmonda ma'lumot manbalari ko'rsatilmagan; muallif moliyaviy razvedkadan foydalanish maqsadga muvofiqligini asoslab, JFODL va korrupsiyaga qarshi kurashish rejimlarini bog'lovchi qonun tuzatishlarini taklif etadi.*

Kalit so'zlar: *moliyaviy razvedka, korrupsiya xavfini baholash, JFODL, O'zbekiston, PEP, FATF, moliyaviy monitoring.*

Introduction. Over the past two decades, anti-corruption policy has undergone a paradigmatic shift from reactive, case-by-case law enforcement toward proactive, data-driven risk management[11]. Central to this shift is the growing recognition that corruption much like money laundering leaves a discernible financial footprint: unusual asset accumulation, transactions structured to avoid reporting thresholds, and financial flows connected to individuals holding or having held prominent public functions[12]. This recognition has, in a number of jurisdictions, prompted efforts to bridge two regulatory regimes that have historically developed in parallel: the anti-money laundering (AML) financial-monitoring system, built around suspicious transaction reporting by banks and other obliged entities, and the corruption-prevention system, built around declaration review, conflict-of-interest management, and increasingly risk mapping.

Uzbekistan offers a particularly instructive, and currently unexplored, case for examining this intersection. On one hand, the country has, since the mid-2000s, developed a relatively mature AML/CFT financial-monitoring architecture in line with FATF standards, centered on a financial intelligence unit (FIU) that receives and analyzes suspicious transaction reports from banks and designated non-financial businesses and professions[13]. On the other hand, Presidential Decree No. ПФ-270, signed on 30 December 2025, introduced an entirely new institutional mechanism: a rating-based evaluation of anti-corruption effectiveness across state bodies, coupled with a phased national certification management system to be implemented between 2026 and 2030[14]. The Decree explicitly frames this evaluation as risk-based, yet it stops short of identifying which categories of data are to feed into the underlying risk assessment.

This creates an evident, and legally significant, gap. Financial intelligence precisely because it captures transactional anomalies before a criminal case is opened is, in principle, one of the most forward-looking indicators available for corruption risk assessment. Yet the legal framework governing Uzbekistan's financial monitoring system was designed primarily to support individual

[11] Rose-Ackerman S., Palifka B.J. Corruption and Government: Causes, Consequences, and Reform. 2nd ed. Cambridge University Press, 2016. P. 220–225.
[12] FATF. Guidance on Politically Exposed Persons (Recommendations 12 and 22). Paris, 2013.
[13] Law of the Republic of Uzbekistan "On Combating the Legalization of Proceeds from Crime, Financing of Terrorism and Financing of Proliferation of Weapons of Mass Destruction" // https://lex.uz/docs/-283717
[14] Decree of the President of the Republic of Uzbekistan No. ПФ-270, 30.12.2025 // https://lex.uz/docs/7962922

criminal investigations, not aggregate, sector-level risk analysis for a separate institutional mechanism such as the one established by Decree PF-270. Whether, and under what legal conditions, financial intelligence data can be lawfully repurposed for this new function has not, to the author's knowledge, been addressed in either Uzbek or regional legal scholarship.

The purpose of this article is therefore twofold: first, to analyze the existing legal basis (or absence thereof) for using financial intelligence in corruption risk assessment in Uzbekistan; and second, drawing on FATF guidance and comparative practice, to propose a legally sound mechanism for bridging the two regulatory regimes.

Legal and Institutional Analysis

Under the Law «On Combating the Legalization of Proceeds from Crime, Financing of Terrorism and Financing of Proliferation of Weapons of Mass Destruction», the national financial intelligence unit is mandated to receive, analyze, and where sufficient grounds exist transmit suspicious transaction reports to law enforcement bodies for use in individual criminal proceedings[15]. This purpose limitation, while essential for protecting the confidentiality of reporting entities and data subjects, was not designed with a separate, sector-level risk-assessment function in mind. Consequently, the current legal architecture offers no explicit basis for transmitting anonymized, aggregated financial intelligence to the Anti-Corruption Agency for the purposes of the rating mechanism introduced by Decree PF-270.

This is not merely a technical gap. The FATF's standards themselves envisage a broader role for financial intelligence units: beyond supporting individual investigations, FIUs are expected to conduct strategic analysis the identification of trends, typologies, and risk patterns across the financial system as a whole[16]. The Egmont Group's Principles for Information Exchange similarly confirm that financial intelligence may be lawfully repurposed for strategic, non-case-specific analysis, including institutional and sectoral risk mapping, provided that appropriate anonymization and data-protection safeguards are applied[17]. In other words, the international standards that Uzbekistan has already committed to already contemplate the very function that Decree PF-270 now requires the

[15] Law of the Republic of Uzbekistan "On Combating the Legalization of Proceeds from Crime, Financing of Terrorism and Financing of Proliferation of Weapons of Mass Destruction," Art. 8
[16] FATF Recommendation 29 and its Interpretive Note, The FATF Recommendations. Paris, 2012 (updated)
[17] Egmont Group of Financial Intelligence Units. Principles for Information Exchange Between Financial Intelligence Units. 2013.

missing element is not international guidance, but the domestic statutory bridge connecting the two regimes.

Comparative practice offers a workable institutional template. The Russian Federal Financial Monitoring Service (Rosfinmonitoring) periodically produces strategic-analysis reports that inform broader government risk-assessment and policy processes, separate from case-specific reporting. A similar division case-level reporting feeding law enforcement, and periodic strategic-analysis output feeding corruption risk assessment could be replicated in Uzbekistan without requiring the FIU to disclose individual-level data outside its statutory mandate.

Conclusion and Recommendations

The analysis demonstrates that Uzbekistan's AML financial-monitoring architecture already generates the type of data that could meaningfully strengthen the evidentiary basis of the newly established corruption risk-rating mechanism, yet the two regimes remain legally disconnected. Bridging this gap requires targeted, rather than structural, legislative intervention.

The author proposes three concrete measures. First, the Law «On Combating the Legalization of Proceeds from Crime» should be amended to explicitly authorize the transmission of anonymized, aggregated financial intelligence specifically, sectoral typology patterns and PEP-linked transaction indicators from the financial intelligence unit to the Anti-Corruption Agency for use within the rating mechanism established by Decree PF-270. Second, the two authorities should adopt a joint methodological instruction defining precisely which categories of financial-intelligence indicators are relevant to corruption risk scoring, thereby preventing ad hoc or inconsistent use of sensitive data. Third, statutory data-protection safeguards should be introduced to ensure that individual-level suspicious transaction data is never directly attributable within published rating outcomes, preserving the confidentiality guarantees on which the effectiveness of the reporting system as a whole depends.

Taken together, these measures would allow Uzbekistan to operationalize the risk-based logic of Decree PF-270 using data that already exists within the state apparatus, rather than relying solely on complaint statistics or self-reported compliance indicators thereby strengthening both the accuracy and the credibility of the country's emerging corruption risk-assessment framework.

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