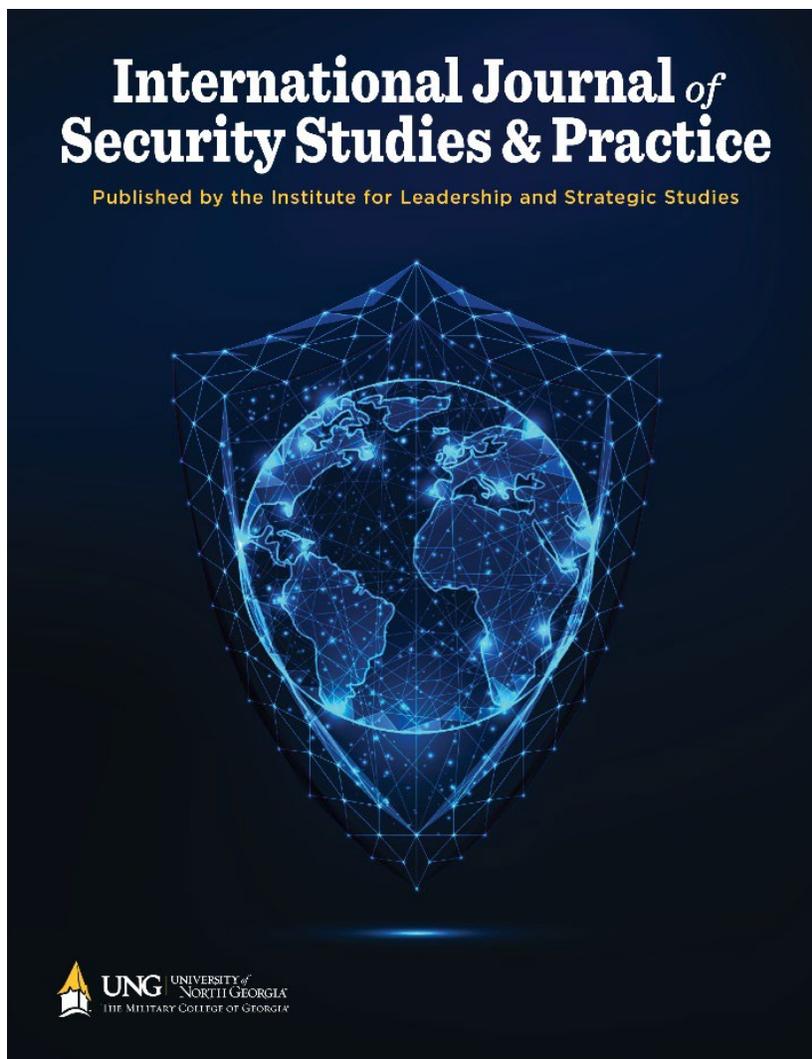


2023

Analysis of Money Laundering in Sri Lanka: A National Security Saboteur



Charani Patabendige
Sri Lanka Ministry of Defence
Institute of National Security Studies
charanipatabendige.inss@gmail.com

Recommended Citation

Patabendige, C. (2023). Analysis of money laundering in Sri Lanka: A national security saboteur. *International Journal of Security Studies & Practice*, 3(1), Article 7. <http://ijssp.ung.edu>

This focus article is brought to you for free and open access by Nighthawks Open Institutional Repository. It has been accepted for inclusion in the *International Journal of Security Studies & Practice* by an authorized editor.

Charani Patabendige

Sri Lanka Ministry of Defence

Institute of National Security Studies

Charani Patabendige is an Acting Research Analyst and a Research Assistant at the Institute of National Security Studies, the premier think tank for the Ministry of Defence Sri Lanka. She also serves as an Honorary Associate Research Fellow and as a member of the National Authority to Prevent Violent Extremism. A versatile and self-motivated postgraduate student reading for M.Phil./Ph.D. in Law also holds a Bachelor of Laws degree with a second class from Sri Lanka's General Sir John Kotelawala Defence University. She holds a distinction pass in Advanced Diploma in Transitional Justice conducted by the Bandaranaike Center for International Studies. Patabendige recently served on several committees and conferences related to Sri Lanka's national security.

In 2023, as a Near East South Asia (NESA) alumna, she represented Sri Lanka in the NESA-Africa Command (AFRICOM) Workshop Series Changing Nature of Security, Transnational Threats Know No Boundaries, The Women's Revolution: Life, Liberty, and Freedom in Bangkok, Thailand. In 2022, she served on the committee charged with reviewing and finalizing the proposed National Security Policy for Sri Lanka; participated in the NESA Center for Strategic Studies Climate Change and Security Senior Executive Seminar in Washington, D.C.; and participated in a NESA roundtable on Women, Peace and Security. In 2021, she represented Sri Lanka at the International Scientific-Practical Conference on Regional Security in Asia in the Context of Preventing New Challenges and Threats conducted by the Conference on Interaction and Confidence Building Measures in Asia (CICA) organized by the Republic of Kazakhstan in 2021.

Patabendige has many international and national publications.

The author declares that there is no potential conflict of interest related to this article.

Correspondence concerning this article should be addressed to Charani Patabendige,
charanipatabendige.inss@gmail.com

Abstract

Money laundering is an unscrupulous, cross-border crime, with multiple perpetrators. The crime is not restricted to the grassroots level criminals, money laundering can also be perpetrated by white-collar criminals. Laundering money is a complex multi-tiered process since it involves multiple perpetrators and transnational nature. When considering the Sri Lankan context, it is evident that money laundering has posed a threat to the country's national security across multiple domains, including economic, political, social, and human security. This article examined whether Sri Lanka's present legal regime is adequate to combat and mitigate money laundering and inquired whether current anti-money laundering laws can ensure the national security of Sri Lanka. The article used secondary sources such as books, journal articles, and reports. In addition, legal instruments as well as case laws were used. The author found that despite institutional frameworks and a rigid legal system, there are gaps that jeopardize Sri Lanka's national security and offers recommendations that can be utilized to mitigate and prevent money laundering.

Key words: legal regime, money laundering, national security, Sri Lanka

Analysis of Money Laundering in Sri Lanka: A National Security Saboteur

The Financial Action Task Force on Money Laundering (FATF) defined the term “money laundering” as “the processing of criminal proceeds to disguise their illegal origin to legitimize the ill-gotten gains of crime” (Central Bank Sri Lanka, 2006). The money laundering process has three stages: Placement, Layering, and Integration. In the placement stage, ill-gotten money is placed into the legitimate financial system. In the layering stage, the placed money is broken into several transactions resulting in a complexity that makes it difficult to determine whether a crime has been committed and to identify the perpetrators. The final stage is integration where the ill-gotten money is mixed (or laundered) with legitimate money. In the past, money laundering was often discussed in the context of the illegal drug trade. However, money laundering crimes are wide-ranging and include tax evasion, bribery, fraud, human smuggling, and weapons trade.

Legal Framework: Prevention of Money Laundering Act (PMLA)

No. 05 of 2006 and Amendments

This is the primary law that addresses the prevention of money laundering. Section 2 of the PMLA delineates the scenarios in which an offence is considered to have been committed under its provisions. These circumstances include:

1. When an individual commits an offence while being a resident in Sri Lanka. In such cases, if a person residing within the country violates any provisions of the Act, it is considered an offence.
2. When an institution is employed for the commission of an offence under the Act, and this institution is conducting its business in Sri Lanka. Moreover, it should be either incorporated or registered within Sri Lanka or outside the borders of Sri Lanka. If these

conditions are met, any offence committed through such an institution is deemed to have been committed under the Act. 3.

3. When an act itself constitutes an offence, and it is a branch of a bank that is incorporated under this Act. If this offence takes place within the confines of Sri Lanka, it falls under the purview of the Act and is considered an offence as defined therein.

This Act applies to natural persons including an individual or a body of persons, and financial institutions, which are juridical. Furthermore, the Act surpasses Sri Lanka's domestic boundaries, which means it is extra-territorial. Similar laws are found in other countries as well. For instance, in the case of *R v Rogers* 2014, "the court determined that the Act's jurisdiction extends to cases where the conduct occurred outside the UK [United Kingdom], and there were no allegations of money laundering against the defendant in that foreign jurisdiction. The court justified this decision by stating that the 'offence' of money laundering is par excellence an offence that knows no national boundaries. Therefore, the Act was deemed sufficiently expansive to confer jurisdiction in such situation." Section 3 of the PMLA stipulates that

any individual who directly or indirectly partakes in any transaction involving property derived or acquired, directly or indirectly, from unlawful activities or the proceeds of such activities, or who receives, possesses, conceals, disposes of, brings into Sri Lanka, transfers out of Sri Lanka, or invests in Sri Lanka any property derived or acquired, directly or indirectly, from unlawful activities or their proceeds, with knowledge or reason to believe that said property originates from unlawful activities or their proceeds, shall be charged with the crime of money laundering. . .

The Act not only criminalizes the money laundering activity, but it also criminalizes the mens rea and those who are indirectly involved in a money laundering scheme. For example, as reported by

(Sanjeewa, 2018), close associate and financial handler of the well-known criminal figure Makandure Madush, along with the wife of notorious drug kingpin Devundara Chamil, were apprehended by the police. Investigations revealed that the associate, Akila, was deeply involved in Madush's drug-related financial affairs exposing her as an accomplice committing predicate offences. Additionally, Ishanka Savithri, associated with Akila, was found with 2,590 milligrams of heroin, and possessions including a car, an Apple iPad, and an iPhone were confiscated. In addition, Balasuriya and Sugathapala (2020) reported that the mother of Janith Madusanka de Silva, aka 'Podi Lassi', was arrested for handling money derived from illegal drug trafficking. Separately, a 40-year-old woman was apprehended in Boralesgamuwa for aiding a Mount Lavinia drug trafficker. She was involved in a heroin trafficking case in Horana that encompassed over 1.5 kg of heroin and seven bank accounts engaging in transactions exceeding Rs.140 million. These are examples where spouses and close associates were arrested for having knowledge of crimes committed by the offenders.

Notably, the offence of conspiracy is not included in the PMLA, which is a deficiency in Sri Lankan law, whereas laws in the United Kingdom (UK) do include conspiracy. The UK Proceeds of Crime Act (2002) defines money laundering as an act which constitutes an offence under sections 327-962 and includes attempt, conspiracy, aiding, abetting, counselling, and procuring the commission of the offence; all principal offenses in the UK. In addition, UK laws address non-reporting offences and tipping-off offences under the Proceeds of Crime Act. Sri Lanka does not include similar provisions as the UK and this is a grave drawback.

Unlike in Sri Lanka, other countries also include conspiracy as an act of committing money laundering. In the 2006 case of the United States of America v. Luis A. Flores an attorney who was willfully blind to the illegal source of the client's money was convicted of conspiring with the

client to commit money laundering by opening bank accounts and conducting financial transactions for the client. In the 2016 case of *R v Joseph Ashman and others*, “The wife and sister of a prolific drug smuggler, who was responsible for importing 4.5 tons of cannabis resin into the UK, have been convicted of laundering more than £300,000 proceeds of crime.” One of the strengths of the Act is the ability to apprehend predicate offences as well. In the 2016 case of *Director of Public Prosecutions v Elladius Cornelio Tesha and others*, the courts found that “It is permissible to charge both money laundering and its predicate offending.” Sri Lanka has the same provision; however, there is a detrimental effect because the offender may be convicted of the predicate offence rather than money laundering, which is difficult and seldom proven.

Sri Lanka’s PMLA Section 3 establishes the penalties for laundering money which are a fine not less than the value of the property in respect of which the offence is committed and not more than three times the value of the property in respect of which the offence is committed; to rigorous imprisonment for not less than five years and not exceeding twenty years; or to both fine and imprisonment. In the 2016 case law of *State v Arthur Chikukwa* the court decided that “There was no duplication of punishment in charging an accused with both fraud and money laundering arising out of the fraud, the accused was guilty of both fraud and money laundering.”

It is not only the money generated from deceitful means but also property acquired from money laundering that can be confiscated. Under PMLA, during any legal proceedings it will be assumed until proven otherwise that any movable or immovable property acquired by an individual that has been derived or realized, directly or indirectly, from any unlawful activity, or if it comes from the proceeds of any unlawful activity. Therefore, a defendant is culpable if (a) in the case of money it cannot be proven or could not have been part of the known income or receipts of that person, or if it cannot be shown that it represents money to which their known income or receipts

have been converted, or (b) in the case of property other than money, it cannot be proven or could not have been acquired with any part of the individual's known income or receipts, nor does it constitute property that is or was part of their known income or receipts, or if it cannot be shown that it represents property to which any part of their known income or receipts has been converted. The term "property" in this context encompasses any kind of property, currency, or asset, whether movable or immovable, tangible or intangible, regardless of its location in Sri Lanka or elsewhere. Moreover, the PMLA includes legal documents or instruments in any form whatsoever including electronic or digital form, evidencing title to or interest in such assets.

In the event that a group of persons is proven to be involved in money laundering, every director or other officer of that body shall be guilty of money laundering: such persons are considered members of an unincorporated body, such as an association or club. However, there is a defence available if such an act is committed without his/her knowledge and he/she exercised all due diligence to prevent the commission of the offence. When it comes to assets including property, the assets of any person found guilty of the offence of money laundering shall be liable to forfeiture of property due to the “commission of the unlawful activity” (Prevention of Money Laundering Act). By forfeiture, ownership rights to a property are lost as the property is seized by the government or law enforcement agencies. This is witnessed in Sri Lanka, especially with underworld goons and drug kingpins, where the assets of spouses or family members are frozen. Makadure Madush's and Wele Suda's cases are such examples.

As per section 7 of the PMLA, whenever the police have reasonable grounds that a person has accrued wealth that cannot be justified, a police officer not below the rank of Superintendent of Police could issue a “freezing order” for a maximum of seven days prohibiting any transactions concerning such person’s bank accounts, property and investments. The prosecuting officers

could make further applications before the High Court to extend the freezing order under section 8 of the Act for an additional period of up to one year. Amidst such a freezing order the police, through the Attorney General, should prosecute the offenders if there are satisfactory grounds for framing a charge sheet. Similarities are found in other countries as well. One of the more interesting instances involved the 2020 case of Hajiyeva v National Crime Agency in which the “Unexplained Wealth Order” was found and was upheld by the Court of Appeals.

One of the cardinal features of the Prevention of Money Laundering Act is found in Section 16 of the Act, which overrides confidentiality obligations if money laundering is determined to be involved. The disclosure of confidential information under the Act is not considered to comply with the provisions of the Act and shall not be deemed in contravention to confidentiality obligations or restrictions. Banks and other financial institutions have an undeniable duty to employ practices like Know Your Customer (KYC) and report suspicious transactions. However, there have been shortcomings in implementing these measures in Sri Lanka.

Table 1

Sri Lanka’s Institutional Framework Relating to Anti-money Laundering

Entity	Responsibilities
Attorney General’s Department	Carries out legal proceedings and offers guidance to law enforcement and other affiliated organizations regarding inquiries as well as legal documents. Money laundering cases are prosecuted by the department on indictment before the High Court.
Central Bank of Sri Lanka (CBSL)	Certain CBSL departments are tasked crucial responsibilities. The Department of Banking Supervision regulates bank licensing and oversight under the Banking Act of 1988. Under the framework of the Financial Transactions Reporting Act No. 6 of 2006, the Financial Intelligence Unit assesses and shares financial reports with law enforcement agencies. The Department of Supervision of Non-Bank Financial Institutions ensures adherence to the Finance Companies Act, overseeing deposit-taking entities except licensed commercial and specialized banks. The Exchange Control Department manages government foreign exchange operations and oversees moneychangers, reinforcing effective financial vigilance.

Entity	Responsibilities
Commission to Investigate Allegations of Bribery or Corruption	Has the authority to examine cases related to bribery or corruption which involve government employees and to provide instructions to the Attorney General's Department regarding violations under the Bribery Act and the Declaration of Assets and Liabilities Law, No. 1 of 1975.
Department of Cooperative Development, within the Ministry of Food Security	Has oversight of rural banks and thrift and credit cooperative societies.
Department of Immigration and Emigration	Collaborates with other organizations to identify individuals as they cross Sri Lanka's borders regarding Anti-Money Laundering and Countering the financing of Terrorism.
Department of Inland Revenue	Responsible for tax collection and the prevention and identification of tax evasion and avoidance operating under the Inland Revenue Act of 2006 and subsequent revisions. Additionally, it is the sole entity overseeing casinos at present.
Insurance Board of Sri Lanka	Regulates and supervises the insurance industry through the Act of Insurance Industry 2000.
Ministry of Foreign Affairs	In the context of Anti-Money Laundering (AML) and Countering the Financing of Terrorism (CFT), takes the lead in managing Sri Lanka's involvement with international frameworks, including those established by the UN Security Council.
Ministry of Finance and Planning Sri Lanka Customs	Shapes economic policies, approves foreign funding, and oversees the CBSL. The External Resources Department authorizes foreign funds, while Sri Lanka Customs enforces the Customs Ordinance, with the power to seize goods and impose penalties.
Ministry of Justice	Supervises the Attorney-General's Department as well as the court system, and manages the execution of justice and law reform policies, plans, and programs. The Secretary to the Minister of Justice serves as the central authority for matters related to mutual assistance.
Non-Government Organizations Secretariat	Primarily responsibility for overseeing the nonprofit sector, including tasks like registration, outreach, and supervision.
Office of the Chief of National Intelligence	Functioning under the Ministry of Defence, this unit oversees the coordination of Sri Lanka's counter-terrorism efforts and other national security threats, with some role in investigations, and is the competent authority for UNSCR 1267 obligation
Registrar of Companies/Registrar General Department	Responsible for registering legal entities under the Companies Act No. 07 of 2007, overseeing legal arrangements as per the Trust Ordinance No. 9 of 1917, and managing notaries in line with the Notaries Ordinance.
Secretary to the Ministry for Defence	This is the competent authority designated for United Nations Security Council Resolution (UNSCR) 1373 obligations who is appointed by the Minister for External Affairs, in consultation with the Minister for Defence.
Securities and Exchange Commission (SEC)	Operating under the Ministry of Finance, the SEC oversees and regulates the operations of the capital market in Sri Lanka. It also holds the authority to issue directives, conduct inspections, and revoke licenses within the sector.
Sri Lanka Police	The Criminal Investigation Division (CID) manages various criminal inquiries, including predicate crimes and money laundering, with two

Entity	Responsibilities
	financial investigation units. The Terrorist Investigation Division (TID) focuses on probing terrorist activities as well as financing. The Narcotics Bureau addresses drug-related crimes, occasionally sharing data with CID or TID. Further, Interpol Bureau maintains international law enforcement connections, aiding domestic investigations. The Human Trafficking/People Smuggling Division investigates such cases, occasionally referring this information to CID or TID.

Gaps, Loopholes and Weaknesses

In addition to the drawbacks mentioned in the previous section, many other factors hinder the justice process. Police use outdated information-gathering techniques that result in a lack of quality intelligence and severely hinders the ability to identify and prosecute perpetrators. If state-of-the-art investigatory mechanisms were to be employed, there would be many more convictions. It is also important to extend confiscation measures to third parties. Presently, confiscation is impossible if the wrongdoer is dead. Furthermore, insufficient resources, trained personnel, lack of competency, and technological expertise have a detrimental effect. In addition, the lack of adequate and updated research and training hinders the justice and effectiveness of the anti-money laundering regime.

Politicization is another prevalent factor. The public lose faith in the justice system when influential figures are capable of influencing decisions. One of the key drawbacks is that nonprofit organizations go unregulated and unsupervised. Due to unsupervised funds and lack of beneficial ownership, ascertaining the identity of the owner complicates matters. Similarly, the informal value transfer system is a major hardship. As cited by Thennakoon (2016) from the Financial Crimes Enforcement Network (FinCEN),

informal value transfer systems are any system, mechanism, or network of individuals that receives money with the intention of transferring funds or an equivalent value to a third

party in a different geographic location, regardless of whether it is in the same form, is classified as an Informal Value Transfer System (IVTS). Examples of IVTS include the Hawala system in the Middle East and Asia, Fei-Chin in China, HuiKuan in Hong Kong, Pei Kwan in Thailand, Hundi in Pakistan and India, Undiyal among Sri Lankan Tamils, the black market peso exchange in Colombia, and Padala in the Philippines.

Money Laundering and Sri Lankan Experience

Money laundering is not an unusual occurrence in Sri Lanka. Various drug kingpins, underworld goons, religious extremists, and terrorists are laundering money on a large scale. Although the Sri Lankan military defeated the Liberation Tigers of Tamil Eelam (LTTE) the LTTE's international networks remain intact. It is important to mention that LTTE, its front cover, and sympathetic organizations are still being tried and convicted for money laundering. In 2018, SWI reported that

In its indictment, the OAG had accused the people of violating the Swiss Penal Code by raising funds for the Liberation Tigers of Tamil Elam (LTTE) between 1999 and 2009. After its nine-year investigation, the OAG suspected the accused of financially supporting the World Tamil Coordinating Committee (WTCC). But in June 2018 the Federal Criminal Court found that the hierarchical link between the LTTE and WTCC could not be sufficiently established. The judges also felt there was not enough proof to consider the LTTE a criminal group. In April the OAG appealed against the verdict, insisting that the accused had supported a criminal group. In a decision published on Tuesday the Federal Court upheld the previous ruling, noting that Article 260 in the Swiss Penal Code was designed to combat organized crime of a mafia nature. Since then it has also been applied to terrorist groups such as al-Qaeda or the Islamic State (IS) terrorist militia. (Tamil Tigers)

This is an example of the prevailing national security menace to Sri Lanka where terrorism can occur at any time.

Furthermore, the Easter Sunday Attack in 2019 was funded by laundered money. According to Subramanian (2020), “Zaharan was both a beneficiary and an agent of a well-studied trend that has, for a couple of decades, been shaping Sri Lankan Islam. From Saudi Arabia, rich patrons send money and clerics to build new mosques and seed Wahhabism”. Subramanian goes on to mention that

Zaharan had possibly received an education in terrorism in India; that he had set up safe houses in Sri Lanka to train his men; that the money for at least one such house came from Inshaf. This house, near Wanathavilluwa, was disguised as a poultry farm . . . [the intelligence official said that] There was a lagoon on one side . . . A direct run from South India. All these explosives and chemicals could have come through that sea route.

These examples vividly portray how property and assets are acquired by dirty money.

Money Laundering and National Security

The relationship between money laundering and national security is intricate and significant, with far-reaching effects on various aspects of a country's safety. Money laundering directly jeopardizes different dimensions of security, including economic, political, social, and human security. Therefore, it is essential to examine these diverse facets of insecurity within the context of money laundering. Money laundering poses the most threat to economic security. The funds generated through illicit activities are funneled into legitimate channels, causing fluctuations that disrupt the stability of financial markets. Consequently, this results in reduced economic growth, reduced capital outflow, and a weakened sense of investor confidence. Money laundering also affects political security by infiltrating political systems. It fosters corruption, bribery, and manipulation among politicians, eroding public trust in government officials and undermining the political landscape. The social security domain is also adversely affected as money laundering

fosters social instability through organized crime and violence. Additionally, it perpetuates human rights abuses by generating funds through human smuggling, trafficking, and extortion. Furthermore, money laundering poses a threat to a nation's sovereignty and territorial integrity, as it can fuel terrorism and separatism. Terrorist groups and extremists generate funds through illicit financial transactions, creating strategic vulnerabilities for countries like Sri Lanka, which are susceptible to illegal financial flows.

Considering all these factors, money laundering emerges as a saboteur of Sri Lanka's security. It not only finances criminal activities but also weakens the country's stability and integrity, presenting severe risks to overall security. Thus, combating money laundering becomes a critical imperative to safeguard the nation's well-being. Effective measures and international cooperation are vital to address the extra-territorial nature of money laundering and mitigate its damaging impact on Sri Lanka's security landscape.

Conclusion and Recommendations

It is crystal clear that money laundering is detrimental to all security spheres and includes militaristic aspects and nontraditional security threats. Sri Lanka has a satisfactory legal regime and a solid institutional framework to combat and minimize money laundering. Yet, there is room for development to dissuade and thwart national security threats. In light of that, several recommendations are made:

1. Sri Lanka must align its anti-money laundering framework with international standards.
2. Money laundering is an offence that is constantly evolving with advances in technology such as digital currency, therefore, the PMLA must adapt accordingly.
3. Establish an interagency platform consisting of relevant ministries, security forces, and private entities as deemed appropriate.

4. Establish mutual legal assistance channels with other countries to share expertise and experience. Information exchange will be essential to preventing or mitigating money laundering.
5. Create public awareness of money laundering and its security repercussions.
6. The government must invest in research and development and conduct related training programs for officers.
7. The government should better regulate and supervise nonprofit organizations to verify beneficial ownership.
8. Introducing legislation for asset recovery is imperative.
9. Designated Non-Financial Businesses and Professions should be taken under the purview of the anti-money laundering framework.

References

- Balasuriya, D. S., & Sugathapala, D. G. (2020, August 26). 'Podi Lassi's mother arrested in Kottawa. *Daily Mirror*. https://www.dailymirror.lk/print/front_page/Podi-Lassis-mother-arrested-in-Kottawa/238-194539
- Central Bank Sri Lanka. (2006). *Preventing money laundering and combating the financing of terrorism*. Pamphlet Series No. 6.
https://www.cbsl.gov.lk/sites/default/files/cbslweb_documents/publications/Preventing%20Money%20Laundering%20and%20Combating%20the%20Financing%20of%20Terrorism%20%282006%29.pdf
- Director of Public Prosecutions v. Elladius Cornello Tesha HC (DAR) Criminal Appeal No. 135 of 2013 per Arufani, J. dated 27th May 2016 (Unreported)
- Hajiyeva v National Crime Agency [2020] EWCA Civ 108 (2020, February 5)
- Prevention of Money Laundering (Amendment) Act No 40 (2011).
- Prevention of Money Laundering Act No 05 (2006).
- R v. Joseph Ashman and others (2016).
- R v. Rogers. EWCA Crim 1680 (2014). [https://uk.practicallaw.thomsonreuters.com/D-026-9868?transitionType=Default&contextData=\(sc.Default\)&firstPage=true](https://uk.practicallaw.thomsonreuters.com/D-026-9868?transitionType=Default&contextData=(sc.Default)&firstPage=true)
- R v. Rogers. United Kingdom of Great Britain and Northern Ireland (2014).
<https://sherloc.unodc.org/cld/case>
- Sanjeewa, D. (2018, June 4). Financial handler of Makandure Madush and wife of Devundara Chamil arrested. *DailyMirror*. <https://www.dailymirror.lk/article/Financial-handler-of-Makandure-Madush-and-wife-of-Devundara-Chamil-arrested--150819.html>

Subramaniam, S. (2020, February 24). Two wealthy Sri Lankan's brothers became suicide bombers. but why? *The New York Times Magazine*.

<https://www.nytimes.com/2020/07/02/magazine/sri-lanka-brothers-bombing.html>

Tamil Tigers acquitted in Switzerland. (2018). *SWI swissinfo.ch*.

https://www.swissinfo.ch/eng/politics/law---order_tamil-tigers-acquitted-in-switzerland/45409056

The State v. Arthur Chikukwa. The High Court of Zimbabwe HH 813/16 (2016).

Thennakoon, N. (2019, May 29). Combating invisible financing for terrorism. *Daily FT*.

<https://www.ft.lk/columns/Combating-invisible-financing-for-terrorism/4-679070>

UK Proceeds of Crime Act. (2002). <https://www.legislation.gov.uk/ukpga/2002/29/contents>

United States of America v. Luis A. Flores, Appellant, US Court of Appeals for the Third Circuit (2006). <https://law.justia.com/cases/federal/appellate-courts/F3/454/149/489708/>