



**Who, indeed, is the lawmaker?
An analysis of FATF's influence on the Latin American AML system**

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Abstract:

This paper discusses the influence of international bodies on national criminal policy, analyzing the case of FATF (Financial Action Task Force) intervention in Latin America's AML (Anti-money laundering) legislation and regulation. The first part of the paper contextualizes the controversial aspects of the creation and operation of FATF. Based on this framework, an empirical methodology is applied to measure how much FATF's influence can be realized in the Latin American AML system. The data collection uses three different criteria: chronological, normative/content, and legislative-process focused. Documentation, legislation, and regulation were analyzed. The geographical approach includes the countries that are part of FATF's regional body, the Financial Action Task Force of Latin America (GAFILAT). Finally, the conclusion highlights the need for greater transparency and accountability in FATF's activities to allow control and genuine participation, once its influence is decisive in determining the region's AML criminal policy.

Keywords:

Money laundering; FATF, criminal policy, GAFILAT, Latin America, lawmaking process.

Resumen:

Este artículo aborda la influencia de los organismos internacionales en la política penal nacional, analizando el caso de la intervención del GAFI (Grupo de Acción Financiera Internacional) en la legislación y la regulación contra el lavado de dinero (AML) en

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América Latina. La primera parte del artículo contextualiza los aspectos controvertidos de la creación y el funcionamiento del GAFI. A partir de este marco, se aplica una metodología empírica para medir en qué medida se puede apreciar la influencia del GAFI en el sistema ALD latinoamericano. La recopilación de datos se basa en tres criterios diferentes: cronológico, normativo/de contenido y centrado en el proceso legislativo. Se analizaron la documentación, la legislación y la normativa. El enfoque geográfico incluye a los países que forman parte del órgano regional del GAFI, el Grupo de Acción Financiera de América Latina (GAFILAT). Por último, la conclusión destaca la necesidad de una mayor transparencia y rendición de cuentas en las actividades del GAFI para permitir el control y la participación genuina, ya que su influencia es decisiva a la hora de determinar la política penal ALD de la región.

Palabras clave:

Blanqueo de capitales, GAFI, política penal, GAFILAT, América Latina, proceso legislativo.

TABLE OF CONTENTS

1. Introduction..... 434

2. FATF’s origin and its “Soft law” tools 435

3. Influence on the legislative process: Concepts and practical application 440

4. An overview of GAFILAT’s influence in Latin America 441

 4.1. Chronological approach..... 441

 4.2. Legislative-process focused approach..... 445

 4.3. Normative content approach..... 446

5. Conclusion..... 448

References 449

Annex 1. Legislative and regulatory changes 453

Annex 2: Explicit references to the FATF 456

1. INTRODUCTION

Criminal lawmaking is an interdisciplinary topic that involves not only legal, but political science and sociological approaches as well. Verifying the actual impact of international organizations on internal legislation is challenging. Besides building effective methodological tools, the political role these organizations play in the global scenario must be considered to conduct data analysis. The pressure mechanisms applied in the background of so-called “soft law”¹ can be exerted at an extremely persuasive level, depending on the geographical location of its addressee.

This paper aims to measure the influence of the Financial Action Task Force (FATF) on Latin American legislation and regulation² on Anti-Money Laundering (AML).

A few initial questions that should be posed are: Is FATF an official organization? Does it have legitimacy to influence internal countries’ decisions about criminal policy? Could their ‘soft law’ tools, such as blacklists and evaluation reports, be considered effective means of pressure?

To better understand FATF, the first part of this research is dedicated to introducing the organization’s origins, as well as the countries involved. The effective participation of Latin American countries in FATF’s decision-making process will be discussed.

The second part of this research aims to demonstrate how the 40 Recommendations of FATF, along with its suggestions for law amendments expressed in the Mutual Evaluation Reports (MER), reflect on GAFILAT³ members’ internal legislation. To achieve this goal, three criteria will be applied: chronological, normative/content, and legislative-process focused. The methodological tools will be better explained in the specific subsections dedicated to the analysis (2.1, 2.2, and 2.3). The analyzed material includes documents, legislation, and regulations.

The question that guides the discussion of the data collected is: how much of FATF’s influence can be realized in the Latin American AML normative system? As a consequence of this question, the proposed reflection concerns the real autonomy of Latin American countries to decide which kind of AML criminalization best fits their societies, considering the social, economic, and cultural aspects of the region, which is mainly composed of developing countries.

¹ In general terms, means of conflict resolution that are not characterized by rules with sanctions and express coercive force.

² Due to the large number of regulations on this matter in each country, these will be analyzed only as a complement to the legislation, which is the main focus of the research.

³ GAFILAT is the branch of FATF (GAFI) in Latin America. According to its website, GAFILAT is an intergovernmental organization that has been granted associate membership status with the FATF. Adhering to the FATF’s 40 Recommendations, it supports member countries in their implementation, mainly through training, technical assistance, and evaluations (see: <https://www.gafilat.org/index.php/es/inicio>).

The initial hypothesis is that FATF's influence in the region delimits the content of this legislation and the timing of its changes, leading to a significant political impact on the internal criminal lawmaking process. The results of these criminal policies in the Latin American prison and justice systems are beyond the scope of this paper.

2. FATF'S ORIGIN AND ITS "SOFT LAW" TOOLS

The Financial Action Task Force (FATF) was established in 1989. It was developed in the context of the United States' (US) criminalization of money laundering, within the framework of the "war on drugs" (Johnson and Lim 2003, p. 8, Kerwer and Hülse 2011, p. 52, Nance 2018b, p. 114, Bernussi *et al.* 2023, p. 30).

It is essential to note that Latin America was the central region for this enforcement, as it concentrates the largest drug production destined for the US market⁴ (Bernussi *et al.* 2023, p. 30).

On its webpage, FATF defines itself as the global "watchdog"⁵ against money laundering and terrorist financing. The intergovernmental body⁶ sets international standards to prevent these illegal activities and works to "generate political will" to enable national legislative and regulatory reforms in these areas. It also assesses whether countries are taking measures considered effective to avoid and punish this kind of criminality.

FATF was originally an intergovernmental organization with a small secretariat, including the G7 countries, the European Commission, and eight other OECD⁷ countries. None of them was from South America (Belay 2019, p. 20).⁸

Despite being a small network, FATF engages in topics that concern most countries (Belay 2019, p. 20): money laundering prevention. The initial objective was to be a temporary initiative to study the topic. After successive prorogations, in 2019, its open-ended mandate was established. This decision was not supported by an international treaty, which could have given this new juridical status to FATF (Pavlidis 2020, p. 435). There is no central agreement on how to design the decision-making procedures. The secretariat, which recently started playing a more active role, is highly connected with the OECD⁹ (Turner 2015, p. 553, Nance 2018a, p. 138).

⁴ The effects of this anti-drugs agenda and its racist implementation are reflected in most Latin American prisons (Zaffaroni 1991, Garland 2008). Discussions about an alternative to the "war on drugs" policy always face international resistance (Scheerer and Valois 2020).

⁵ <https://www.fatf-gafi.org/en/the-fatf/who-we-are.html>

⁶ The legitimacy of the body for setting norms, due to its unclear legal nature, is questioned by doctrine (Chohan 2019, p. 6).

⁷ Organization for Economic Co-operation and Development.

⁸ Currently, only a few countries in the region make up the OECD. With the exception of Mexico, which was admitted as a member in 1994, Chile, Colombia and Costa Rica joined the organization in 2010, 2020 and 2021 respectively.

⁹ "There is no central agreement in FATF that outlines the decision-making procedures. Plenary meetings happen roughly 3 times a year. At least one of those meetings is in Paris, where FATF's small secretariat sits under the same roof as the OECD." (Nance 2018b, p. 115).

FATF's main document about anti-money laundering (AML) policy, the 40 Recommendations, was first published in 1990 (Nanyun and Nasiri 2021, p. 234), and has undergone some changes since then. The organization's "club" character allowed the members to quickly agree on its content. Afterwards, the new members had to commit to adopting the norms mostly previously defined¹⁰ (Kerwer and Hülse 2011, p. 52; Bernussi *et al.* 2023, p. 35).

FATF plays a crucial role in the fight against money laundering worldwide. However, its influence on local criminal policy, either by setting legislation standards or evaluating systems, can be seen as problematic in some aspects.

Harmonizing norms is usually perceived as a need to articulate solutions to a common problem. When defining a problem and developing a solution, the political and economic power relations involved must be considered (Bernussi *et al.* 2023, p. 30).¹¹

There is a lack of transparency in terms of FATF's coordination as well as how its agenda is set. Therefore, it can be seen as just an instrument to promote the developed countries' political interests, as they are the ones who participated in writing the original version of the Recommendations (Pavlidis 2020, p. 436).

In the case of Latin America, this opacity mainly regards US interests (Bernussi *et al.* 2023, p. 35). The strong US influence in the region, especially concerning anti-drug and anti-terrorism criminal policy,¹² created the conditions for spreading the anti-money laundering agenda (Bernussi *et al.* 2023, p. 40).

In Latin America, FATF operates through one of its regional bodies, GAFILAT.¹³ In periodic evaluations (MER), countries are analyzed and ranked not only on their adherence to the Recommendations, but also on their "improvements" since they were last assessed. (Zapata *et al.* 2016, p. 31).

Expanding the discussion to include more member countries from different regions and additional actors, such as the private sector, could mitigate this scenario. The reliability of those who make up the body could be complemented by broadening the participation base

¹⁰ The fact that some regulations are too costly, or designed for developed countries, is pointed out by doctrine (De Koker 2011, p. 368).

¹¹ Even in the context of the European Union, where the leadership of the Commission and Parliament belongs to the region itself, the harmonization of national legislation through directives, especially in the criminal sphere, has presented the same problems. The political and economic inequalities between countries, as well as the dissonance generated in internal systems, are emphasized by doctrine (Riboli 2019, p. 847, Corral Maraver 2026, p. 21).

¹² Anti-terrorism criminal policy is highly related to the AML agenda, since eight more recommendations (currently nine) were added to the FATF's 40 Recommendations after the attacks of September 11, 2001. (Chohan 2019, p. 5). In the same context: "Finally, the FATF has acquired tremendous authority by aligning itself with U.S. national security strategies. Many core Recommendations contain provisions that have been a part of U.S. federal law since 1970. Furthermore, the Nine Special Recommendations were adopted in coordination with U.S. efforts to combat terrorist financing following the attacks of September 11, 2001" (Turner 2015, p. 557).

¹³ FATF has several other regional bodies that work to implement its guidelines. Regarding its activities in Arab countries, for instance, it is worth mentioning Murrar and Barakat (2021).

in decision-making (Pavlidis 2020, p. 436). The question is to know whether this is effective in real life, and not just a formal step, considering the interest involved.

FATF's standards in the 40 Recommendations are intended to be flexible to facilitate their adaptation to national legal systems. They are built on a risk-based approach and are intended to be soft law. For this reason, there are no official sanctions for non-compliance. Nevertheless, there is a contradictory perspective about FATF's intervention, between voluntariness and coercion (Kerwer and Hülse 2011, p. 52). International organizations and forums refer to FATF's determinations, blurring the distinction between binding and non-binding norms (Sharman 2008, p. 636, Pavlidis 2020, p. 435, Weisser 2021, p. 31, Bernussi *et al.* 2023 p. 34).

The International Monetary Fund (IMF), World Bank (WB), and United Nations Security Council's¹⁴ (i. e., Resolution 1617, from 2005)¹⁵ endorsement of FATF Recommendations contributed to its dissemination and adoption by more than 150 non-member countries (Belay 2019, p. 20, Nanyun and Nasiri 2021, p. 237).¹⁶ The IMF and World Bank, in addition, actively participate with the FATF Secretariat in directing the country's evaluations (Turner 2015, p. 554).

This "latent coercion" suffered by non-member and peripheral countries emanates from the strong economic power that FATF's central members have in comparison to weak economies that depend on financial assistance. Non-compliance with the standards of the dominant states' "club" could lead to a boycott from international organizations and financial institutions. This scenario shapes the international regulatory system in favor of those few elite countries, as what also occurs in policy interests (Belay 2019, p. 21).

FATF's decision about standards impacts the world's lawmaking processes in the economic field. The expansion of membership to developing countries was insufficient compared to the wide implementation of its rules, suggesting that only a few countries are dominant in decision-making and norm-setting (Belay 2019, p. 25). It can also take place in the context of regional bodies, such as GAFILAT, due to differences in the countries' economic and political influence on the region. The lack of decision-making procedures and transparency makes it impossible to prove whether it occurs or not.

In summary, the inclusion of private actors and some developing countries resembles more of a strategy to legitimize the standards, working as a bounded inclusion (Kerwer and Hülse 2011, p. 58). It is especially problematic nowadays, due to the growing interconnectedness of the financial sector and the comprehensive effect of a financial crisis (Belay 2019, p. 24).

The ranking generated by the FATF evaluation also stimulates competition among developing countries to attract more financial investment. The more well-ranked a country

¹⁴ Discussing the role of the Security Council as a global legislator: Rosand 2004, Talmon 2005.

¹⁵ "Strongly urges all Member States to implement the comprehensive, international standards embodied in the Financial Action Task Force's (FATF) 40 Recommendations on Money Laundering and the FATF Nine Special Recommendations on Terrorist Financing".

¹⁶ "FATF recommendations are regarded as soft law bodies' recommendations, then suddenly transform into hard law for compulsory compliance by countries seeking loans from IMF and WB" (Nanyun and Nasiri 2021, p. 238).

is, the more reliable its economy seems to be. It can also be seen as a strategy to disseminate its standards (Bernussi *et al.* 2023, p. 35).

Moreover, FATF uses the “expertocratic” process to convince countries to build their rule-making according to its standards. Experts not only set the rules, but the assessment (MER) as well. This technical approach is emphasized in all FATF reports, to appear neutral (Kerwer and Hülsse 2011, p. 55, 56).

The main problem with this approach is precisely that it denies the political influences that typically occur in criminal lawmaking processes. This denial does not change the fact that this process is deeply political, allowing powerful countries to ensure their interests prevail. Pretending that it is a neutral process only obstructs the creation of procedures and the claim for transparency, which is essential to exert any kind of control.

The pressure wielded by the body, especially through evaluations, goes beyond mere non-binding advice and often leads to legal regulatory duties, externally pre-determining national legislation even in countries from the Global North, such as Germany¹⁷ (Weisser 2021, p. 34) or with strong economies, such as Australia (Goldbarsht 2017).¹⁸

For Turner, these effects are expected to be accomplished by the use of soft law in financial regulations. These kinds of methods can be extremely effective as they respond to three common challenges in the economic field: a) rapid responses to global financial crises; b) unwillingness of domestic legislature to cede control or sovereignty, and c) difficulty in reaching consensus on technical issues, mainly when political issues are at play (Turner 2015, p. 549). The engagement of what he calls technocratic elites in rulemaking outside the political process and the public view (Turner 2015, p. 551) could facilitate the process of shaping behaviors, promoting governance, and law enforcement. This procedure could be associated with the development of important topics, such as corruption fighting, environmental protection, or human rights promotion. However, this is not necessarily true when the technical approach concerns the pressure to use criminal law to increase punishment in developing countries, where money laundering is commonly associated with the “war on drugs,”¹⁹ which generates mass incarceration with a racist and classist perspective (Santos *et al.* 2022, Lourenço *et al.* 2022, Georgini *et al.* 2024).

The “global consensus” (Turner 2015, p. 556) achieved by FATF occurs by being ostracized from the global financial system when a country “decides” not to collaborate. The colonial and imperialist logic behind it makes it impossible to imagine such an initiative originating in the Global South to impose standards or assess Global North economies without accountability, procedures, or juridical conventions. The lack of formality and transparency cannot be ignored as it encourages abuse of power, especially in environments with diverse

¹⁷ The author recounts demands made in FATF evaluations against Germany in 2010 and 2014, both of which were adopted into national law.

¹⁸ Other European countries, such as Spain, also brought their national legislation into line with the FATF’s recommendations shortly before joining the then European Economic Community (Flores Martín and González Botija 2017, pp. 103 and 118).

¹⁹ The association was also made by the FATF itself, which only expanded the scope of the Recommendations in 1996 to include other predicate offenses in addition to drug trafficking (Nance 2018b, p. 114).

political and economic interests. The unpredictable nature of the decision-making process makes external control or questioning impossible.

It is important to emphasize that these standards can represent an intervention in a country's sovereignty to "fix" its criminal law. This mainly transpires in peripheral countries, like those from the Global South, because they are usually not in a position to take center stage in the body's debates. The external pressure to change internal legislation can be seen as lacking legitimacy from a democratic point of view. Lawmaking procedures that are typical of democratic societies are harmed. Generally, they must take place in the parliamentary arena.

Another complication arises from the asymmetries generated within the internal legal system by FATF-driven AML reforms.²⁰ Especially in the context of criminal law, this intervention based on expert knowledge can violate the respect for human rights when it is based solely on efficiency targets (Weisser 2021, p. 44).

Between 2000 and 2006, FATF used blacklisting to nominate countries that did not cooperate in the fight against money laundering, some weeks after OECD published its list (González 2020, p. 13). The effect of this list is especially problematic in developing countries, including a reduction in development assistance that can endure after the delisting (De Koker *et al.* 2023, p. 23). Reflecting the body's lack of accountability, this decision is not subject to a specific appeal procedure (Chohan 2019, p. 8). FATF still utilizes different lists²¹ regarding high-risk and monitored jurisdictions, calling on its members to enhance due diligence or apply countermeasures for transactions with these countries (Weisser 2021, p. 24). The negative status created with blacklisting is linked with material costs, representing a means of coercion as well²² (Sharman 2008, p. 653).

Beyond the academic discussion of whether MERs and the FATF blacklist constitute soft law, their influence on domestic legislation is of questionable legitimacy, especially concerning peripheral countries. The lack of official status, which apparently facilitates procedures, prevents even minimal control over the decision-making process. This can be especially problematic as it pertains to criminal law, particularly in societies where it tends to be applied unevenly, violating the human rights of disadvantaged groups.

²⁰ In Brazil, problematic aspects of money laundering crime itself are emphasized by specialized doctrine. Legal uncertainty generated by dogmatic incompatibilities - legal asset undefinition (Badaró and Bottini 2016, p. 79), consummation undefinition, possibility of willful blindness (Lucchesi 2018), classification as a permanent crime - seem minor in the face of pressure to interpret various behaviors as a sort of money laundering act, inside a very open typology. It happens in the context of what are called generations of money laundering laws, which are increasingly punitive.

²¹ <https://www.fatf-gafi.org/en/publications/High-risk-and-other-monitored-jurisdictions.html>

²² "Another coercive tactic since the formation of FATF is the classification of certain countries as Non-Cooperative Countries and Territories (NCCT). Once a country is designated an NCCT, it is blacklisted. It then becomes extremely challenging to enter into financial transactions with any of the 130+ member countries of FATF and the Organization for Economic Cooperation and Development (OECD). Most countries, therefore, try to avoid being blacklisted. This is because all the members of the OECD are automatic members of FATF. Therefore, the colossal impacts coerce recalcitrant countries to conform and adhere to the articles of FATF 40 recommendations against ML/TF despite it being a Soft Law organization" (Nanyun and Nasiri 2021, p. 238).

3. INFLUENCE ON THE LEGISLATIVE PROCESS: CONCEPTS AND PRACTICAL APPLICATION

The discussion presented in this text falls within the scope of Criminal Legislative Policy, which aims to address the various aspects of criminal lawmaking. The topic involves pre-legislative, parliamentary, and post-legislative phases (Díez Ripollés 2003). Various types of research can be conducted in this context. The development of legislative and regulatory policy can be viewed as a public policy objective with the intention of improving the process of drafting norms, which underpins other policies (Queiroz and Feferbaum 2019, p. 146).

In this study, the focus is on the influence of external bodies and actors, particularly international ones, on the drafting of national legislation in Latin American countries. The analyzed legislation concerns criminal law, mainly the prevention of money laundering (AML system). To this end, it is necessary to establish some premises, such as the concept of influence that was adopted.

The dictionary definition of “influence” refers to the action of bringing about a result in a particular thing or person.²³ It is therefore assumed here that influence refers to the power exercised (action) by an external body over the internal Legislative Branch, determining the content of the legislation to be produced (result).

This “action” will be measured within two dimensions: a chronological one (combined with content-based criteria)²⁴ and the other focused on the legislative process itself. The chronological criterion will consider legislative changes and their content, while the legislative process criterion deals with explicit references. The “result”, in turn, will be measured by the content of the internal anti-money laundering systems as a whole. The details of how these methods are applied will be covered in the following sections of this article. These criteria were selected by this researcher, based on the doctrine of social research methods (Gil 2008, Collier 2011, Lima 2017), and involve some degree of discretion.

Regarding the documentation used to measure these factors, FATF’s criminal policy interests will be taken into account based on the main documents produced by the body: the 40 Recommendations and the mutual evaluations conducted in Latin America. In the analyzed countries, the cornerstone of the AML systems is, as a rule, the law criminalizing this practice (money laundering). Secondly, other regulatory acts pertaining to the same subject matter will be examined.

The limitations of this study involve the impossibility of mapping all other external and concomitant influences that may permeate this activity (lawmaking) in the various countries analyzed, as well as the lack of documenting actions taken during the legislative drafting process. Such records could strongly substantiate the exercise of power (influence). It is

²³ <https://www.dicio.com.br/influencia/>

²⁴ This criterion does not rule out the influence of other factors on the legislative change in question, nor the possibility that it reflects a tendency on the part of the legislature under review to enact various legal changes, since other changes to the AML system that occurred prior to the MER will not be accounted for in general terms. This issue is mitigated by a content analysis of the changes.

therefore assumed that mapping FATF's influence does not exclude that of other actors advocating the same policy direction.

4. AN OVERVIEW OF GAFILAT'S INFLUENCE IN LATIN AMERICA

Despite the challenges of measuring influence, a methodological tool was designed to verify the extent to which FATF's power is reflected in determining the content of the Latin American AML system. The following criteria will be used: chronological, normative/content, and legislative-process focused. The procedure for each criterion will be explained in the subsequent sections.

To define the scope of this research, the analysis only considers the GAFILAT member countries: Argentina, Bolivia, Brazil, Chile, Colombia, Costa Rica, Cuba, Dominican Republic, Ecuador, El Salvador, Guatemala, Mexico, Nicaragua, Panama, Paraguay, Peru, Uruguay, and Honduras. Two criteria were applied in this selection: a) the geographical region, as this is the scope proposed in the text; b) the specific countries that have explicitly chosen to join GAFILAT. This last criterion was adopted due to these countries' political decision to formally join FATF, as well as the methodology of the empirical research, which incorporated the content of the mutual evaluations to verify legislative changes.

The documentation analyzed includes legislation, regulations, and documents of the legislative process. The research primarily relied on official sources, including the websites of national congresses and relevant governmental agencies. Non-official sources are indicated in the final table (Annex 2). One of this study's limitations lies precisely in the accessibility of documents from the legislative process in these countries, a point that will be highlighted in the following sections. In the case of regulatory law, which was analyzed in a complementary manner, even some changes may not have been mapped. This is owing to the fact that there are not many requirements for publicity and procedural bureaucracy for such changes, resulting in higher frequency. There are also limitations in the complementary use of news websites, which was based on those that appear prominently in search engine results, such as Google.

Data collection for the following three research phases took place between 10 September and 12 October 2025.²⁵

4.1. CHRONOLOGICAL APPROACH

The chronological approach is focused on the Mutual Evaluation Report, the instrument used by FATF to evaluate and rank²⁶ the efficiency of a country's system against money laundering threats. This detailed document evaluates risk, policies, the legal system, preventive measures, supervision, international cooperation, etc. It assesses whether the country is aligned with the 40 Recommendations of FATF and describes, at the end, what should be improved before the next assessment. All GAFILAT member countries have

²⁵ The data collection was realized with the help of four law students: Camila Machado Ferreira (CNPQ scholarship-holder), Kauane de Oliveira, Valentina Schuelter and Kayron Beviláqua.

²⁶ <https://www.fatf-gafi.org/en/publications/Mutualevaluations/Assessment-ratings.html>

been evaluated. Some of them have been assessed only once, while others two or three times.

The objective of this approach is to examine the national AML legislation of these countries to ascertain: a) whether the laws were amended following the MERs, and b) whether such amendments align with FATF recommendations. The second question will be answered from a qualitative perspective. The results of this analysis indicate whether the MERs constitute a powerful instrument of pressure and whether their application achieved the intended objective in Latin America: harmonizing and standardizing AML legislation.

To accomplish this objective, the following steps were developed: a) a table of all GAFILAT member countries was compiled, detailing the years in which each underwent a Mutual Evaluation; b) the executive summaries and conclusions of the initial MER for each country were analyzed, focusing on the deficiencies identified by FATF; c) legislative updates in the years following the first MER were mapped to determine: c.1) whether the AML legislation was amended after the first MER (and prior to the second MER in countries where it was applied) and c.2) whether these legislative changes aligned with the specific recommendations by FATF in the MER. Steps “b” and “c” were repeated for countries that have undergone more than one MER. Finally, the findings were consolidated into three different tables, which are presented in Annex 1.²⁷

The number of legislations and regulations created or modified in a country after each MER, and how much time a bill took to be approved, were not considered relevant data in the quantitative analysis. This information does not necessarily indicate a greater or lesser pressure to collaborate. It can vary depending on the legislative culture of each country or even the composition of the National Congress at that time.²⁸

The data collected shows some interesting results. The eighteen GAFILAT member countries have been assessed by FATF at least once between 2004 and 2024.²⁹ El Salvador was the last evaluated, as it became a GAFILAT member in January 2022.

After the first MER (and considering the time frame up to the second MER in countries where it was applied), 17 of 18 countries have made changes in their AML system, which represents 94.4%. Paraguay was the only country where no significant reforms were detected in the analyzed period.

²⁷ Some legislative and regulatory changes are referred to in the MERs without numbering. A complementary search was conducted on the official websites of the countries, but not all the numbers of the laws and decrees analyzed were found.

²⁸ Explanation: some legislators promote partial reforms to existing laws, while others propose completely new legislation. In the latter case, the change may be greater, even though quantitatively it is only one law. Similarly, the time required for a bill to be approved may depend on internal consensus and the number of parties involved in the vote at the time, among other factors, which were not mapped in this study.

²⁹ Argentina (2004), Bolivia (2006), Brazil (2004), Chile (2006), Colombia (2008), Costa Rica (2007), Cuba (2014), Dominican Republic (2006), Ecuador (2007), El Salvador (2024), Guatemala (2010), Mexico (2008), Nicaragua (2008), Panama (2018), Paraguay (2005), Peru (2005), Uruguay (2006), Honduras (2009).

All 17 countries have changed their legislation, at least partially, in line with FATF's recommendations. Uruguay, El Salvador, Mexico, and Panamá can be highlighted as the countries where the most substantial reforms have been conducted.

Uruguay promulgated a whole new legislation, 18494/2009,³⁰ which expanded general definitions and obligations in the area of money laundering prevention. El Salvador also promulgated new legislation, n. 426, just one year after its first MER. Mexico transformed its AML system following the main suggestions indicated in the MER, such as adopting the concept of all serious crimes as precedents of money laundering, allowing confiscation without conviction, authorizing the obtention of information from financial institutions by the FIU without judicial authorization, criminalizing terrorist financing, and creating a comprehensive regulatory framework in 2012 to supervise DNFBPs (Designated Non-Financial Businesses and Professions).³¹ Panama also reformed its AML system, promulgating three legislations: 70/2019, 129/2020, and 254/2021, which focus on increasing transparency, creating obligatory reports and registration for many AML system actors.

Regarding the second MER, 15 of the 18 GAFILAT member countries were assessed.³² From that group, 13 changed their AML system in alignment with FATF, representing 86.6%. The two countries that did not make these changes were the Dominican Republic and Guatemala. Guatemala has made some small changes in the administrative sector, but the main bill, n. 6593, which provided substantial reforms indicated by FATF, was not approved.

Bolivia and Honduras have special situations. Bolivia approved four main legislative reforms to the AML system, but one of them (1386/2021) was later revoked (by law n. 1409/2021), weakening FATF's suggestions. Honduras produced three decrees contrary to FATF's recommendations (57-2020, 93-2021, and 116-2019), but all of them were revoked in 2023. Therefore, substantial administrative reforms in line with FATF's direction prevailed, including a reform in the Penal Code, which incorporates money laundering as a crime (Article 439).

Brazil, Argentina and Chile have made significant reforms in their AML systems to attend to FATF's recommendations after their second MER. Brazil with Law 12.683/2012 (Falavigno 2024), Argentina with Law 27.739/2024, Chile with Law 21.121/2018, among others. Mexico has also implemented several modifications to comply with FATF's suggestions, such as updating its confiscation system, data access protocols, and sanctions

³⁰ The law was taken into account during this period because, although it was approved in 2009, the year of the second MER, it incorporates changes recommended in the first one, as expressly indicated in the second MER report, on page 2: "It is necessary to note that following the evaluation team's on-site visit, the Republic of Uruguay enacted Law 18,494 on June 5, 2009. This law introduced significant modifications to Law 17,835 regarding the System for the Prevention and Control of Money Laundering and Terrorist Financing. As previously noted, the evaluators—in accordance with the criteria adopted by GAFISUD—only considered legislation in force at the time of the visit for grading purposes. Notwithstanding the above, and given the proximity and magnitude of these modifications, the evaluators have mentioned the advancements incorporated by Law 18,494 throughout the body of this report where applicable."

³¹ This is a particularly problematic area for external regulatory influence, given the specific characteristics of each profession, its regulatory body, and its greater or lesser prevalence in each country's economy.

³² Argentina (2010), Bolivia (2011), Brazil (2010), Chile (2010), Colombia (2018), Costa Rica (2015), Dominican Republic (2018), Ecuador (2011), Guatemala (2016), Mexico (2018), Nicaragua (2017), Paraguay (2008), Peru (2008), Uruguay (2009), Honduras (2016).

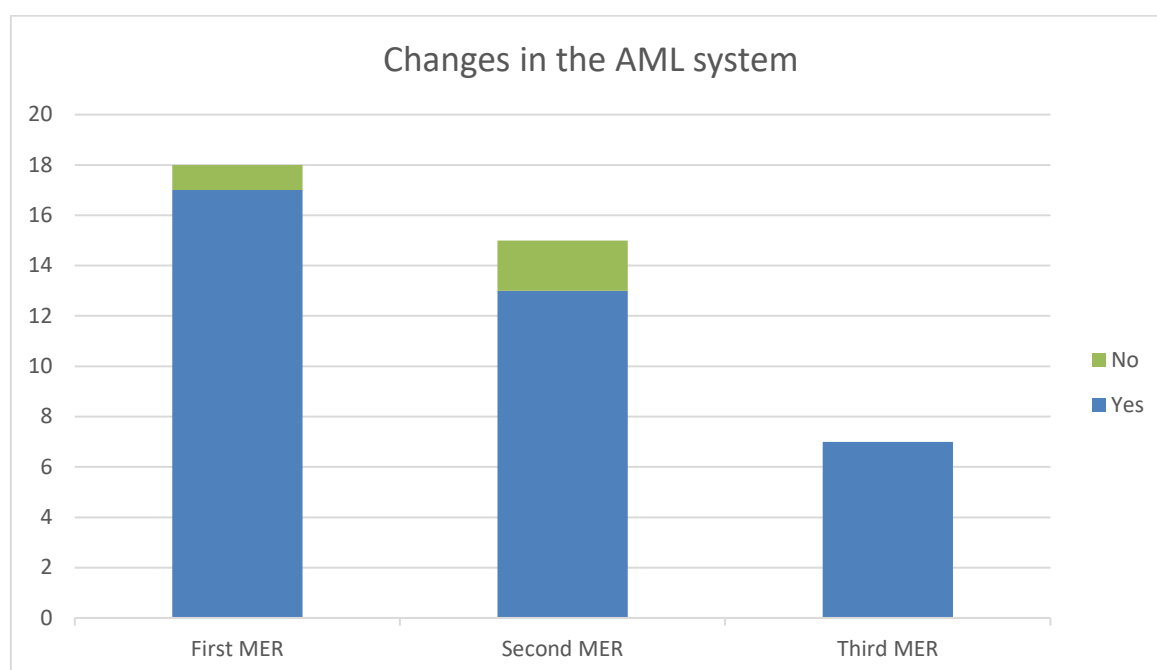
against terrorist financing, as well as enhancing international cooperation and supervision of the regime imposed on DNFBP.

Paraguay is also noteworthy, as no significant reforms were identified following its first MER in 2005. Nevertheless, after the second MER in 2008, nine separate legislative acts were approved, reforming substantial aspects of the AML system.

Regarding the third MER, evaluations were conducted in seven GAFILAT member countries.³³ Although some of these reports are very recent, all assessed countries updated their AML system—through legislation or significant regulation—within the analyzed timeframe. All changes were at least partially aligned with FATF, representing a 100% adoption rate among the countries assessed. Notably, these updates included the supervision of new sectors, such as betting and gambling, as seen in Brazil and Peru.

The data collected is summarized in the following Graph 1 (author's elaboration), in which “Yes” represents the countries that changed their AML systems after the MER and “No” for the countries that did not change:

GRAPH 1



Graph 1. Changes in the AML system.

To conclude this first topic, MER effectively serves as a powerful pressure mechanism, identifying when and how countries should modify their AML system; this influence extends to the revocation of measures that conflict with the FATF Recommendations. Each MER resulted in 86.6 to 100% of countries amending their internal legislation. These changes were implemented to align with FATF recommendations to standardize risk-based assessments and to strengthen criminal law and criminal procedure law, making them more punitive regarding the fight against money laundering. Existing differences in internal

³³ Bolivia (2023), Brazil (2023), Chile (2021), Ecuador (2023), Paraguay (2022), Peru (2019), Uruguay (2020).

systems and juridical cultures within these countries do not seem strong enough to hinder this movement. Furthermore, the trend toward increased punishment in the sector appears irreversible, guiding all these systems to a more punitive approach.

4.2. LEGISLATIVE-PROCESS FOCUSED APPROACH

The second criterion is an analysis focused on the country's legislative process. To develop this topic, all documents found on the legislative process of AML legislation in each country were scrutinized. The objective is to verify if there is an explicit reference to FATF participation therein. Preference was given to official websites, primarily those of the National Congress and the Government. Different documentation was mapped: bills, meeting minutes, legal opinions, etc. Two limitations and obstacles should be noted: partial access to documentation, as many National Congresses do not provide full access, and the fact that influences are not always formally registered in the documents.

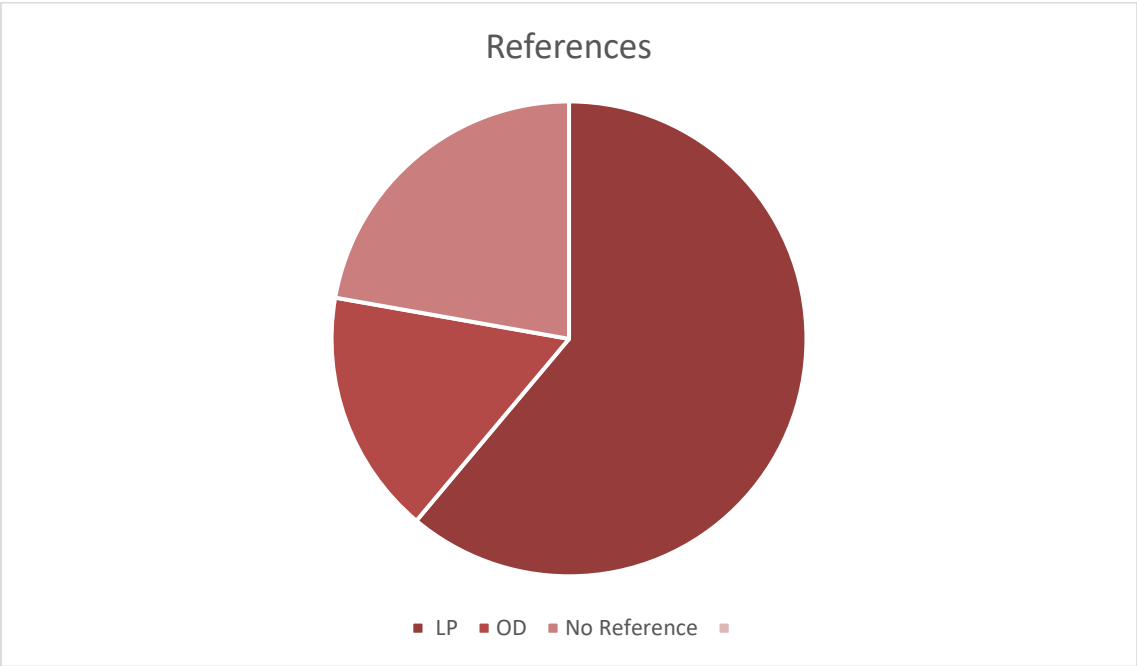
This topic was complemented with the FATF website information of each country, where there are some references to Letters and other documentation sent to official bodies in order to recommend enforcement in the AML legal system. Journalistic websites about the legislation process were used only in a complementary search. These last two steps were conducted only in countries where the information on the official websites was insufficient.

The results were compiled in a table in Annex 2 of this paper. In 14 of the 18 countries analyzed, a direct reference to FATF's influence was found, representing 77.7% of the sample. In 11 countries, the reference was in the legislative process documents; meanwhile, in three countries (El Salvador, Nicaragua, and Panamá), these references appeared on official legislative and executive websites.

No single standard was found regarding which legislative documents contained these references. They appeared in introductions, justifications, minutes, opinions, and even within the legislation itself. In two countries (Uruguay and Panamá), the fear of being blacklisted by FATF was also documented on official government websites.

The result can be observed in Graph 2 (author's elaboration), in which LP represents Legislative Process and OD, other documents:

GRAPH 2



Graph 2: Explicit reference to the FATF in documents.

In the four countries where no references were found (Bolivia, Peru, Guatemala, and Cuba), the researchers reported difficulties or the impossibility of finding official documents from the legislative process.

4.3. NORMATIVE CONTENT APPROACH

The last approach used to analyze the Latin American AML system is the similarity of legislation/regulation content and its structure with the 40 FATF Recommendations. To make it possible, the 40 Recommendations were carefully read and summarized in 10 main measures that express the “core” of its criminal policy:

TABLE 1

1. Risk-based analysis – Law with a structured anti-money laundering policy. (R1)
2. Money laundering is criminalized, with a broad list of predicate offenses (or no list). Terrorist financing must be a predicate offense. (R3 and R5)
3. Obligations imposed on financial institutions under the Money Laundering Law, including customer identification and recording of transactions for at least 5 years (R10 and 11).

4. Special due diligence requirements for financial institutions for politically exposed persons and persons and companies from countries FATF considers high risk (R12 and R19).
5. The money laundering law should provide for the duty of financial institutions to report suspicious transactions to the Intelligence Unit (R20).
6. Preventive anti-money laundering policy, including, to some extent, designated non-financial businesses and professions (casinos, real estate agents, gem dealers, lawyers, trust service providers). (R22 and R23)
7. Countries should establish a financial intelligence unit (FIU) to serve as a national center for receiving and analyzing reports of suspicious transactions (R29).
8. Countries should have tools to monitor the movement of physical currency across borders (R32).
9. Countries should provide for sanctions for non-compliance with preventive measures against money laundering, which may be civil, criminal, or administrative, and should apply to financial institutions and their directors (R35).
10. International cooperation: the country must sign treaties (Vienna and Palermo, among others) and establish mutual agreements that allow for measures such as extradition and confiscation of assets in cases of money laundering, etc. (R36, R37, R38, R39, R40).

Table 1. Key points of the 40 recommendations.

In the second phase, the AML systems of each country were analyzed once more to verify if they meet any aspect of these 10 measures. The main focus was on the anti-money laundering legislation of each country. The checklist answers used by the researchers only show the possibilities “Yes” or “No”. In cases where legislation is partially compliant with the measure, the answer was counted as positive (“yes”).

The results of this analysis showed a 100% affirmative (“yes”) rate across all eighteen GAFILAT member countries. This shows that the AML system of the region is strongly influenced by the 40 FATF Recommendations in terms of content, proving its harmonization process.

5. CONCLUSION

FATF's influence in Latin America is pivotal in defining the AML criminal policy, shaping not only the scope of criminalization but also the timeline of legislative changes. The research hypothesis (influence on the legislative process) is confirmed in terms of both action (chronological criterion and the legislative process itself) and results (content-based criterion). Although the body is not formally recognized as an official institution, supposedly using non-sanctioning tools, the MER has consistently dictated the direction followed by the internal Legislative Branch.

This standardized criminal policy can be seen as problematic in many ways. It impedes the country from developing its own understanding about the topic, damaging the democratic aspects of legislative procedure. The pressure is always to increase punishment, as can be observed in the reported legislation changes and in the revocation of decrees that moved in another direction, contrary to FATF recommendations. These countries lack the autonomy to explore alternative approaches beyond criminal law and strict regulation.

It is important to note that one factor contributing to this increased external influence on the legislative process in some Latin American countries is the weakening of the legislative branch, a trend that legal scholars have observed for some years, citing Brazil as an example (Nascimento 2019, Ramos 2024, Falavigno and González Guarda 2024). The lack of legislative rationality, with a lawmaking process that fails to incorporate concrete data and expert opinions, leaves a vacuum easily filled by various political influences. In the criminal justice field, they range from the media and punitive ideologies to external actors, as noted in this study. Although this is not the main cause of the phenomenon analyzed here, such reforms in the legislative process could be an alternative for its mitigation—or at least to increase visibility.

Furthermore, this generates asymmetries in the specific characteristics of internal systems, which may not be compatible with some of the FATF perspectives, such as the criminalization of legal persons or confiscation without conviction. This can be especially problematic regarding sectors outside financial institutions, such as the DNFBP, which may conflict with the self-regulation of professional bodies (e.g., lawyers).

The sanctioning of various penal types can be influenced by these changes. As money laundering is non-violent, increasing its punishment could generate the need to heighten punishment in general, as in cases of robbery and homicide, to maintain the coherence of the Penal Code. The same applies to changes in criminal procedure.

The final and perhaps most important conclusion of this paper is the urgent need to deepen the debate regarding the influence of international bodies on national criminal legislation, especially in developing countries. Political and economic interests that are present in these “Soft Law” tools can influence this process, undermining domestic democracy, geopolitical balance, and national juridical coherence across both micro and macro regions. The very concept of soft law needs to be defined, as it is questionable whether recommendations

that provide for mechanisms of economic coercion can be considered as such. These mechanisms operate as sanctions, particularly in economically vulnerable countries.³⁴

Especially in the case of FATF and GAFILAT, it is imperative to increase transparency and formalization. Official documentation of their composition should be created, such as in the form of a convention. Documentation of the discussions, emphasizing how the norms are developed, should be publicized to allow for public scrutiny.

As with internal legislative procedure, it is impossible to control every factor of influence in the criminal lawmaking process. However, the more democratic and transparent a process is, the easier it becomes to identify pressure and controversial influences. Failing to ensure this transparency is usually a deliberate decision.

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³⁴ Regarding Bolivia’s inclusion on the FATF’s “grey list”: Zenteno 2025.

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ANNEX 1. LEGISLATIVE AND REGULATORY CHANGES

TABLE 3

Countries	Legislation	Regulation
Argentina	Lei 26.023/2005; Lei 26.024/2005; Lei 26.268 (2007); Decreto 1225/2007	Resolución 228/2007 da UIF
Bolivia	DS 29681/2008; DS 910/2011; Lei 004/2010	-
Brazil	Lei 11.343/2006	-
Chile	Lei 20.393/2009; Lei 20.402 (Fevereiro/2010)	Capítulo III.I.2 das normas do Banco Central do Chile; Circular 508/2010 da Superintendência de Valores e Seguros (SVS)
Colombia	Lei 1474/2011; Lei 1708/2014; Lei 1762/2015; Lei 1778/2016	-
Costa Rica	(Lei 8204) Lei 8719/2009	-
Cuba	Decree-Law No. 361 e No. 362, de 2018	-
Dominican Republic	Lei 155-2017;	Resolution No. 215 do Banco Central, de 2021
Ecuador	Ley Orgánica de Prevención	-
El Salvador	Decreto Legislativo n.º 426/2025	-
Guatemala	Decreto 55-2010; Ac. Gov. 443-2013	Ofício IVE nº 1818-2012
Mexico	Ley Federal para la Prevención de Operaciones con Recursos de Origen Ilícito (LFPIORPI), 2012 Ley Nacional de Extinción de Dominio (LNEI)	
Nicaragua	Lei 735/2010 ; Decreto 70/2010; Lei 793/2012	Resolución No. UAF-N-11-2016
Panama	Ley No. 70, 2019; Ley No. 129, 2020; Ley No. 254, 2021	-
Paraguay	No changes	
Peru	Decreto Legislativo N° 986/2007; Lei N° 29.212/2008; Lei N° 29038/2007	Decreto Supremo N° 018-2006-JUS; Resolução SBS N° 486-2008; Resolução SBS N° 1782-2007
Uruguay	Lei 18494/2009	-
Honduras	Decreto n. 26-2010/27-2010; Decreto n. 241-2010;; Decreto n. 153-2010; Decreto n. 144-2014; Decreto n. 131-2014	Resolução UIF n. 1537/2011

Table 3. First MER.

TABLE 4

Countries	Legislation	Regulation
Argentina	Lei 26.683/2011; Lei 26.734/2011; Dec. 918/2012; Lei 27.739/2024	Resolución 199/2024 UIF
Bolivia	Lei 262/2012; Lei 393/2013; Lei 1386/2021; Lei 1409/2021	-
Brazil	Lei 12.683/2012; Lei 13.260/2016 e Lei 13.810/2019	-
Chile	Lei 21.121 (2018)	-
Colombia	Lei 1908/2018; Lei 2155/2021 e Lei 2195/2022	-
Costa Rica	Reformas en la Ley 7786	Specific regulation ³⁵ -
Dominican Republic	No changes	-
Ecuador	Lei de prevenção, detecção e erradicação de lavagem de dinheiro e financiamento de delitos/2016	-
Guatemala	No changes	
Mexico	Ley Federal para la Prevención e Identificación de Operaciones con Recursos de Procedencia Ilícita(LFPIORPI) reformada en 2025, Reforma Fiscal/ Código Fiscal da Federação (CFF, art 32b) de 2021/2022, Reforma AML ampla (2024–2025)	-
Nicaragua	Lei 976/2018	Lei 977/2018
Paraguay	Lei 4024 dde 2010; Lei no 6.431/2019; Lei no 6.446/19; Lei no 6.430/19; Lei no 6.379/2019; Lei 6.452/2019; Lei no 6399/2019; Lei no 6396/2019; Lei 6408/2019	-
Peru	Lei 30.822/2018	-
Uruguay	Lei N° 20.345/24	-
Honduras	Novo Código Penal (Decreto n. 130-2017); Decreto 57-2020; Decreto 93-2021; Decreto 116/2019	Resolução SB n. 348/27-04-2016; Reglamento para la Regulación de Actividades y Profesiones No Financieras Designadas (APNFD) de 2018; “Estrategia Nacional para el Combate LA/FT/PADM de 2019; Resolução: CNBS n. 018-2021;

Table 4. Second MER.

³⁵ https://www.icd.go.cr/portaIcd/images/docs/uif/doc_interes/acerca_uif/RESULTADOSGAFLPDF.

TABLE 5

Countries	Legislation	Regulation
Bolivia	DS 4904/2023; DS 5200/2024	-
Brazil	Lei 14.478/2022; Lei 14.790/2023	-
Chile	Ley 21.595 de 2023	-
Ecuador	Ley Orgánica de Prevención, Detección y Combate del Delito de Lavado de Activos y de la Financiación de Otros Delitos /2024	
Paraguay	Decreto 9012 de 2023; 2463/2024	
Peru	Lei 30. 822/2018	
Uruguay	Lei N° 20.345/24	

Table 5. Third MER.

ANNEX 2: EXPLICIT REFERENCES TO THE FATF

TABLE 6

Countries	Reference (yes/no)	Where (legislation)	Other websites	Other information
Argentina ³⁶	Yes	Piece of law Justification.	News on official websites about meetings to reform the law.	No additional search was conducted.
Bolivia	No	No	No	No reference was found in current laws, only in draft bills. Access to information on the legislative process presented difficulties.
Brazil ³⁷	Yes	Express reference on pages 30 and 67 of the bill that resulted in Law 12,683 of 2012, which substantially amended the money laundering law after a MER.	No additional search was conducted.	No additional search was conducted.
Chile ³⁸	Yes	In two key pieces of legislation on money laundering, reference to the FATF appears in the official justification for the law and in the “history of the law” tab on the Congress website,	No additional search was conducted.	No additional search was conducted.

³⁶ <https://www.senado.gob.ar/prensa/21421/noticias>

<https://www.argentina.gob.ar/noticias/modificaciones-la-ley-25246> ; Decreto 891/2024, 09 October.

³⁷ *Projeto de lei N.º 3.443-A, de 2008.*

³⁸ More information: <http://bcn.cl/historiadelaley/historia-de-la-ley/vista-expandida/4975/>; <https://www.bcn.cl/historiadelaley/historia-de-la-ley/vista-expandida/8195/>

		respectively, suggesting that the commission is linked to the body's standards.		
Colombia	Yes	Report on a presentation made during the legislative process.	No additional search was conducted.	The researcher reported difficulties in accessing information about the legislative process.
Costa Rica ³⁹	Yes	Mention in opinions and minutes of the legislative process.	No additional search was conducted.	No additional search was conducted.
Cuba	No	No	No	Some references were found on the FATF website, but they were considered insufficient for verification purposes. The researcher reported great difficulty in accessing documents related to the legislative process.
Dominican Republic ⁴⁰	Yes	Preamble to the legislation (initial explanations).	No additional search was conducted.	No additional search was conducted.

³⁹ Asamblea Legislativa de la República de Costa Rica, *Ley para mejorar la lucha contra el fraude fiscal*. Exp. n° 19.425. 24 August 2016; *Acta sesión extraordinaria n° 25*. 18 July 2016.

⁴⁰ Congreso Nacional de la República Dominicana, 2002. *Ley contra el lavado de activos y el financiamiento del terrorismo que busca sustituir y derogar la Ley No. 72-02, sobre el lavado de activos provenientes del tráfico ilícito de drogas, del 7 de junio de 2002*.

Ecuador ⁴¹	Yes	References in various documents of the legislative process of the two main money laundering laws (debate report, supplement register, and approved bill).	No additional search was conducted.	Easily accessible legislative process documents.
El Salvador ⁴²	Yes	No	Reports from the Legislative website on parliamentary debates during the drafting of the money laundering law.	The researcher reported difficulties in accessing the legislative process documents.
Guatemala	No	No	No	References to the FATF were found in bills aimed at amending the money laundering law (Decree 58/2005). Access to information on the legislative process presented difficulties.
Mexico ⁴³	Yes	Several citations in the explanatory memorandum to the law.	No additional search was conducted.	A computer error was reported when accessing

⁴¹ Asamblea Nacional de la República del Ecuador: *Informe para primer debate del Proyecto de Ley Reformatoria a la ley de prevención, detección y erradicación del delito de lavado de activos y del financiamiento de delitos. Comisión no. 3.* 9 March 2016; *Ley Orgánica de Prevención, Detección y Erradicación del Delito de Lavado de Activos y del Financiamiento de Delitos (T231230)*; *Memorando Nro. AN-CRET-2024-0040-M*; *Informe para primer debate del Proyecto de Ley Orgánica de Prevención, Detección y Combate del delito de lavado de activos y de la financiación de delitos*, 7 March 2024; *Memorando Nro. AN-CRET-2024-0076-M*. *Informe segundo debate del Proyecto de Ley Orgánica de Prevención, Detección y Combate del delito de lavado de activos y de la financiación de delitos*, 16 June 2024; *Oficio No. AN-KKHF-2024-0034-O. Proyecto de Ley Orgánica de Prevención, Detección y Combate del delito de lavado de activos y de la financiación de delitos*, 24 June 2024.

⁴² <https://www.asamblea.gob.sv/node/13714>; <https://www.asamblea.gob.sv/node/13059>

⁴³ Gobierno de México. Ley federal para la prevención e identificación de operaciones con recursos de procedencia ilícita. *Diario Oficial de la Federación*, 17 octubre 2012.

				the Mexican parliament's website.
Nicaragua ⁴⁴	Yes	No	News report on the Legislative website about the reform of the money laundering law.	The researcher reported extreme difficulty in accessing documents related to the legislative process.
Panama	Yes	No	News reports on government websites (Executive Branch) stating that the law was passed in order to comply with FATF commitments.	One of the news reports expresses the country's concern about getting off the FATF gray list. ⁴⁵
Paraguay ⁴⁶	Yes	Resolution informing the legislative process and introduction of an Executive decree supplementing the money laundering law.	No additional search was conducted.	No additional search was conducted.
Peru	No	No	No	Only news items were found on unofficial websites. The legislative process documents were not found.

⁴⁴ <https://noticias.asamblea.gob.ni/aprueban-reformas-a-la-ley-contra-el-lavado-de-dinero-y-financiamiento-al-terrorismo/>

⁴⁵ https://www.prensa.com/economia/Pleno-aprueba-proyecto-salir-GAF_0_4166583489.html.

⁴⁶ Congreso Nacional de Paraguay. *Resolución n° 2579, que eleva el informe de la comisión bicameral de investigación ante los organismos internacionales que combaten el lavado de dinero y el crimen organizado y presenta formal denuncia ante la comunidad internacional, y al Ministerio Público*, Presidencia de la República del Paraguay, Decreto n° 6583. *Por el cual se reglamente la Ley n° 6872/2021, que establece un régimen especial y transitorio para reconducción de sociedades anónimas incumplidoras de la ley n° 5895/2017.*

Uruguay ⁴⁷	Yes	References were found in the Legislative Assembly's session minutes.	There are news reports on the government website stating that the approval of the laws prevents Uruguay from being blacklisted by the FATF. ⁴⁸	No additional information.
Honduras ⁴⁹	Yes	In the law itself (Article 22).	No additional search was conducted.	No additional search was conducted.

Table 6. References to the FATF in countries' internal documents.

⁴⁷ República Oriental de Uruguay. *Diario de sesiones de la Cámara de Representantes*. 17 de mayo de 2012.

⁴⁸ <https://www.gub.uy/secretaria-nacional-lucha-contra-lavado-activos-financiamiento-terrorismo/comunicacion/noticias/uruguay-promovio-transparencia-combate-del-lavado-activos-ultimos-15-anos>.

⁴⁹ República de Honduras. Decreto n° 144-2014, Ley Especial contra el Lavado de Activos. *La Gaceta*, no. 33718. 30 April 2015.