

24 May 2023

THE TARGETING OF INFRASTRUCTURE BY AMERICA'S VIOLENT FAR-RIGHT

The latest edition of the CTC Sentinel carried an article saying that, in the US, violent far-right extremists have targeted critical infrastructure to radicalize and recruit members, promulgate their narratives, and sow chaos. It gives as an example that, in February, federal authorities announced the arrest of 2 men, both charged with conspiracy to damage a US energy facility. One was a founding member of the neo-Nazi group known as the Atomwaffen Division (AWD), and they planned to use automatic weapons to attack an electrical grid in Baltimore, Maryland. The article warns that, if organised into a regular campaign with a high operational tempo, violent extremists could inflict very significant damage by targeting critical infrastructure. It also says that the proliferation and mainstreaming of extreme far-right ideologies, conspiracies, and narratives by both public figures and politicians demonstrate the importance and urgency in understanding how the far-right ecosystem interacts with critical infrastructure.

<https://ctc.westpoint.edu/the-targeting-of-infrastructure-by-americas-violent-far-right/>

THE PAKISTAN TALIBAN AFTER THE TALIBAN'S AFGHANISTAN TAKEOVER

The May edition of the CTC Sentinel carried this article about the Tehrik-i-Taliban Pakistan (TTP), better known as the Pakistani Taliban. With Pakistan engulfed by political and economic turmoil, it is said to be a growing threat once again. The article says that, with the Taliban's victory in Afghanistan, the TTP has obtained new more sophisticated weapons and relocated fighters from Afghanistan to Pakistan and is now turning its focus back to its war against the Pakistani state; and that the Taliban victory in Afghanistan has emboldened and strengthened the TTP.

<https://ctc.westpoint.edu/the-tehrik-i-taliban-pakistan-after-the-talibans-afghanistan-takeover/>

JAPAN CHIP EXPORT CURB TO CHINA WILL TAKE EFFECT IN JULY

On 23 May, Nikkei Asia reported that the Japanese Government has announced that it will add 23 items, including advanced semiconductor manufacturing equipment, to its list of regulated exports.

<https://asia.nikkei.com/Business/Tech/Semiconductors/Japan-chip-export-curb-to-China-will-take-effect-in-July>

<https://english.cctv.com/2023/05/24/ARTIALA0ZtZpR1jZDfZNDau5230524.shtml>

US: RECOGNITION OF FOREIGN BANKRUPTCY PROCEEDINGS

On 23 May, a post on the Transnational Litigation Blog is concerned with the recognition of foreign insolvency proceedings in the US under Chapter 15 of the US Bankruptcy Code. This Chapter is largely based on the UNCITRAL Model law on Cross-Border Insolvency (1997), which has been adopted in 58 countries, including the UK, Canada, and Singapore. In essence, the Model Law provides that transnational insolvency proceedings generally should be recognised by the member states, and at the same time, that the law does not preclude the possibility of concurrent insolvency proceedings. The post explains the basic procedure for recognition under Chapter 15, its requirements, and its exceptions.

<https://tlblog.org/recognition-of-foreign-bankruptcy-proceedings-under-chapter-15/>

US COMMERCE DEPARTMENT ADDS 71 ENTITIES TO ENTITY LIST IN LATEST RESPONSE TO RUSSIA'S INVASION OF UKRAINE

On 19 May, the Department of Commerce's Bureau of Industry and Security (BIS) announced that 71 additional businesses had been added to its Entity List and therefore were subject to export control restrictions. Parties on the Entity List are subject to export, reexport, and transfer (in country) licensing requirements and license application review policies supplemental to those found elsewhere in the Export Administration Regulations (EAR).

<https://www.bis.doc.gov/index.php/documents/about-bis/newsroom/press-releases/3273-2023-05-19-bis-press-release-russia-rules-and-joint-bis-fincen-alert/file>

<https://www.internationaltradeinsights.com/2023/05/bis-implements-additional-export-controls-and-entity-list-additions-targeting-russia-to-align-with-allies-and-partners/>

AUSTRALIA: OFFSHORE GAMBLING COULD COST COUNTRY \$3 BILLION

On 24 May, iGB reported on a new report from a group in Australia that claims that illegal offshore gambling could cost Australians close to \$3billion in lost taxes. The report also estimates that 92% of the online market was onshore in 2022. This has grown steadily since 2017, when the onshore market was estimated at 82%.

<https://igamingbusiness.com/legal-compliance/legal/australia-offshore-gambling-could-cost-country-3bn>

MALTA: BILL TABLED TO PROTECT OPERATORS FROM FOREIGN LIABILITY

On 24 May, iGB reported that lawmakers in the Maltese parliament have tabled legislation to protect licensed online gaming operators from foreign liability. It would give legal cover to gambling businesses active in the European grey market which have faced lawsuits.

<https://igamingbusiness.com/legal-compliance/malta-bill-tabled-protect-operators-foreign-liability>

ISLE OF MAN: AMENDMENTS TO RUSSIA SANCTIONS LISTS

On 24 May, the Isle of Man followed the UK in announcing amendments to existing entries for 3 individuals and 1 entity.

<https://www.gov.im/news/2023/may/24/financial-sanctions-russia/>

UK: PRIOR OBLIGATIONS GENERAL LICENCE

On 24 May, OFSI posted on its blog an article saying that it had received unprecedented numbers of licence applications to permit prohibited transactions or activities owing to more sweeping and far-reaching sanctions imposed relating to Russia and Belarus. Many of these applications involve UK persons who are owed money by Russian and Belarusian Designated Persons (DP) under contracts agreed before the designation of those DP and can only receive such payments once they receive an OFSI licence. OFSI has now issued a General Licence covering such prior obligations, and the post explains the requirements, including reporting requirements.

<https://ofsi.blog.gov.uk/2023/05/24/prior-obligations-general-licence/>

EMBEZZLEMENT v MONEY LAUNDERING: WHAT IS THE DIFFERENCE?

Comply Advantage has published this article to help to explain the major differences between money laundering and embezzlement and consider the potential consequences for white-collar criminals engaging in either.

<https://complyadvantage.com/insights/embezzlement-money-laundering-differences/>

UK: NEW SPECIALIST FRAUD SQUAD TO HELP DEPARTMENTS PREVENT FRAUD IN PUBLIC SERVICES

On 24 May, the Cabinet Office advised that the new team will be part of the Government's £1 billion crackdown on fraud, led by the Public Sector Fraud Authority. A central team of experts will help to prevent fraud by identifying areas of services which are most at risk, and will also help civil servants to 'design out' fraud when new schemes and services are being launched.

<https://www.gov.uk/government/news/new-specialist-fraud-squad-to-help-departments-prevent-fraud-in-public-services>

UK: FAQ ON GOVERNMENT DIGITAL IDENTITY CONSULTATION RESPONSE

On 23 May, the Cabinet Office released FAQ regarding the government response to the consultation on draft legislation to support identity verification. A consultation closed in March on proposed legislation to support fast, safe and secure data sharing between departments to enable people to more easily access public services online. It emphasises that proposed legislation does not include any proposal to create either a digital or physical ID card.

<https://www.gov.uk/government/news/faqs-on-government-digital-identity-consultation-response>

DUBAI CUSTOMS SEIZE 30 TONNES OF SMUGGLED RED SANDALWOOD

On 23 May, The National reported that Dubai Customs seized more than 30 tonnes of a widely smuggled species of Indian tree in high demand on the black market as part of a crackdown on the illegal wildlife and plant trade. It was hidden inside a commercial shipping container. It is said that the agency has seized 330 tonnes and more than 200 samples of animal and plant species smuggled into the Emirates over the past 3 years.

<https://www.thenationalnews.com/uae/2023/05/23/dubai-customs-seize-30-tonnes-of-smuggled-red-sandalwood/>

700 KG OF COCAINE FOUND IN BANANA SHIPMENT AT VLISSINGEN

On 24 May, Dutch News reported that Customs investigators have found over 700 kg of cocaine hidden among a shipment of bananas in a container in Vlissingen, the second such haul in the port in a few weeks.

<https://www.dutchnews.nl/2023/05/700-kilos-of-cocaine-found-in-banana-shipment-at-vlissingen/>

EUROPOL HAS SUPPORTED THE DUTCH AUTHORITIES IN TAKING DOWN AN ILLEGAL IPTV (INTERNET PROTOCOL TV) SERVICE SERVING OVER 1 MILLION USERS ACROSS EUROPE

On 23 May, a news release from Europol announced that a series of raids were carried out across the Netherlands as part of an illegal streaming crackdown.

<https://www.europol.europa.eu/media-press/newsroom/news/one-of-europes-biggest-pirate-iptv-service-taken-down-in-netherlands>

REPORT: FRENCH BANK LET ASSOCIATES OF LEBANON'S CENTRAL BANK GOVERNOR MOVE FUNDS UNHINDERED

On 24 May, OCCRP said that a leaked report reveals how French bank BNP Paribas allowed associates of Lebanon's Central Bank Governor, Riad Salame, who is currently under investigation for money laundering and embezzlement, to transfer funds with minimal due diligence.

<https://www.occrp.org/en/daily/17668-report-french-bank-let-associates-of-lebanon-s-central-bank-governor-move-funds-unhindered>

"KINAHAN" DRUGS AND CASH SMUGGLER TOLD TO PAY MORE THAN €700,000 TO UK AUTHORITIES

On 23 May, The Journal in Ireland reported that a jailed former haulage company owner who smuggled drugs across Europe for the Kinahan organised crime group must pay €724,103 to UK authorities or face more prison time.

<https://www.thejournal.ie/thomas-maher-offaly-jailed-proceeds-of-crime-finding-6075201-May2023/>

WHO'S WHO AMONG RUSSIA'S MERCENARY COMPANIES

On 23 May, Rferl reported that Wagner, with its yearslong rise to prominence in places like Mali, Sudan, and the Central African Republic, has become a household name for followers of Russian military tactics. But, the article says, that company is far from the only one of its sort.

<https://www.rferl.org/a/russia-other-mercenary-companies-ukraine/32424520.html>

GERMANY INTRODUCES NEW WHISTLEBLOWER PROTECTION ACT

On 24 May, an Out-Law article said that the German Bundestag and Bundesrat have agreed on the contents of a new Whistleblower Protection Act, after lengthy negotiations. The legislation will implement the EU Whistleblower Protection Directive and impose new obligations on businesses.

<https://www.pinsentmasons.com/out-law/news/bundestag-beschliesst-hinweisgeberschutz-gesetz>

JAPAN TO IMPOSE STRICTER AML MEASURES FOR CRYPTO TRANSACTIONS

On 24 May, Todayq News reported that the Japanese government has decided to implement stricter AML measures for cryptocurrency transactions. The decision, made by the Japanese parliament aims to bring the country's legal framework in line with global crypto regulations.

<https://news.todayq.com/news/japan-to-impose-strict-anti-money-laundering-measures-for-crypto-transactions/>

<https://www.cryptopolitan.com/japans-new-crypto-regulations/>

<https://www.cryptopolitan.com/japan-creates-new-anti-money-laundering-measures/>

<https://www.kitco.com/news/2023-05-24/Japan-looks-to-crack-down-on-money-laundering-in-crypto-industry.html>

FACTORS INFLUENCING THE CHOICE OF TECHNIQUE TO LAUNDER FUNDS

This paper in the Journal of Economic Criminology proposes a new framework to provide insights into the techniques that launderers adopt to clean illicit funds, drawing on existing literature and theories including rational choice, public value, structural coupling, and stakeholder. The proposed APPT framework is named after 4 factors that explain the choice of techniques: the **A**ctors involved, **P**redicate crime, the **P**urpose of laundering, and **T**echnological innovations.

<https://www.sciencedirect.com/science/article/pii/S2949791423000064>

REVOLUT FACES NEW LEGAL BATTLE OVER 'ENABLING' £600,000 FRAUD

On 21 May, This is Money reported that fintech firm Revolut has been accused of enabling a £600,000 fraud. Terna Energy Trading has launched legal action against the UK bank over claims it breached money laundering rules by failing to stop a 'fraudulent' transaction last year.

<https://www.thisismoney.co.uk/money/markets/article-12105729/Revolut-faces-new-legal-battle-600-000-fraud.html>

PODCAST: "SPIN DICTATORS"

In the latest TRACE podcast, Daniel Treisman, co-author of *Spin Dictators: The Changing Face of Tyranny in the 21st Century*, discusses the new generation of dictators and how they weaponise information, bully with legal action and mobilise enablers to stay in power.

<https://www.traceinternational.org/resources-podcast>

US: CRS REVIEWS CURRENT REGULATORY AUTHORITY OVER CRYPTO

On 23 May, Fried Frank reported that the US Congressional Research Service had reviewed federal and state efforts to regulate cryptocurrencies and highlighted related policy issues. It focused on regulators' efforts to apply existing frameworks to cryptocurrency in lieu of a comprehensive federal regulatory framework.

<https://www.findknowdo.com/news/05/23/2023/crs-reviews-current-regulatory-authority-over-crypto>

IOSCO OFFERS POLICY RECOMMENDATIONS ON CRYPTO ASSETS

On 23 May, Fried Frank reported that the International Organization of Securities Commissions had offered policy recommendations to "support jurisdictions seeking to establish compliant markets for the trading of crypto or 'digital' or 'virtual' assets".

<https://www.findknowdo.com/news/05/23/2023/iosco-offers-policy-recommendations-crypto-assets>

<https://www.iosco.org/library/pubdocs/pdf/IOSCOPD734.pdf>

UKRAINE AND THE KINZHAL MISSILE: DON'T FORGET THE HYPERSONIC HYPE

On 23 May, a report from the Brookings Institution said that, initially, in touting the Kinzhal as a hypersonic missile and then using it against Ukraine, Russia set off a misplaced alarm regarding both Ukraine's air defences and its own lead over the US in the hypersonic weapons arms race. However, Ukrainian interceptions have helped to dismantle the tattered reputation of advanced Russian weapons and their ability to evade defences. To aid in this, the report disentangles 5 hypersonic myths. These include that arms control for hypersonics is useless.

<https://www.brookings.edu/blog/order-from-chaos/2023/05/23/ukraine-and-the-kinzhal-dont-believe-the-hypersonic-hype/>

RUSSIAN HYPERSONIC SCIENTIST ACCUSED OF BETRAYING SECRETS TO CHINA

On 24 May, Reuters claimed an exclusive in reporting the arrest of an institute chief, one of 3 scientists arrested for treason. Alexander Shipluk, the head of the Kristianovich Institute of Theoretical and Applied Mechanics in Siberia, is said to be accused of revealing secret information during a meeting in China in 2017.

<https://www.reuters.com/world/russian-hypersonic-scientist-accused-betraying-secrets-china-sources-2023-05-24/>

<https://english.sawtbeirut.com/world/russian-hypersonic-scientist-accused-of-betraying-secrets-to-china>

OFAC DESIGNATES TERROR OPERATIVES AND ILLICIT CHARCOAL SMUGGLERS IN SOMALIA

On 24 May, OFAC advised that it had designated 26 individuals and entities connected with the terrorist group al-Shabaab, including 15 financial facilitators and operatives, 4 charcoal smugglers, and 7 of their associated companies. This action targets key regional leaders, affiliates, and members of the terrorist group in Somalia who are involved in a wide range of activities in support of al-Shabaab, including financial facilitation, business activities, collection of funds on behalf of the

terrorist group, proliferation of Improvised Explosive Devices (IED), and illegal charcoal smuggling from Somalia, all of which have exacerbated local conflicts and suffering.

<https://ofac.treasury.gov/recent-actions/20230524>

<https://home.treasury.gov/news/press-releases/jy1499>

GERMANY: 4 EX-MANAGING DIRECTORS AT TECHNOLOGY COMPANY CHARGED FOR ALLEGEDLY SELLING RESTRICTED SOFTWARE TO A TURKISH GOVERNMENT AGENCY WITHOUT AN EXPORT LICENCE

On 24 May, the EU Sanctions blog reported that the Munich Public Prosecutor's Office had announced that it has charged 4 ex-managing directors at Munich-based technology company FinFisher. They are alleged to have used a Bulgarian subsidiary as the seller of the software and a fake Turkish customs agency as the purchaser.

<https://www.europeansanctions.com/2023/05/german-prosecutors-charge-tech-executives-over-export-control-breaches/>

OFAC NEW VENEZUELA GENERAL LICENSE

On 24 May, the EU Sanctions blog reported that OFAC had issued General License 8L – “Authorizing Transactions Involving PdVSA Necessary for the Limited Maintenance of Essential Operations in Venezuela or the Wind Down of Operations in Venezuela for Certain Entities”.

<https://www.europeansanctions.com/2023/05/ofac-issues-venezuela-related-general-license/>

<https://ofac.treasury.gov/media/931811/download?inline>

INSOLVENCY PRACTITIONERS: MAKING SENSE OF SANCTIONS REGIMES

On 24 May, Field Fisher published an article saying that insolvency practitioners should know that it is possible to enter an insolvency procedure with sanctioned entities, or entities connected to sanctioned individuals, accept appointments and get paid. It considers the risks and the key points to bear in mind.

<https://www.fieldfisher.com/en/insights/insolvency-practitioners-making-sense-of-sanctions>

Up To 500,000 Killed by Fake Medicines in Sub-Saharan Africa

Figures linked to falsified and substandard medicines in Sub-Saharan Africa

Deaths per year

267,000 linked to falsified/substandard antimalarial medicines

169,271 linked to falsified/substandard antibiotics (for severe pneumonia in children)

\$12.0 million - \$44.7 million annual cost of caring for people who have used falsified/substandard medical products (malaria only)

605 tons of falsified/substandard medical products seized 2017-21 (West Africa only)

19-50% estimated share of medical products that are falsified/substandard (Sahel medical market)



Major exporting countries:



China



Belgium



France



India

Sahel zone neighboring states



Source: UNODC Trafficking in Medical Products in the Sahel



statista 

<https://www.statista.com/chart/30068/falsified-medicines-in-sub-saharan-africa>

SUPREME COURT OVERTURNS WIRE FRAUD CONVICTION OF PRIVATE CITIZEN UNDER HONEST-SERVICES THEORY AFTER HOLDING THAT THE JURY INSTRUCTIONS GIVEN WERE TOO VAGUE

On 24 May, a post from the Compliance & Enforcement blog from the program on Corporate Compliance and Enforcement at the New York University School of Law said that the US Supreme Court overturned a wire fraud conviction based on an honest-services theory.

https://wp.nyu.edu/compliance_enforcement/2023/05/24/supreme-court-overtURNS-wire-fraud-conviction-of-private-citizen-under-honest-services-theory-after-holding-that-the-jury-instructions-given-were-too-vague/

5 MOLDOVA COUP-PLOTTERS FACE EU SANCTIONS

On 24 May, EU Observer reported that 5 Moldovans are to have their EU money frozen and lose access to Europe to help stop Russia from usurping power in Chişinău. The website says that 2 alleged white-collar bank robbers and Russia-coup masterminds — Ilhan Şor and Vladimir Plahotniuc — top the new blacklist for "actions destabilising the Republic of Moldova", seen by EUobserver.

<https://euobserver.com/world/157072>

UK: UPDATED GUIDE TO EXPORT CREDIT INSURANCE

On 26 April, the British Exporters Association published a revised and updated Guide to Export Credit Insurance. Export credit insurance covers the risk of not being paid for goods and services that have been delivered, specifically invoices raised on overseas customers, political risks, insolvency and default. It gives exporters the confidence to extend credit to customers, protecting receivables without additional co-operation with the customer.

<https://www.bexa.co.uk/BEXA/Policy-and-Publications/BExA-Guides.aspx>

EUROJUST ANNUAL REPORT 2022: AGENCY STEPS UP ITS ROLE IN FIGHTING WAR CRIMES

On 24 May, a news release from Eurojust advised, in its new annual report, that, in response to Russia's invasion of Ukraine, Eurojust's role in fighting core international crimes was significantly enhanced in 2022. It is said that Eurojust contributed to the arrest of more than 4,000 suspects, the seizure and or freezing of criminal assets worth almost €3 billion, and the seizure of drugs worth almost €12 billion. These operational outcomes are the result of effective transnational cooperation between judicial authorities, facilitated by Eurojust, in close cooperation with all actors in the criminal justice chain.

<https://www.eurojust.europa.eu/news/eurojust-steps-its-role-fighting-war-crimes-says-agencys-annual-report-2022>

US: ENFORCEMENT ACTION TO STOP BITCOIN FRAUD TARGETING THE SPANISH-SPEAKING COMMUNITY

On 24 May, a release on Mondo Visione reported that the Commodity Futures Trading Commission had filed a Complaint in California against several defendants, charging them with defrauding more than 170 individuals — a group of predominantly Spanish-speaking investors — out of hundreds of thousands of dollars. The defendants operated a digital asset commodity trading business under the name "Icomtech" that enabled a cash-for-Bitcoin and other digital assets trading platform. Marketing materials promised exceptional returns, commissions, and referral bonuses.

<https://mondovisione.com/media-and-resources/news/statement-of-cftc-commissioner-kristin-n-johnson-enforcement-action-to-stop-bi/>

<https://mondovisione.com/media-and-resources/news/cftc-charges-five-defendants-with-fraudulent-digital-assets-trading-scheme/>

STABLECOINS & CBDC REPORT

On 24 May, a release on Mondo Visione advised that a report from CCData offers insight into the latest developments in the stablecoin and CBDC sector, focusing on analysis that relates to market capitalisation, trading volume, peg deviation and more.

<https://mondovisione.com/media-and-resources/news/ccdatas-stablecoins-and-cbdcs-report-stablecoin-trading-volumes-drop-to-yearly-l/>

RUSSIAN ACCUSED OF MONEY LAUNDERING LOBBIES TO BE INCLUDED IN POTENTIAL US-RUSSIA PRISONER SWAP

On 24 May, CNN reported that Alexander Vinnik is accused of running a multibillion-dollar cryptocurrency exchange that allegedly did business with drug dealers and identity thieves. He was extradited from France to the US last year. It is reported that lawyers for Vinnik are talking of a swap for Wall Street reporter Evan Gershkovich, who was arrested in Russia in March on what US officials say are bogus espionage charges.

<https://edition.cnn.com/2023/05/24/politics/alexander-vinnik-lobbies-potential-prisoner-swap/index.html>

US: NEW JUSTICE DEPARTMENT-LED TASK FORCE PLEDGES GLOBAL CRACKDOWN ON ILLEGAL TIMBER CRIME

On 23 May, ICIJ reported that the interagency group will coordinate with other governments to combat trafficking in wood linked to environmental crimes and human rights abuses. It will identify, investigate and prosecute illegal trafficking in timber linked to environmental and other crimes. TIMBER (Timber Interdiction Membership Board and Enforcement Resource), brings together several government departments — Justice, Agriculture, Interior and Homeland Security — and the US Council on Transnational Organized Crime's Strategic Division.

<https://www.icij.org/investigations/deforestation-inc/new-justice-department-led-task-force-pledges-global-crackdown-on-illegal-timber-trade>

CHINESE LABS ARE SELLING FENTANYL INGREDIENTS FOR MILLIONS IN CRYPTO - AND IT'S HAPPENING IN PLAIN SIGHT

On 23 May, Wired reported that new research, from Elliptic and Chainalysis, shows that cryptocurrency is playing a different role in that deadly opioid's supply chain

<https://www.wired.com/story/fentanyl-ingredients-chinese-labs-cryptocurrency>

SUSPECTED IRANIAN HACKERS TARGET ISRAELI SHIPPING AND LOGISTICS COMPANIES

On 23 May, The Record reported that several shipping and logistics websites in Israel had been hacked to gather information about their users. The hacking campaign targeted at least 8 Israeli websites, using a so-called "watering hole" type of attack – where hackers compromise a website that is frequently visited by a specific group of people and, once hacked, attackers can inject harmful code into the website, which gets activated when users visit the site.

<https://therecord.media/israel-shipping-logistics-watering-hole-cyberattacks>

JERSEY PUBLISHES TERRORIST FINANCING NATIONAL RISK ASSESSMENT UPDATE 2023

On 23 May, the Jersey FSC published this update which provides a summary of actions taken since the 2021 NRA. It concludes that the risk of Jersey being used as a conduit for terrorist financing remains medium-low.

<https://www.jerseyfsc.org/news-and-events/government-of-jersey-publishes-terrorist-financing-national-risk-assessment-update-2023/>

<https://www.gov.je/Industry/Finance/FinancialCrime/NationalRiskAssessments/pages/nationalriskassessmentterroristfinancing.aspx>



ARGENTINA IMPOSES FURTHER RESTRICTIONS AIMED AT REDUCING THE VOLUME OF DEMAND FOR FOREIGN CURRENCY – US DOLLARS

On 24 May, Estrella de Panama reported that a new rule restricts operations with securities that settle in foreign currency or their transfer to and from abroad if during the 15 days before and after financial dollars were purchased through the sale of sovereign bonds. Already, due to exchange restrictions on access to the official foreign exchange market, individuals buy and sell dollars in a parallel market.

<https://www.laestrella.com.pa/economia/230524/argentina-intensifica-controles-compra-dolares-financieros-bajas-reservas>

<https://www.buymeacoffee.com/KoIvM842y>

