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Comparative analysis of the prevention of the laundering of the proceeds of crime in different countries

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Abstract

The objective of the research was to analyze the fight against the laundering of money obtained by criminal means as one of the priorities of the socio-economic development of all countries with advanced economies. This is particularly important in the period of the fight against COVID-19, when countries faced global economic decline, growing budget deficits, and the need to find mechanisms to stimulate economic growth under conditions of a large number of restrictions imposed by coronavirus infection. The authors used the methods of analysis of scientific documents, laws and legal norms. As a result, a comparative analysis of the main elements of anti-money laundering systems in different countries was carried out and, in addition, the characteristics of the construction of AML/CFT systems at the international level are indicated. It is concluded that, as a rule, government authorities start from the understanding that banks know their customers and understand their operations better than the financial intelligence agency and the supervisory authority. Therefore, they also believe that it is necessary to send the financial intelligence agency already «leaked» information about suspicious transactions, which will probably be used by law enforcement authorities.

Keyword: anti-money laundering law; control threshold; criminal proceeds; financial intelligence; global financial sector.

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Análisis comparativo de la prevención del blanqueo de dinero en diferentes países

Resumen

El objetivo de la investigación fue analizar la lucha contra el lavado de dinero obtenido por medios delictivos como una de las prioridades del desarrollo socioeconómico de todos los países con economías avanzadas. Esto es particularmente importante en el período de la lucha contra el COVID-19, cuando los países enfrentaron un declive económico global, déficits presupuestarios crecientes y la necesidad de encontrar mecanismos para estimular el crecimiento económico en condiciones de un gran número de restricciones impuestas por la infección por coronavirus. Los autores utilizaron los métodos de análisis de documentos científicos, leyes y normas jurídicas. Como resultados, se efectuó un análisis comparativo de los principales elementos de los sistemas contra el lavado de dinero en diferentes países y, además, se indican las características de la construcción de sistemas ALD/CFT a nivel internacional. Se concluye que, por regla general, las autoridades gubernamentales parten del entendimiento de que los bancos conocen a sus clientes y entienden sus operaciones mejor que la agencia de inteligencia financiera y la autoridad supervisora. Por lo tanto, también creen que es necesario enviar a la agencia de inteligencia financiera información ya «filtrada» sobre transacciones sospechosas, que probablemente será utilizada por las autoridades policiales.

Palabra clave: lucha contra el blanqueo de capitales; umbral de control; producto delictivo; inteligencia financiera; sector financiero global.

Introduction

In the last quarter of the twentieth century, under the influence of the rapid development of information, financial and transport technologies, the world became global. The global economy is dominated by multinational corporations, which equaled the economic power and political influence of nation-states. Rapidly developing technological advances have offered new forms of communication that have opened up additional opportunities for organized crime. As a result, conditions have developed that are extremely favorable for the growth of the criminal economy, which has also become global in scale, structure of relations and spheres of activity.

The analysis of the structure of the modern economic system allows us to clearly reveal the economic content of the concept of "money laundering". The essence of money laundering is that the money acquired

illegally is appeared as receives in the eyes of the state and society a form that completely or largely hides their origin. In practice, after laundering “dirty” money becomes indistinguishable from legally obtained money. The legalization of criminal proceeds is a complex process involving many different operations performed by a variety of methods that are constantly being improved. Despite the huge variety of mechanisms and schemes of legalization, they are based on almost one technology.

1. Research and methodology

In the Russian Federation, the subject of legalization (laundering) of proceeds from crime is money or other property, the illegal acquisition of which is a sign of a specific crime (for example, theft, taking a bribe), as well as money or other property received as a material reward for a crime (for example, for murder for hire) or as payment for the sale of items restricted in civil circulation.

There are differences in national AML/CFT systems and methods due to different initial states of economies and the role of shadow components in them. Given these differences, the approaches to the fight against ML/FT various foreign countries can be classified into the following groups (Alifanova, Evlakhova, 2015; Anti-money laundering and counter-terrorist financing measures, 2019; Voznyakovskaya, 2012):

- 1) The Countries to which legal norms in the fight against ML/TF was formed largely under the influence of international law (member countries of the European Union and the member States of the Council of Europe).
- 2) Countries whose legal norms in the field of combating ML/FT were formed for the most part within the national legal framework without significant influence of international law (the United States, Canada and other countries of the American continent). Such a feature of the US legislation is due to the fact that in this country the legislation on combating organized crime and, accordingly, on laundering the proceeds from criminal activities was created in the early 70s of the last century, when the international legal framework in the field of countering these types of criminal activities was not yet at the level of the United Nations, or at the regional, in particular European, level (Money Laundering and Tax Evasion, 2017; National assessment of the risks of legalization (laundering) of criminal proceeds, 2018; Money laundering, 2018).
- 3) Asian countries have strong and competent law enforcement agencies, but the transparency of their financial systems is insufficient to judge the extent of money laundering.

- 4) Countries whose legal norms in the field of combating ML/FT have not yet been formed, but are only in their infancy (these are a number of States in Africa and Latin America). In most countries in these regions, no measures have been taken against ML/FT. For example, in Africa, there are relatively few countries that have ratified the Vienna Convention and adopted special measures against money laundering, which may simply mean that there is no money laundering problem on the same scale as in other regions (Solongo, 2001; Anti-money laundering and counter-terrorist financing measures, 2019; Schneider, 2010).

It should be noted that the legal norms of control in the banking and financial sphere are of particular importance at the present time, since it is a platform where the most of this type of crime occurs. Increased attention in the legislation of various countries is aimed to the control of ML/FT at the stage of their placement in financial institutions. Research shows that this phase of the legalization of criminal proceeds is the most vulnerable to state control. The effectiveness of any ML/FT control model depends on the extent to which it ensures financial transparency of the activities of financial and non-financial sector institutions for authorized government bodies.

2. Results and Discussion

Table 1 provides a detailed analysis of the main elements of the national AML/CFT systems of the countries that received a high FAFT rating as part of the preparation of the mutual assessment report. Here are some distinctive features of the organization of foreign AML/CFT systems.

Table 1. Analysis of the main elements of national AML/CFT systems*

Country	Year of adoption of the law	Special legislation	Financial Intelligence Unit (FIU)	Control thresholds	Responsible for informing the FIU	Special software systems for analytical work	Criminal liability for money laundering
Russia	2001	Federal Law of 07.08.2001 No. 115-FZ; Art. 174 and 174.1 of the Criminal Code of the Russian Federation; -special regulatory legal acts of the Bank of Russia	Federal Service for Financial Monitoring (Rosfinmonitoring)	600,000 rubles, about 8,000 USD	Responsible employees of financial intermediaries	Information Resources of Rosfinmonitoring and the Bank of Russia	Low enough (from a monetary fine to imprisonment up to 7 years)
The USA	1970	- Bank Secrecy Act (BSA), 1970; - Money Laundering Control Act, 1986; - Comprehensive Money Laundering Act, 1986; - Anti-Drug Abuse Act, 1988; - Crime Central Act. Par. 2532, 1990; - Housing and Community Development Act, 1992 - Presidential Decision Directive (PDD) № 42, 1995; - Foreign Account Tax Compliance Act (FATCA), 2013	FinCEN	10 000 USD	Responsible employees of financial intermediaries	CBQS Currency and Banking Inquiry System	Very high (imprisonment up to life imprisonment)
Great Britain	1986	- Money Laundering Control Law , 1896; - Terrorism Act 2000; - Anti-terrorism, Crime and Security Act, 2001; - Proceeds of Crime Act, 2002; - Serious Organised Crime and Police Act, 2005; - Money Laundering Regulations, 2007 - Criminal Finances Act 2017	National Criminal Intelligence Service (NCIS)	10 000 EUR	Money laundering reporting officer, MLRO	Information and analytical center NCIS	High (imprisonment for up to 14 years, including inspectors (MLRO), not who reported a dubious operation)
Italy	1991	- Law No. 646 "On the fight against the mafia", 1982; - Law No. 55 "On the activity of financial and credit institutions of the country", 1990;	UIC	10 000 EUR	Responsible employees of financial intermediaries	GIANOS system	High (imprisonment for up to 12 years or more, as well as large monetary fine)

* compiled by the authors

USA. FinCEN currently has the world's largest data bank by volume of information and the most advanced data management system, which includes software based on artificial intelligence methodology. AI/MPP (MPP - Massive Parallel Processing) technology allows monitoring of the entire American electronic banking process in real time. The AI/MRP artificial intelligence system automatically scans more than 70 major American databases, combining fragmentary information about the object under study. It is able to detect illogical / atypical financial transactions for further study by specialists (Alstadster et al., 2017; Leandro, Schneider, 2018). FinCEN works with the U.S. Treasury Department to develop AML/CFT programs, and specific verification programs for individual foreign accounts.

According to foreign experts, FinCEN is the largest of all existing databases, capable of processing and analyzing huge amounts of information in the short term. It should be noted that since January 1, 2013, the US law "On Taxation of Foreign Accounts" (Foreign Account Tax Compliance Act, FATCA) has entered into force, according to which financial organizations of all countries must conclude a special agreement with the US Internal Revenue Service (IRS) on monitoring the availability of accounts of American taxpayers and from January 1, 2014, transmit information about them to the IRS. At the same time, if the financial institution does not have such an agreement, 30% will be forcibly withheld from the amounts of money transfers originating in the United States; from the proceeds received from the sale of American assets (for example, shares or bonds), regardless of whether a profit or loss was obtained as a result of the transaction; from all transfers to organizations that have not entered into this agreement. Moreover, the IRS also undertakes to provide relevant information to the tax authorities of these countries.

The compliance of financial institutions with the requirements of US AML/CFT legislation is regulated by Regulation 31 CFR 103.121⁵ and section 326 of the US PATRIOT⁶ Act, according to which each financial institution is required to perform a customer identification program (hereinafter referred to as PIK) in accordance with the size and nature of its activities, including certain minimum requirements. It should also provide for reasonable and practical risk-based procedures to verify the identity

- 5 The Client Identification Programs Statement was developed jointly by the US Treasury Department, FinCEN, the Office of the Comptroller of the Currency, the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, the Savings Oversight Office and the National Credit Union Administration, and has been applied in practice since 10/01/2003.
- 6 USA PATRIOT Act, a law passed by the US Congress and signed by President George W. Bush on 10/26/2001 (after the 9/11/2001 terrorist attack). Thanks to this law, the powers of the special services in the field of anti-terrorist activities were significantly expanded. The law also extends to the financial sector, expanding the powers of the competent authorities to carry out regulatory activities and supervise financial transactions, especially those that are carried out by foreign private and legal entities.

of each client. These procedures should enable the financial institution to reasonably believe that it knows the true identity of each client.

Based on the analysis of documents and established banking practices of AML/CFT adopted in the United States, we conclude that the success of any financial investigation requires the principle of “follow money” (“follow money”), together with a thorough review of many documents on transactions, including using information from a bank account, research via the Internet, reports on credit transactions, taxpayer taxes, financial reports (balance sheet, income statement, etc.), suspicious transactions or activities (SAR), as well as analytical reports FBAR, CTR. We believe that in order to develop AML/CFT mechanisms in Russia, attention should be paid to these facts (Haruk, 2010; National assessment of the risks of legalization (laundering) of criminal proceeds, 2018).

The experience of European countries is also interesting for Russian practice. In European countries, the system of monitoring and informing about banking operations and transactions is built differently, depending on the specifics of a particular country.

The United Kingdom became the first European country to ratify the Council of Europe Convention on laundering, search, seizure and confiscation of the proceeds of crime in 1990.

In 1992, the National Criminal Intelligence Service (NCIS) is established in the UK, which is responsible for collecting, storing, estimating and analyzing information about serious crimes, including those related to ML/FT. This activity allows to create data banks on almost all aspects of crime. The Service receives information about suspicious transactions from authorized state bodies (this duty is assigned to AML/CFT inspectors (money laundering reporting officer)). An employee of a financial institution is obliged to inform the competent authorities about the transaction performed by the client, if this employee suspects that the client's transaction is aimed at ML/FT, or the amount for it exceeds the established threshold value.

The Office of Strategic and Special Intelligence NCIS is located in London and is a think tank that studies various aspects of high-risk crimes. The Department collects, researches and analyzes information on economic crimes. Reports on the work in the form of dossiers, memoranda and qualified opinions are submitted by this office to the British law enforcement and other authorities. The reports contain information on trends and trends in the development of crime. This NCIS unit is also engaged in tactical intelligence against criminals and criminal groups.

The financial Investigation Departments of the police forces of the UK countries, based on the materials of the NCIS, carry out operational checks of persons suspected of possessing or disposing of criminal proceeds. If

it is necessary to obtain information about the accounts of the client of a financial and credit institution, the local police officers are required to apply to the court for a production order, on the basis of which the financial and credit institution has the right to provide the police with information about the movement of the client's funds. For example, if individuals have information or assumptions that the money is illegal income from the commission of a crime, and they do not report this to the relevant competent authorities, they can be prosecuted with imprisonment for up to five years.

Thus, we can conclude that the system is under/The UK CFT has a three-level structure, where the central place is occupied by the state body, which is responsible for financial monitoring of data received from the primary AML/CFT subsystem (inspectors of financial institutions on allegations of money laundering), as well as conducting their preliminary analysis with further transmission of information to law enforcement agencies and courts in the UK. At the same time, the main feature of such an AML/CFT system is the presence in the FIU body of a database of suspicious transactions with the possibility of access to it by police agencies, which undoubtedly increases the effectiveness of interaction between supervisory and law enforcement agencies.

In order to improve the effectiveness of the interaction of Russian state bodies in the field of AML/CFT, attention should be paid to these facts.

In *Italy*, the fight against financial crimes was launched earlier than in many other European countries.

In 1982, the Law No. 646 "On combating the Mafia" was adopted, which allowed the verification of bank accounts of persons suspected of involvement in criminal groups, and the investigation of real estate transactions made by them. The Italian law enforcement authorities have the right to study the lifestyle, financial situation, sources of income of citizens suspected of belonging to criminal syndicates, and members of their families (wives, children), as well as individuals and legal entities whose property and funds the suspects may directly or indirectly dispose of.

In addition, in Italy, persons involved in the legalization (laundering) of income and property obtained by criminal means can be imprisoned for a period of 7 to 12 years and subject to a large monetary fine. For officials who use their official position, the period of punishment for the same criminal acts may be extended. Law No. 197, adopted in 1991, introduced a control system that includes:

- Prohibition of circulation of bearer securities.
- Mandatory indication of the beneficiary when performing a large-amount transaction;
- Limit the maximum amount of funds in bearer accounts to 20 million liras (from 01.03.2003-10 000 EUR).

- The role of the financial intelligence agency, which receives information about suspicious transactions, is performed by a special body of the Bank of Italy-UIC (Ufficio Italiano dei Cambi), which has the following functions::
- Statistical accounting and operational analysis of the Italian balance of payments.
- Management of foreign exchange reserves.
- Preventing and combating the legalization (laundering) of criminal proceeds, through financial analysis and intelligence.

The UIC operates in close cooperation with the Financial Guard units. The Financial Guard is a security agency that carries out special investigations of suspicious financial transactions detected by the UIC. The main purpose of the guard units is to identify the sources of income and determine the composition of the property of the accused and suspects. When the facts of violation of the law are established in the course of a special investigation, the information is brought to the Chief Prosecutor, who decides to initiate a criminal investigation.

Thus, it should be noted that within the framework of the Italian AML/CFT system, the Financial Guard carries out operational and investigative activities, while the functions of the Italian FIU-UIC consist exclusively in information and analytical support. In addition, the competence of the Financial Guard includes smuggling and organized crime in the financial sphere.

Summarizing the above, it is necessary to note that, despite many international recommendations, there are no common approaches to the organization of work in the field of AML/CFT in banking institutions in different countries. Each country has its own characteristics of the organization of this work. However, there are also general principles of this work. Almost all developed foreign countries have adopted AML/CFT laws, established financial intelligence units, developed special programs, and set thresholds for monitoring. Special tools have been developed that banks use to manage ML/FT risks: indicators for identifying suspicious transactions, setting transaction thresholds, having special reports and databases, developing special programs and software, as well as a corporate strategy for AML/CFT purposes (Johnson, 2019; Summary rating for assessing the effectiveness..., 2020; Voznyakovskaya, 2012).

The Russian AML/CFT system differs from most foreign AML/CFT systems, primarily by the increased level of detail of the rules and procedures described in laws and regulations, and the relatively strict regulation of the activities of credit institutions under AML/FT.

In addition, Russian credit institutions have a fairly passive role in the AML/CFT system. In essence, this role is limited to the registration, storage and transmission of information about transactions subject to mandatory control. In turn, the burden of conducting financial investigations in Russia largely lies not on the banks themselves, but on the Bank of Russia and Rosfinmonitoring, which acts as a “filter” for processing and analyzing information, standing between the banking system and law enforcement agencies.

At the same time, in most foreign AML/CFT systems, the financial intelligence unit receives information that has already been substantially processed (“filtered”) in the banks themselves, which are engaged in financial investigations. The information presented below allows us to assess how carefully foreign banks “dose” information sent to financial intelligence units in comparison with Russian banks (Table 2). The data in table 2 should be understood taking into account the scale of banking systems.

Table 2. Number of reports submitted by banks from different countries to financial intelligence agencies*

Country	Number of messages per year, million									
	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Russia	6	7,5	8,9	9,5	10,2	12,7	22,2	30	33,8	29,3
The USA	2,1	1,7	1,9	2,7	1,6	1,97	1,8	1,9	2	2,2
Great Britain	0,24	0,32	0,41	0,279	0,316	0,354	0,381	0,418	0,441	0,478
Italy	0,021	0,0373	0,049	0,067	0,064	0,072	0,082	0,101	0,094	0,098

* compiled by the authors

Conclusion

In the foreign countries the government authorities proceed from the understanding that banks know their customers and understand their operations better than the financial intelligence agency and the supervisory authority. Therefore, they believe that it is necessary to send to the financial intelligence agency already “filtered” information about suspicious transactions, which is highly likely to be used by law enforcement and supervisory authorities.

There are strong arguments that national AML/CFT systems based on the principle of granting banks broad rights and powers in the field of AML/CFT, based on the priority of the substantive side of work over the formal side, are the most advanced and effective (if we use the traditional understanding of efficiency as the ratio of results and the cost of resources to achieve them).

The conducted research and comparison of national AML/CFT systems makes it clear that the focus should be shifted to the internal control of banks.

First, such AML/CFT systems increase the effectiveness of the work of state bodies in identifying illegal, socially dangerous activities as a result of monitoring banking operations and, accordingly, suppressing these activities.

Secondly, advanced AML/CFT systems help to reduce the costs and expenses across the economy for carrying out work in the field of AML / CFT by achieving the fullest possible alignment and harmony of the interests of the banking sector with the interests of the state. The emphasis is placed on the fact that banks independently and in their own interests build an internal control system aimed at managing the risks associated with customer service.

Thus, the experience of the United States and European countries can be used in solving the issue of developing mechanisms to counteract the legalization of illegal income in the banking system in Russia. At the same time, it should be understood that an insufficiently thought-out and hasty copying of even the most advanced foreign experience, without a preliminary assessment of the readiness of national authorities and business circles to accept these changes, can lead not to an increase in the effectiveness of the AML/CFT system, but, on the contrary, to negative results. In addition, it should be noted that an important step towards the effective functioning of any AML/CFT system is to understand the economic content of the process of legalization (laundering) of illegal income, its manifestations and consequences.

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